DRAFT

Montclair Place District Specific Plan EIR

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	Average daily traffic
AFY	acre-feet per year
AHU	air handling unit
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
ANF	Angeles National Forest
ANSI	American National Standards Institute
APE	Area of Potential Effect
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ASTM	American Society for Testing and Materials
BANL	Base Ambient Noise Level
BMP	Best Management Practice
C-3	General Commercial
CAAQS	California Ambient Air Quality Standards
CAC	Certified Asbestos Consultant
CAFE	Corporate Average Fuel Economy
Cal/OSHA	California Occupational Safety and Health Administration
CalEPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CAP	climate action plan
CARB	California Air Resources Board
CATV	cable television
CBC	California Building Code
CCWRF	Carbon Canyon Wastewater Reclamation Facility
CDE	California Department of Education
CDPH	California Department of Public Health
CEC	California Energy Commission
CEN	District Center
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CHRIS	California Historical Research Information System
CIP	Capital Improvement Plan
CIWM	California Integrated Waste Management
CIWMB	California Integrated Waste Management Board

Acronym/Abbreviation	Definition
CMA	Congestion Management Agency
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
COD	Chemical Oxygen Demand
COM	District Commons
COR	District Corridor
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRRC	Cool Roof Rating Council
CUPA	Certified Unified Program Agencies
CWA	Clean Water Act
DFEH	Department of Fair Employment and Housing
DPM	Diesel particulate matter
DR	Design Review
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EDR	Environmental Database Resources, Inc.
EIA	Energy Information Administration
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
EV	electric vehicle
FAR	floor area ratio
FAST	federal transportation authorization package
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRMs	Flood Insurance Rate Maps
FTA	Federal Transit Administration
GHG	greenhouse gas
GPA	General Plan Amendment
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GWP	global warming potential
HA	Hydrologic Area
HAP	hazardous air pollution
HAZWOPER	Hazardous Waste Operations and Emergency Response
HFC	hydrofluorocarbon
HI	hazard index
HMBP	hazardous materials business plan
HOV	High Occupancy Vehicle

Acronym/Abbreviation	Definition
HQTA	High Quality Transit Area
HSA	Hydrologic Sub-Area
HU	Hydrologic Unit
HUC	hydrologic unit code
HUD	Housing and Urban Development
HVAC	Heating, Ventilation and Air Conditioning
I	Interstate
ICC	International Code Council
IEUA	Inland Empire Utilities Agency
IIC	Impact Insulation Class
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
ISO	International Organization of Standardization
ISTEA	Intermodal Surface Transportation Efficiency Act
ITE	Institute of Transportation Engineers
LBP	lead-based paint
LED	light emitting diodes
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Development
LOS	level of service
LST	localized significance threshold
Mall	Montclair Place Mall
MAP-21	'Moving Ahead for Progress in the 21st Century'
METRO	Los Angeles County Metropolitan Transportation Authority
MICR	maximum individual cancer risk
MPDSP	Montclair Place District Specific Plan
MPH	miles per hour
MPO	Metropolitan Planning Organization
MT	metric ton
MVWD	Monte Vista Water District
MWD	Metropolitan Water District of Southern California
MWMP	medical waste management plan
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NEDM	Natural Environment Discovery Memo
NEHRP	National Earthquake Hazards Reduction Program
NEHRPA	National Earthquake Hazards Reduction Program Act
NF_3	nitrogen trifluoride
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NMDSP	North Montclair Downtown Specific Plan
NMSP	North Montclair Specific Plan
NO_2	nitrogen dioxide

Acronym/Abbreviation	Definition
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_2	oxygen
O_3	ozone
ONT	Ontario International Airport
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PFC	perfluorocarbon
PGA	peak ground acceleration
PLA	District Place
PM_{10}	particles less than 10 microns in diameter
$PM_{2.5}$	particles less than 2.5 microns in diameter
PPV	peak particle velocity
PRC	Public Resources Code
PSHA	probabilistic seismic hazard assessment
QSD	Qualified Storm Water Pollution Prevention Plan Developer
QSP	Construction General Permit Storm Water Pollution Prevention Plan Practitioner
RCB	reinforced concrete box
RCNM	Roadway Construction Noise Model
RCP	Regional Comprehensive Plan
RECs	recognized environmental conditions
RFS	Renewable fuel standard
RFS1	original Renewable fuel standard program
RHNA	Regional Housing Needs Assessment
RP-1	Regional Plant No. 1
RPS	Renewables Portfolio Standard
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SANBAG	San Bernardino Associated Governments
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SBCFCD	San Bernardino County Flood Control District
SBCFD	San Bernardino County Fire Department
SBCL	Bernardino County Library System
SBTAM	San Bernardino Transportation Analysis Model
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center

Acronym/Abbreviation	Definition
SCE	Southern California Edison
SCRRA	Southern California Regional Rail Authority
SCS	Sustainable Communities Strategy
SEER	Seasonal Energy Efficiency Ratio
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SJVAPCD	San Joaquin Valley Air Pollution Control District
SL	Small-Lot Detached Housing Overlay
SLCP	short-lived climate pollutant
SLF	Sacred Lands File
SMBMI	San Manuel Band of Mission Indians
SO_2	sulfur dioxide
SP	Specific Plan
SPCC	spill prevention, control, and countermeasure
SR	State Route
SRA	Source-receptor area
SRI	solar reflective index
SROs	single-room occupancy units
STC	Sound Transmission Class
STIP	State Transportation Improvement Program
SWIS	Solid Waste Information System
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	toxic air contaminant
TAZ	Transportation Analysis Zone
TCRs	tribal cultural resources
TDM	Transportation Demand Management
TIA	Traffic Impact Analysis for the Montclair Place District Specific Plan
TISG	Transportation Impact Study Guide
TM	Tract Map
TMDL	total maximum daily load
TNM	Traffic Noise Model
TRU	transport refrigeration unit
TWLTL	two-way left-turn lane
UBC	Uniform Building Code
UPC	Uniform Plumbing Code
USDA	United States Department of Agriculture
USEPA	U.S Environmental Protection Agency
USGS	U.S Geological Survey
VCP	vitrified clay pipe
VMT	vehicle miles traveled
VOC	volatile organic compounds
WDR	Waste Discharge Requirement

Acronym/Abbreviation	Definition
WFA	Water Facilities Authority
WQMP	Water Quality Management Plans
WRCC	Western Regional Climate Center
WSA	Water Supply Assessment

EXECUTIVE SUMMARY

This chapter provides a summary of the Environmental Impact Report (EIR) for the proposed Montclair Place District Specific Plan Project (MPDSP or Proposed Project). This section provides a summary of the Proposed Project, areas of known controversy and issues to be resolved, a summary of Proposed Project alternatives, and a summary of all Proposed Project impacts, associated mitigation measures, and ultimate level of significance after mitigation is applied.

ES.1 INTRODUCTION

This EIR has been prepared by the City of Montclair (City) to evaluate potential environmental effects that would result from development of future projects under the proposed Montclair Place District Specific Plan. This EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (Cal. Pub. Resources Code, Section 21000 et. seq., as amended) and implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq.). The City is the lead agency under CEQA.

ES.2 PROPOSED PROJECT LOCATION AND SETTING

The Montclair Place District Specific Plan (MPDSP) area is located in the City of Montclair, within the western end of San Bernardino County (Figure 2-1, Regional Map, see Chapter 2, Project Description), and approximately 36 miles east of downtown Los Angeles. The topographical area encompassing Montclair is known as the Chino Basin. The City lies in the northwest corner of the Basin. Montclair is bordered by the cities of Pomona and Claremont to the west (in Los Angeles County), Upland to the north, Upland and Ontario to the east, and Chino to the south. The San Gabriel Mountains are located to the north, the Jurupa Mountains are located to the southeast, the Chino Hills and Santa Ana Mountains are located to the southwest, and the San José Hills are located to the west. Direct regional access to Montclair is provided by the Interstate 10 (I-10) freeway. The City extends both north and south of the I-10 Freeway. The City limits are shown in Figure 2, City of Montclair. The MPDSP area is located within 10 minutes of the Claremont Colleges and Cable Airport (see Figure 2-2, City of Montclair and Plan Area, see Chapter 2, Project Description).

The Plan area totals approximately 104.35 acres in size and is composed of numerous assessor parcels. The Plan area is bounded by and includes the right-of-ways of Monte Vista Avenue on the west, the I-10 Freeway on the south, and Central Avenue on the east. The northern boundary of the Plan area is the southern boundaries of the North Montclair Downtown Specific Plan (NMDSP), which occurs generally along the existing center line of Moreno Street (Figure 2-3a, Existing North Montclair Specific Plan and Adjacent Specific Plan, see Chapter 2, Project Description).

Local access to the Plan area is provided via Central Avenue, Moreno Street, and Monte Vista Avenue. The area surrounding the Plan area is characterized as urban and is largely built out with a mix of commercial, retail, and residential uses. The Plan area is currently located within the City's North Montclair Specific Plan (NMSP) area.

The Plan area is surrounded by mostly developed properties on all sides. Figure 2-4 (Plan Area and Surrounding Land Uses, see Chapter 2, Project Description), depicts the land uses and businesses that surround the Plan area. To the east, across Central Avenue, are a Chase Bank, McDonald's restaurant, and the Montclair East Shopping Center, that includes retail stores such as Petco, Harbor Freight Tools, Chipotle Mexican Grill, and Ross Dress for Less. To the north across Moreno Street, land uses include retail (Target and Gold's Gym), single-family, and multi-family residential properties. To the west, across Monte Vista Avenue, land uses include single-family and multi-family residential properties, assisted living, a dialysis center, an adult development center, and Moreno Elementary School. To the south, the Plan area is bordered by the I-10 Freeway and its right-of-way.

ES.3 PROPOSED PROJECT BACKGROUND AND DESCRIPTION

Planning Background

1998 North Montclair Specific Plan

In 1998, the City of Montclair adopted the North Montclair Specific Plan in order to provide more detailed planning for the part of the City adjacent to the north and portion of the south sides of the Interstate 10 (I-10) freeway. The North Montclair Specific Plan addressed issues associated with economic vitality, design, redevelopment, compatibility, transportation, and pedestrian access on approximately 640 acres south of the northern city limit. Although the North Montclair Specific Plan provided new design concepts for the area, including pedestrian-oriented design, the City had mixed success implementing the Plan.

North Montclair Downtown Specific Plan

The North Montclair Downtown Specific Plan (NMDSP) was carved out of the North Montclair Specific Plan, adopted in 1998. The areas north of Moreno Street (across from the Plan area) are within the NMDSP area. This plan was adopted in 2006 and sets forth transit-oriented development land use regulations for the areas near the Montclair Transcenter, which is currently a stop on the Metrolink San Bernardino Line and is a planned future stop for the Metro Gold Line light rail line. The Plan area is approximately 0.5 mile south of the existing railroad tracks and is not within the NMDSP area. The NMDSP was amended in 2017 to expand the boundaries of the North Montclair Specific Plan area and introduce certain land use concepts and clarify certain standards.

Downtown Infrastructure and Streetscape Plan

The Downtown Infrastructure and Streetscape Plan recommends changes to the design of streets in the area bounded by Central Avenue, Interstate 10, Monte Vista Avenue, and Richton Street. It also recommends cross-sections for streets adjacent to Montclair Place, as well as Fremont Avenue north of Montclair Place. The Downtown Infrastructure and Streetscape Plan has not yet been formally adopted.

CEQA Review

Based on the Initial Study (IS) Checklist/Environmental Evaluation prepared for the Proposed Project on behalf of the City, the City has determined it is appropriate to prepare an EIR for the Proposed Project. The purpose of the IS Checklist is to identify any potentially significant impacts associated with the Proposed Project, to establish the scope of the EIR that will be prepared, and to document the forthcoming intended analysis in the EIR. The IS was prepared in conformance with Sections 15063 and 15064 of the CEQA Guidelines (14 CCR 15000 et seq.).

The NOP was distributed to the State Clearinghouse, interested agencies, organizations, and persons on May 20, 2019. Specifically, the City sent the NOP to 26 agencies and organizations, along with a copy of the Initial Study on compact disc. The City also sent the NOP to property owners within a 300-foot buffer of the Plan area and to entities or individuals who own property within the Plan area. Recipients of the IS/NOP were requested to provide responses within 30 days after their receipt of the IS/NOP. Hardcopies of the IS/NOP were made available for review at the Montclair Branch Library and at the City's Community Development Department office. An electronic copy of the IS/NOP was also made available on the City's website. Additionally, a scoping meeting was held on May 28, 2019, at the City of Montclair City Council Chambers. A summary of the Proposed Project and the CEQA process was presented at the meeting. The purpose of this meeting was to seek input from public agencies and the general public regarding the environmental issues and concerns that may potentially result from the Proposed Project.

The 30-day IS/NOP public review period ended June 18, 2019. In response to the NOP, 5 written comment letters were received during the IS/NOP public review period. These letters and the IS/NOP are included in Appendix A of this EIR.

Need for the Project

The primary goal of the MPDSP is to create a pedestrian-oriented, multi-modal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line that would extend light rail line service to the City of Montclair. This downtown environment will be built on an interconnected network of tree-lined streets that connect

inviting parks, greens, and plazas. Its buildings will be built close to, and directly accessible from, the sidewalk. Parking will be located behind buildings or will be subterranean.

The existing General Commercial (C-3) and North Montclair Specific Plan (NMSP) zoning prohibit the development of such an environment. Residential uses and park/playground uses are not permitted. In addition, the existing C-3 and NMSP permit uses, by-right, that are inconsistent with the pedestrian-oriented, mixed-use vision for the MPDSP area. Examples of some of these incompatible uses include: auto parts sales (with installation); automobile body and fender repair shops; refrigerated lockers; and used car sales areas. Buildings accommodating these land uses are not currently present in the Plan area, and therefore, removal of these uses from the land use requirements does not result in the presence of non-conforming buildings or uses.

In addition, the C-3 development standards are not conducive to generating a pedestrian-oriented, mixed-use setting. For example, required front setbacks are 35 to 75 feet; parking is permitted between buildings and the sidewalk/street; and the maximum lot coverage is 50 percent.

As such, the MPDSP will enable the future development of commercial, multi-family residential, hotel, and mixed-use projects within walking and biking distance of the Montclair Transcenter. The MPDSP will assign and create appropriate land use zones for parcels within the Plan area and provide development standards and architectural guidelines to guide development within the MPDSP area through 2040. These standards are intended to complement the development of standards and architectural guidelines contained in those of the North Montclair Downtown Specific Plan (NMDSP), adopted in 2006 and amended in 2017.

Proposed Montclair Place District Specific Plan

The Plan area and surrounding area is characterized as an urban, developed commercial and residential area. The Plan area and all surrounding properties have undergone disturbance previously resulting from development of the existing Mall and the commercial and residential uses that surround it. Vegetation within the Plan area is limited to ornamental landscaping associated with the existing development and several ornamental trees that currently buffer the Plan area from adjacent residential uses to the west.

Typical residential development in the area ranges from one to three stories in height. Most of the surrounding commercial structures are one story in height. Existing buildings within the Plan area range in height between approximately 30 and 75 feet. Because of the relatively low height of most development within the Plan area, long-range viewsheds are relatively unobstructed; however, the proximity of the surrounding development generally obstructs long-range views from within the Plan area. Existing light sources come from both development within the Plan area and from surrounding commercial and residential uses.

The characteristics of the Plan area, its surroundings, and its existing conditions are summarized in Table 1 (Site Information).

Table 1
Site Information

General Plan Designation	Regional Commercial
Zoning	C-3 General Commercial – North Montclair Specific Plan (NMSP)
Site Size	104.35 acres
Assessor's Parcel Number(s)	31 parcels: 1008-171-01; 1008-171-02; 1008-171-03; 1008-171-04; 1008-171-05; 1008-171-06; 1008-171-07; 1008-171-11; 1008-171-13; 1008-181-04; 1008-181-05; 1008-181-06; 1008-181-07; 1008-191-01; 1008-191-02; 1008-191-03; 1008-191-04; 1008-321-04; 1008-321-07; 1008-341-08; 1008-351-07; 1008-321-10l 1008-331-06; 1008-331-07; 1008-331-08; 1008-331-09; 1008-331-15; 1008-331-16; 1008-341-04; 1008-341-08; 1008-351-07
Present Use	Regional Mall, strip commercial development, freestanding restaurants, major furniture store, and surface parking uses
Surrounding Land Uses & Zoning	North: Commercial and Residential Uses • Corridor Residential and Town Center zones of the North Montclair Downtown Specific Plan (NMDSP) • R-1 – Specific Plan 82-1 South: I-10 Freeway East: Commercial Uses (C-3 General Commercial - NMSP) West: Commercial, Institutional and Residential Uses – NMSP • R-1 Single-Family Residential • R-3 Multiple Family Residential • C-2 Restricted Commercial
Access	Monte Vista Avenue and Central Avenue (north-south) and Moreno Street (east-west)
Ingress/Egress	Primary Access: Signalized entrance/exit at Central Avenue Secondary Access: Three signalized entrance/exits along Moreno Street; one signalized and two unsignalized entrance/exits along Monte Vista Avenue
Public Services	Water Supply: Monte Vista Water District Sewer Service: City of Montclair Solid Waste: Burrtec Waste Industries Fire Protection: Montclair Fire Department Police Protection: Montclair Police Department School District: Ontario-Montclair School District (K-8) and Chaffey Joint Union High School District (9-12)
Utilities	Gas Supply: The Gas Company Electric Supply: Southern California Edison Telephone: Frontier Cable TV: Spectrum and Frontier

Source: City of Montclair, 2020.

ES.4 PROPOSED PROJECT OBJECTIVES

The primary objectives of the proposed MPDSP include the following:

- Enable phased redevelopment of the existing Montclair Place Mall and the area south of the Mall including the Ashley's Furniture site and the Entertainment Plaza area. The time frame for build-out in the Plan area is anticipated to take up to 20 years.
- Create a pedestrian-oriented, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and anticipated extension of the Foothill Gold Line railway.
- Replace the existing C-3 zoning with new mixed-use zones that permit residential use in standalone and mixed-use configurations and office.
- Introduce appropriate land use zones and uses, intensity levels, and future street patterns for properties in the Plan area.
- Provide zoning that is flexible and responsive to changing market demands.
- Account for an increase in the maximum number of dwelling units and additional commercial/office square footage allowable by the Plan. The maximum amounts envisioned by the Plan are approximately 6,321 dwelling units (5 million square feet of residential uses) and a total of 512,000 additional square feet of commercial/office uses.
- Introduce form-based development, massing, and architectural standards to successfully implement the Plan.
- Reduce automobile trips by creating a mixed-use, pedestrian-oriented, multi-modal, park-once environment with access to alternative modes of transportation, including walking, biking, Metrolink, the proposed Foothill Gold Line railway extension, and curb space for transit network companies such as Uber and Lyft.

ES.5 AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Section 15123(b)(2) of the State CEQA Guidelines requires that areas of controversy known to the lead agency must be stated in the EIR summary. Issues of interest to the public and public agencies were identified during the 30-day public comment period for the Initial Study and Notice of Preparation (May 20, 2019 through June 18, 2019). The City received five (5) comment letters in response to the Notice of Preparation and Initial Study. Comments received during this scoping period were considered during the preparation of this EIR. Copies of these comment letters are provided in Appendix A-3 through A-7 of this EIR

Comment letters received during the scoping period expressed concern about air quality, potential impacts to schools in terms of enrollment and hazards, tribal cultural resources, and circulation/transportation. Additionally, a scoping meeting was held on May 28, 2019 at the City

of Montclair City Council Chambers. These concerns have been identified as areas of known controversy and are analyzed in Chapter 3, Environmental Analysis, of this EIR. The Initial Study, Notice of Preparation, and comments received during the scoping period are included in Appendix A of this EIR.

ES.6 SUMMARY OF ENVIRONMENTAL IMPACTS

This EIR has been prepared to assess the potentially significant effects on the environment that could result from implementation of the Proposed Project. For a detailed discussion regarding potential significant impacts, please see Chapter 3, Environmental Analysis, of this EIR.

As required by CEQA, a summary of the Proposed Project's impacts identified in this EIR is provided in Table ES-1, Summary of Project Impacts, below. Also provided in Table ES-1 is a list of the proposed mitigation measures that are recommended in response to the potentially significant impacts identified in the EIR, as well as a determination of the level of significance of the impacts after implementation of the recommended mitigation measures. Additional mitigation measures were identified in the Initial Study (Appendix A-2) and will be included along with the mitigation measures identified in the EIR as part of the mitigation monitoring and reporting program for the Proposed Project.

ES.7 ALTERNATIVES TO THE PROPOSED PROJECT

State CEQA Guidelines Section 15126.6 requires consideration and discussion of alternatives to the proposed project in an EIR. Three alternatives are reviewed in Chapter 4, Alternatives, of this EIR and are summarized below.

Alternative 1 – No Project/No Build Alternative

The No Project/No Build Alternative is included pursuant to the requirements of CEQA and the CEQA Guidelines. Under this alternative, it is assumed that the Proposed Project would not be approved and no development would occur.

Alternative 2 – No Project/Existing Planned Development Alternative

The No Project/Existing Planned Development Alternative assumes that additional development could occur, as long as the development is consistent with the current General Plan Land Use designations and zoning designations.

Alternative 3 – Reduced Residential Alternative

The Reduced Residential Alternative would result in a 15% reduction in residential units as compared to the Proposed Project. This alternative would result in a total of 5,496 residential units total, whereas the Project proposes 6,321 units.

Alternative 4 – Reduced Commercial/Office Alternative

The Reduced Commercial/Office Alternative would result in a 7.5% reduction in commercial and office space as compared to the Proposed Project. This alternative would result in a total of 1,905,139 square feet of commercial space, whereas, the Proposed Project would involve the development of 2,058,909 square feet of commercial space. Specifically, the southwest corner of the Proposed Project plan area would not be included in the Alternative 4 plan area, and would remain in the existing condition.

Environmentally Superior Alternative

State CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The State CEQA Guidelines also state that, should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

A comparative summary of the environmental impacts associated with each alternative as compared to the Proposed Project is provided in Table 4-2 (see Chapter 4, Alternative, of this EIR). The No Project/No Build Alternative (Alternative 1) would be the environmentally superior alternative as it would result in no new environmental impacts, would avoid many of the Proposed Project's impacts, and would eliminate the significant and unavoidable impacts identified for the Proposed Project related to air quality (criteria air pollutant emissions associated with construction), population and housing, public services (parks), and recreation. However, Alternative 1 would result in significant and unavoidable operational air quality impacts, greenhouse gas emission impacts, and transportation impacts. Alternative 1 would not achieve any of the Project objectives.

Alternative 3 would not avoid the Project's significant and unavoidable impacts. However, because less development would be involved under Alternative 3, these impacts would be slightly less when compared to the Project. Energy consumption under Alternative 3 would also be less than the Proposed Project. Therefore, Alternative 3 is the Environmentally Superior Alternative. However, Alternative 3 would only partially meet the Project objectives.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Aesthetics			
a. Would the project have a substantial adverse effect on a scenic vista?	Less Than Significant Impact	None required	Less Than Significant Impact
b. Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	None required	No Impact
c. Would the project in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant Impact	None required	Less Than Significant Impact
d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Potentially Significant Impact	**MM-AES-1** The project applicant shall prepare lighting and signage plans for the Proposed Project depicting the proposed locations and heights of light poles and signs. Concurrent with the building permit submittal, the project applicant shall incorporate lighting design specifications to meet the City's minimum safety and security standards as outlined in the City's Building Security Requirements. The following measures shall be included in all	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		lighting plans: • Luminaires shall be designed with cutoff-type fixtures or features that cast low-angle illumination to minimize incidental spillover of light onto adjacent private properties. Fixtures that shine light upward or horizontally shall not spill any light onto adjacent properties. • Luminaires shall provide accurate color rendering and natural light qualities. Low pressure sodium and high-pressure sodium fixtures that are not color-corrected shall not be used, except as part of an approved sign or landscape plan. • Luminaire mountings shall be downcast and pole heights minimized to reduce potential for back scatter into the nighttime sky and incidental spillover light onto adjacent properties. The height of light poles shall be reviewed and approved by the City to ensure consistency with the City's Municipal Code requirements. Luminaire mountings shall be treated with non-glare finishes.	
Would the project have a cumulative aesthetic and/or lighting impact?	Less Than Significant Impact	None required	Less Than Significant Impact
Air Quality			
a. Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact	**Construction:** **MM-AQ-1 Construction Equipment Emissions Reductions.** During Proposed Project construction, the applicant shall incorporate the following measures to reduce construction criteria air pollutant emissions, including VOC, NO_x, PM_{10}, and $PM_{2.5}$, generated by construction equipment used for future development projects implemented under the proposed MPDSP: a) For off-road equipment with engines rated at 75 horsepower or greater, no construction equipment shall be used that is less than Tier 4 Interim. An exemption from these requirements may be	Significant and Unavoidable Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		granted by the City in the event that the applicant documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment.[1] Before an exemption may be considered by the City, the applicant shall be required to demonstrate that two construction fleet owners/operators in the Los Angeles Region were contacted and that those owners/operators confirmed Tier 4 Interim or better equipment could not be located within the Los Angeles region. b) Minimize simultaneous operation of multiple construction equipment units. During construction, vehicles in loading and unloading queues shall not idle for more than 5 minutes, and shall turn their engines off when not in use to reduce vehicle emissions. c) Properly tune and maintain all construction equipment in accordance with manufacturer's specifications; d) Where feasible, employ the use of electrical or natural gas-powered construction equipment, including forklifts and other comparable equipment types. e) To reduce the need for electric generators and other fuel-powered equipment, provide on-site electrical hookups for the use of hand tools such as saws, drills, and compressors used for building construction. f) Develop a Construction Traffic Control Plan to ensure construction traffic and equipment use is minimized to the extent practicable. The Construction Traffic Control Plan shall include	

[1] For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded from a Tier 4 Interim to a higher tier (i.e., Tier 4 Final) or replaced with an alternative-fueled (not diesel-fueled) piece of equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		measures to reduce the number of large pieces of equipment operating simultaneously during peak construction periods, scheduling of vendor and haul truck trips to occur during non-peak hours, establish dedicated construction parking areas to encourage carpooling and efficiently accommodate construction vehicles, identify alternative routes to reduce traffic congestion during peak activities, and increase construction employee carpooling. **MM-AQ-2** **Fugitive Dust Control.** During Proposed Project construction, the applicant shall incorporate the following measures to reduce construction fugitive dust emissions (PM10 and PM2.5), generated by grading and construction activities of future development projects implemented under the proposed MPDSP, consistent with SCAQMD Rule 403, with a goal of retaining dust on the site: a) Water, or utilize another SCAQMD-approved dust control non-toxic agent, on the grading areas at least three times daily to minimize fugitive dust. b) All permanent roadway improvements shall be constructed and paved as early as possible in the construction process to reduce construction vehicle travel on unpaved roads. To reduce fugitive dust from earth-moving operations, building pads shall be finalized as soon as possible following site preparation and grading activities. c) Stabilize grading areas as quickly as possible to minimize fugitive dust. d) Apply chemical stabilizer, install a gravel pad, or pave the last 100 feet of internal travel path within the construction site prior to public road entry, and to on-site stockpiles of excavated material. e) Remove any visible track-out into traveled public streets with the use of sweepers, water trucks, or similar method as soon as possible.	

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Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		f) Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. Unpaved construction site egress points shall be graveled to prevent track-out. g) Wet wash the construction access point at the end of the workday if any vehicle travel on unpaved surfaces has occurred. h) Cover haul trucks or maintain at least 2 feet of freeboard to reduce blow-off during hauling. i) Evaluate the need for reduction in dust generating activity, potential to stop work, and/or implementation of additional dust control measures if winds exceed 25 miles per hour. j) Enforce a 15-mile-per-hour speed limit on unpaved surfaces. k) Provide haul truck staging areas for the loading and unloading of soil and materials. Staging areas shall be located away from sensitive receptors, at the furthest feasible distance. l) Construction Traffic Control Plans shall route delivery and haul trucks required during construction away from sensitive receptor locations and congested intersections, to the extent feasible. Construction Traffic Control plans shall be finalized and approved prior to issuance of grading permits. m) Review and comply with any additional requirements of SCAQMD Rule 403. **MM-AQ-3** **Architectural Coating VOC Emissions.** To address the impact relative to VOC emissions, Super-Compliant VOC-content architectural coatings (0 grams per liter to less than 10 grams per liter VOC) during Proposed Project construction, the applicant shall ensure the construction/application of paints and other architectural coatings to reduce ozone precursors. If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September. The developer shall procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		(Architectural Coatings). **Operational:** **MM-AQ-4 Vehicle Miles Traveled Reduction Strategies.** The City shall ensure the implementation of Transportation Demand Management (TDM) measures to facilitate increased opportunities for transit, bicycling, and pedestrian travel, as well as provide the resources, means, and incentives for ride-sharing and carpooling to reduce vehicle miles traveled and associated criteria air pollutant emissions. The following components are to be included in the TDM Program: *Bicycle and Pedestrian Travel* a) Develop a comprehensive pedestrian network designed to provide safe bicycle and pedestrian access between the various internal Proposed Project land uses, which will include design elements to enhance walkability and connectivity and shall minimize barriers to pedestrian access and interconnectivity. Physical barriers, such as walls or landscaping, that impede pedestrian circulation shall be eliminated. b) The Proposed Project design shall include a network that connects the Proposed Project uses to the existing off-site facilities (e.g., existing off-site bike paths). c) Proposed Project design shall include pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements. Roadways shall be designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips with traffic calming features. Traffic calming features may include: marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, and	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		others. d) Provide bicycle parking facilities along main travel corridors: one bike rack space per 20 vehicle/employee parking spaces or to meet demand, whichever results in the greater number of bicycle racks. e) Provide shower and locker facilities to encourage employees to bike and/or walk to work: one shower and three lockers per every 25 employees. *Ride-Sharing and Commute Reduction* f) Promote ridesharing programs through a multi-faceted approach, such as designating a certain percentage of parking spaces for ridesharing vehicles; designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles; or providing a website or message board for coordinating rides. g) Implement marketing strategies to reduce commute trips. Information sharing and marketing are important components to successful commute trip-reduction strategies. Implementing commute trip-reduction strategies without a complementary marketing strategy would result in lower VMT reductions. Marketing strategies may include: new employee orientation of trip reduction and alternative mode options; event promotions; or publications. h) One percent (1%) of vehicle/employee parking spaces shall be reserved for preferential spaces for car pools and van pools. i) Coordinate with the Southern California Association of Governments (SCAG) for carpool, vanpool, and rideshare programs that are specific to the Proposed Project. j) Implement a demand-responsive shuttle service that provides access throughout the MPDSP area, to the park-and-ride lots, and to the nearby transit centers.	

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Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		Transit k) Bus pull-ins shall be constructed where appropriate within the Plan area. l) Coordinate with SCAG on the future siting of transit stops/stations within or near the MPDSP. **MM-AQ-5 Encourage Electric Vehicles.** The City shall ensure that each development project in the Plan area incorporate the following: a) Designate 10% of parking spaces to be for electric and alternative fuel vehicles. b) Install Level 2 EV charging stations in 6% of all parking spaces. **MM-AQ-6 Idling Restriction.** For Proposed Project land uses that include truck idling, the City shall ensure that each implementing development project minimize idling time of all vehicles and equipment to the extent feasible; idling for periods of greater than five (5) minutes shall be prohibited. Signage shall be posted at truck parking spots, entrances, and truck bays advising that idling time shall not exceed five (5) minutes per idling location. To the extent feasible, the tenant shall restrict idling emission from trucks by using auxiliary power units and electrification. Each cold storage dock door shall provide electrification for transport refrigeration units (TRUs). **MM-AQ-7 Energy Conservation.** The City shall ensure that each development project incorporate the following conservation measures into proposed building plans: a) Install a solar photovoltaic rooftop system to reduce the electric demand from the local grid. b) Install Energy Star rated heating, cooling, lighting, and appliances. c) Outdoor lighting shall be light emitting diodes (LED) or other high-efficiency lightbulbs.	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		d) Provide information on energy efficiency, energy efficient lighting and lighting control systems, energy management, and existing energy incentive programs to future tenants. e) Non-residential structures shall meet the U.S. Green Building Council standards for cool roofs. This is defined as achieving a 3-year solar reflective index (SRI) of 64 for a low-sloped roof and 32 for a high-sloped roof. f) Outdoor pavement, such as walkways and patios, shall include paving materials with 3-year SRI of 0.28 or initial SRI of 0.33. g) Construction of modest cool roof, defined as Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance and 0.75 thermal emittance. h) Use of Heating, Ventilation and Air Conditioning (HVAC) equipment with a Seasonal Energy Efficiency Ratio (SEER) of 12 or higher. i) Installation of water heaters with an energy factor of 0.92 or higher. j) Maximize the use of natural lighting and include daylighting (e.g., skylights, windows) in rooms with exterior walls that would normally be occupied. k) Include high-efficacy artificial lighting in at least 50% of unit fixtures. l) Install low-NO_x water heaters and space heaters, solar water heaters, or tank-less water heaters. m) Use passive solar cooling/heating. n) Strategically plant trees to provide shade. o) Structures shall be equipped with outdoor electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment.	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Potentially Significant Impact	**MM-AQ-1** through **MM-AQ-7**	Significant and Unavoidable Impact
c. Would the project expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant Impact	**MM-AQ-1** through **MM-AQ-7** **MM-AQ-8 Toxic Air Contaminant Reduction.** At the time of discretionary approval of new sources of TAC emissions in close proximity to existing sensitive land uses, the City shall require development projects to implement applicable best management practices, as necessary and feasible, that will reduce exposure to TACs. Such measures may include the installation of non-diesel fueled generators or the installation of diesel generators with an EPA-certified Tier 4 engine or engines that are retrofitted with a CARB Level 3 Verified Diesel Emissions Control Strategy. Specific reduction measures will be evaluated and determined depending on proposed land use TAC sources and feasibility. **MM-AQ-9 Health Risk Assessment Requirements.** Consistent with the California Air Resources Board's recommendations on siting new sensitive land uses, a formal health risk assessment shall be performed under the following conditions: a) *Distribution Centers*. For any distribution center that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week located within 1,000 feet of a sensitive receptor. In addition, configuration of entry and exit points of the distribution center shall be considered to minimize exposure to sensitive receptors.	Significant and Unavoidable Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		b) *Gasoline Dispensing Facilities*. For any large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater) within 300 feet of a sensitive receptor. For any typical gas dispensing facility (with a throughput of less than 3.6 million gallons per year) within 50 feet of a sensitive receptor. c) *Dry Cleaners Using Perchloroethylene*. For any dry cleaning operation within 300 feet of a sensitive receptor. For operations with three of more machines, consult with the South Coast Air Quality Management District for when a health risk assessment shall be prepared as the distance to the closest sensitive receptor may be less than 300 feet. d) *Other Sources of Toxic Air Contaminants*. For other sources of TACs, the City shall evaluate the need to prepare a health risk assessment based on the types of TACs and the distance to sensitive receptors.	
d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have a cumulative air quality impact?	Potentially Significant Impact	**MM-AQ-1** through **MM-AQ-9**	Significant and Unavoidable Impact
Biological Resources			
a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a	Less Than Significant Impact	None required	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			
b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No Impact	None required	No Impact
c. Would the project have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	None required	No Impact
d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with	Potentially Significant Impact	**MM-BIO-1** Prior to the issuance of a demolition, grading, and/or building permit for activities during the avian nesting season (generally February through August), a qualified biologist shall conduct a nesting bird survey within 7 days of vegetation clearing, cutting, or removal activities. The survey would consist of full coverage of the proposed project footprint and an appropriate	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		buffer, as determined by the biologist. If no active nests are discovered or identified, no further mitigation is required. In the event that active nests are discovered on site, a suitable buffer determined by the biologist (e.g., 30 to 50 feet for passerines) shall be established around any active nest. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Limits of construction to avoid a nest shall be established in the field by the biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The results of the survey shall be documented and filed with the City of Montclair within 5 days after the survey.	
e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less Than Significant Impact	None required	Less Than Significant Impact
f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	None required	No Impact
Would the project have a cumulative biological resources impact?	Less Than Significant Impact	None required	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Cultural Resources			
a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines?	Less Than Significant Impact	None required	Less Than Significant Impact
b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines?	Potentially Significant Impact	**MM-CR-1** In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, shall evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find as determined by the archaeologist, the archaeologist may decide to record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted. Preservation in place shall be the preferred means of mitigation, if determined to be feasible by the archaeologist and the City.	Less Than Significant Impact
c. Would the project disturb any human remains, including those interred outside of formal cemeteries?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have a cumulative cultural resources impact?	Less Than Significant Impact	None required	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Energy			
a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	Potentially Significant Impact	**MM-AQ-1**, **MM-AQ-4** through **MM-AQ-7** **MM-GHG-1** (See Greenhouse Gas Emissions Section of this Table)	Less Than Significant Impact
B. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have a cumulative energy impact?	Less Than Significant Impact	None required	Less Than Significant Impact
Geology and Soils			
A. Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Less Than Significant Impact	None required	Less Than Significant Impact
ii. Strong seismic ground shaking?	Less Than Significant Impact	None required	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
iii. Seismic-related ground failure, including liquefaction?	Less Than Significant Impact	None required	Less Than Significant Impact
iv. Landslides?	Less Than Significant Impact	None required	Less Than Significant Impact
b.. Would the project result in substantial soil erosion or the loss of topsoil?	Less Than Significant Impact	None required	Less Than Significant Impact
c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less Than Significant Impact	None required	Less Than Significant Impact
d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less Than Significant Impact	None required	Less Than Significant Impact
e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	None required	No Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant Impact	**MM-GEO-1** In the event that paleontological resources (fossil materials) are exposed during construction activities for the Proposed Project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology, can assess the nature and importance of the find. Depending upon the significance of the find, the paleontologist may record the find and allow work to continue, or may recommend salvage and recovery of the resource. All recommendations will be made in accordance with the Society of Vertebrate Paleontology's 1995 guidelines and shall be subject to review and approval by the City. Work in the area of the find may only resume upon approval of a qualified paleontologist.	Less Than Significant Impact
Would the project have a cumulative geology and soils impact?	Less Than Significant Impact	None required	Less Than Significant Impact
Greenhouse Gas Emissions			
a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Potentially Significant Impact	**MM-AQ-1** and **MM-AQ-4** through **MM-AQ-7** **MM-GHG-1 Water Conservation.** The following water conservation measures into Proposed Project building plans: a) Install low-water use appliances and fixtures b) Restrict the use of water for cleaning outdoor surfaces and prohibit systems that apply water to non-vegetated surfaces c) Implement water-sensitive urban design practices in new construction d) Install rainwater collection systems where feasible. **MM-GHG-2 Solid Waste Reduction.** Provide storage areas for recyclables and green waste in new construction, and food waste storage, if a pick-up service is available.	Significant and Unavoidable Impact
b. Would the project conflict with a plan, policy or regulation adopted for the purpose of	Potentially Significant Impact	**MM-AQ-1** and **MM-AQ-4** through **MM-AQ-7** **MM-GHG-1** **MM-GHG-2**	Significant and Unavoidable Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
reducing the emissions of greenhouse gases?			
Would the project have a cumulative impact on greenhouse gas emissions?	Potentially Significant Impact	**MM-AQ-1** and **MM-AQ-4** through **MM-AQ-7** **MM-GHG-1** **MM-GHG-2**	Significant and Unavoidable Impact
Hazards and Hazardous Materials			
a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact	**MM-HAZ-1** Prior to the issuance of demolition permits for any buildings or structures that would be demolished in conjunction with individual development projects that would be accommodated by the Montclair Place District Specific Plan, the project applicant/developer shall conduct the following inspections and assessments for all buildings and structures onsite and shall provide the City of Montclair Building Official with a copy of the report of each investigation or assessment. 1. The project applicant shall retain a California Certified Asbestos Consultant (CAC) to perform abatement project planning, monitoring (including air monitoring), oversight, and reporting of all asbestos-containing materials (ACM) encountered. The abatement, containment, and disposal of all ACM shall be conducted in accordance with the South Coast Air Quality Management District's Rule 1403 and California Code of Regulation Title 8, Section 1529 (Asbestos). 2. The project applicant shall retain a licensed or certified lead inspector/assessor to conduct the abatement, containment, and disposal of all lead waste encountered. The contracted lead inspector/assessor shall be certified by the California Department of Public Health (CDPH). All lead abatement shall be performed by a CDPH-certified lead supervisor or a CDPH-certified worker under the direct supervision of a lead supervisor certified by CDPH. The abatement, containment, and disposal of all lead waste encountered shall be conducted in accordance with the	Less Than Significant Impact

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Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		US Occupational Safety and Health Administration Rule 29, CFR Part 1926, and California Code of Regulation, Title 8, Section 1532.1 (Lead). 3. Evidence of the contracted professionals attained by the project applicant shall be provided to the City of Montclair Community Development Department. Additionally, contractors performing ACM and lead waste removal shall provide evidence of abatement activities to the City of Montclair Community Development Department and to the South Coast Air Quality Management District.	
b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Potentially Significant Impact	**MM-HAZ-1**	Less Than Significant Impact
c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less Than Significant Impact	None required	Less Than Significant Impact
d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section	Potentially Significant Impact	**MM-HAZ-1**	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
65962.5 and, as a result, would create a significant hazard to the public or the environment?			
e. Would the project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	Less Than Significant Impact	None required	Less Than Significant Impact
f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less Than Significant Impact	None required	Less Than Significant Impact
g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have a cumulative impact related to hazards and hazardous materials?	Potentially Significant Impact	**MM-HAZ-1**	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Hydrology and Water Quality			
a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Potentially Significant Impact	**MM-HAZ-1** **MM-HYD-1** Prior to issuance of a grading permit by the City of Montclair Public Works Department for individual projects within the Specific Plan area, a Storm Water Pollution Prevention Plan (SWPPP) shall be developed. The SWPPP shall be implemented during Project grading, excavations, and construction. The following list includes, but is not limited to, examples of construction water quality Best Management Practices (BMPs) that are standard for most construction sites subject to the Construction General Permit: a) Silt fences and/or fiber rolls installed along limits of work and/or the Project construction site; b) Stockpile containment and exposed soil stabilization structures (e.g., visqueen plastic sheeting, fiber rolls, gravel bags and/or hydroseed); c) Runoff control devices (e.g., fiber rolls, gravel bag barriers/chevrons, etc.) used during construction phases conducted during the rainy season; d) Wind erosion (dust) controls; e) Tracking controls at the site entrance, including regular street sweeping and tire washes for equipment; f) Prevention of fluid leaks (inspections and drip pans) from construction vehicles; g) Materials pollution management; h) Proper waste/trash management; and i) Regular inspections and maintenance of BMPs. These BMPs shall be refined and/or added to as necessary by a Construction General Permit SWPPP Practitioner (QSP) and/or Qualified SWPPP Developer (QSD), as certified by the California Stormwater Quality	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		Association, to meet the performance standards in the Construction General Permit. **MM-HYD-2** Prior to issuance of a building permit by the City of Montclair Public Works Department for individual projects within the Plan area, the Applicant shall include operational non-structural BMPs to address water quality impacts as part of the proposed Business Plan. These BMPs shall be annually inspected by the City NPDES Coordinator for compliance with the regional NPDES permit and Montclair Storm Water Ordinance. These operational BMPs shall include, but not be limited to:: a) Regular sweeping of all open and planter areas, at a minimum, on a weekly basis in order to prevent dispersal of pollutants that may collect on those surfaces; b) Regular pruning of the trees and shrubs in the planter areas to avoid formation of dried leaves and trigs, which can clog surface inlets and drains; c) Use of trash and recycling containers that, if located outside, are fully enclosed and watertight in order to prevent contact of stormwater with wastewater, which can be a potential source of bacteria and other pollutants in runoff; d) Provide educational training materials for the property owners, such that the owners are aware of the structural BMPs installed in the Plan area, and their maintenance requirements; e) Provide materials to brief property owners about chemical management and proper methods of handling and disposing of wastes; and f) Minimization of pesticide and fertilizer use, to the maximum extent practicable, with on-site landscaping.	
b. Would the Project substantially decrease groundwater supplies or interfere substantially with	Less Than Significant Impact	None required	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
groundwater recharge such that the Project may impede sustainable groundwater management of the basin?			
c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			
i. result in substantial erosion or siltation on- or off-site?	Potentially Significant Impact	**MM-HYD-1** **MM-HYD-2**	Less Than Significant Impact
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?	Potentially Significant Impact	**MM-HYD-1** **MM-HYD-2**	Less Than Significant Impact
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Potentially Significant Impact	**MM-HYD-1** **MM-HYD-2**	Less Than Significant Impact
iv. impede or redirect flood flows?	No Impact	None required	No Impact
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less Than Significant Impact	None required	Less Than Significant Impact
e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater	Less Than Significant Impact	None required	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
management plan?			
Would the project have a cumulative hydrology or water quality impact?	Potentially Significant Impact	**MM-HYD-1** **MM-HYD-2**	Less Than Significant Impact
Land Use and Planning			
a. Would the project physically divide an established community?	Less Than Significant Impact	None required	Less Than Significant Impact
b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have a cumulative land use and planning impact?	Less Than Significant Impact	None required	Less Than Significant Impact
Noise			
a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable	Less Than Significant Impact	None required	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
standards of other agencies?			
b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant Impact	None required	Less Than Significant Impact
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have a cumulative noise impact?	Less Than Significant Impact	None required	Less Than Significant Impact
Population and Housing			
a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Potentially Significant Impact	**MM-AES-1** **MM-AQ-1** through **MM-AQ-9** **MM-GHG-1** **MM-GHG-2** **MM-HAZ-1** **MM-HYD-1** **MM-HYD-2** **MM-PUB-1** (See Public Services Section of this Table) **MM-TCR-1** (See Tribal Cultural Resources Section of this Table) **MM-TCR-2** (See Tribal Cultural Resources Section of this Table)	Significant and Unavoidable Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact	None required	No Impact
Would the project have a cumulative impact on population and housing?	Potentially Significant Impact	**MM-AES-1** **MM-AQ-1** through **MM-AQ-9** **MM-GHG-1** **MM-GHG-2** **MM-HAZ-1** **MM-HYD-1** **MM-HYD-2** **MM-PUB-1** (See Public Services Section of this Table) **MM-TCR-1** (See Tribal Cultural Resources Section of this Table) **MM-TCR-2** (See Tribal Cultural Resources Section of this Table)	Significant and Unavoidable Impact
Public Services			
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:			
Fire protection?	Potentially Significant Impact	**MM-PUB-1** Future development within the MPDSP area shall adhere to State and local law, including the California Code of Regulations, Title 24 (fire Code) and PRC 21157.1. As such, applicants of all future development within the MPDSP area shall be required to pay fees consistent with the requirements of Resolution 11-2872 of the City Council of the City of Montclair Adopting Local Goals and Policies for Community Facilities Districts..	Less Than Significant Impact
Police protection?	Less Than Significant Impact	None required	Less Than Significant Impact
Schools?	Less Than Significant Impact	None required	Less Than

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
			Significant Impact
Parks?	Potentially Significant Impact	None available	Significant and Unavoidable Impact
Other public facilities?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have cumulative public services impacts?	Potentially Significant Impact	**MM-PUB-1**	Significant and Unavoidable Impact
Recreation			
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Potentially Significant Impact	None available	Significant and Unavoidable Impact
b. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Potentially Significant Impact	None available	Significant and Unavoidable Impact
Would the project have a cumulative impact on recreation?	Potentially Significant Impact	None available	Significant and Unavoidable Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Transportation			
a. Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less Than Significant Impact	None required	Less Than Significant Impact
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Less Than Significant Impact	None required	Less Than Significant Impact
c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant Impact	None available	Significant and Unavoidable Impact
d. Would the project result in inadequate emergency access?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have cumulative impacts on transportation and traffic?	Potentially Significant Impact	None available	Significant and Unavoidable Impact
Tribal Cultural Resources			
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	Less Than Significant Impact	None required	Less Than Significant Impact
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Potentially Significant Impact	**MM-TCR-1** Prior to the issuance of any grading permit for the Proposed Project, the City of Montclair (City) shall ensure that the Project applicant retain the services of a Tribal monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation for Native American monitoring during ground-disturbing activities. This provision shall be included on Proposed Project plans and specifications. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or augering, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Plan area. The Project site shall be made accessible to the monitor(s), provided adequate notice is given to the construction contractor and that a construction safety hazard does not occur. The monitor(s) shall be approved by the Gabrieleño Band of Mission Indians-Kizh Nation and shall be present on site during the construction phases that involve any ground-disturbing activities. The monitor(s) shall possess Hazardous Waste Operations and Emergency Response (HAZWOPER) certification. In addition, the monitor(s) shall be required to provide insurance certificates, including liability insurance, for any tribal cultural resources and/or archaeological resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act (CEQA), California Public Resources Code (PRC) Division 13, Section 21083.2 (a) through (k). If evidence of any tribal cultural resources is found during ground-disturbing activities, the monitor(s) shall have the capacity to halt construction in the immediate vicinity of the find to recover and/or determine the appropriate	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		plan of recovery for the resource. The recovery process shall not unreasonably delay the construction process. Construction activity shall not be contingent on the presence or availability of a monitor, and construction may proceed regardless of whether or not a monitor is present on site. The monitor shall complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed or when the monitor has indicated that the site has a low potential for tribal cultural resources and/or archaeological resources.. **MM-TCR-2** All tribal cultural resources and/or archaeological resources unearthed by Proposed Project construction activities shall be evaluated by the qualified archaeologist and Native American monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation. Upon discovery of any archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. Construction work shall be permitted to continue on other parts of the Project site while evaluation and, if necessary, preservation measures take place (State CEQA Guidelines Section15064.5 [f]). If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation tribe shall coordinate with the landowner regarding treatment and curation of these resources. If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures shall be made available through coordination between the Gabrieleño Band of Mission Indians-Kizh Nation and the Project applicant. The treatment plan established for the resources shall be in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5(f) for historical resources and Public Resources Code (PRC) Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.	
Would the project have cumulative impacts on tribal cultural resources?	Potentially Significant Impact	**MM-TCR-1** **MM-TCR-2**	Less Than Significant Impact
Utilities and Service Systems			
a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Potentially Significant Impact	**MM-UTIL-1** Prior to issuance of a grading permit by the City of Montclair Public Works Department for individual projects within Phases E through G of the Specific Plan area, the Applicant shall demonstrate that Southern California Edison has sufficient infrastructure capacity to accommodate the electric power requirements for completion of each Specific Plan phase. In the event such infrastructure is not available, the environmental impacts associated with installation of such infrastructure shall be evaluated in project-specific California Environmental Quality Act documents. **MM-UTIL-2** Prior to issuance of a grading permit by the City of Montclair Public Works Department for individual projects within Phases E through G of the Specific Plan area, the Applicant shall demonstrate that the Specific Plan area telecommunication provider has sufficient infrastructure capacity to accommodate the telecommunication requirements for completion of each Specific Plan phase. In the event such infrastructure is not available, the environmental impacts associated with installation of such infrastructure shall be evaluated in project-specific California Environmental Quality Act documents.	Less Than Significant Impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less Than Significant Impact	None required	Less Than Significant Impact
c. Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less Than Significant Impact	None required	Less Than Significant Impact
d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less Than Significant Impact	None required	Less Than Significant Impact
e. Would the project comply with federal, state, and local statutes and regulations related to solid waste?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have cumulative public services and/or utilities impacts?	Less Than Significant Impact	None required	Less Than Significant Impact

CHAPTER 1
INTRODUCTION

This Environmental Impact Report (EIR) has been prepared by the City of Montclair (City) to evaluate the potential environmental effects that could result from the proposed Montclair Place District Specific Plan (MPDSP, or Proposed Project). This EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (Cal. Pub. Resources Code, Section 21000 et. seq., as amended) and implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq.). The City is the lead agency under CEQA.

1.1 SUMMARY OF THE PROPOSED PROJECT

The proposed MPDSP would assign and create land use zones for parcels within the approximately 104.35-acre site (Plan area) located in downtown Montclair, just north of the Interstate 10 (I-10) freeway and just south of the City's North Montclair Downtown Specific Plan Area. The MPDSP would provide development standards and architectural guidelines to guide development in the Plan area through 2040. The majority of the Plan area (approximately 75 acres) is currently occupied by the existing Montclair Place Mall properties. A key feature of the MPDSP would provide for the demolition of all or a portion of the existing Mall, some or all appurtenant free-standing outbuildings, and portions of the existing surface parking lots, to construct a pedestrian-oriented, mixed-use downtown district, with structured parking facilities through a series of planned phases. The maximum number of dwelling units for the Plan area envisioned under the MPDSP is approximately 5 million square feet of residential uses (or 6,321 dwelling units) and the total additional commercial square footage envisioned under the MPDSP is approximately 512,000 square feet. Additionally, the MPDSP includes provisions for the construction of a hotel with approximately 100 to 200 rooms. The MPDSP would replace the existing C-3 zoning of the North Montclair Specific Plan (NMSP) for project site with new mixed-use zones, thereby enabling the future development of commercial, office, multi-family residential, hotel, and mixed-use projects within walking and biking distance of the nearby Montclair Transcenter.

1.2 CEQA REQUIREMENTS

CEQA requires the preparation of an EIR for any project that a lead agency determines may have a significant impact on the environment. According to Section 21002.1(a) of CEQA, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

CEQA also establishes mechanisms whereby the public and decision makers can be informed about the nature of the project being proposed and the extent and types of impacts that the project and its alternatives would have on the environment if they were to be implemented.

The basic purposes of CEQA are to:

1. Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities;
2. Identify the ways that environmental damage can be avoided or significantly reduced;
3. Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved (14 CCR 15002).

The EIR process typically consists of three parts: (1) the Initial Study (IS) and Notice of Preparation (NOP), (2) the Draft EIR, and (3) the Final EIR. The IS/NOP is intended to encourage interagency communication concerning the proposed action and provide sufficient background information about the proposed action so that agencies, organizations, and members of the public can respond with specific comments and questions on the scope and content of the EIR. Here, the City prepared an Initial Study in order to determine whether the Proposed Project could potentially result in significant impacts to the environment, requiring preparation of an EIR. Based upon the information contained within the Initial Study, the City concluded that an EIR should be prepared.

The NOP was distributed to the State Clearinghouse, interested agencies, organizations, and persons on May 20, 2019. Specifically, the City sent the NOP to 26 agencies and organizations, along with a copy of the Initial Study on compact disc. The City also sent the NOP to property owners within a 300-foot buffer of the Plan area and to entities or individuals who own property within the Plan area. Recipients of the IS/NOP were requested to provide responses within 30 days after their receipt of the IS/NOP. Hardcopies of the IS/NOP were made available for review at the Montclair Branch Library and at the City's Community Development Department office. An electronic copy of the IS/NOP was also made available on the City's website. Additionally, a scoping meeting was held on May 28, 2019, at the City of Montclair City Council Chambers. A summary of the Proposed Project and the CEQA process was presented at the meeting. The purpose of this meeting was to seek input from public agencies and the general public regarding the environmental issues and concerns that may potentially result from the Proposed Project.

The 30-day IS/NOP public review period ended June 18, 2019. In response to the NOP, 5 written comment letters were received during the IS/NOP public review period. These letters and the

IS/NOP are included in Appendix A of this EIR. The comment letters provide recommendations for preparing the air quality analysis in the EIR, recommendations for the circulation/transportation design for the Proposed Project, recommendations for sustainability practices that could be incorporated into the Proposed Project, instructions for complying with Assembly Bill 52 and Senate Bill 18 (tribal consultation processes), recommendations for cultural resources assessments, and recommendations for hazardous materials assessments. One comment letter also expressed concerns regarding potential impacts to Moreno Elementary School and Serrano Middle School, both in terms of enrollment and potential hazards that the Proposed Project may pose to the schools. These comments were considered during preparation of the EIR. No CEQA-related comments were expressed at the scoping meeting.

This EIR focuses on the environmental impacts identified as potentially significant during the Initial Study and scoping process. The following issues were determined to be potentially significant and are therefore addressed in Chapter 3, Environmental Analysis, of this EIR:

- Aesthetics
- Air Quality
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

The EIR will be made available for review to the public and public agencies for 45 days to enable them to provide comments on the "sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (14 CCR 15204). The timeframe of the public review period is identified in the Notice of Availability attached to this Draft EIR. During this period, copies of the Draft EIR and the proposed MPDSP are available for review at the City of Montclair Community Development Department located at 5111 Benito Street, Montclair, California 91763, as well as www.cityofmontclair.org. During this period, comments from the general public, organizations, and agencies regarding environmental issues analyzed in the Draft EIR and the Draft EIR's accuracy and completeness may be submitted to the lead agency at the following address:

Michael Diaz, Community Development Director
City of Montclair
Community Development Department
5111 Benito Street
Montclair, California 91763
Email: mdiaz@cityofmontclair.org

As the lead agency for the Proposed Project, the City has assumed responsibility for preparing this document. The City's Planning Commission will act in an advisory role, and the City Council has final decision-making authority over the Proposed Project and associated discretionary actions. The City will use the information included in this EIR to consider potential impacts to the physical environment associated with the Proposed Project when considering approval. As set forth in Section 15021 of the State CEQA Guidelines, the City, as lead agency, has the duty to avoid or minimize environmental damage where feasible. Specifically, 14 CCR 15021(d) states that:

> CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment.

Prior to approval of the Proposed Project or an alternative to the Proposed Project, the City, as the lead agency and decision-making entity, is required to certify that this EIR has been completed in accordance with CEQA, that the Proposed Project has been reviewed and the information in this EIR has been considered, and that this EIR reflects the independent judgment of the City. CEQA also requires the City to adopt "findings" with respect to each significant environmental effect identified in the EIR (Pub. Resources Code Section 21081; Cal. Code Regs., Title 14, Section 15091). For each significant effect, CEQA requires the approving agency to make one or more of the following findings:

- The proposed project has been altered to avoid or substantially lessen significant impacts identified in the Final EIR.
- The responsibility to carry out such changes or alterations is under the jurisdiction of another agency.

- There are specific economic, legal, social, technological, or other considerations, which make infeasible the mitigation measures or alternatives identified in the Final EIR.

If the City concludes that the Proposed Project will result in significant effects that cannot be substantially lessened or avoided by feasible mitigation measures and alternatives, the City must adopt a "statement of overriding considerations" prior to approval of the Proposed Project (Pub. Resources Code Section 21081(b)). Such statements are intended under CEQA to provide a written means by which the lead agency balances in writing the benefits of the Proposed Project and the significant and unavoidable environmental impacts. Where the lead agency concludes that the economic, legal, social, technological, or other benefits outweigh the unavoidable environmental impacts, the lead agency may find such impacts "acceptable" and approve the Proposed Project.

In addition, the City must also adopt a Mitigation Monitoring and Reporting Program describing the changes that were incorporated into the Proposed Project or made a condition of Project approval in order to mitigate or avoid significant effects on the environment (Pub. Resources Code Section 21081.6). The Mitigation Monitoring and Reporting Program is adopted at the time of project approval and is designed to ensure compliance during project implementation. Upon approval of the Proposed Project, the City will be responsible for implementation of the Proposed Project's Mitigation Monitoring and Reporting Program. This document will be attached to the Final EIR.

1.3 EIR ORGANIZATION

This EIR is organized as follows:

An **Executive Summary** of the EIR is provided at the beginning of this document. This section provides a summary of the Proposed Project and the Proposed Project alternatives analyzed in the EIR, as well as a discussion of areas of known controversy associated with the Proposed Project. This section also includes a table summarizing all environmental impacts identified in this EIR along with the associated mitigation measures proposed to reduce or avoid each impact.

Chapter 1, Introduction, serves as a forward to this EIR, introducing the Proposed Project, the applicable environmental procedures, and the organization of the EIR.

Chapter 2, Project Description, provides a thorough description of the Proposed Project elements, the purpose and need for the Proposed Project, Proposed Project objectives, and required discretionary approvals. This chapter also includes a description of the intended uses of the EIR and public agency actions.

Chapter 3, Environmental Analysis, describes the potential environmental effects of the Proposed Project, as well as proposed mitigation measures to reduce or avoid any potentially significant impacts. The discussion in Chapter 3 is organized by 15 environmental issue areas as follows:

- Aesthetics
- Air Quality
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

Environmental issue areas that are listed in Appendix G of the State CEQA Guidelines but not included in Chapter 3 have been scoped out of the EIR through the Initial Study and scoping process. A discussion of those environmental issues areas and the justification for not carrying those environmental issue areas forward to this EIR can be found in the Initial Study, which is attached to this EIR as Appendix A.

For each environmental issue area addressed in Chapter 3 of the EIR, the analysis and discussion are organized into seven subsections as described below:

- **Existing Conditions –** This subsection describes the physical environmental conditions in the vicinity of the Proposed Project at the time of publication of the NOP. The environmental setting establishes the baseline conditions by which the City will determine whether specific Project-related impacts are significant.
- **Regulatory Setting –** This subsection describes the regulatory setting applicable to the environmental issue area and the Proposed Project at the time of publication of the NOP.
- **Thresholds of Significance –** This subsection identifies a set of thresholds by which the level of impact is determined. Thresholds that were eliminated from further review in the EIR as part of the Initial Study analysis will also be identified here.
- **Impacts Analysis –** This subsection provides a detailed analysis regarding the environmental effects of the Proposed Project and whether the impacts of the Proposed Project would meet or exceed the established significance criteria.
- **Cumulative Impacts –** This subsection discusses the cumulative effects of the Proposed Project in combination with the effects of other projects in the vicinity.

- **Mitigation Measures –** This subsection identifies potentially feasible mitigation measures that would avoid or substantially reduce any significant adverse impacts that are identified as a result of the Proposed Project.
- **Significance After Mitigation –** This subsection discusses whether Project-related impacts would be reduced to below a level of significance with implementation of the mitigation measures identified in the EIR. If applicable, this subsection also identifies any residual significant and unavoidable adverse effects of the Proposed Project that would result even with implementation of mitigation measures.

In addition to the seven subsections listed above, full citations for all referenced documents are included at the end of each section in a "References" subsection.

Chapter 4, Alternatives, discusses alternatives to the Proposed Project, including a No Project Alternative. This chapter describes the rationale for selecting the range of alternatives discussed in the EIR and identifies the alternatives considered by the City that were rejected from further discussion as infeasible during the scoping process. Chapter 4 also includes a discussion of the environmental effects of the alternatives that were carried forward for analysis and identifies the environmentally superior alternative.

Chapter 5, Other CEQA Requirements, addresses if there are any significant environmental effects that cannot be avoided, any significant irreversible environmental changes that would result from implementation of the Proposed Project, and any growth-inducing impacts associated with the Proposed Project.

Chapter 6, List of Preparers, gives names and contact information of those responsible for writing this EIR.

Appendices include various technical studies prepared for the Proposed Project, as listed in the Table of Contents.

The City, as the designated lead agency for the Proposed Project, is responsible for enforcing and verifying that each mitigation measure is implemented as required; however, the project applicant shall be responsible for implementing the mitigation measures as required by the Proposed Project. As part of the Final EIR process, a mitigation monitoring and reporting program will be prepared.

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CHAPTER 2
PROJECT DESCRIPTION

This chapter provides a description of the proposed Montclair Place District Specific Plan, referred to in this document as the "MPDSP" or "Proposed Project." Pursuant to Section 15124 of the California Environmental Quality Act (CEQA) Guidelines, this chapter describes the location, objectives, and characteristics of the Proposed Project, followed by a statement describing the intended uses of this EIR.

2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The City of Montclair (City), as the lead agency for the Proposed Project, is responsible for preparing environmental documentation in accordance with CEQA to determine if approval of the discretionary actions requested and subsequent development in the MPDSP area could have a significant impact on the environment.

This EIR is a program EIR that presents a programmatic analysis of the proposed MPDSP and analyzes full buildout of the MPDSP. The MPDSP area would likely be developed in a phased manner over the course of approximately 20 years. Pursuant to Section 15168(c) of the State CEQA Guidelines, future activities within the MPDSP area would be examined by the City in light of the assumptions and analysis presented in this EIR to determine whether an additional environmental document is required. If the City finds that no subsequent EIR would be required for the later activity, the City would be able to approve the activity as being within the scope of the project covered by this EIR, and no new environmental document would be required. As such, for future activities within the MPDSP area that implement and comply with the MPDSP and that do not exceed the development envelope addressed in this EIR, no new environmental document would be required. Conversely, if a later activity would have effects that were not examined in this EIR, a new initial study would be prepared, leading to either an EIR or a negative declaration. This later analysis would be able to tier from this program EIR as, provided in State CEQA Guidelines, Section 15152.

2.2 PROJECT SUMMARY

The proposed MPDSP would assign and create land use zones for parcels within the approximately 104.35-acre site (Plan area) located in downtown Montclair, just north of the Interstate 10 (I-10) freeway and just south of the City's North Montclair Downtown Specific Plan Area. The MPDSP would provide development standards and architectural guidelines to guide development in the Plan area through 2040. The majority of the Plan area (approximately 75 acres) is currently occupied by the existing Montclair Place Mall (Mall) properties. A key feature of the MPDSP would provide for the demolition of all or a portion of the existing Mall, some or all appurtenant free-standing outbuildings, and portions of the existing surface parking lots and

the parking structure to construct a pedestrian-oriented, mixed-use downtown district, with structured parking facilities through a series of planned phases. The maximum number of dwelling units envisioned by the MPDSP is approximately 5 million square feet of residential uses (or 6,321 dwelling units) and the total additional commercial square footage envisioned by the MPDSP is approximately 512,000 square feet. Additionally, the MPDSP includes provisions for the construction of a hotel with approximately 100 to 200 rooms. The MPDSP would replace the existing C-3 zoning of the NMSP for the Plan area with new mixed-use zones, thereby enabling the future development of commercial, office, multi-family residential, hotel, and mixed-use projects within walking and biking distance of the nearby Montclair Transcenter.

2.3 PROJECT LOCATION

The Plan area is located in the City of Montclair, in the western end of San Bernardino County (Figure 2-1, Regional Map), and approximately 36 miles east of downtown Los Angeles. The topographical area encompassing the City is known as the Chino Basin. The City lies in the northwest corner of the Chino Basin. The City is bordered by the cities of Pomona and Claremont to the west (in Los Angeles County), Upland to the north, Upland and Ontario to the east, and Chino to the south. The San Gabriel Mountains are located to the north, the Jurupa Mountains are located to the southeast, the Chino Hills and Santa Ana Mountains are located to the southwest, and the San José Hills are located to the west. Direct regional access to Montclair is provided by the I-10. The City extends both north and south of the I-10. The City limits and the Plan area boundary are shown in Figure 2-2, City of Montclair and Plan Area. The MPDSP area is located within a 10-minute drive of the Claremont Colleges and Cable Airport (see Figure 2-2, City of Montclair and Plan Area).

The Plan area is approximately 104.35 acres in size and is composed of numerous assessor parcels (see Table 2-1 for a list of the Assessor's Parcel Numbers that make up the Plan area). The Plan area is bounded by and includes the right-of-ways of Monte Vista Avenue on the west, the I-10 on the south, and Central Avenue on the east. The northern boundary of the Plan area extends along the southern boundary of the North Montclair Downtown Specific Plan (NMDSP), which occurs generally along the existing center line of Moreno Street (Figure 2-3a, Existing North Montclair Specific Plan and Adjacent Specific Plans). Existing land uses within the Plan area are shown on Figure 2-4, Plan Area and Surrounding Land Uses.

Local access to the Plan area is provided via Central Avenue, Moreno Street, and Monte Vista Avenue. The area surrounding the Plan area is characterized as urban and is largely built out with a mix of commercial, retail, and residential uses. The Plan area is currently located within the City's North Montclair Specific Plan (NMSP) area.

The Plan area is surrounded by mostly developed properties on all sides. Figure 2-4, Plan Area and Surrounding Land Uses, depicts the land uses and businesses that surround the Plan area. To the east, across Central Avenue, are a Chase Bank, McDonald's restaurant, and the Montclair East Shopping Center, which includes retail stores such as Petco, Harbor Freight Tools, Chipotle Mexican Grill, and Ross Dress for Less. To the north across Moreno Street, land uses include retail (Target and Gold's Gym), single-family residential, and multi-family residential. To the west, across Monte Vista Avenue, land uses include single-family and multi-family residential, assisted living, a dialysis center, an adult development center, and Moreno Elementary School. To the south, the Plan area is bordered by the I-10 and its right-of-way.

2.4 EXISTING SETTING

The Plan area and surrounding area is characterized as an urban, developed commercial and residential area. The Plan area and all surrounding properties have undergone disturbance previously resulting from development of the existing Mall and the commercial and residential uses that surround it. Vegetation within the Plan area is limited to ornamental landscaping associated with the existing development and several ornamental trees that currently buffer the Plan area from adjacent residential uses to the west. Planters with ornamental trees, shrubs, and grasses are scattered sparsely throughout the numerous surface parking lots within the Plan area. There are two vacant lots within the Plan area, both of which are highly disturbed, graded to varying degrees, and support only minimal amounts of low-growing vegetation (mostly annual weeds).

Typical residential development in the surrounding area ranges from one to three stories in height. Most of the surrounding commercial structures are one story in height. Existing buildings within the Plan area range in height between approximately 30 feet and 75 feet. Because of the relatively low height of most development within the Plan area, long-range viewsheds are relatively unobstructed; however, the proximity of the surrounding development generally obstructs long-range views from within the Plan area. Existing light sources come from both development within the Plan area and from surrounding commercial and residential uses.

The characteristics of the Plan area, including its existing conditions and surrounding land uses, are summarized in Table 2-1 (Site Information).

Table 2-1
Site Information

General Plan Designation	Regional Commercial
Zoning	C-3 General Commercial – North Montclair Specific Plan (NMSP)
Site Size	104.35 acres
Assessor's Parcel Number(s)	31 parcels: 1008-171-01; 1008-171-02; 1008-171-03; 1008-171-04; 1008-171-05; 1008-171-06; 1008-171-07; 1008-171-11; 1008-171-13; 1008-181-04; 1008-181-05; 1008-181-06; 1008-181-07;

Table 2-1
Site Information

	1008-191-01; 1008-191-02; 1008-191-03; 1008-191-04; 1008-321-04; 1008-321-07; 1008-341-08; 1008-351-07; 1008-321-10l 1008-331-06; 1008-331-07; 1008-331-08; 1008-331-09; 1008-331-15; 1008-331-16; 1008-341-04; 1008-341-08; 1008-351-07
Present Use	Regional mall, strip commercial development, freestanding restaurants, major furniture store, and surface parking uses
Surrounding Land Uses & Zoning	North: Commercial and Residential Uses • Corridor Residential and Town Center zones of the North Montclair Downtown Specific Plan (NMDSP) R-1 – Specific Plan 81-2South: I-10 Freeway East: Commercial Uses (C-3 General Commercial - NMSP) West: Commercial, Institutional and Residential Uses – NMSP • R-1 Single-Family Residential • R-3 Multiple Family Residential • C-2 Restricted Commercial
Access	Monte Vista Avenue and Central Avenue (north-south) and Moreno Street (east-west)
Ingress/Egress	Primary Access: Signalized entrance/exit at Central Avenue Secondary Access: Three signalized entrance/exits along Moreno Street; one signalized and two unsignalized entrance/exits along Monte Vista Avenue
Public Services	Water Supply: Monte Vista Water District Sewer Service: City of Montclair Solid Waste: Burrtec Waste Industries Fire Protection: Montclair Fire Department Police Protection: Montclair Police Department School District: Ontario-Montclair School District (K-8) and Chaffey Joint Union High School District (9-12)
Utilities	Gas Supply: The Gas Company Electric Supply: Southern California Edison Telephone: Frontier Cable TV: Spectrum and Frontier

Source: City of Montclair 2018.

The Plan area is served by all basic infrastructure, as listed in Table 2-1.

One groundwater recharge basin associated with the San Antonio Wash is located approximately ¼-mile west of the Plan area. There is another basin located to the north of this basin across Moreno Street, and two just south of this basin on either side of the I-10 freeway. All four basins are mapped as freshwater ponds by the U.S. Fish and Wildlife Service National Wetland Inventory. They are also mapped as being diked/impounded or excavated, indicating that the ponds are substantially modified and/or created by artificial means (USFWS 2018). These basins are surrounded by urban development.

Population and Housing Trends in the City

The estimated population for the City as of 2018, according to the Southern California Association of Governments, was 40,402 residents (SCAG 2019a). The City experienced a 4.4% population increase between 2016 and 2018, and forecasts show population growth continuing over the next 20 years, with an estimated population of 49,200 in 2045 (SCAG 2019b).

The current residential population in the Plan area is zero.

Commercial Development

Commercial land uses continue to dominate the Plan area. The existing, freestanding mix of commercial uses in the southern portion of the Plan area include the Montclair Entertainment Plaza, various restaurant uses, an LA Fitness Center, an Ashely Furniture store, and an optometrist's office. Montclair Place (formerly known as Montclair Plaza), a major regional mall, largely dominates the remaining planning area. There is a Unitarian Universalist Church and small commercial strip center in the northwest portion of the Plan area. Based on reviews of aerial photographs, the current pattern of commercial development in the NMDSP area (located just north of the MPDSP area) consists predominately of standalone large structures surrounded wholly or in part by paved surface parking.

Transportation and Transit

Major streets surrounding the Plan area include Central Avenue, Moreno Street, and Monte Vista Avenue. The MPDSP area is within ten miles of various regional destinations and transportation links, such as Ontario Airport, Cable Airport, and the Interstate 15 (I-15) and Interstate 210 (I-210) freeways. The I-10 freeway and Metrolink's San Bernardino commuter rail line provide direct regional access to the City. The I-10 freeway is an eight-lane grade-separated facility that is the most significant regional transportation facility serving the City.

The City is planned as the eastern terminus of the Foothill Gold Line railway extension to the Montclair Transcenter (although there has been some discussion of extending further east to Ontario International Airport), which will link Montclair with the foothill communities of the San Gabriel Valley and the City of Los Angeles. The construction of the Foothill Gold Line railway extension is subject to the jurisdiction of the Metro Gold Line Foothill Extension Construction Authority. Upon completion, the lines will be operated by, and will be under the jurisdiction of, the Los Angeles Metropolitan Transportation Authority.

Phase 2B of the Foothill Gold Line rail service is proposed for construction from Azusa to the Montclair Transcenter (located approximately 0.5 mile north of the Plan area). Pursuant to Assembly Bill 2574, the Montclair Transcenter is the designated terminus for the Foothill Gold

Line extension from Pasadena to Montclair. Planning for Foothill Gold Line Phase 2B (also known as the "Glendora to Montclair" project) began in 2003, and significant work has been completed for the segment. The Final EIR for the project was certified by the Construction Authority Board in March 2013. Advanced conceptual engineering was completed in 2016, and construction broke ground in December 2017. The first few years of the project were used to relocate and protect strategic utilities, conduct other pre-construction activities, hire the design-build team, and finalize design. In July 2019, the Construction Authority approved and certified a Supplemental EIR allowing for phased construction and operation of the Glendora to Montclair segment, in order to address funding issues. In August 2019, the Construction Authority awarded a design-build contract, and major construction is expected to start in late summer 2020. Construction of the Gold Line to Pomona is expected to be complete in 2025, and construction of the Gold Line to Montclair is expected to be complete in 2028, assuming that sufficient funding is secured (Foothill Gold Line 2020).

The Montclair Transcenter is an intermodal transit center located between Central and Monte Vista Avenues on Richton Street. Omnitrans, Foothill Transit, and the Riverside Transit Agency (RTA) all provide bus service from the Transcenter, with Foothill Transit and RTA providing express service and Foothill Transit and Omnitrans providing local service. Commuters also use the Montclair Transcenter as a park and ride facility.

The Montclair Transcenter is also a station on the Metrolink San Bernardino Line. The station serves as the dividing line between Foothill Transit's service area and Omnitrans' service area. Omnitrans buses run to the east, while Foothill Transit buses run to the west. The Montclair Transcenter is the largest such facility between Union Station in the City of Los Angeles and San Bernardino Station in the City of San Bernardino.

Parking

Under existing conditions, the Plan area provides a total of 6,595 parking spaces as follows:

- The Mall property currently provides for approximately 5,788 parking spaces. Of these spaces, 4,802 are provided in the surface parking lots surrounding the Mall. Additionally, there is a two-level parking structure fronting Moreno Street that provides 986 parking spaces.
- The group of properties to the south of the Mall property provide approximately 695 parking spaces.
- The Monte Vista Unitarian Universalist Congregation Church property provides approximately 44 parking spaces.
- The mini-mall property at the southeast corner of Monte Vista Avenue and Moreno Street provides approximately 38 parking spaces.

Utilities

The Plan area is currently served with all necessary utilities. Utilities may not extend to each parcel, but utilities are available in developed roadway right-of-ways. The following provides specific information about each type of utility:

- **Stormwater Conveyance and Detention**. Stormwater in the Plan area is conveyed through City-owned infrastructure connected to the Chino Basin Water Conservation District and San Bernardino County Flood Control District storm drains. Stormwater in the Plan area is conveyed to a groundwater recharge basin associated with the San Antonio Wash located approximately ¼-mile west of the Plan area, and operated by the Chino Basin Water Conservation District and the Chino Basin Watermaster.
- **Electrical Power**. Power is provided by Southern California Edison.
- **Water Supply.** Water is supplied by the Monte Vista Water District.
- **Sanitary Sewer Service.** The City's domestic wastewater is conveyed via City-owned and maintained infrastructure to treatment facilities owned and maintained by the Inland Empire Utilities Agency (IEUA). The wastewater is disposed of at one of two locations. Most of the sewage flows to the Carbon Canyon Wastewater Reclamation Facility in Chino, while a small amount flows to the Regional Plant No. 1 in south Ontario.

Government Services

The Plan area is currently served with all the standard government services such as fire, police, school, and a public library operated by the San Bernardino County Library System.

- **Fire Services.** Fire Station No. 151 is currently situated just north of the Plan area at the southeast corner of Monte Vista Avenue and Arrow Highway. A second fire station (Fire Station No. 152) is located in the southern portion of the City, near the intersection of Monte Vista Avenue and Mission Boulevard. Fire Station No. 151 is currently outfitted with a three-person engine and a Type 1 engine. The Plan area is served by 18 firefighters, three chief officers, and one fire investigator.
- **Police Services.** Police protection services in the City are provided by the Montclair Police Department, located at 4870 Arrow Highway, on the northwest corner of Arrow Highway and Monte Vista Avenue. The Montclair Police Department employs approximately 53 sworn officers. Typically, the station is staffed with at least four patrol officers per shift.
- **Schools.** Currently no schools are located in the Plan area. However, the Plan area is served by Moreno Elementary School and Serrano Middle School. Moreno Elementary School is located on Moreno Street, and Serrano Middle School is located on San José

Street, both of which are both located approximately 740 feet and west of the Plan area. Montclair High School serves the entire City and is located on Benito Street, approximately 0.7 mile southwest of the Plan area.

- **Library.** The Montclair Branch of the San Bernardino County Library system is located at 9955 Fremont Avenue in the Montclair Civic Center, approximately 0.75 mile south of the Plan area. The Montclair Library is one of the largest facilities in the regional library system, encompassing 20,200 square feet and 59,100 volumes. The library serves approximately 14,000 patrons per month.

Airports

The City is located within the Airport Influence Area (AIA) of the Ontario International Airport (ONT) Airport Land Use Compatibility Plan (ALUCP). The ONT ALUCP establishes a set of procedural and compatibility policies that set limits on future land uses and development within the Ontario International Airport AIA in order to address noise, safety, airspace protection, and overflight impacts of current and future airport activity within the AIA (City of Ontario 2011).

The City is also located within the AIA of the Cable ALUCP. The Cable ALUCP establishes a set of procedural and compatibility policies that set limits on future land uses and development within the Cable Airport AIA in order to address noise, safety, airspace protection, and overflight impacts of current and future airport activity within the AIA (ALUC 1981).

General Plan and Zoning

The City's General Plan (General Plan) was adopted in 1999, though the General Plan Housing Element has been subsequently updated. The General Plan is currently being updated. The Plan area is located within the Regional Commercial land use designation and is within Sub-area 1 of the General Plan study area. The total area classified as Regional Commercial within the City, including the Mall property, totals approximately 125 acres. The General Plan characterizes the Montclair Plaza (Place) Mall as a major regional shopping center that provides for the sale of general merchandise, apparel, furniture, and home furnishings, along with support services. The Montclair Plaza (Place) Mall and surrounding commercial areas are intended to draw shoppers from a relatively large regional market area. As a regional shopping center located in close proximity to a variety of urban areas, the mall attracts shoppers from Los Angeles, San Bernardino, Orange, and Riverside counties. The General Plan notes that the major expansion to the mall in 1985 and the subsequent addition of other promotional centers around the mall since that time have helped maintain the strength of the retail sector of the local economy (City of Montclair 1999).

The 1998 NMSP is the current guiding zoning document for the Plan area and surrounding areas south of Moreno Street. According to the NMSP, the Plan area is designated in the Montclair Zoning and Development Code (the Zoning Code) as General Commercial and is zoned C-3 (City of Montclair 1998). The C-3 General Commercial Zone is the designation intended for general business uses in the City of Montclair. The uses that would be located within the Plan area (such as retail stores, restaurants/cafes, and theaters) are all permitted or conditionally permitted uses within the C-3 zone. These uses would be consistent with those allowed in the C-3 zone and would also be consistent with the Regional Commercial General Plan designation. However, the proposed residential uses under the Plan would not be consistent with the current designation. Thus, a General Plan Amendment would be required to change the land use designation of the Plan area to Planned Development land use designation. In addition, the Proposed Project would require a Specific Plan Amendment to remove the Plan area from boundaries of the North Montclair Specific Plan (NMSP) (see Figure 2-3b, Proposed Amendment to the North Montclair Specific Plan). Two ordinances would be required for the proposed project in order to amend the NMSP and to create the MPDSP.

The NMSP sets forth the current applicable development criteria and standards for the Plan area, including a maximum building height of 75 feet. The Plan area is also subject to the provisions of the Zoning Code that are not replaced or modified by the NMSP (City of Montclair 1998).

The areas north of Moreno Street (across from the Plan area) are located within the NMDSP area. This plan was originally adopted in 2006 and updated in 2017 and sets forth transit-oriented development land use regulations for the areas near the Montclair Transcenter, which is currently a stop on the Metrolink San Bernardino Line and is a planned future stop for the Foothill Gold Line rail line. The Plan area is approximately 0.5 mile south of the existing railroad tracks and is not within the NMDSP area.

2.5 PROJECT BACKGROUND

Planning Background

The MPDSP is being proposed within the context of several other planning efforts for improvements and development in downtown Montclair. These plans are described below.

1998 North Montclair Specific Plan

In 1998, the City adopted the NMSP in order to provide more detailed planning for the part of the City adjacent to I-10 freeway. Although the majority of the NMSP area is located on the north side of the I-10 freeway, a smaller area on the south side the freeway was included and largely developed with a Costco Warehouse store and fueling facility, and three new car auto dealerships.The NMSP addressed issues associated with economic vitality, design,

redevelopment, compatibility, transportation, and pedestrian access within an approximately 640-acre planning area located south of the northern City limit and north of the I-10. Although the NMSP provided new design concepts for the area, including pedestrian-oriented design, the City had mixed success implementing the Plan.

North Montclair Downtown Specific Plan

The North Montclair Downtown Specific Plan (NMDSP) is a new specific plan carved out of the NMSP adopted in 1998 (described above). The areas north of Moreno Street (across from the Plan area) are generally within the NMDSP area. This plan was adopted in 2006 and sets forth transit-oriented development land use regulations for the areas near the Montclair Transcenter, which is currently a stop on the Metrolink San Bernardino Line and is a planned future stop for the Metro Gold Line light rail line. The Plan area is approximately 0.5 mile south of the existing railroad tracks and is not within the NMDSP area (City of Montclair 2006). The NMDSP was amended in 2017 to expand the boundaries of the North Montclair Specific Plan area and introduce certain land use concepts and clarify certain standards.

Downtown Infrastructure and Streetscape Plan

The Downtown Infrastructure and Streetscape Plan recommends changes to the design of streets in the area bounded by Central Avenue, I-10, Monte Vista Avenue, and Richton Street. It also recommends cross-sections for streets adjacent to Montclair Place, as well as Fremont Avenue north of Montclair Place. The Downtown Infrastructure and Streetscape Plan has not yet been formally adopted.

Need for the Project

The primary goal of the MPDSP is to create a pedestrian-oriented, multi-modal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line that would extend light rail line service to the City of Montclair. This downtown environment would be built on an interconnected network of tree-lined streets that connect inviting parks, greens, and plazas. Its buildings would be built close to, and directly accessible from, the sidewalk. Parking would be located behind buildings or will be subterranean.

The existing General Commercial (C-3) and NMSP zoning prohibit the development of such an environment. Residential uses and park/playground uses are not permitted. In addition, the existing C-3 and NMSP permit uses, by-right, that are inconsistent with the pedestrian-oriented, mixed-use vision for the MPDSP area. Examples of some of these incompatible uses include: auto parts sales (with installation); automobile body and fender repair shops; refrigerated lockers; and used car sales areas. Buildings accommodating these land uses are not currently present in

the Plan area, and therefore, removal of these uses from the land use requirements does not result in the presence of non-conforming buildings or uses.

In addition, the C-3 development standards are not conducive to generating a pedestrian-oriented, mixed-use setting. For example, required front setbacks are 35 to 75 feet; parking is permitted between buildings and the sidewalk/street; and the maximum lot coverage is 50 percent.

As such, the MPDSP would enable the future development of commercial, multi-family residential, hotel, and mixed-use projects within walking and biking distance of the Montclair Transcenter. The MPDSP would assign and create appropriate land use zones for parcels within the Plan area and provide development standards and architectural guidelines to guide development within the MPDSP area through 2040. These standards are intended to complement the development standards and architectural guidelines contained in the NMDSP, adopted in 2006 and amended in 2017.

2.6 PROJECT OBJECTIVES

Section 15124(b) of the State CEQA Guidelines states that the project description of an EIR shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the Proposed Project is to redevelop and revitalize an underutilized site within downtown Montclair to support increased density, activity, and multi-modal transportation opportunities within proximity to transit opportunities.

The Proposed Project's specific objectives are provided below.

- Enable phased redevelopment of the existing Montclair Place Mall and the area south of the Mall including the Ashley Furniture site and the Montclair Entertainment Plaza area. The time frame for build-out in the Plan area is anticipated to take up to 20 years.
- Create a pedestrian-oriented, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and anticipated extension of the Foothill Gold Line railway.
- Replace the existing C-3 zoning with new mixed-use zones that permit residential use in standalone and mixed-use configurations and office.
- Introduce appropriate land use zones and uses, intensity levels, and future street patterns for properties in the Plan area.
- Provide zoning that is flexible and responsive to changing market demands.
- Account for an increase in the maximum number of dwelling units and additional commercial/office square footage allowable by the Plan. The maximum amounts envisioned

by the Plan are approximately 6,321 dwelling units (5 million square feet of residential uses) and a total of 512,000 additional square feet of commercial/office uses.

- Introduce form-based development, massing, and architectural standards to successfully implement the Plan.
- Reduce automobile trips by creating a mixed-use, pedestrian-oriented, multi-modal, park-once environment with access to alternative modes of transportation, including walking, biking, Metrolink, the proposed Foothill Gold Line railway extension, and curb space for transit network companies such as Uber and Lyft.

2.7 PROJECT COMPONENTS

The MPDSP would guide land uses for the approximately 104.35-acre Plan area and allow development within this Plan area as defined in the MPDSP. The key project components of the MPDSP include the following:

New Form-Based Zoning

The MPDSP creates a policy framework for transforming the Plan area into a pedestrian-oriented, multi-modal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line railway. Figure 2-5, Illustrative Build-Out Scenario, shows the Plan area upon buildout of the Plan. (The buildout scenario shown in Figure 2-5 assumes that the Mall would be completely replaced by mixed-use development. It is currently unknown whether the entire Mall would ultimately be removed or whether portions of the Mall may remain upon buildout. However, full buildout of the Plan is analyzed in this EIR as a worst-case scenario.)

Key components of the MPDSP include:

- **The Plan.** This chapter describes the vision for the overall plan, as well as for each of the Plan area's subareas. The document is illustrated with plans, perspective renderings, and precedent images.
- **Infrastructure.** This chapter describes recommended transportation improvements to the Plan area and its vicinity. It includes a street network plan and associated cross sections; a bicycle and pedestrian connectivity plan to nearby transit (the Montclair Transcenter and adjacent bus lines), nearby schools, and parks; the approach for parking, including on-street parking, park-once structures, and parking management strategies; and, descriptions of various multi-modal components and strategies, including bicycle and scooter amenities and parking and transportation network company curb space for Uber and Lyft. The MPDSP introduces street standards

derived from the NMDSP. This chapter also describes the proposed distribution, location, and extent of the utilities infrastructure (water, sewer, storm water, power, natural gas, telephone, and cable)and other facilities to support the proposed development within the Plan area.

- **Open Space and Landscape.** This chapter describes the various components of the Plan area's public realm, including streetscape improvements and proposed open spaces. It includes standards for streetscapes, such as a street tree master plan and conceptual layouts for various streets within the Plan area.
- **Development Code.** This chapter is a form-based code that enables a varied mix of uses, including residential, office, service, retail, civic, institutional, , and provides development standards (building height, setbacks, frontage requirements, on-site open space, parking placement and standards) and building design standards (massing, articulation, materials, openings, landscape, screening, signage, etc.). This chapter also provides subdivision and block size requirements and standards for streetscape, landscape, hardscape, and public art within public streets and publicly accessible parks, plazas, and greens. The Development Code would replace the underlying zoning with four new zones. These zones are depicted in Figure 2-6, Proposed Zones, and are described below:
    - **District Corridor (COR).** The District Corridor zone would apply to parcels along the western portion of the Plan area adjacent to Monte Vista Avenue. Mixed-use buildings accommodating a mix of residential and commercial uses would be allowed to extend up to 55 feet in height. Buildings with retail ground floor uses would be located at or near the sidewalk, while buildings with residential ground floors would be set back behind small front yards. To encourage pedestrian activity, all buildings would be accessed directly from the sidewalk through appropriate frontage types or through lobbies. New buildings within the District Corridor zone would be required to have a minimum floor area ratio of 1.0.
    - **District Place (PLA).** The District Place zone would apply to the southern portion of the Plan area. Buildings would be allowed to extend up to 55 feet in height and would accommodate office, and other commercial uses. While residential uses would be allowed in this district, they would be generally discouraged due freeway proximity. Buildings with retail ground floor uses would be located at or near the sidewalk, while buildings with residential ground floors would be set back behind small front yards. To encourage pedestrian activity, all buildings would be accessed directly from the sidewalk through appropriate frontage types or through lobbies. New buildings within the District Place zone would be required to have a minimum floor area ratio of 1.0.

- **District Commons (COM).** The District Commons zone would allow for urban, mixed-use buildings extending up to 90 feet in height and situated at or near the sidewalk. Primary building access would be from the sidewalk, and parking would be behind buildings or subterranean. Buildings with retail ground floors would be located at the back of sidewalk while buildings with residential ground floors would be set back with small front yards. New buildings within the District Commons zone would be required to have a minimum floor area ratio of 1.3.
- **District Center (CEN).** The District Center zone would allow for urban, mixed-use buildings ranging between 55 feet and 240 feet in height. This zone would be located in the area primarily occupied by the existing Mall building. Buildings would be located at the back of sidewalk and would be accessed from the sidewalk. Parking would be behind buildings or subterranean. New buildings within the District Center zone would be required to have a minimum floor area ratio of 2.0.

- **Implementation.** This chapter discusses the key economic goals, policies, and actions for implementation of the MPDSP, the subdivision of property, any necessary on-site street, park, and infrastructure improvements, and a description of strategies for funding these improvements. It also discusses strategies for funding public art and provides a framework for transferring development rights from one zone to another in response to market conditions.

Development Potential

Implementation of the MPDSP would alter the development potential for the planning area when compared to the existing condition. The development potential refers to the ultimate development scenario, including dwelling units and commercial space, proposed at the culmination of the MPDSP timeframe. This scenario is expressed in the text, illustrations, and phasing diagrams of the MPDSP.

Table 2-2 (MPDSP Residential Buildout) and Table 2-3 (MPDSP Non-Residential Buildout) compares the development potential of the MPDSP with the existing condition. Table 2 shows the anticipated base development potential, as well as the maximum development potential, inclusive of a 15% affordable and senior housing density bonus.

Table 2-2
MPDSP Residential Buildout

Land Use	Existing Dwelling Units	Proposed Dwelling Units			Proposed Change over Existing
		Proposed Base [1]	*Proposed 15% Density Bonus*	*Proposed Total*[2]	
Single-Family	0	0	0	0	0

Table 2-2
MPDSP Residential Buildout

Land Use	Existing Dwelling Units	Proposed Dwelling Units			Proposed Change over Existing
		Proposed Base [1]	*Proposed 15% Density Bonus*	*Proposed Total[2]*	
Multi-Family	0	5,496	825	6,321	6,321
Condominium	*0*	*1,099*	*165*	*1,264*	*1,264*
Apartment	*0*	*4,397*	*660*	*5,057*	*5,057*
Total	**0**	**5,496**	**825[3]**	**6,321**	**6,321**

1 Base residential buildout derived by multiplying the total net area within each zone by 122.03 dwelling unit (du)/acre for the District Center Zone, 88.95 du/acre for the District Commons Zone, 40.67 du/acre for the District Corridor Zone, and 56.74 du/acre for the District Place Zone. Residential buildout calculations do not include private right-of-ways or pubic open spaces.

2 Residential buildout with density bonus derived by multiplying the total net area within each zone by 140.38 du/acre for the District Center Zone, 102.25 du/acre for the District Commons Zone, 46.75 du/acre for the District Corridor Zone, and 65.41 du/acre for the District Place Zone. Residential buildout calculations do not include private right-of-ways or pubic open spaces.

3 Total includes 165 condominiums and 660 apartments. No Single-Family dwelling units are proposed.

As shown in Table 2-2, the development potential allowed under the MPDSP would provide for an additional 6,321 dwelling units in the MPDSP area (assuming the full 15% affordable/senior housing density bonus is applied).

Table 2-3
MPDSP Non-Residential Buildout[1]

Existing Land Use	Existing Square Footage	Proposed Square Footage					Proposed Change
		District Corridor	*District Place*	*District Commons*	*District Center*	*Proposed Total*	
Montclair Place (Mall)	1,289,845	156,212	0	858,909	862,960	1,878,081	588,236
Out Parcels	256,428	0	180,827	0	0	180,827	-75,601
Non-Residential	**1,546,273**	**156,212**	**180,827**	**858,909**	**862,960**	**2,058,908**	**512,635**

1 Nonresidential Build-out includes, office, retail, and service uses. Non-residential buildout derived by multiplying the total net area within each applicable zone by a floor area ratio (FAR) of 1.17 for the District Center Zone, 0.68 for the District Commons Zone, 0.39 for the District Corridor Zone, and 0.51 for the District Place Zone. Non-residential buildout calculations do not include private rights-of-way or pubic open spaces.

As shown in Table 2-3, the development potential allowed under the MPDSP would provide for an additional 512,635 square feet of non-residential space in the MPDSP area.

2.8 RELATED PROJECTS

The State CEQA Guidelines require that an EIR discuss the cumulative impacts of a project, taken together with other past, present, and probable future projects producing related impacts. The cumulative analysis for the Proposed Project is presented throughout Chapter 3 of this EIR, in a "cumulative impacts" subsection for each environmental issue area. The

State CEQA Guidelines Section 15130 allows for the use of two alternative methods to determine the scope of the cumulative impacts analysis. This analysis uses both methods, depending on the environmental issue and the timeframe that is being discussed. (Due to the programmatic nature of this analysis and the 20-year buildout horizon for the MPDSP, the Proposed Project's cumulative impacts beyond the next approximately 5 years are generally evaluated using the projection method, while cumulative impacts within the near future are evaluated using the list method and/or the projection method.)

- **List Method.** A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency. These projects will be referred to as "related projects." Past, present, and probable future projects with the potential to combine with the Proposed Project to produce cumulative effects are listed in Table 2-4 (Related Projects).
- **Projection Method.** A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Applicable plans that are used in this analysis include the 2016 Air Quality Management Plan, the Southern California Association of Government's Regional Transportation Plan/Sustainable Communities Strategy, and general plans for the cities of Montclair, Claremont, Upland, Pomona, Chino, and Ontario.

The State CEQA Guidelines Section 15130 also states that lead agencies should define the geographic scope of the area affected by a cumulative impact and provide a reasonable explanation for the geographic limitation that is used. The geographic area that could be affected by implementation of the Proposed Project in combination with other projects varies depending on the type of environmental resource being considered. For instance, cumulative aesthetics or noise impacts are more localized, whereas cumulative air quality and greenhouse gas emissions impacts occur on a broader regional or global scale. The geographic scope for each environmental topic is identified in the respective cumulative impact discussions throughout Chapter 3 of this EIR.

Table 2-4 below includes the approved, under construction, or proposed development projects within the vicinity of the Proposed Project. The list of development projects is derived from lists made available by the cities of Claremont, Montclair, Upland, Pomona, and Chino.[1] The general plan and regional plan projections used for the "projection method" of analysis take into consideration future potential projects that may not be included in the list below and that may currently be unknown.

[1] The City of Ontario, which is also within the vicinity of the Proposed Project, was contacted to determine whether there were any past, present, or probable future projects that may produce related or cumulative impacts when combined with the Proposed Project. The City of Ontario determined that there were no such related projects within its jurisdiction at this time.

Table 2-4
Related Projects

No.	Project	Land Use Type	Land Use Intensity
City of Claremont			
1	Claremont McKenna College Master Plan	college/university	250 students
2	Gable Crossing	multi-family residential	60 dwelling units
3	Tentative Tract Map 62814	multi-family residential	13 dwelling units
4	Foothill East - The Commons	single-family residential	25 dwelling units
		multi-family residential	78 dwelling units
		shopping center	5,600 square feet
5	Doubletree Hotel/Old School House Specific Plan	multi-family residential	126 dwelling units
6	Parkview Specific Plan (Sycamore Hills)	single-family residential	400 dwelling units
		shopping center	78,000 square feet
7	Harvey Mudd College 2015 Master Plan Amendment	college/university	100 students
8	Village Lofts	multi-family residential	74 dwelling units
		shopping center	5,000 square feet
9	Scripps College Dormitory	off-campus student apartments	110 residents
10	Pomona College 2015 Master Plan	college/university	50 students
11	Claremont Graduate University Master Plan	college/university	475 students
12	Mt San Antonio Gardens Master Plan	senior adult housing - detached	19 dwelling units
		senior adult housing - attached	46 dwelling units
13	Peppertree Square Retail/Restaurant Pad Building	shopping center	5,749 square feet
14	John Elway's Claremont Chrysler Dodge/Jeep/Ram	used automobile sales	67,700 square feet
15	Keck Graduate Institute	college/university	300 students
16	Western Christian Schools	private school	63 students
17	Knight's Inn Renovation (formerly proposed as new Hampton Inn & Suites)	motel	56 rooms
City of Montclair			
18	Bravo	multi-family residential	90 dwelling units
19	Village at Montclair	shopping center	25,000 square feet
		multi-family residential	360 dwelling units
20	Arrow Highway Warehouse	warehouse	93,000 square feet
21	Contractor Office & Warehouse	warehouse	5,795 square feet
22	Montclair Senior Assisted Living	assisted living	152 beds
23	Vista Court	multi-family residential	23 dwelling units
24	Alexan Montclair	multi-family residential	211 dwelling units
City of Upland			
25	Upland Commons	multi-family residential	48 dwelling units
26	Tract Map (TM) 18249	single-family residential	223 dwelling units
27	TM 18274	single-family residential	145 dwelling units
28	The Enclave at Upland	single-family residential	350 dwelling units
29	1985 11th Street	warehouse	67,990 square feet
30	TM 18951	single-family residential	78 dwelling units

Table 2-4
Related Projects

No.	Project	Land Use Type	Land Use Intensity
31	Specific Plan (SP) 16-14	warehouse	76,000 square feet
32	Design Review (DR) 18-08	warehouse	41,490 square feet
33	SP 16-20	single-family residential	40 dwelling units
34	SP 16-26	multi-family residential	23 dwelling units
City of Pomona			
35	Towne/Foothill Hotel	motel	132 rooms
36	Mixed Use Project in Pomona Corridors Specific Plan	mid-rise residential with 1st-floor commercial	650 dwelling units
37	Auto Body Assembly	manufacturing	29,000 square feet
38	Reservoir Street Warehouse	warehouse	72,000 square feet
City of Chino			
39	Andy's Burgers	fast-food restaurant with drive-through window	4,925 square feet
40	Planet Fitness Gym	health/fitness club	20,275 square feet
41	Adult Day Care Center	day care center	5,271 square feet
42	Pine Tree Motel Expansion	motel	32 rooms
43	10th Street Assisted Living Facility	assisted living	74 beds
44	Monte Visa/Riverside Homes	single-family residential	5 dwelling units
45	Public Charter School	charter elementary school	6,670 square feet
46	Monte Visa/Gettysburg Homes	single-family residential	4 dwelling units
47	Francis Avenue Homes	single-family residential	39 dwelling units

Source: Appendix F

2.9 INTENDED USES OF THIS EIR

An EIR is a public document used by a public agency to analyze the potential environmental effects of a project and to disclose possible ways to reduce or avoid potentially significant environmental impacts, including alternatives to the proposed project. As an informational document, an EIR does not make recommendations for or against approving a project. The main purpose of an EIR is to inform public agency decision makers and the public about potential environmental impacts of the project (State CEQA Guidelines Section 15121). This EIR will be used by the City, as the lead agency under CEQA, in making decisions with regard to the Proposed Project described above and the related approvals listed below.

The City is expected to use the EIR in its decision-making relative to the MPDSP. The required discretionary approvals sought by the City consist of the following:

1. A General Plan Amendment (GPA) to reflect the new land uses permitted within the MPDSP area. This area would be re-designated in the General Plan from Regional Commercial to Planned Development.
2. A zone change in the official City of Montclair Zoning Map and other exhibits to reflect the new zoning for the MPDSP.
3. In addition, the project would require a Specific Plan Amendment to remove the Plan area from boundaries of the NMSP.
4. Approval of the MPDSP.

Other regulatory agencies that may also require permits or other approvals for the Proposed Project include:

- Airport Land Use Commission review for Cable Airport and Ontario International Airport;
- Native American Heritage Commission and affiliated Tribes for the Assembly Bill 52 consultation process;
- California Native American tribes for the Senate Bill 18 consultation process; and
- Monte Vista Water District approval for the Water Supply Assessment (WSA).

2.10 REFERENCES

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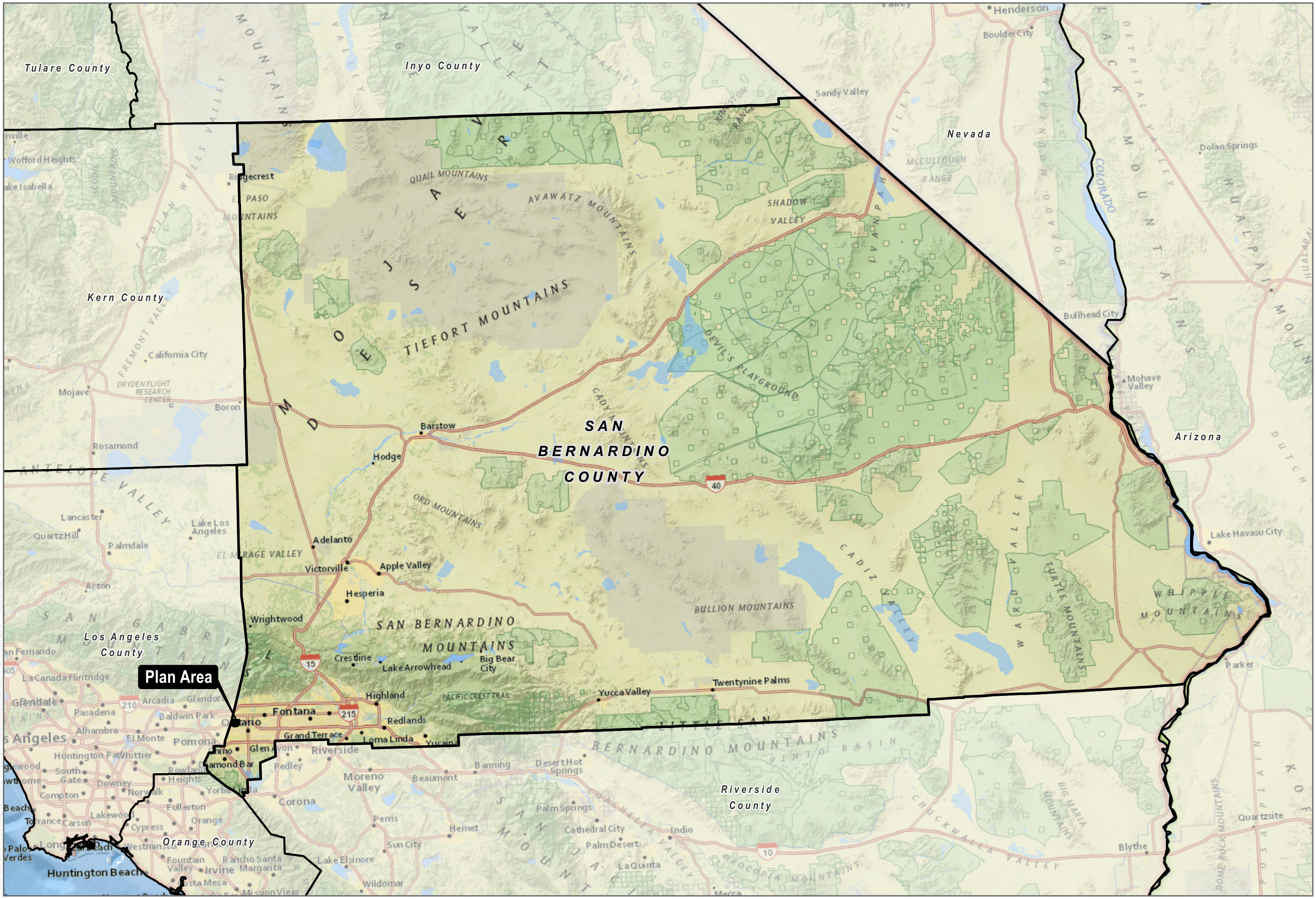

SOURCE: ESRI 2018

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0 65,000 130,000 Feet

FIGURE 2-1

Regional Map

Montclair Place District Specific Plan EIR

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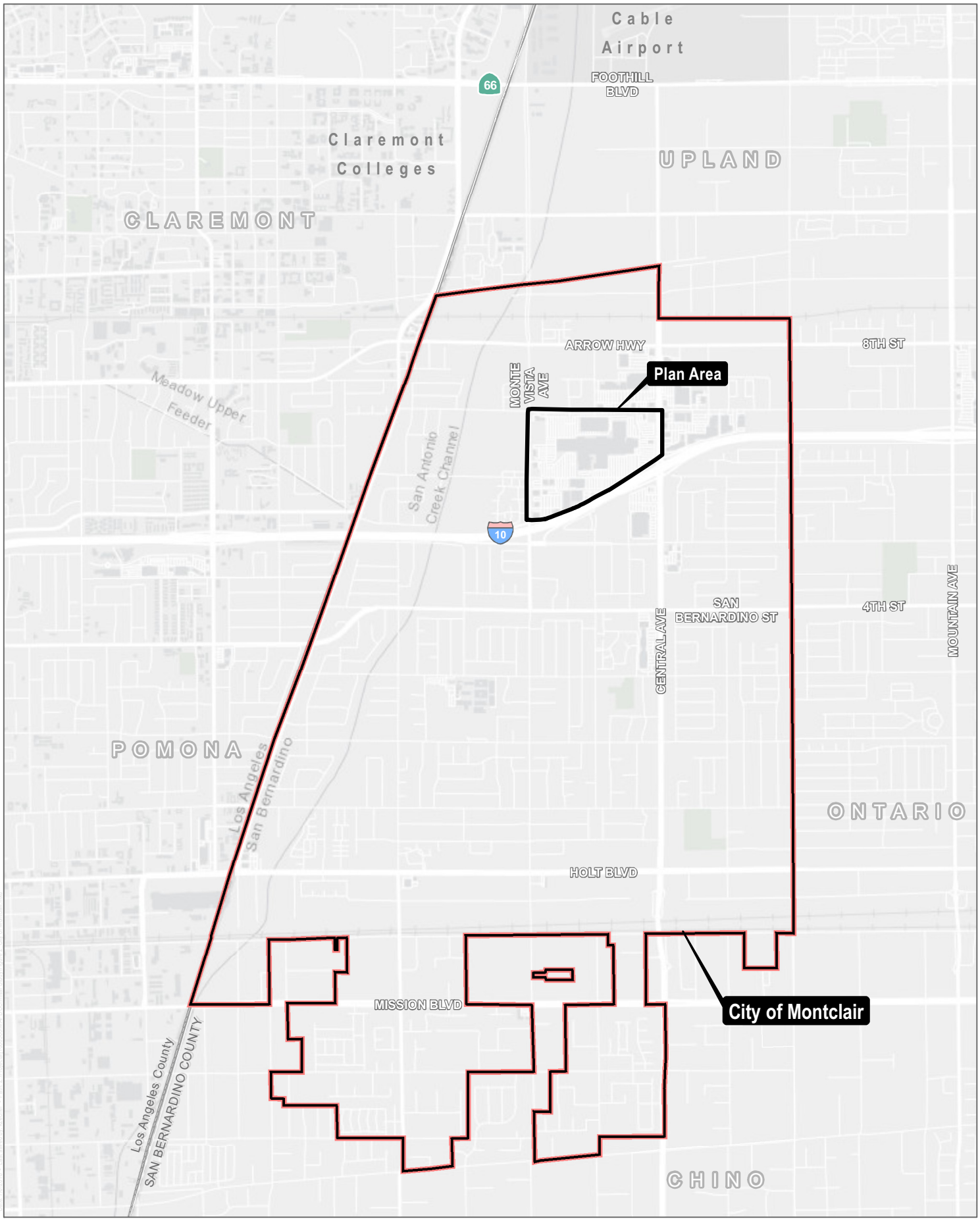

SOURCE: ESRI 2018

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FIGURE 2-2

City of Montclair and Plan Area

Montclair Place District Specific Plan EIR

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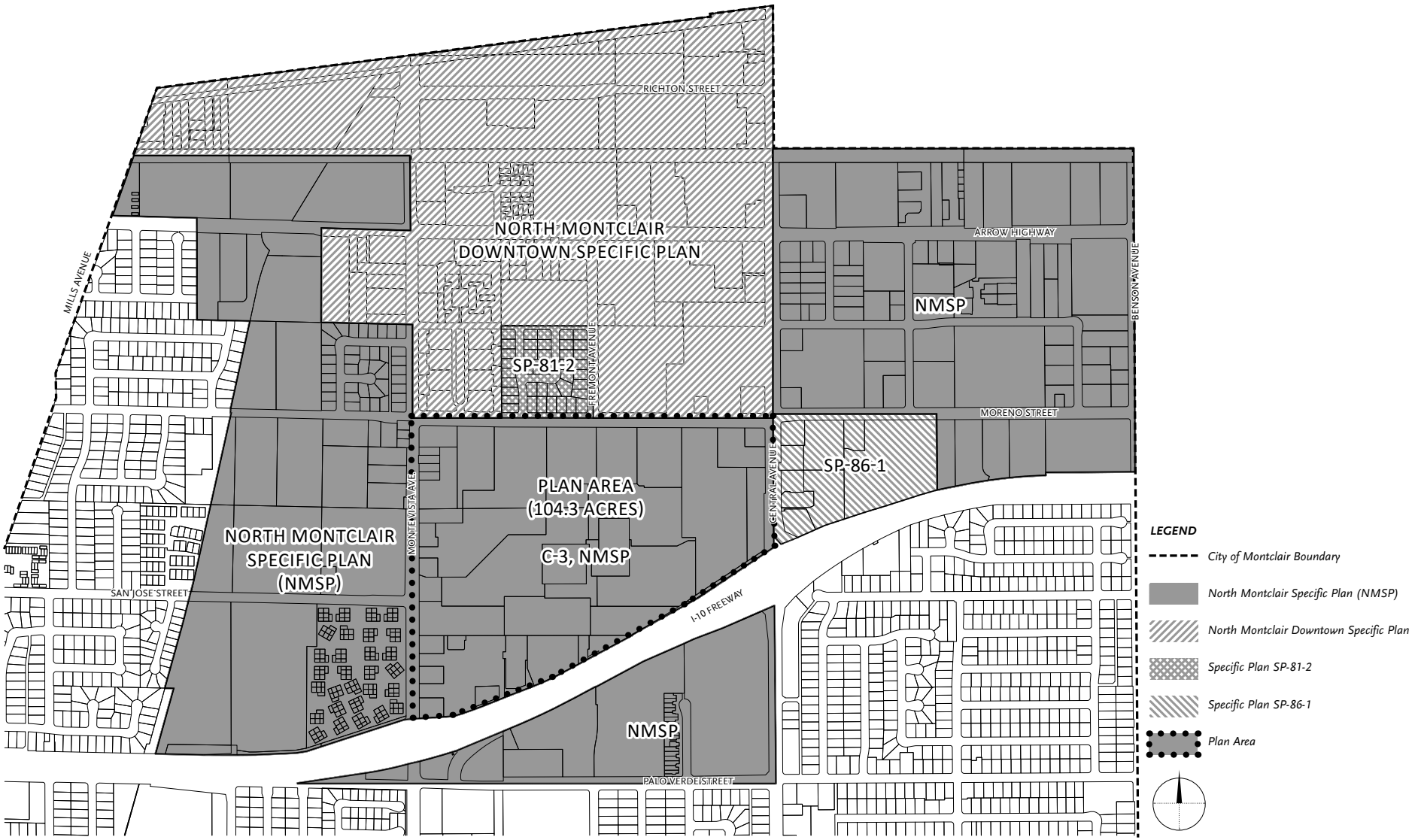

SOURCE: Montclair Place Specific Plan 2020

FIGURE 2-3a

Existing North Montclair Specific Plan and Adjacent Specific Plans

Montclair Place District Specific Plan EIR

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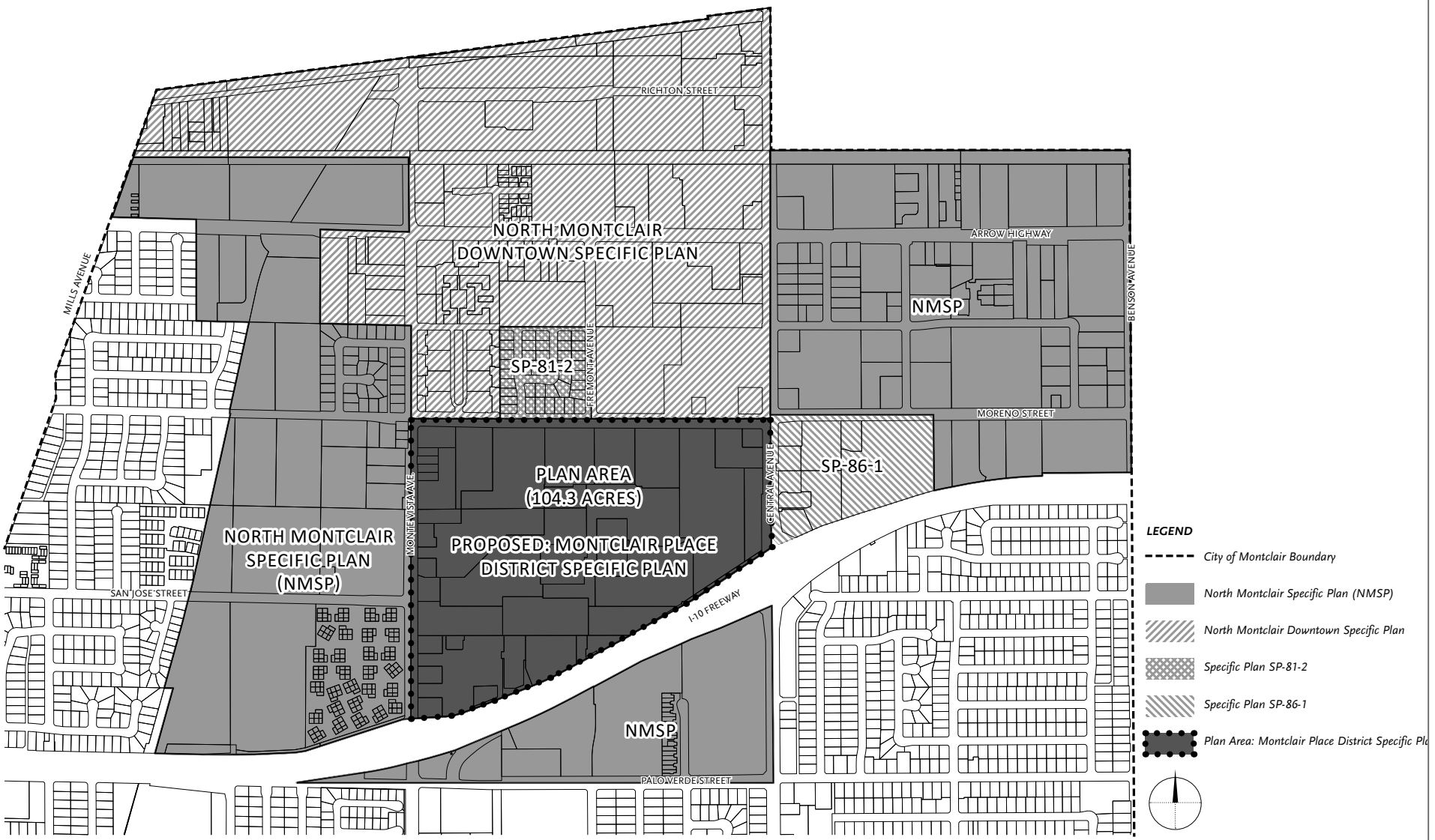

SOURCE: Montclair Place Specific Plan 2020

FIGURE 2-3b

Proposed Amendment to the North Montclair Specific Plan

Montclair Place District Specific Plan EIR

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FIGURE 2-4

Plan Area and Surrounding Land Uses

Montclair Place District Specific Plan EIR

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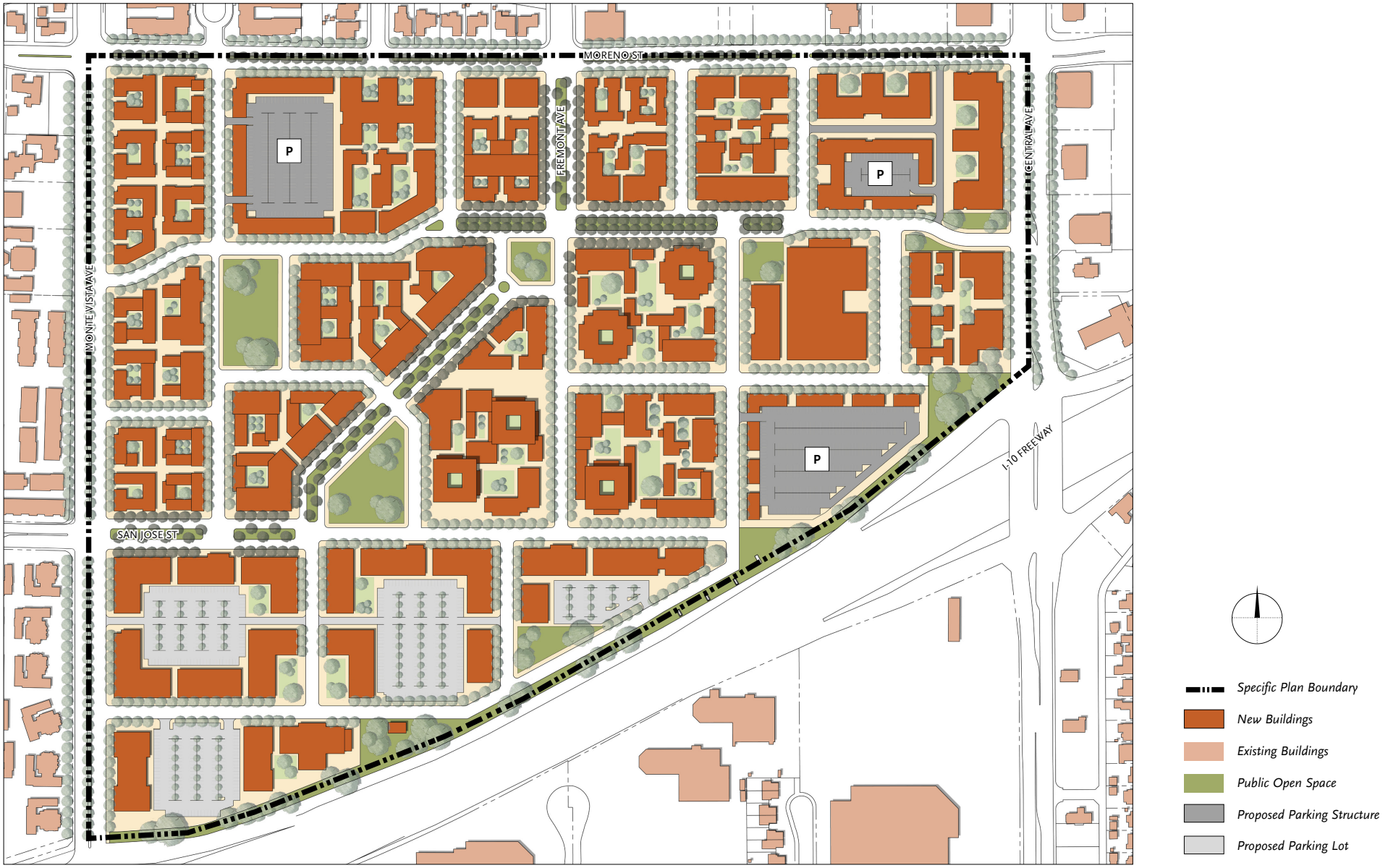

SOURCE: Moule & Polyzoids 2020

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FIGURE 2-5

Illustrative Build-Out Scenario

Montclair Place District Specific Plan EIR

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SOURCE: Moule & Polyzoids 2020

FIGURE 2-6

Proposed Zones

Montclair Place District Specific Plan EIR

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CHAPTER 3
ENVIRONMENTAL ANALYSIS

The following sections contain an analysis, by issue area, of the potentially significant environmental effects of the Proposed Project. The environmental issue areas analyzed in this chapter are as follows:

- Aesthetics (Section 3.1)
- Air Quality (Section 3.2)
- Energy (Section 3.3)
- Geology and Soils (Section 3.4)
- Greenhouse Gas Emissions (Section 3.5)
- Hazards and Hazardous Materials (Section 3.6)
- Hydrology and Water Quality (Section 3.7)
- Land Use and Planning (Section 3.8)
- Noise (Section 3.9)
- Population and Housing (Section 3.10)
- Public Services (Section 3.11)
- Recreation (Section 3.12)
- Transportation (Section 3.13)
- Tribal Cultural Resources (Section 3.14)
- Utilities and Service Systems (Section 3.15)

The discussions of each environmental issue area include the following subsections:

- Existing Conditions
- Regulatory Setting
- Thresholds of Significance
- Impacts Analysis
- Cumulative Impacts
- Mitigation Measures
- Significance After Mitigation

Section 3.2, Air Quality; Section 3.5, Greenhouse Gas Emissions; and Section 3.13, Transportation, of the EIR also includes a Methodology section.

As stated in the May 2019 Initial Study (see Appendix A), it was found that the Proposed Project would have either no new impacts/no impacts or a less than significant impact with or without new mitigation relative to the following environmental issue areas. As such, these issue areas are not included in this EIR.

- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Mineral Resources
- Wildfire

3.1 AESTHETICS

This section describes the existing visual setting and resources of the Montclair Place District Specific Plan (MPDSP or Proposed Project) area and vicinity, identifies associated regulatory requirements, assesses the Proposed Project's impacts to scenic vistas, and analyzes the Proposed Project's consistency with applicable zoning and other regulations governing scenic quality.

3.1.1 Existing Conditions

Scenic Vistas

Scenic vistas are publicly accessible viewpoints that provide views of areas from the project site and onto the project site that exemplify a community's environment (i.e., scenic resources). There are no scenic vistas from public vantage points in or in the vicinity of the Plan area. While the City's General Plan (City of Montclair 1999) does not identify any designated scenic vistas, views of the San Gabriel Mountains can be particularly prominent visual features when viewed from various vantage points throughout the City. These views generally consist of mountainous terrain and ridgelines in the middle- to background viewing range (i.e., approximately 5 to 10 miles away from the Plan area) and provide a scenic backdrop beyond the foreground of urbanized development in the City. However, because there is no substantial variation in the overall topography of the City area (no hillside areas), and because the majority of the City is developed, these scenic views are often obscured by existing structures and landscaping and are typically only visible through "viewing windows" along north-south roadways and when viewed in between existing trees and structures. In addition to intervening landscaping and development, scenic views of the San Gabriel Mountains may also be obscured by atmospheric conditions (e.g., smog and cloud cover)

Near the Plan area, opportunities to experience scenic views are limited to portions of public roadways surrounding the Plan area, including from Monte Vista Avenue and Central Avenue adjacent to the Plan area's western and eastern boundaries and from the Interstate 10 (I-10) freeway to the south. The primary viewers of these publicly accessible scenic views include northbound motorists and pedestrians traveling along Monte Vista Avenue and Central Avenue, and eastbound and westbound motorists on the I-10 freeway. For motorists and pedestrians traveling northbound along the Plan area's eastern and western boundaries, these views are framed by the existing development that abuts the public rights-of way, and are sometimes obscured by street trees within roadway medians, as is particularly the case with Monte Vista Avenue. For eastbound and westbound motorists travelling on the I-10 freeway adjacent to the Plan area, these views are much less prominent given that they must be experienced peripherally while motorists are travelling at a high (i.e., 65-70 miles per hour) speed. Moreover, existing development (i.e., the Montclair Place Mall) and mature landscape trees within the Plan area

often obscure these views for much of the 2,200-foot long segment of the I-10 freeway adjacent to the Plan area. Additionally, given that the Plan area is in an urbanized area surrounded by existing residential and commercial development, expectations for uninterrupted scenic viewing opportunities are low.

3.1.2 Regulatory Setting

Federal

There are no federal regulations pertaining to scenic quality or the preservation of scenic vistas in the City of Montclair.

State

There are no state regulations pertaining to scenic quality or the preservation of scenic vistas in the City of Montclair.

Local

City of Montclair General Plan

The City's General Plan addresses aesthetic considerations in the Community Design Element, which includes goals, objectives, and implementing policies adopted for the purposes of maintaining and improving the visual quality of the environment. Applicable goals, objectives, and implementing policies include the following:

Goal CD- 1.0.0 To coordinate, through the General Plan, the physical elements of the City into an attractive as well as a functional relationship in order to establish, preserve and enhance the City's setting and identity.

Goal CD- 2.0.0 To develop a comprehensive framework plan and program for the protection and enhancement of the scenic environment adjacent to selected state highways, county roads and travel routes of unique or local importance within the City of Montclair.

Objective CD-1.1.0 To develop parkway improvement programs to enhance scenic qualities.

Objective CD-1.2.0 To encourage the design of road and street improvements that protect or enhance the scenic values along the city's roadsides

Objective CD-1.3.0 To continue to develop and reexamine policies and programs regulating public and private improvement as they relate to enhancing the community aesthetic image.

Objective CD-1.4.0 To promote the maintenance of compatible land uses and mitigate existing land use conflicts through redevelopment and/or incorporating the design principles and concepts contained in this element.

Objective CD-1.5.0 To promote community identity and community aesthetics as a means for creating a positive living and working environment as well as to maintain high economic stability.

Objective CD-1.6.0 To encourage the development of parcels along Central Avenue and Holt and Mission Boulevards where development has previously been hindered due to parcel size and configuration, access and multiple ownership.

Policy CD- 1.1.1 Continue the establishment of an individual and distinctive identity by encouraging the highest quality design in architecture, landscape architecture, sign graphics, and in the design of street furniture and fixtures.

Policy CD- 1.1.2 Prepare and adopt a comprehensive landscape design program for the streets, parks, and open spaces n the community. This program shall include standards and locations for types of trees, street and park furniture, sign graphics, paving, lighting and other community design elements.

Policy CD- 1.1.3 Devise development standards that will fully integrate the regional shopping center with commercial development on Central Avenue and the Civic Center. This coordination will obtain the maximum benefit from both private and public investments.

Policy CD.1.1.4 Encourage the state to install the highest quality of planting along the freeway to ensure the compatibility of the freeway with the total environment of the community, except where the noise level has an adverse impact where sound walls should be installed.

Policy CD.1.1.5 Establish a complete program for developing and landscaping the median island from city limit to city limit on all major circulation arteries.

Policy CD.1.1.6 Continually review new opportunities for design concepts to be implemented through the zoning ordinance to improve the appearance of parking lots and other areas devoted to automobile use

Policy CD.1.1.7 Continually review new opportunities for design concepts to be implemented through the zoning ordinance for buildings and landscaping in order to encourage quality development.

Policy CD.1.1.8 Require and promote public utility agencies to beautify their facilities by under grounding power lines and the painting and landscaping of substations and corporation yards.

Policy CD.1.1.9 Existing or indispensable conflicting land uses should be effectively screened from view from the roadway. Effective screening can be accomplished by proper use of plantings, grading or attractive fencing.

Policy CD- 1.1.10 The size, height, number and type of on-premises signs allowed should be the minimum necessary for identification. The design, materials, color, texture, and location should relate to and be in harmony with the surrounding environment. Sign regulations should be based on the premise that the purpose of signing is for identification and not as a means of advertising.

Policy CD- 1.1.11 Off-premises outdoor advertising should not be permitted to intrude or impact upon residential, commercial, or light industrial areas.

Policy CD- 1.1.12 New or relocated utility lines should be placed underground whenever feasible.

Policy CD- 1.1.13 Alignment of new transmission and distribution lines should be situated such that the lines do not harm scenic resources nor the visual environment.

Policy CD- 1.1.14 Grading or earth moving operations should be done with a minimum of disturbance to the natural ground and result in natural or sculpture forms. Quarries and other excavations should be restored to an attractive appearance.

Policy CD- 1.1.15 Existing specimens and stands of trees and other plant materials of outstanding scenic value should be protected.

Policy CD- 1.1.16 Older mature trees provide a sense of age and permanence. Every effort should be made to retain these trees, even in new development and in instances where the tree can be saved in the event of a disorder. As a policy, the City should adopt and maintain a Master Plan of Street Trees that includes a minimum maintenance and replacement program.

Policy CD- 1.1.17 Site planning, architectural and landscape architectural design should result in an attractive appearance and a harmonious relationship among the various elements of the development to blend with the image of the community.

Policy CD- 1.1.18 Structure *(sic.)* on private or public properties should be maintained in good condition and proper attention should be given to a neat appearance

and replacement of dead or dying plant material. The grounds should be kept free of trash or other objectionable uses or effectively and attractively screened from view.

In addition, while not explicitly stated as a policy, the Community Design Element encourages the use of specific plans, as they offer unique opportunities to create a set of tailored design guidelines that address the opportunities and constraints of a particular area.

City of Montclair Municipal Code - Title 11 – Zoning and Development

While not particularly relevant to the Plan area because the MPDSP would redesignate the Plan area with a regulating plan distinct from that of the City of Montclair's zoning code, Title 11, Zoning and Development, of the City's Municipal Code includes design standards specific to each Zoning District related to building height, parking, landscaping requirements, and other visual considerations. These regulations are applicable to all areas within the City not subject to a specific plan, and have been adopted to ensure that both current and future development within the City is designated and constructed to conform to existing visual character and quality of the surrounding built environment.

City of Montclair Municipal Code - Title 9 – Public Services and Public Places

While Title 11 of the City of Montclair's zoning code contains the majority of the City's regulations pertaining to the visual character and quality of the built environment[1], Title 9, Public Facilities and Public Places, of the City's Municipal Code includes regulations relating to protection and preservation of trees within the City. Given the role that trees serve in shaping the visual environment, the applicable provisions of Title 9 of the City's Municipal Code are provided in this discussion.

Chapter 9.28, Trees, of the City's Municipal Code protects and preserves trees planted within the City rights-of-way and at City facilities. Furthermore, Chapter 9.16.120 of the City's Municipal Code states that trees located between the property line and the curb or street are designated as City trees and the pruning, planting and removal of City trees are regulated pursuant to the City Tree Manual. Per the City Tree Manual, City trees shall be replaced at a minimum ratio of 1:1 for each tree removed. Furthermore, mitigation may be required for the removal of trees on private property and is at the discretion of the City.

3.1.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criteria based on Appendix G of the California Environmental Quality Act

[1] Or, as is in the case for the Proposed Project, a specific plan may contain these regulations.

(CEQA) Guidelines (14 CCR 15000 et seq.). It was concluded in the Initial Study that there were no impacts or less than significant impacts for the following significance criteria. Therefore, the following significance criteria are not included as part of this EIR:

B. Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

D. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The following significance criteria, included for analysis in this EIR, is based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.), and will be used to determine the significance of potential aesthetic impacts. Impacts to aesthetics would be significant if the Proposed Project would:

A. Have a substantial adverse effect on a scenic vista?

C. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

3.1.4 Impacts Analysis

A. Would the Project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. Scenic vistas are publicly accessible viewpoints that provide views of areas from a project site and onto a project site that exemplify a community's environment (i.e., scenic resources). There are no designated scenic vistas from public vantage points in the planning area. There are no scenic views from area roadways or other vantage points within the surrounding area onto the Plan area. Views from public areas near the planning area are dominated by commercial and residential development. Development permitted under the MPDSP would result in similar (if not improved) visual character of the area. However, the views of the San Gabriel Mountains to the north, which can be particularly prominent visual features under optimal atmospheric conditions, could be partially blocked by the implementation of future projects under the MPDSP.

Implementation of the MPDSP would permit the development of a varied mix of uses, including residential, office, service, retail, civic, and institutional uses, within the Plan area and along street frontages of Monte Vista Avenue, Central Avenue, and the I-10 freeway. The MPDSP provides flexibility in design, allowing for development to occur

incrementally and in response to changing market conditions. As such, the ultimate disposition of the street and block layout, the types of buildings that are built, and the extent to which the existing structures are retained or dismantled, may vary. Nonetheless, the MPDSP would permit development throughout the Plan area, and in the Plan's District Center (i.e., the District that allows for the most intense development patterns), the MPDSP would allow for the development of buildings up to 258 feet tall (inclusive of parapets and roofs). Because the existing General Commercial zone currently allows for development of buildings up to 75 feet tall (and existing buildings in the Plan area range in height between approximately 30 feet and 75 feet), future development within the Plan area could result in varying degrees of increased blockage of prominent landforms (i.e., the San Gabriel Mountains) north of the Plan area. For viewers along Monte Vista Avenue and Central Avenue, existing views of the San Gabriel Mountains to the north would be relatively unchanged. Development along these street frontages would result in a minor degree of blockage of peripheral views to the mountains when viewed across the Plan area; however, direct views of the mountains to the north would remain for viewers on Monte Vista Avenue and Central Avenue, as development would not directly be located within or beyond these streets. For viewers present south of the Plan area (i.e., eastbound motorists on the I-10 freeway), development along the Plan area's southern border would result in a more severe degree of blockage of the San Gabriel Mountains. However, the increased view blockage would be experienced briefly by motorists travelling at high speeds (i.e., 65-70 miles per hour) and changes to the landscape would occur within the peripheral field of vision of mobile receptors. These motorists would be accustomed to the degree of blockage resulting from implementation of the MPDSP, as existing development and mature landscaping associated with the surrounding area intermittently blocks views along the segment of the I-10 freeway near the Plan area, and expectations for uninterrupted scenic viewing opportunities would be low. Moreover, views to the mountains would be restored immediately upon passing the Plan area and would continue to be available on an intermittent basis heading into the communities of Upland and Claremont. In addition, the I-10 freeway is not designated by the state or City of Montclair as a scenic corridor offering particularly scenic vistas such that the roadway draws motorists on account of the scenic qualities of the visible landscape. Rather, the I-10 freeway is an interstate highway that traverses the highly urbanized Greater Los Angeles Metropolitan Area. Therefore, due to the brief duration of increased view blockage to the San Gabriel Mountains along the Plan area frontage of the I-10 freeway, the presence of existing development, and the lack of scenic designation of the I-10 freeway, future redevelopment of the Plan area would not result in a substantial adverse effect on a scenic vista, and impacts would be **less than significant**. No mitigation is required.

C. In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. Section 20171 of the California Public Resources Code (PRC) defines an "urbanized area" as "(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." As of January 1, 2019, the California Department of Finance estimated the population of Montclair 39,563 persons (DOF 2019). Additionally, the City of Montclair is located adjacent to the City of Ontario, which the California Department of Finance estimates to have a population of 178,268 as of January 1, 2019 (DOF 2019). Therefore, because the City of Montclair shares a border with the City of Ontario, and because the two cities' combined population exceed 100,000 persons, the City of Montclair is considered an urbanized area per CEQA and the first question of this threshold does not apply to the Proposed Project, as it is directed at non-urbanized areas. Section 21071 of the California PRC also defines an urbanized area for unincorporated areas; however, the City of Montclair is an incorporated city, so this definition was not considered.

The Plan area is subject to the City's General Plan, which contains goals, objectives, and implementing policies relating to scenic quality. These goals, objectives, and implementing policies are listed above in Section 3.1.2, Regulatory Setting, and a thorough discussion of the Proposed Project's consistency with the applicable goals, objectives, and implementing policies as they relate to scenic quality is provided in Section 3.8, Land Use and Planning. As determined in Section 3.8, the MPDSP would be consistent with the goals, objectives, and implementing policies relating to scenic quality.

To ensure that both current and future development within the City is designated and constructed to conform to existing visual character and quality of the surrounding built environment, the Title 11, Zoning and Development, of the City's Municipal Code includes design standards specific to each Zoning District related to building height, parking, landscaping requirements, and other visual considerations. Under the existing conditions, development within the Plan area is required to conform to these regulations. However, the Project as proposed includes the adoption of the MPDSP, which would create a new comprehensive policy framework to guide future development within the Plan area. Chapter 5, Development Code, of the MPDSP includes a form-based zoning framework that would provide development standards (building height, setbacks,

frontage requirements, on-site open space, parking placement and standards) and building design standards (massing, articulation, materials, openings, landscape, screening, signage, etc.). The chapter also provides subdivision and block size requirements and standards for streetscape, landscape, hardscape, and public art that occurs within public streets and publicly accessible parks, plazas, and greens. Upon approval of the Proposed Project, the new regulations outlined in the MPDSP Development Code would replace the underlying zoning regulations. All future development within the Plan area would be required to conform to these regulations. According to the MDPSP, these standards were designed to regulate the manner in which individual parcels and blocks are developed to create a diverse and finely-grained development. Furthermore, all future development applicants would be subject to an external peer review to ensure compliance with the development standards and design guidelines outlined in the MPDSP. The required external peer review would be conducted by an architect, urban designer, or planner in private practice, as chosen by the review authority. Conformance with the proposed development standards would ensure compatibility with adjoining properties, ensure a high standard of architectural quality and design variety, and ensure consistency with the MPDSP. Approval of the MPDSP would establish development standards and regulations for the Plan area and other associated discretionary approvals included as part of the Proposed Project (i.e., General Plan Amendment and zone change). Therefore, upon approval of the MPDSP, the Proposed Project would not conflict with applicable zoning regulations governing scenic quality.

In addition, implementation of the Proposed Project would not conflict with Title 9, Public Facilities and Public Places, of the City's Municipal Code (which includes regulations adopted for the purpose of the protecting and preserving trees planted within the City rights-of-way and at City facilities, and are therefore regulations pertaining to scenic quality). As noted in Section 3.1.1, existing ornamental trees are located throughout the Plan area within raised planters and landscape islands throughout the parking lot, as well as immediately adjacent to the Plan area within raised landscape medians within the public right-of-way. Should future development pursuant to the MPDSP include landscape improvements located within the public right-of-way (i.e., between a private property line and the curb or street), the future developer would be required to replace City Street trees at a minimum ratio of 1:1 for each tree removed. For trees located on private property, the City has the discretion to require future development to mitigate for the loss of any trees. More importantly, however, the MPDSP includes Street Trees and Parkways standards to ensure that future development pursuant to the MPDSP provides trees and landscaping (and includes minimum landscape standards) to enhance the streetscape and supplement open space areas within the Plan Area. Because these Street Trees and Parkways standards would be part of the MPDSP,

future development projects would be required to undergo an external peer review to ensure future projects meet these tree provision requirements and provide for a high standard of landscape quality.

As discussed above, given the required compliance of future projects pursuant to the MPDSP with the City's tree policy, and upon approval of the MPDSP, the Proposed Project would not conflict with applicable zoning regulations governing scenic quality, and impacts would be **less than significant**. No mitigation is required.

3.1.5 Cumulative Impacts

Future redevelopment of the Plan area with residential, office, service, retail, civic, and institutional land uses would not result in a cumulative scenic vista impact and would not contribute to cumulatively considerable impact on scenic vistas. As previously stated, Monte Vista Avenue, Central Avenue, and the I-10 freeway are not designated by the state or City of Montclair as scenic corridors and are not described in the General Plan as containing scenic vistas or particularly scenic views. Views of the San Gabriel Mountains are available along roadways however; the mountainous terrain is occasionally obstructed from view by existing development and is routinely interrupted by street and parking lot trees. Future redevelopment of the Plan area may result in slightly increased view blockage of the San Gabriel Mountains to the I-10 freeway receptors (i.e., eastbound and westbound motorists); however, the increased view blockage would be experienced briefly and would be located in the peripheral field of vision of east-west oriented receptors. Further, viewing windows to the San Gabriel Mountains would be preserved for northbound motorists and pedestrians on Central Avenue and Monte Vista Avenue. Additionally, none of the related projects (see Table 2-4 in Chapter 2, Project Description) are located on the northern frontage of the I-10 corridor, and as such, would not combine with the Proposed Project to result in levels of increased view blockage beyond the view blockage resulting from implementation of the Proposed Project. For projects outside of the 5-year cumulative project timeframe (accounting for projects that are not listed in Table 2-4 and may occur within the 5-20 year buildout horizon), the majority of the northern side of the I-10 corridor in the vicinity of the Plan area is built out, resulting in limited opportunities for new development or redevelopment to block views of the San Gabriel Mountains. Further, each zone along this corridor has existing development standards relating to height. The zone with the maximum height allowed along this corridor would be an area immediately east of the Plan area zoned Regional Commercial, which allows for development of buildings up to 75 feet tall; this area is currently developed with retail development approximately 40 feet tall. All other zones long the northern frontage of the I-10 corridor within the proximity of the Plan area allow for development with maximum heights ranging from 25 feet to 40 feet. If future cumulative projects were to be developed beyond these height limits, discretionary approval would be required and the projects would be subject to additional environmental review pursuant to CEQA. Given that the Proposed Project would result in limited, less-than-significant levels of

view blockage, there are no immediately foreseeable projects that would combine with the Proposed Project to result in cumulatively considerable levels of view blockage, and existing development patterns and development regulations limit opportunities for future view blockage, implementation of the Proposed Project would not result in a cumulative scenic vista impact and impacts would be **less than significant**. No mitigation is required.

Upon approval of the Proposed Project, all future development within the Plan area would be required to conform to the regulations outlined within Chapter 5, Development Code, of the MPDSP. All other future development outside the Plan area would be required to conform to the adopted regulations within the respective base zoning district established by the City of Montclair. Conformance to these regulations would ensure that scenic quality is appropriately protected and preserved, and therefore, implementation of the Proposed Project would result in **less than significant** cumulative scenic quality impacts. No mitigation is required

3.1.6 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. No impact to scenic vistas would occur as a result of future development under the Proposed Project. As such, no mitigation is required. As included in the Initial Study (Appendix A), implementation of mitigation measure **MM-AES-1** would reduce impacts to nighttime views associated with new sources of lighting to a less than significant level (Threshold D).

MM-AES-1 The project applicant shall prepare lighting and signage plans for the Proposed Project depicting the proposed locations and heights of light poles and signs. Concurrent with the building permit submittal, the project applicant shall incorporate lighting design specifications to meet the City's minimum safety and security standards as outlined in the City's Building Security Requirements. The following measures shall be included in all lighting plans:

- Luminaires shall be designed with cutoff-type fixtures or features that cast low-angle illumination to minimize incidental spillover of light onto adjacent private properties. Fixtures that shine light upward or horizontally shall not spill any light onto adjacent properties.
- Luminaires shall provide accurate color rendering and natural light qualities. Low-pressure sodium and high-pressure sodium fixtures that are not color-corrected shall not be used, except as part of an approved sign or landscape plan.
- Luminaire mountings shall be downcast and pole heights minimized to reduce potential for back scatter into the nighttime sky and incidental

spillover light onto adjacent properties. The height of light poles shall be reviewed and approved by the City to ensure consistency with the City's Municipal Code requirements. Luminaire mountings shall be treated with non-glare finishes.

3.1.7 Significance After Mitigation

Future redevelopment of the Plan area would result in no new scenic vista impacts. Impacts to existing views along adjacent streets resulting from future development of the Plan area would be **less than significant**.

Upon approval of the MPDSP, all future development within the Plan area would be required to conform to the regulations and standards relating to scenic quality outlined within the MPDSP, and impacts would be **less than significant**.

With the implementation of mitigation measure **MM-AES-1**, impacts to day and nighttime views from new sources of lighting and glare associated with future redevelopment of the Plan area would be **less than significant**.

3.1.8 References

California DOF (Department of Finance). E-1: City/County/State Population Estimates with Annual Percent Change January 1, 2018 and 2019. May 1, 2019. http://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-1/documents/E-1_2019PressRelease.pdf

3.2 AIR QUALITY

This section describes the existing air quality setting of the Montclair Place District Specific Plan Project (MPDSP or Proposed Project) and discusses applicable federal, state, and regional regulations pertaining to air quality. This section evaluates the impacts to air quality associated with future development under the Proposed Project as follows: conflict with or obstruct implementation of the applicable air quality plan; result in a cumulatively considerable net increase of any criteria pollutant for which the Proposed Project region is non-attainment under an applicable federal or state ambient air quality standard; and expose sensitive receptors to substantial pollutant concentrations; and result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Air quality modeling data and associated information has been included as part of Appendix B.

3.2.1 Existing Conditions

The Proposed Project is located within the South Coast Air Basin (SCAB). The SCAB is a 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The SCAB's air pollution problems are a consequence of the combination of emissions from the nation's second-largest urban area, meteorological conditions that hinder dispersion of those emissions, and mountainous terrain surrounding the SCAB that traps pollutants as they are pushed inland with the sea breeze (SCAQMD 2017). Meteorological and topographical factors that affect air quality in the SCAB are described below.[1]

3.2.1.1 Climate and Meteorology

The SCAB generally lies in the semi-permanent, high-pressure zone of the eastern Pacific. As a result, the climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the SCAB is a function of the area's natural physical characteristics (e.g., weather and topography) as well as of man-made influences (e.g., development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and/or dispersion of pollutants throughout the SCAB.

Moderate temperatures, comfortable humidity, and limited precipitation characterize the climate in the SCAB. The average annual temperature varies little throughout the basin, averaging 75 degrees Fahrenheit (°F). However, with a less pronounced oceanic influence, the eastern inland portions of the basin show greater variability in annual minimum and maximum temperatures. All portions of

[1] The discussion of meteorological and topographical conditions of the SCAB is based on information provided in the *Final 2016 Air Quality Management Plan* (SCAQMD 2017).

the SCAB have recorded temperatures over 100 °F in recent years. Although the SCAB has a semiarid climate, the air near the surface is moist because of the presence of a shallow marine layer. Except for infrequent periods when dry air is brought into the basin by offshore winds, the ocean effect is dominant. Periods with heavy fog are frequent, and low stratus clouds, occasionally referred to as "high fog," are a characteristic climate feature. Annual average relative humidity is 70% at the coast and 57% in the eastern part of the basin. Precipitation in the SCAB is typically 9 to 14 inches annually and is rarely in the form of snow or hail, due to typically warm weather. The frequency and amount of rainfall is greater in the coastal areas of the basin.

The City of Montclair's (City) climate is characterized by relatively low rainfall, with warm summers and mild winters. Average temperatures range from a high of 91 degrees Fahrenheit (°F) in August to a low of 38°F in January. Annual precipitation averages about 0.26 to 3.56 inches, falling mostly from November through April (Western Regional Climate Center (WRCC) 2016).[2]

Sunlight

The presence and intensity of sunlight are necessary prerequisites for the formation of photochemical smog. Under the influence of the ultraviolet radiation of sunlight, certain "primary" pollutants (mainly reactive hydrocarbons and oxides of nitrogen [NO_X][3]) react to form "secondary" pollutants (primarily oxidants). Since this process is time dependent, secondary pollutants can be formed many miles downwind of the emission sources. Southern California also has abundant sunshine, which drives the photochemical reactions that form pollutants such as ozone (O_3) and a substantial portion of fine particulate matter ($PM_{2.5}$, particles less than 2.5 microns in diameter). In the SCAB, high concentrations of O_3 are normally recorded during the late spring, summer, and early autumn months, when more intense sunlight drives enhanced photochemical reactions. Because of the prevailing daytime winds and time-delayed nature of photochemical smog, oxidant concentrations are highest in the inland areas of Southern California.

Temperature Inversions

Under ideal meteorological conditions and irrespective of topography, pollutants emitted into the air mix and disperse into the upper atmosphere. However, the Southern California region frequently experiences temperature inversions in which pollutants are trapped and accumulate close to the ground. The inversion, a layer of warm, dry air overlaying cool, moist marine air, is a normal condition in coastal Southern California. The cool, damp, and hazy sea air capped by coastal clouds is heavier than the warm, clear air, which acts as a lid through which the cooler marine layer cannot rise. The height of the inversion is important in determining pollutant

[2] Local climate data for the City is based on the closest and most-representative station measured by the Western Regional Climate Center, which is the Pomona Fairplex (047050) climatological station.

[3] NO_x is a general term pertaining to compounds of nitric oxide (NO), nitrogen dioxide (NO_2) and other oxides of nitrogen.

concentration. When the inversion is approximately 2,500 feet above mean sea level (amsl), the sea breezes carry the pollutants inland to escape over the mountain slopes or through the passes. At a height of 1,200 feet amsl, the terrain prevents the pollutants from entering the upper atmosphere, resulting in the pollutants settling in the foothill communities. Below 1,200 feet amsl, the inversion puts a tight lid on pollutants, concentrating them in a shallow layer over the entire coastal basin. Usually, inversions are lower before sunrise than during the daylight hours.

Mixing heights for inversions are lower in the summer and inversions are more persistent, being partly responsible for the high levels of ozone (O_3) observed during summer months in the SCAB. Smog in Southern California is generally the result of these temperature inversions combining with coastal day winds and local mountains to contain the pollutants for long periods, allowing them to form secondary pollutants by reacting in the presence of sunlight. The basin has a limited ability to disperse these pollutants due to typically low wind speeds and the surrounding mountain ranges.

As with other cities within the SCAB, the City is susceptible to air inversions, which trap a layer of stagnant air near the ground where pollutants are further concentrated. These inversions produce haziness, which is caused by moisture, suspended dust, and a variety of chemical aerosols emitted by trucks, automobiles, furnaces, and other sources. Elevated concentrations of particles less than 10 microns in diameter (PM_{10}) and of $PM_{2.5}$ can occur in the SCAB throughout the year, but they occur most frequently in fall and winter. Although there are some changes in emissions by day of the week and by season, the observed variations in pollutant concentrations are primarily the result of seasonal differences in weather conditions.

3.2.1.2 Pollutants and Effects

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The national and California standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O_3, nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), PM_{10}, $PM_{2.5}$, and lead. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants. These pollutants, as well as toxic air contaminants (TACs), are discussed in the following text.[4]

[4] The descriptions of each of the criteria air pollutants and associated health effects are based on the U.S. Environmental Protection Agency's (EPA's) Criteria Air Pollutants (2018a) and the California Air Resources Board's (CARB's) Glossary of Air Pollutant Terms (2019a).

Ozone. O_3 is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O_3 precursors, such as hydrocarbons and NO_x. These precursors are mainly NO_x and volatile organic compounds (VOCs). The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O_3 exists in the upper atmosphere ozone layer (stratospheric O_3) as well as at the Earth's surface in the troposphere (ground-level O_3). [5] The O_3 that the Environmental Protection Agency (EPA) and California Air Resources Board (CARB) regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level ozone is a harmful air pollutant that causes numerous adverse health effect and is thus, considered "bad" ozone. Stratospheric ozone, or "good" ozone, occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the earth's atmosphere. Without the protection of the beneficial stratospheric ozone layer, plant and animal life would be seriously harmed.

O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2013). These health problems are particularly acute in sensitive receptors such as the sick, the elderly, and young children.

Inhalation of O_3 causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms. Exposure to O_3 can reduce the volume of air that the lungs breathe in and cause shortness of breath. O_3 in sufficient doses increases the permeability of lung cells, rendering them more susceptible to toxins and microorganisms. The occurrence and severity of health effects from O_3 exposure vary widely among individuals, even when the dose and the duration of exposure are the same. Research shows adults and children who spend more time outdoors participating in vigorous physical activities are at greater risk from the harmful health effects of O_3 exposure. While there are relatively few studies of O_3's effects on children, the available studies show that children are no more or less likely to suffer harmful effects than adults. However, there are a number of reasons why children may be more susceptible to O_3 and other pollutants. Children and teens spend nearly twice as much time outdoors and engaged in vigorous activities as adults. Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults. Also, children are less likely than adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better

[5] The troposphere is the layer of the Earth's atmosphere nearest to the surface of the Earth. The troposphere extends outward about 5 miles at the poles and about 10 miles at the equator.

distinguish between health effects in children and adults. Children, adolescents and adults who exercise or work outdoors, where O_3 concentrations are the highest, are at the greatest risk of harm from this pollutant (CARB 2019b).

Nitrogen Dioxide and Oxides of Nitrogen. NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide, which is a colorless, odorless gas. NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers.

A large body of health science literature indicates that exposure to NO_2 can induce adverse health effects. The strongest health evidence, and the health basis for the ambient air quality standards (AAQS) for NO_2, results from controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses. Infants and children are particularly at risk because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration. Several studies have shown that long-term NO_2 exposure during childhood, the period of rapid lung growth, can lead to smaller lungs at maturity in children with higher levels of exposure compared to children with lower exposure levels. In addition, children with asthma have a greater degree of airway responsiveness compared with adult asthmatics. In adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease (CARB 2019c).

Carbon Monoxide. CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the project location, automobile exhaust accounts for the majority of CO emissions. CO is a nonreactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

CO is harmful because it binds to hemoglobin in the blood, reducing the ability of blood to carry oxygen. This interferes with oxygen delivery to the body's organs. The most common effects of CO exposure are fatigue, headaches, confusion and reduced mental alertness, light-headedness, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental effects. Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO (CARB 2019d).

Sulfur Dioxide. SO_2 is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels.

Controlled human exposure and epidemiological studies show that children and adults with asthma are more likely to experience adverse responses with SO_2 exposure, compared with the non-asthmatic population. Effects at levels near the 1-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath, and chest tightness, especially during exercise or physical activity. Also, exposure at elevated levels of SO_2 (above 1 parts per million [ppm]) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality. The elderly and people with cardiovascular disease or chronic lung disease (such as bronchitis or emphysema) are most likely to experience these adverse effects (CARB 2019e).

SO_2 is of concern both because it is a direct respiratory irritant and because it contributes to the formation of sulfate and sulfuric acid in particulate matter (NRC 2005). People with asthma are of particular concern, both because they have increased baseline airflow resistance and because their SO_2-induced increase in airflow resistance is greater than in healthy people, and it increases with the severity of their asthma (NRC 2005). SO_2 is thought to induce airway constriction via neural reflexes involving irritant receptors in the airways (NRC 2005).

Particulate Matter. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Coarse particulate matter (PM_{10}) is about 1/7 the thickness of a human hair. Major sources of PM_{10}

include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter ($PM_{2.5}$) is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport absorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also produce haze and reduce regional visibility and damage and discolor surfaces on which they settle.

A number of adverse health effects have been associated with exposure to both $PM_{2.5}$ and PM_{10}. For $PM_{2.5}$, short-term exposures (up to 24-hour duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases. In addition, of all of the common air pollutants, $PM_{2.5}$ is associated with the greatest proportion of adverse health effects related to air pollution, both in the United States and worldwide based on the World Health Organization's Global Burden of Disease Project. Short-term exposures to PM_{10} have been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits (CARB 2017a).

Long-term exposure (months to years) to $PM_{2.5}$ has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children. The effects of long-term exposure to PM_{10} are less clear, although several studies suggest a link between long-term PM_{10} exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer (CARB 2017a).

Lead. Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

Sulfates. Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO_2 in the atmosphere and can result in respiratory impairment, as well as reduced visibility.

Vinyl Chloride. Vinyl chloride is a colorless gas with a mild, sweet odor, which has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air can cause nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen Sulfide. Hydrogen sulfide is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of hydrogen sulfide include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to hydrogen sulfide can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Visibility-Reducing Particles. Visibility-reducing particles are any particles in the air that obstruct the range of visibility. Effects of reduced visibility can include obscuring the viewshed of natural scenery, reducing airport safety, and discouraging tourism. Sources of visibility-reducing particles are the same as for $PM_{2.5}$ described above.

Volatile Organic Compounds. Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O_3 are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the sources of hydrocarbons.

Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O_3 and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs. There are no separate health standards for VOCs as a group.

Non-Criteria Air Pollutants

Toxic Air Contaminants. A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a TAC. TACs are identified by federal and state agencies based on a review of available scientific evidence. In the state of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter. Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90% of DPM is less than 1 micrometer in diameter (about 1/70th the diameter of a human hair), and thus is a subset of $PM_{2.5}$ (CARB 2016a). DPM is typically composed of carbon particles ("soot," also called black carbon, or BC) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde,

acetaldehyde, acrolein, and 1,3-butadiene. The CARB classified "particulate emissions from diesel-fueled engines" (i.e., DPM; 17 CCR 93000) as a TAC in August 1998. DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars and off-road diesel engines including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2000). To reduce the cancer risk associated with DPM, CARB adopted a diesel risk reduction plan in 2000 (CARB 2000). Because it is part of $PM_{2.5}$, DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies. Those most vulnerable to non-cancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.

3.2.1.3 Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air pollution-sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses where air pollution-sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses) (CARB 2005). The South Coast Air Quality Management District (SCAQMD) identifies sensitive receptors as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).

The closest off-site sensitive receptors to the Plan area are single-family and multi-family residences which are located on the north side of Moreno Street and the west side of Monte Vista Avenue. Furthermore, the closest schools to the Plan area are Moreno Elementary School, which is located approximately 370 feet to the west and Serrano Middle School, which is located approximately 850 feet to the west. Construction activities generated by future projects under the Proposed Project would take place at various locations within the Plan area, both near and far from adjacent existing sensitive receptors. For example, future construction associated with redevelopment of the Vista Moreno Plaza site would take place within approximately 100 feet of residential uses (along Moreno Street) and approximately 370 feet of the Moreno Elementary School. Therefore, given that the closest existing sensitive receptors are located within approximately 100 feet of Proposed Project construction sites, these sensitive receptors would be exposed to localized air quality impacts resulting from future construction activities under the Proposed Project.

3.2.2 Regulatory Setting

Regulatory oversight for air quality in the SCAB is maintained by the EPA at the federal level, CARB at the state level, and by the SCAQMD at the local level. Applicable laws, regulations and standards of these three agencies are described in the following subsections.

3.2.2.1 Federal

Criteria Air Pollutants

The federal Clean Air Act, passed in 1970 and last amended in 1990 forms the basis for the national air pollution control effort. The EPA is responsible for implementing most aspects of the Clean Air Act, including the setting of National Ambient Air Quality Standards (NAAQS; federal standards) for major air pollutants, hazardous air pollution (HAP) standards, approval of state attainment plans, motor vehicle emission standards, stationary source emissions standards and permits, acid rain control measures, stratospheric O_3 protection, and enforcement provisions. Federal standards are established for criteria pollutants under the Clean Air Act, which are O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead.

The federal standards describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The federal standards (other than for O_3, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. Federal standards for O_3, NO_2, SO_2, PM_{10}, and $PM_{2.5}$ are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The Clean Air Act requires the EPA to reassess the federal standards at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the federal standards must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames.

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the federal standards to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels.

Hazardous Air Pollutants

The 1977 federal Clean Air Act amendments required the EPA to identify National Emission Standards for HAPs to protect public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 federal Clean Air

Act Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

3.2.2.2 State

Criteria Air Pollutants

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency (CalEPA) in 1991, is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products.

CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS. As stated previously, an ambient air quality standard defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harm to the public's health. For each pollutant, concentrations must be below these relevant CAAQS before a basin can attain the corresponding CAAQS. Air quality is considered "in attainment" if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The CAAQS for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, PM_{10}, and $PM_{2.5}$ and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded.

California air districts have based their thresholds of significance for California Environmental Quality Act (CEQA) purposes on the levels that scientific and factual data demonstrate that the air basin can accommodate without affecting the attainment date for the NAAQS or CAAQS. Since an ambient air quality standard is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the ambient air quality standard, this means that the thresholds established by air districts are also protective of human health.

The NAAQS and CAAQS are presented in Table 3.2-1, Ambient Air Quality Standards.

Table 3.2-1
Ambient Air Quality Standards

Pollutant	Average Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary*[c,d]	*Secondary*[c,e]
O_3	1 hour	0.09 ppm (180 μg/m^3)	—	Same as primary standard
	8 hours	0.070 ppm (137 μg/m^3)	0.070ppm (137 μg/m^3)[f]	

Table 3.2-1
Ambient Air Quality Standards

Pollutant	Average Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary[c,d]*	*Secondary[c,e]*
NO_2[g]	1 hour	0.18 ppm (339 μg/m³)	0.100 ppm (188 μg/m³)	Same as primary standard
	Annual arithmetic mean	0.030 ppm (57 μg/m³)	0.053 ppm (100 μg/m³)	
CO	1 hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	None
	8 hours	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	
SO_2[h]	1 hour	0.25 ppm (655 μg/m³)	0.075 ppm (196 μg/m³)	—
	3 hours	—	—	0.5 ppm (1,300 μg/m³)
	24 hours	0.04 ppm (105 μg/m³)	0.14 ppm (for certain areas)[g]	—
	Annual	—	0.030 ppm (for certain areas)[g]	—
PM_{10}[i]	24 hours	50 μg/m³	150 μg/m³	Same as primary standard
	Annual arithmetic mean	20 μg/m³	—	
$PM_{2.5}$[i]	24 hours	No separate state standard	35 μg/m³	Same as primary standard
	Annual arithmetic mean	12 μg/m³	12.0 μg/m³	15.0 μg/m³
Pb[j,k]	30-day average	1.5 μg/m³	—	—
	Calendar quarter	—	1.5 μg/m³ (for certain areas)[j]	Same as primary standard
	Rolling 3-month average	—	0.15 μg/m³	
H_2S	1-hour	0.03 ppm (42 μg/m³)	—	—
Vinyl chloride[i]	24-hour	0.01 ppm (26 μg/m³)	—	—
SO_4	24-hour	25 μg/m³	—	—
Visibility-reducing particles	8-hour (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to particles when the relative humidity is less than 70%	—	—

Source: CARB 2016.

Notes: O_3 = ozone; ppm= parts per million by volume; μg/m³ = micrograms per cubic meter; NO_2 = nitrogen dioxide; CO = carbon monoxide; mg/m³ = milligrams per cubic meter; SO_2 = sulfur dioxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; Pb = lead; H_2S = hydrogen sulfide; SO_4 = sulfates; PST = Pacific standard time.

a State standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, and suspended particulate matter—PM_{10}, $PM_{2.5}$, and visibility-reducing particles—are values that are not to be exceeded. All others are not to be equaled or exceeded. The CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

b National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μg/m³ is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25° Celsius (C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

d National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[e] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[f] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[g] To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb, whereas California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[h] In 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[i] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM_{10} standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[j] CARB has identified Pb and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[j] The national standard for Pb was revised on October 15, 2008, to a rolling 3-month average. The 1978 Pb standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[k] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Toxic Air Contaminants

The state Air Toxics Program was established in 1983 under AB 1807 (Tanner). The California TAC list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with AB 2728, the state list includes the (federal) HAPs. The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) seeks to identify and evaluate risk from air toxics sources; however, AB 2588 does not regulate air toxics emissions. TAC emissions from individual facilities are quantified and prioritized. "High-priority" facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

In 2000, the CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines (CARB 2000). The regulation is anticipated to result in an 80% decrease in statewide diesel health risk in 2020 compared with the diesel risk in 2000. Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment Program. These regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel-powered equipment. Several Airborne Toxic Control Measures that reduce

diesel emissions including In-Use Off-Road Diesel-Fueled Fleets (13 Cal. Code Regs. §§ 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 Cal. Code Regs. § 2025).

California Health and Safety Code Section 41700

Section 41700 of the Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or that endanger the comfort, repose, health, or safety of any of those persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

3.2.2.3 Local

South Coast Air Quality Management District

The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in the SCAB, where the project is located. The SCAQMD operates monitoring stations in the SCAB, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. The SCAQMD's Air Quality Management Plans (AQMPs) include control measures and strategies to be implemented to attain state and federal ambient air quality standards in the SCAB. The SCAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment.

The most-recently adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD governing board on March 3, 2017. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP addresses criteria air pollutant emissions from ocean-going vessels, which are considered federal sources, and includes emissions associated with marine vessels and engines in the baseline year and future forecasts. The 2016 AQMP's overall control strategy is an integral approach relying on fair-share emission reductions from federal, state, and local levels. The 2016 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources (SCAQMD 2017). These control strategies are to be implemented in partnership with CARB and the EPA.

The previous AQMP was the 2012 AQMP, which was adopted in February 2013 (SCAQMD 2013). The 2012 AQMP proposed policies and measures to achieve national and California standards for improved air quality in the SCAB and those portions of the Salton Sea Air Basin

(formerly named the Southeast Desert Air Basin) that are under SCAQMD jurisdiction. The 2012 AQMP is designed to meet applicable federal and state requirements for O_3 and particulate matter. The 2012 AQMP documents that attainment of the federal 24-hour $PM_{2.5}$ standard is impracticable by 2015 and the SCAB should be classified as a Serious nonattainment area along with the appropriate federal requirements. The 2012 AQMP includes the planning requirements to meet the 1-hour O_3 standard. The 2012 AQMP demonstrates attainment of the federal 24-hour $PM_{2.5}$ standard by 2014 in the SCAB through adoption of all feasible measures. Finally, the 2012 AQMP updates the EPA-approved 8-hour O_3 control plan with new measures designed to reduce reliance on the Clean Air Act section 182(e)(5) long-term measures for NO_x and VOC reductions. The 2012 AQMP reduction and control measures, which are outlined to mitigate emissions, are based on existing and projected land use and development. The EPA, with a final ruling on April 14, 2016, approved the Clean Air Act planning requirements for the 24-hour $PM_{2.5}$ standard portion and on September 3, 2014, approved the 1-hour O_3 Clean Air Act planning requirements.

Applicable Rules

Emissions that would result from stationary and area sources during operation under the Proposed Project may be subject to SCAQMD rules and regulations. The SCAQMD rules applicable to the Proposed Project may include the following:

- **Rule 201 – Permit to Construct:** This rule establishes an orderly procedure for the review of new and modified sources of air pollution through the issuance of permits. Rule 201 specifies that any facility installing nonexempt equipment that causes or controls the emissions of air pollutants must first obtain a permit to construct from the SCAQMD.
- **Rule 203 – Permit to Operate:** This rule states that a person shall not operate or use any equipment permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer.
- **Rule 401 – Visible Emissions:** This rule establishes the limit for visible emissions from stationary sources for a period or periods aggregating more than three minutes in any hour. This rule prohibits visible emissions dark or darker than Ringelmann No. 1 for periods greater than three minutes in any hour or such opacity which could obscure an observer's view to a degree equal or greater than does smoke.
- **Rule 402 – Nuisance:** This rule prohibits the discharge of air pollutants from a facility that cause injury, detriment, nuisance, or annoyance to the public or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule requires fugitive dust sources to implement best available control measures for all sources to ensure all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce

PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust.

- **Rule 431.2 – Sulfur Content of Liquid Fuels:** The purpose of this rule is to limit the sulfur content in diesel and other liquid fuels for the purpose of reducing the formation of SO_x and particulates during combustion and of enabling the use of add-on control devices for diesel-fueled internal combustion engines. The rule applies to all refiners, importers, and other fuel suppliers such as distributors, marketers, and retailers, as well as to users of diesel, low-sulfur diesel, and other liquid fuels for stationary-source applications in the SCAQMD. The rule also affects diesel fuel supplied for mobile sources.
- **Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines**: This rule applies to stationary and portable engines rated at greater than 50 horsepower (hp). The purpose of Rule 1110.2 is to reduce NO_x, VOCs, and CO emissions from engines. Emergency engines, including those powering standby generators, are generally exempt from the emissions and monitoring requirements of this rule because they have permit conditions that limit operation to 200 hours or less per year as determined by an elapsed operating time meter.
- **Rule 1113 – Architectural Coatings*:*** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- **Rule 1401 – New Source Review of Toxic Air Contaminants:** This rule specifies limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index (HI) from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants listed in Table I of Rule 1401. The rule establishes allowable risks for permit units requiring new permits pursuant to Rules 201 or 203.
- **Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule shall apply to any person who owns or operates a stationary CI engine in the SCAQMD with a rated brake horsepower greater than 50 (>50 bhp), except as provided in subdivision (h). This rule regulates the fuel, hours of operation, maintenance, and reporting requirements for applicable engines.
- **Rule 2202 – On-Road Motor Vehicle Mitigation Options:** The purpose of this rule is to provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal Clean Air Act. This Rule applies to any employer who employs 250 or more employees on a full or part-time basis at a worksite for a consecutive six-month period calculated as a monthly average, except as provided in subdivision (l) of this Rule.

- **Regulation XIII – New Source Review:** This regulation sets preconstruction review requirements for new, modified, or relocated facilities to ensure that the operation of such facilities does not interfere with progress in attainment of the NAAQS and that future economic growth within SCAQMD is not unnecessarily restricted. The specific air quality goal of this regulation is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors. In addition to nonattainment air contaminants, this regulation will also limit emissions increases of ammonia and O_3-depleting compounds from new, modified, or relocated facilities by requiring the use of best available control technology.
- **Regulation XIV – Toxics and Other Non-Criteria Pollutants:** This regulation includes rules that regulate toxics and other non-criteria pollutants. It provides specifications for maximum individual cancer risk, cancer burden, and noncancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units that emit TACs. The rules establish allowable risks for permit units requiring new permits pursuant to Rules 201 or 203. Under this regulation, Rule 1401 (New Source Review of Toxic Air Contaminants) specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard indices from new permit units, relocations, or modifications to existing permit units that emit TACs listed in the rule.
- **Regulation XIV – Rule 1403, Asbestos Emissions from Demolition/Renovation Activities:** This rule states that an owner or operator of any demolition or renovation activity is required to have an asbestos study performed prior to demolition and to provide notification to SCAQMD prior to commencing demolition activities.

Southern California Association of Governments

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated metropolitan planning organization for the Southern California region and is the largest metropolitan planning organization in the United States.

With respect to air quality planning and other regional issues, SCAG has prepared the 2008 Regional Comprehensive Plan: Helping Communities Achieve a Sustainable Future (2008 RCP) for the region (SCAG 2008). The 2008 RCP sets the policy context in which SCAG participates in and responds to the SCAQMD air quality plans and builds off the SCAQMD AQMP processes that are designed to meet health-based criteria pollutant standards in several ways (SCAG 2008). First, it complements AQMPs by providing guidance and incentives for public agencies to consider best practices that support the technology-based control measures in AQMPs. Second, the 2008 RCP emphasizes the need for local initiatives that can reduce the

region's greenhouse gas (GHG) emissions that contribute to climate change, an issue that is largely outside the focus of local attainment plans. Third, the 2008 RCP emphasizes the need for better coordination of land use and transportation planning, which heavily influences the emissions inventory from the transportation sectors of the economy. This also minimizes land use conflicts, such as residential development near freeways, industrial areas, or other sources of air pollution.

On April 7, 2016, SCAG's Regional Council adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2016 RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The 2016 RTP/SCS was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. In June 2016, SCAG received its conformity determination from the Federal Highway Administration and the Federal Transit Administration indicating that all air quality conformity requirements for the 2016 RTP/SCS and associated 2015 Federal Transportation Improvement Program Consistency Amendment through Amendment 15-12 have been met (SCAG 2016). The SCAQMD 2016 AQMP applies the updated SCAG growth forecasts assumed in the 2016 RTP/SCS.

On May 7, 2020 SCAG's Regional Council adopted the Connect SoCal (2020-2045 RTP/SCS) for federal transportation conformity purposes and will consider approval of Connect SoCal in its entirety within 120 days from May 7, 2020. The Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

City of Montclair

The City of Montclair General Plan (City of Montclair 1999) includes various policies related to improving air quality (both directly and indirectly). Applicable policies include the following:

Circulation Element

Policy CE-1.1.6 Keep traffic on all streets in balance with the capacity of the circulation system by regulating the intensity and density of land use in conformity with Level of Service (LOS) "D" or better performance during typical weekday peak hours.

Policy CE-1.1.8 Continue promotion of the construction of sidewalks in residential areas to provide safe pedestrian circulation.

Policy CE-1.1.10 Promote the provision of public modes of transportation between strategic locations such as the Montclair Plaza Shopping Center, and other traffic generators such as the Montclair Transcenter and potential Metrolink station on the Riverside Line.

Housing Element

Policy HE-1.1.27 Develop housing in a manner which will allow the maximum use of alternative energy sources (e.g., solar, wind, cogeneration).

Air Quality Element

Policy AQ-2.1.1 Encourage and facilitate mixed use and self-sufficient development which are pedestrian and transit-oriented. The areas north of the Montclair Plaza and within the Montclair Transcenter have been identified by the "North Montclair Specific Plan" as viable sites for such developments.

Policy AQ-2.3.2 Require interconnected signal control systems for all primary arterials including those which cross interjurisdictional boundaries.

Policy AQ-2.4.3 Provide bicycle and pedestrian pathways and facilities to encourage non-motorized trips.

3.2.2.4 Air Quality Conditions

Regional and Local Air Quality Conditions

SCAB Attainment Designation

Pursuant to the 1990 federal Clean Air Act amendments, the EPA classifies air basins (or portions thereof) as "attainment" or "nonattainment" for each criteria air pollutant, based on whether the NAAQS have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area

exceeds the standard, the area is classified as "nonattainment" for that pollutant. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified" or "unclassifiable." The designation of "unclassifiable/attainment" means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are re-designated as maintenance areas and must have approved Maintenance Plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as "attainment" or "nonattainment," but based on CAAQS rather than the NAAQS. Table 3.2-2 depicts the current attainment status of the Plan area with respect to the NAAQS and CAAQS.

Table 3.2-2
South Coast Air Basin Attainment Classification

Pollutant	Designation/Classification	
	National Standards	*California Standards*
Ozone (O_3), 1-hour	No National Standard	**Nonattainment**
Ozone (O_3), 8-hour	**Extreme Nonattainment**	**Nonattainment**
Nitrogen Dioxide (NO_2)	Unclassifiable/Attainment	Attainment
Carbon Monoxide (CO)	Attainment/Maintenance	Attainment
Sulfur Dioxide (SO_2)	Unclassifiable/Attainment	Attainment
Coarse Particulate Matter (PM_{10})	Attainment/Maintenance	**Nonattainment**
Fine Particulate Matter ($PM_{2.5}$)	**Serious Nonattainment**	**Nonattainment**
Lead (Pb)	Nonattainment	Attainment
Hydrogen Sulfide	No National Standard	Unclassified
Sulfates	No National Standard	Attainment
Visibility-Reducing Particles	No National Standard	Unclassified
Vinyl Chloride	No National Standard	No designation

Sources: EPA 2018b (national); CARB 2018 (California).
Notes: Bold text = not in attainment; Attainment = meets the standards; Attainment/Maintenance = achieves the standards after a nonattainment designation; Nonattainment = does not meet the standards; Unclassified or Unclassifiable = insufficient data to classify; Unclassifiable/Attainment = meets the standard or is expected to be meet the standard despite a lack of monitoring data.

In summary, the SCAB is designated as a nonattainment area for federal and state O_3 standards and federal and state $PM_{2.5}$ standards. The SCAB is designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and state NO_2 standards, and federal and state SO_2 standards. While the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard (EPA 2018b; CARB 2018).

Despite the current nonattainment status, air quality within the SCAB has generally improved since the inception of air pollutant monitoring in 1976. This improvement is mainly a result of

lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the SCAQMD. This trend toward cleaner air has occurred in spite of continued population growth. Despite this growth, air quality has improved significantly over the years, primarily because of the impacts of the region's air quality control program. PM_{10} levels have declined almost 50% since 1990, and $PM_{2.5}$ levels have also declined 50% since measurements began in 1999 (SCAQMD 2013). Similar improvements are observed with O_3, although the rate of O_3 decline has slowed in recent years.

Local Ambient Air Quality

The Plan area's local ambient air quality is monitored by SCAQMD and CARB. CARB, air districts, and other agencies monitor ambient air quality at approximately 250 air quality monitoring stations across the state. Air quality monitoring stations usually measure pollutant concentrations 10 feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations.

The Upland monitoring station, located at 1350 San Bernardino Road, California, is the nearest air quality monitoring station to the Plan area, approximately 3.55 miles east of the Plan area. Data for this site were only available for 8-hour O_3, 1-hour O_3, NO_2, and CO concentrations. SO_2, PM_{10}, and $PM_{2.5}$ measurements were taken from the Fontana monitoring station (924 North Garey Avenue, approximately 13.25 miles east of the Plan area). The data collected at these two stations are considered representative of the air quality experienced in the Proposed Project vicinity. Air quality data from 2016 through 2018 are provided in Table 3.2-3. The number of days exceeding the ambient air quality standards is also shown in Table 3.2-3.

Table 3.2-3
Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2016	*2017*	*2018*	*2016*	*2017*	*2018*
Ozone (O_3)										
Upland Monitoring Station	ppm	Maximum 1-hour concentration	California	0.09	0.156	0.150	0.133	53	66	25
	ppm	Maximum 8-hour concentration	California	0.070	0.116	0.128	0.112	89	89	52
			National	0.070	0.116	0.127	0.111	88	87	54
Nitrogen Dioxide (NO_2)										
Upland Monitoring Station	ppm	Maximum 1-hour concentration	California	0.18	0.070	0.064	0.058	0	0	0
			National	0.100	0.070	0.064	0.059	0	0	0
	ppm	Annual	California	0.030	0.016	0.015	0.014	—	—	—

Table 3.2-3
Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2016	*2017*	*2018*	*2016*	*2017*	*2018*
		concentration	National	0.053	—	—	—	—	—	—
Carbon Monoxide (CO)										
Upland Monitoring Station	ppm	Maximum 1-hour concentration	California	20	—	—	—	—	—	—
			National	35	1.7	1.9	1.7	0	0	0
	ppm	Maximum 8-hour concentration	California	9.0	—	—	—	—	—	—
			National	9	1.3	1.4	1.2	0	0	0
Sulfur Dioxide (SO_2)										
Fontana Monitoring Station	ppm	Maximum 1-hour concentration	National	0.075	0.063	0.039	0.029	0	0	0
	ppm	Maximum 24-hour concentration	National	0.14	0.008	0.011	0.009	0	0	0
	ppm	Annual concentration	National	0.030	0.0038	0.0022	0.0035	0	0	0
Coarse Particulate Matter (PM_{10})[a]										
Fontana Monitoring Station	μg/m³	Maximum 24-hour concentration	California	50	94.8	75.3	61.5	ND (14)	ND (8)	ND (8)
			National	150	94.0	75.3	64.1	0.0 (0)	ND (0)	0.0 (0)
	μg/m³	Annual concentration	California	20	ND	ND	ND	—	—	—
Fine Particulate Matter ($PM_{2.5}$)[a]										
Fontana Monitoring Station	μg/m³	Maximum 24-hour concentration	National	35	58.8	39.2	29.2	3.2 (1)	3.0 (1)	0.0 (0)
	μg/m³	Annual concentration	California	12	58.8	39.2	29.2	—	—	—
			National	12.0	12.3	12.0	11.1	—	—	—

Sources: CARB 2019f; EPA 2018c.

Notes: ppm = parts per million by volume; ND = insufficient data available to determine the value; — = not available; μg/m³ = micrograms per cubic meter.

Data taken from CARB iADAM (http://www.arb.ca.gov/adam) and EPA AirData (http://www.epa.gov/airdata/) represent the highest concentrations experienced over a given year.

Exceedances of national and California standards are only shown for O_3 and particulate matter. Daily exceedances for particulate matter are estimated days because PM_{10} and $PM_{2.5}$ are not monitored daily. All other criteria pollutants did not exceed national or California standards during the years shown. There is no national standard for 1-hour ozone, annual PM_{10}, or 24-hour SO_2, nor is there a state 24-hour standard for $PM_{2.5}$.

Upland Monitoring Station is located at 1350 San Bernardino Road, Upland, California 91786.

Fontana Monitoring Station is located at 924 North Garey Avenue, Pomona, California 91767.

[a] Measurements of PM_{10} and $PM_{2.5}$ are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored. The numbers in parentheses are the measured number of samples that exceeded the standard.

3.2.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criterion based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.). These significance criteria, included for analysis in this EIR, will be used to determine the significance of potential air quality impacts. Impacts to air quality would be significant if the Proposed Project would:

A. Conflict with or obstruct with implementation of the applicable air quality plan.

B. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

C. Expose sensitive receptors to substantial pollutant concentrations.

D. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The SCAQMD has established Air Quality Significance Thresholds, as revised in March 2015, that set forth quantitative emission significance thresholds below which a project would not have a significant impact on ambient air quality under existing and cumulative conditions. The quantitative air quality analysis provided herein applies the SCAQMD thresholds identified in Table 3.2-4 to determine the potential for the project to result in a significant impact under CEQA.

Table 3.2-4
SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	*Construction (pounds per day)*	*Operation (pounds per day)*
VOCs	75	55
NO_x	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3
TACs and Odor Thresholds		
TACs[b]	Maximum incremental cancer risk ≥ 10 in 1 million Chronic and acute hazard index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Table 3.2-4
SCAQMD Air Quality Significance Thresholds

Ambient Air Quality Standards for Criteria Pollutants[c]	
NO_2 1-hour average NO_2 annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.030 ppm (state) and 0.0534 ppm (federal)
Ambient Air Quality Standards for Criteria Pollutants[c]	
CO 1-hour average CO 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)
PM_{10} 24-hour average PM_{10} annual average	10.4 μg/m³ (construction)[d] 2.5 μg/m³ (operation) 1.0 μg/m³
$PM_{2.5}$ 24-hour average	10.4 μg/m³ (construction)[d] 2.5 μg/m³ (operation)

Source: SCAQMD 2015a.

Notes: μg/m³ = micrograms per cubic meter; CO = carbon monoxide; NO_2 = nitrogen dioxide; NO_x = oxides of nitrogen; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; ppm = parts per million; SCAQMD = South Coast Air Quality Management District; SO_x = sulfur oxides; TAC = toxic air contaminant; VOC = volatile organic compounds

GHG emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not include included as they will be addressed within the GHG emissions analysis and not the air quality study.

[a] The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

[b] TACs include carcinogens and noncarcinogens.

[c] Ambient air quality standards for criteria pollutants are based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.

[d] Ambient air quality threshold are based on SCAQMD Rule 403.

The phasing out of leaded gasoline started in 1976. As gasoline no longer contains lead, the Proposed Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

The evaluation of whether the project would conflict with or obstruct implementation of the applicable air quality plan (Impact AQ-A) is based on the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993), Chapter 12, Sections 12.2 and 12.3. The first criterion assesses if the project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP, which is addressed in detail in Section 3.2.4, Threshold AQ-B. The second criterion is if the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase, as discussed further in Section 3.2.4, Threshold AQ-A.

In addition to the above-listed emission-based thresholds, the SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the

project as a result of construction activities. Such an evaluation is referred to as a localized significance threshold (LST) analysis. For project sites of five acres or less, SCAQMD LST Methodology (SCAQMD 2008) includes lookup tables that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance criteria (i.e., the emissions would not cause an exceedance of the applicable concentration limits for NO_2, CO, PM_{10}, and $PM_{2.5}$) without performing project-specific dispersion modeling.

The LST significance thresholds for NO_2 and CO represent the allowable increase in concentrations above background levels in the vicinity of a project that would not cause or contribute to an exceedance of the relevant ambient air quality standards, while the threshold for PM_{10} represents compliance with Rule 403 (Fugitive Dust). The LST significance threshold for $PM_{2.5}$ is intended to ensure that construction emissions do not contribute substantially to existing exceedances of the $PM_{2.5}$ ambient air quality standards. The allowable emission rates depend on the following parameters:

a. Source-receptor area (SRA) in which the project is located
b. Size of the project site
c. Distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals)

The Plan area is located in SRA 32 (Northwest San Bernardino Valley). The SCAQMD provides guidance for applying California Emissions Estimator Model (CalEEMod) to the LSTs. LST pollutant screening level concentration data is currently published for 1-, 2-, and 5-acre sites for varying distances. The maximum number of acres disturbed on the peak day was estimated using the Fact Sheet for Applying CalEEMod to Localized Significance Thresholds (SCAQMD 2014). During grading activities, fugitive dust can be generated from the movement of dirt on the project site. CalEEMod estimates dust from dozers moving dirt around, dust from graders or scrapers leveling the land, and loading or unloading dirt into haul trucks. Each of those activities is calculated differently in CalEEMod, based on the number of acres traversed by the grading equipment. Only some pieces of equipment generate fugitive dust in CalEEMod. The CalEEMod manual identifies various equipment and the acreage disturbed in an 8-hour day:

- Crawler tractors, graders, and rubber tired dozers: 0.5 acres per 8-hour day
- Scrapers: 1 acre per 8-hour day

While the look-up tables include projects up to 5 acres, it should be noted that projects which could disturb greater than 5 acres would require dispersion modeling to determine LSTs. However, because the assumed construction scenario may not be representative of actual construction, the LSTs for 1-acre and 2-acre disturbance areas are also presented in Table 3.2-5 and the analysis conservatively applies the most stringent thresholds, which are for 1-acre sites.

The closest sensitive receptors (i.e., closest residences to future construction sites within the Plan area) would be located approximately 100 feet (30.48 meters) from potential construction activity locations. Because the SCAQMD does not provide lookup table values for 30.48 meters, the LST value for a distance of 25 meters was used; this represents the closest distance presented in the lookup tables. The LST values from the SCAQMD lookup tables for SRA 32 (Northwest San Bernardino Valley) for a disturbed acreage of 1-, 2-, and 5- acres and a receptor distance of 25 meters are shown in Table 3.2-5.

Table 3.2-5
Localized Significance Thresholds for Source Receptor Area 32
(Northwest San Bernardino Valley)

Pollutant	Threshold by Acres Disturbed Per Day (Pounds per Day)		
	1-acre	*2-acres*	*5-acres*
NO_2	118	170	270
CO	863	1,232	2,193
PM_{10}	5	6	16
$PM_{2.5}$	4	5	9

Source: SCAQMD 2008.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.
LST thresholds were determined based on the values for a distance of 25 meters (82 feet) from the nearest sensitive receptor.

The potential for the Proposed Project to expose sensitive receptors to substantial pollutant concentrations (Section 3.2.4, Threshold AQ-C) includes the LST analysis, a CO hotspot analysis, a qualitative health risk discussion, and a qualitative assessment of the health effects of other criteria air pollutants.

The potential for the project to result in an odor impact (Section 3.2.4, Threshold AQ-D) is based on the Proposed Project's land use types and anticipated construction activity, and the potential for the project to create an odor nuisance pursuant to SCAQMD Rule 402.

3.2.4 Methodology

The Proposed Project identifies anticipated development by land use type and square footage. However, project specifics for construction and operation of the Proposed Project are currently not available. Nonetheless, Proposed-Project-generated emissions were estimated in a good faith effort to disclose the magnitude of potential criteria air pollutant emissions generated during construction and operation of the Proposed Project.

Construction Emissions

Emissions from the construction phase of the project were estimated using CalEEMod Version 2016.3.2. Construction scenario assumptions, including phasing, equipment mix, and vehicle trips, were based on CalEEMod default values, which were adjusted to more accurately reflect long-term buildout of the project.

For purposes of estimating project emissions, construction was assumed to start in 2021 and have a duration of 20 years, with build out of the Proposed Project by 2040. While construction specifics for buildout of the Proposed Project are not currently available, six approximately 3.3-year phases of construction were assumed to reflect phased development over 20 years. The analysis contained herein is based on the following assumptions for each of the six 3.3-year phases (duration of phases is approximate):

- Demolition: 2 months
- Site Preparation: 1 month
- Grading: 3 months
- Building Construction: 32 months
- Paving: 2 months
- Application of Architectural Coatings: 2 months

While not all of the existing buildings would be demolished and replaced, it was conservatively assumed that all 251,581 square feet of existing structures would be demolished over the 20-year buildout. Accordingly, it was assumed that 41,930 square feet would be demolished in each of the six demolition phases. Grading quantities are currently not identified and grading is anticipated to be minimal because the site is already developed; however, to capture potential haul truck trips during the grading phase, it was assumed that 10,000 cubic yards would be exported during each grading phase. To capture emissions associated with the asphalt surfaces (e.g., streets and parking lots) it was assumed that 20% of total Plan area acreage was paved.

Construction-worker estimates and vendor truck trips by construction phase were based on CalEEMod default values. CalEEMod default trip length values were used for the distances for all construction-related trips.

The construction equipment mix and vehicle trips used for estimating the Proposed Project-generated construction emissions are shown in Table 3.2-6. For the analysis, it was generally assumed that heavy construction equipment would be operating at the site 5 days per week (22 days per month) during project construction.

Table 3.2-6
Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Demolition (Phases 1, 2, 3, 4, 5, and 6)	16	0	192	Concrete/industrial saws	1	8
				Excavators	3	8
				Rubber-tired dozers	2	8
Site preparation (Phases 1, 2, 3, 4, 5, and 6)	18	0	0	Rubber-tired dozers	3	8
				Tractors/loaders/backhoes	4	8
Grading (Phases 1, 2, 3, 4, 5, and 6)	20	0	1,250	Excavators	2	8
				Graders	1	8
				Rubber-tired dozers	1	8
				Scrapers	2	8
				Tractors/loaders/backhoes	2	8
Building construction (Phases 1, 2, 3, 4, 5, and 6)	936	194	0	Cranes	1	7
				Forklifts	3	8
				Generator sets	1	8
				Tractors/loaders/backhoes	3	7
				Welders	1	8
Paving (Phases 1, 2, 3, 4, 5, and 6)	16	0	0	Pavers	2	8
				Paving equipment	2	8
				Rollers	2	8
Architectural coating (Phases 1, 2, 3, 4, 5, and 6)	186	0	0	Air compressors	1	6

Notes: See Appendix B-1 for details.

Operational Emissions

Emissions from the operational phase of the Proposed Project were estimated using CalEEMod Version 2016.3.2. Operational year 2040 development scenario was assumed, which is consistent with the traffic impact analysis (TIA) prepared for the Proposed Project (Appendix F). Buildout of the Proposed Project would include 2,058,908 square feet in commercial land uses and 6,321 multi-family residential uses.

Emissions from the existing land uses (Existing Scenario) were also estimated using CalEEMod to present the net change in criteria air pollutant emissions. Operational year 2020 was assumed for the Existing Scenario which is identified as the last full-year in which existing land uses would be operational before construction activity would commence in 2021. The total existing land use within the Plan area evaluated in the Existing Scenario is approximately 1,546,273 square feet.

The Proposed Project and Existing Scenario land use assumptions in CalEEMod are presented in Table 3.2-7.

Table 3.2-7
Proposed Project and Existing Scenario Development Land Use Summary

Land Use	Proposed Project	Existing Scenario
	Square Feet	
Residential (mid-rise)	5,057 units	0
Residential (high-rise)	1,264 units	0
General office	331,056	0
Medical office	201,452	0
Hotel	99,000 (250 rooms)	0
Shopping center retail	1,170,853	1,180,009
Strip center retail (Monte Vista Ave)	72,682	13,913
Civic	74,030	0
Outbuilding - retail	0	98,168
Outbuilding - restaurant	0	74,210
Outbuilding - fitness	0	46,536
Outbuilding - auto repair	0	7,055
Movie theater	109,836	109,836
Church	0	16,546
Total	**2,058,908 (6,321 dwelling units)**	**1,546,273**

Source: Montclair Place District Specific Plan, 2020.

The Proposed Project would result in an increase of 512,635 square feet of commercial uses and 6,321 residential units.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating, water heating, and stoves are calculated in the building energy use module of CalEEMod, as described in the following text. The Proposed Project and Existing Scenario are assumed to not include woodstoves or fireplaces (wood or natural gas). As such, area source emissions associated with hearths were not included.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (California Air Pollution Control Officers Association (CAPCOA) 2017). Consumer product VOC emissions are estimated in

CalEEMod based on the floor area of nonresidential buildings and on the default factor of pounds of VOC per building square foot per day. For the asphalt surface land use assumed in the Proposed Project scenario, CalEEMod estimates VOC emissions associated with use of parking surface degreasers based on a square footage of parking surface area and pounds of VOC per square foot per day.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers using during building maintenance. CalEEMod calculates the VOC evaporative emissions from application of nonresidential surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. The VOC emission factor is based on the VOC content of the surface coatings, and SCAQMD's Rule 1113 (Architectural Coatings) governs the VOC content for interior and exterior coatings. The model default reapplication rate of 10% of area per year is assumed. Consistent with CalEEMod defaults, it is assumed that the nonresidential surface area for painting equals 2.0 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating and assumed that the residential surface area for painting equals 2.7 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating.

For the other asphalt surfaces assumed in the Proposed Project scenario, the architectural coating area is assumed to be 6% of the total square footage, consistent with the supporting CalEEMod studies provided as an appendix to the CalEEMod User's Guide (CAPCOA 2017).

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers. The emissions associated from landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per residential dwelling unit per day and grams per square foot of nonresidential building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days. For San Bernardino County, the average annual "summer" days are estimated to 365 days; however, it is assumed that landscaping equipment would likely only operate during the week (not weekends), so operational days were assumed to be 250 days per year in CalEEMod (CAPCOA 2017).

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHGs in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site.

The energy use from nonresidential land uses (natural gas usage per square foot per year) is calculated in CalEEMod based on the California Commercial End-Use Survey database. CalEEMod default values for energy consumption, which assume compliance with the 2016 Title 24 Building Energy Efficiency Standards, were applied for the Proposed Project analysis. However, Proposed Project energy use is anticipated to be less than assumed as development under the Proposed Project, at a minimum, would be required to comply with the more stringent 2019 Title 24 Building Energy Efficiency Standards at the time of building construction, which became effective on January 1, 2020. CalEEMod default values for energy source emissions modeling were also assumed for the Existing Scenario; however, energy use is anticipated to be greater as the existing buildings were built in compliance with less stringent building energy efficiency codes.

Mobile Sources

Mobile sources for the Proposed Project would primarily be motor vehicles (automobiles and light-duty trucks) traveling to and from the Plan area. Motor vehicles may be fueled with gasoline, diesel, or alternative fuels. The default vehicle mix provided in CalEEMod 2016.3.2, which is based on CARB's Mobile Source Emissions Inventory model, EMFAC, version 2014, was applied for both the Proposed Project and Existing Scenario, which is a more conservative approach since the vehicle fleet is expected to be cleaner in later years.

Trip generation rates for the Proposed Project and Existing Scenario were based on the TIA prepared for the Proposed Project (Appendix F). The weekday trip generation rate matches the TIA for all land uses. For the Proposed Project, the assumed Saturday and Sunday trip rates were adjusted in proportion to the CalEEMod default weekday, Saturday and Sunday trip rates and the TIA weekday trip rate. For the Existing Scenario, the Saturday and Sunday trip rates were similarly adjusted based on the CalEEMod default trip generation rates. Trip rate assumptions for the Proposed Project and Existing Scenario are shown in Table 3.2-8.

Table 3.2-8
Proposed Project and Existing Scenario Development Trip Rate Assumptions

Land Use	CalEEMod Land Use Surrogate	Trip Rate (per 1,000 square feet)		
		Weekday[a]	*Saturday*[b]	*Sunday*[b]
Existing Land Uses				
Outbuilding - Auto Repair	Automobile Care Center	23.67	23.67	11.85
Outbuilding - Fitness	Health Club	28.96	18.35	23.50
Outbuilding - Restaurant	High Turnover (Sit Down Restaurant)	85.00	105.87	88.14
Outbuilding - Retail	Free Standing Discount Store	44.95	55.80	44.25
Movie Theater	Movie Theater	75.38	95.87	79.08

Table 3.2-8
Proposed Project and Existing Scenario Development Trip Rate Assumptions

Land Use	CalEEMod Land Use Surrogate	Trip Rate (per 1,000 square feet)		
		Weekday[a]	*Saturday*[b]	*Sunday*[b]
Church	Place of Worship	6.71	7.64	26.98
Shopping Center Retail	Regional Shopping Center	22.92	26.82	13.55
Strip Center Retail (Moreno/Monte Vista)	Strip Mall	84.02	79.69	38.73
Proposed Project				
Multifamily Housing (High-Rise)[c]	Apartments High Rise	3.85	4.56	3.34
Multifamily Housing (Mid-Rise)[c]	Apartments Mid Rise	4.70	4.52	4.14
General Office	General Office Building	8.85	1.97	0.84
Civic	Government (Civic Center)	19.52	0.00	0.00
Medical-Dental Office Building	Medical Office Building	30.09	7.46	1.29
Hotel[d]	Hotel	7.23	7.24	5.26
Movie Theatre	Movie Theater	67.51	85.86	70.83
Shopping Center Retail	Regional Shopping Center	20.58	24.08	12.16
Strip Center Retail (Monte Vista)	Strip Mall	44.32	42.04	20.43

Source: Appendix F.
Notes:
[a] Weekday trip rates are from the Proposed Project TIA.
[b] Saturday and Sunday trip rates were either adjusted in proportion to the CalEEMod default weekday, Saturday and Sunday trip rates and the TIA weekday trip rate or assumed to be the same as the weekday trip rate.
[c] Multifamily housing trip rate is per dwelling unit.
[d] Hotel trip rate is per room.

Stationary Sources and Other Sources of Emissions

Based on the type of land uses that would be developed under the Proposed Project, there are additional emission sources that are either not captured in CalEEMod or specifics are not available to accurately estimate emissions using CalEEMod. Potential additional sources of criteria air pollutant and TAC emissions include: emergency generators, boilers, broilers (meat cooking), ovens, cogeneration facilities, chillers, cooling towers, autoclave, metals production, painting and spray booths, offroad equipment (e.g., forklifts), truck idling, transport refrigeration units, and various VOC sources. In addition, emissions from the stationary and mobile sources listed above are also anticipated to occur under the Existing Scenario based on the existing land use. Nonetheless, because specifics are not available to accurately estimate emissions from these anticipated sources under the Proposed Project and Existing Scenario, associated emissions are not included in the estimated emissions presented herein. However, all stationary sources developed under the Proposed Project would be required to comply with applicable SCAQMD rules and regulations, and would be required to obtain a permit to operate from the SCAQMD.

3.2.5 Impacts Analysis

A. Would the Project conflict with or obstruct implementation of the applicable air quality Plan?

Significant and Unavoidable Impact. As previously discussed, the Plan area is located within the SCAB under the jurisdiction of the SCAQMD, which is the local agency responsible for administration and enforcement of air quality regulations for the area. The SCAQMD has established criteria for determining consistency with the AQMP, currently the 2016 AQMP, in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993). The criteria are as follows (SCAQMD 1993):

- **Consistency Criterion No. 1:** The Proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2:** The Proposed Project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Consistency Criterion No. 1

Section 3.2.4, Threshold AQ-B, evaluates the Proposed Project's potential impacts in regards to State CEQA Guidelines Appendix G Threshold 2 (the project's potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation impact analysis). As discussed in below, the Proposed Project would result in a potentially significant impact associated with the violation of an air quality standard. Because the Proposed Project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, the Proposed Project would potentially conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook.

Consistency Criterion No. 2

While striving to achieve the NAAQS for O_3 and $PM_{2.5}$ and the CAAQS for O_3, PM_{10}, and $PM_{2.5}$ through a variety of air quality control measures, the 2016 AQMP also accommodates planned growth in the SCAB. Projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors (e.g., population, employment) is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook).

The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the SCAG for its RTP/SCS (SCAG 2016), which is based on general plans for cities and counties in the SCAB, for the development of the AQMP emissions inventory (SCAQMD 2017).[6] Although the Connect SoCal (2020-2045 RTP/SCS) is the most recent RTP/SCS, the SCAQMD is still in the early stages of updating their AQMP. Therefore, the SCAG 2016 RTP/SCS and associated Regional Growth Forecast would be applicable in this analysis. Because the 2016 RTP/SCS and Regional Growth Forecast are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans.

The 1998 North Montclair Specific Plan (NMSP) identified the Plan area is zoned C-3 (General Commercial). The C-3 General Commercial Zone is the designation intended for general business uses in the City of Montclair. The uses that would be located within the Plan area (such as retail stores, restaurants/cafes, and theaters) are all permitted or conditionally permitted uses within the C-3 zone. These uses would be consistent with those allowed in the C-3 zone and would also be consistent with the Regional Commercial General Plan designation. In order to construct the Proposed Project, approval of a Specific Plan Amendment and a General Plan Amendment from the City are required, would be required to remove the Plan area from the underlying NMSP boundary and allow for the development of residential land uses.

As discussed in Section 3.10, Population and Housing, the MPDSP would provide a residential population of 18,331 people and 1,404 jobs. The Proposed Project would exceed the SCAG population, housing, and employment growth projections for the City; however, the Proposed Project would represent a nominal percentage of the overall projected population, housing, and employment projections for the County and SCAG region. Therefore, the Proposed Project would not stimulate substantial growth outside of the Plan area. Furthermore, development resulting from the Proposed Project would improve overall design, create pedestrian facilities, and incorporate transportation elements to improve the overall accessibility, walkability, and visual appeal.

While the MPDSP is a planning document and does not include any physical improvements or projects at this time, future development facilitated by project approval

[6] Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including CARB, Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socio-economic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socio-economic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

would create a number of temporary, construction related jobs, as well as, permanent jobs associated with the new developments. The City of Montclair is expected to have a jobs-to-housing ratio of 1.87 by 2045, which is higher than San Bernardino County and the SCAG region by 0.04 and 0.55, respectively. This means that the City is considered to be "jobs rich," indicating it would not be required to commute outside the City for employment in 2040. While it is uncertain where future place of residence would be for employees working within the Plan area it is reasonable to assume that a large percentage of these jobs would be filled by persons already living within the City. The total potential increase in population generated by development of the MPDSP (18,331 persons) represents approximately 175% (or 1.7 times) the projected population increase in the City, approximately 2.72% of the projected population increase in the County, and approximately 0.6 % of the projected population increase in the SCAG region. Although the Proposed Project exceeds the population growth projections of the City, the Proposed Project is within the population growth projections in the County and the SCAG region.

Based on these considerations, vehicle trip generation and planned development for the site are concluded to have been anticipated in the SCAG growth projections and implementation of the Proposed Project would not result in a conflict with, or obstruct implementation of, the applicable air quality plan (i.e., SCAQMD 2016 AQMP). Accordingly, the project would meet Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook.

Summary

As described previously, the project would potentially result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and would potentially conflict with Consistency Criterion No. 1. Implementation of the Proposed Project would be not exceed the demographic growth forecasts in the SCAG 2016 RTP/SCS; therefore, the Proposed Project would be consistent with the SCAQMD 2016 AQMP, which based future emission estimates on the SCAG 2016 RTP/SCS. Thus, the Proposed Project would not conflict with Consistency Criterion No. 2. However, because the Proposed Project would potentially conflict with Consistency Criterion No. 1, mitigation measures **MM-AQ-1** through **MM-AQ-3** are required to reduce criteria air pollutant emissions generated during construction of the Proposed Project. Additionally, mitigation measures **MM-AQ-4** through **MM-AQ-7** are required to reduce criteria air pollutant emissions generated from operation of the Proposed Project. However, even with the implementation of these mitigation measures, impacts related to the Proposed Project's potential to conflict with or obstruct implementation of the applicable air quality plan would remain **significant and unavoidable**.

B. Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Significant and Unavoidable Impact. Construction and operation of the Proposed Project would result in emissions of criteria air pollutants from mobile, area, energy and/or stationary sources, which may cause exceedances of national and California ambient air quality standards or contribute to existing nonattainment of ambient air quality standards. The following discussion identifies potential short-term construction and long-term operational impacts that would result from implementation of the Proposed Project.

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality.

In considering cumulative impacts from the Proposed Project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the SCAB is designated as nonattainment for the CAAQS and NAAQS. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

As discussed in Section 3.2.2, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities.

Construction Emissions

Construction of the Proposed Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. Therefore, such emission levels can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts.

As discussed in Section 3.2.3.2, Approach and Methodology (Construction), criteria air pollutant emissions associated with temporary construction activity were quantified using CalEEMod. Construction emissions were calculated for the estimated worst-case day over the construction period associated with each phase and reported as the maximum daily emissions estimated during each year of construction (2020 through 2039). Construction schedule assumptions, including phase type, duration, and sequencing, were based on CalEEMod default values and is intended to represent a reasonable scenario in the absence of Proposed Project-specific information.

Implementation of the Proposed Project would generate criteria air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. The Proposed Project would be required to comply with SCAQMD Rule 403 to control dust emissions generated during the grading activities. Standard construction practices that were assumed to be employed to reduce fugitive dust emissions, and were quantified in CalEEMod, include watering of the active sites two times per day depending on weather conditions. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOCs, NO_x, CO, PM_{10}, and $PM_{2.5}$. The application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113 (Architectural Coatings).

Table 3.2-9 presents the estimated maximum daily construction emissions generated during construction of the Proposed Project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix B-1.

Table 3.2-9
Estimated Maximum Daily Construction Criteria Air Pollutant Emissions by Year - Unmitigated

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
2021	6.79	51.54	56.23	0.18	12.78	6.40
2022	6.30	35.64	53.12	0.18	12.62	3.99
2023	5.80	29.86	50.09	0.17	12.49	3.87
2024	237.84	35.42	47.93	0.17	12.40	5.65
2025	5.21	27.43	45.76	0.16	12.32	3.71

Table 3.2-9
Estimated Maximum Daily Construction Criteria Air Pollutant Emissions by Year - Unmitigated

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
2026	5.05	27.15	44.00	0.16	12.31	3.71
2027	127.81	30.83	42.44	0.16	12.31	5.52
2028	4.74	30.79	41.07	0.15	12.31	3.70
2029	4.56	26.46	39.73	0.15	12.30	3.69
2030	153.66	21.73	38.57	0.15	11.92	3.34
2031	4.12	21.57	37.45	0.15	12.67	7.10
2032	3.94	21.39	36.39	0.15	11.91	3.33
2033	3.79	21.24	35.49	0.15	11.91	3.33
2034	123.57	21.12	34.61	0.15	12.67	7.10
2035	3.46	20.25	33.85	0.15	11.84	3.27
2036	3.46	20.25	33.85	0.15	11.84	3.27
2037	529.49	20.25	33.85	0.15	12.53	6.96
2038	3.46	20.25	33.85	0.15	11.84	3.27
2039	3.46	20.25	33.85	0.15	11.84	3.27
2040	109.52	19.70	31.62	0.14	11.82	3.24
Maximum Daily Emissions	**529.49**	**51.54**	**56.23**	**0.18**	**12.78**	**7.10**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.
See Appendix B-1, Construction (Summer) and Construction (Winter) output, for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

If multiple large construction projects within the Plan area occur simultaneously, it is possible that cumulative impacts associated with air quality violations could occur. To present a conservative scenario of potential emissions associated with multiple construction projects occurring at the same time, the maximum daily emissions during the six analyzed phases of Proposed Project construction are presented below.

Table 3.2-10
Estimated Maximum Daily Construction Criteria Air Pollutant Emissions by Phase - Unmitigated

Phase	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
Demolition	4.24	32.66	22.41	0.04	2.26	1.58
Site Preparation	3.97	40.55	21.83	0.04	12.67	7.10
Grading	4.43	51.54	32.70	0.08	6.14	3.58
Building Construction	6.79	38.68	56.23	0.18	12.78	4.14
Paving	1.45	10.23	15.10	0.23	0.69	0.96
Architectural Coating	529.49	0.93	4.68	0.02	2.10	0.57

Table 3.2-10
Estimated Maximum Daily Construction Criteria Air Pollutant Emissions by Phase - Unmitigated

Phase	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions Assuming Concurrent Phase Construction	**550.37**	**174.59**	**152.94**	**0.59**	**36.64**	**17.93**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**Yes**	**Yes**	No	No	No	No

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
See Appendix B-1, Construction (Summer) and Construction (Winter) output, for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.
Year presented in parenthesis represents the model year the maximum daily emissions from that construction phase would occur.

Because construction specifications are not currently available, under a conservative scenario where maximum emissions from each assessed construction phase would occur concurrently, estimated Proposed Project emissions would exceed the SCAQMD thresholds for VOC and NO_x. Emissions of CO, SO_x, PM_{10}, and $PM_{2.5}$ are not estimated to exceed SCAQMD thresholds. Impacts associated with Proposed Project-generated construction criteria air pollutant emissions would be **significant and unavoidable**.

Operational Emissions

Operation of the Proposed Project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips; area sources, including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources, including combustion of fuels used for space and water heating. As discussed in Section 3.2.3.2, Approach and Methodology (Operational Emissions), pollutant emissions associated with long-term operation of the Proposed Project and the Existing Scenario were quantified using CalEEMod. Mobile source emissions were estimated in CalEEMod based on project-specific trip rates. CalEEMod default values were used to estimate emissions from area and energy sources for both the Proposed Project and Existing Scenario.

Table 3.2-11 presents the net change maximum daily area, energy, and mobile source emissions associated with operation of the Proposed Project in 2040 and operation under the Existing Scenario in 2020, and the estimated net change in emissions (Proposed Project minus the Existing Scenario). The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix B-1.

Table 3.2-11
Estimated Maximum Daily Operational Criteria Air Pollutant Emissions - Unmitigated

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
Proposed Project						
Area	208.58	100.36	559.58	0.63	10.52	10.52
Energy	3.19	27.47	13.29	0.17	2.20	2.20
Mobile	73.31	482.86	1,003.33	5.86	638.28	172.25
Total	**285.08**	**610.69**	**1,576.20**	**6.66**	**651.00**	**184.97**
Existing Scenario						
Area	34.56	<0.01[a]	0.16	<0.01[a]	<0.01[a]	<0.01[a]
Energy	0.89	8.11	6.81	0.05	0.62	0.62
Mobile	117.38	603.68	1,560.78	5.33	419.07	115.64
Total	**152.83**	**611.79**	**1,567.75**	**5.37**	**419.69**	**116.26**
Net Change in Emissions						
Net Change (Proposed Project – Existing Scenario)	**132.25**	**(1.10)**	**8.45**	**1.29**	**231.31**	**68.71**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**Yes**	No	No	No	**Yes**	**Yes**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
See Appendix B-1, Operations (Summer) and Operations (Winter) output, for complete results.
Totals may not sum due to rounding.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.
The Proposed Project emissions reflect operational year 2040.
The Existing Scenario emissions reflect operational year 2020.
Limited to sources captured in CalEEMod.
Negative values are presented in parentheses.
[a] <0.01 = value less than reported 0.01 metric tons per year.

As shown in Table 3.2-11, the net change in combined daily area, energy, and mobile source emissions from the Proposed Project and the Existing Scenario would exceed the SCAQMD operational thresholds for VOC, PM_{10}, and $PM_{2.5}$; NO_x, CO, and SO_x emissions are not anticipated to exceed SCAQMD thresholds. As discussed previously, emissions are limited to sources that are estimated in CalEEMod and sources where project-specifics are available or can be reasonably estimated using CalEEMod. Impacts associated with Proposed Project-generated operational criteria air pollutant emissions would be **significant and unavoidable**.

Summary

As discussed above, prior to mitigation, the Proposed Project would result in emissions that would exceed the SCAQMD thresholds for VOC and NO_x, during construction, as well as VOC, PM_{10}, and $PM_{2.5}$ exceedances during operations. Notably, since the

emission-based thresholds used in this analysis were established to provide project-level estimates of criteria air pollutant quantities that the SCAB can accommodate without affecting the attainment dates for the ambient air quality standards, and since the EPA and CARB have established the ambient air quality standards at levels above which concentrations could be harmful to human health and welfare, with an adequate margin of safety, elevated levels of criteria air pollutants above adopted thresholds as a result of the Proposed Project's construction and operation could cause adverse health effects associated with these pollutants. (The effects typically associated with unhealthy levels of criteria air pollutant exposure are described in Section 3.2.1.2, Pollutants and Effects, above.) In addition, potential health effects from criteria air pollutant emissions are discussed below, in impact criterion (c).. Mitigation measures **MM-AQ-1** through **MM-AQ-3** are required to reduce criteria air pollutant emissions generated during construction of the Proposed Project. In addition, mitigation measures **MM-AQ-4** through **MM-AQ-7** are required to reduce criteria air pollutant emissions generated from operation of the Proposed Project. However, even with the implementation of these mitigation measures, impacts associated with criteria air pollutant emissions generated during construction and operation of the Proposed Project would be **significant and unavoidable**.

C. Would the Project expose sensitive receptors to substantial pollutant concentrations?

Localized Significance Thresholds Analysis

Significant and Unavoidable Impact. As discussed in Section 3.2.1, sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).

The closest off-site sensitive receptors to the Plan area are single-family and multi-family residences which surround the Plan area, located on the north side of Moreno Street and the west side of Monte Vista Avenue. Furthermore, the closes schools to the Plan area are Moreno Elementary School, which is located approximately 370 feet to the west and Serrano Middle School, which is located approximately 850 feet to the west. Construction activities generated by future projects under the Proposed Project would take place at various locations within the Plan area, both near and far from adjacent existing sensitive receptors. For example, future construction associated with redevelopment of the Vista Moreno Plaza site would take place within approximately 100 feet of residential uses (along Moreno Street) and approximately 370 feet of the Moreno

Elementary School. Therefore, given that the closest existing sensitive receptors are located within approximately 100 feet of Proposed Project construction sites, these sensitive receptors would be exposed to localized air quality impacts resulting from future construction activities under the Proposed Project.

An LST analysis has been prepared to determine potential impacts to nearby sensitive receptors during construction of the project. As indicated in the discussion of the thresholds of significance (Section 3.2.3), SCAQMD also recommends the evaluation of localized NO_2, CO, PM_{10}, and $PM_{2.5}$ impacts as a result of construction activities to sensitive receptors in the immediate vicinity of the Plan area. The impacts were analyzed using methods consistent with those in SCAQMD's Final LST Methodology (2009). According to the Final LST Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2009). Hauling of soils and construction materials associated with the project construction are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways. Emissions from the trucks would be relatively brief in nature and would cease once the trucks pass through the main streets.

Construction activities associated with the Proposed Project would result in temporary sources of on-site fugitive dust and construction equipment emissions. Off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis. The most stringent SCAQMD localized significance criteria for SRA 32 (for 1-acre project sites corresponding to a distance to a sensitive receptor of 25 meters, which represents a conservative analysis) are presented in Table 3.2-12 and compared to the maximum daily on-site construction emissions generated during the Proposed Project.

Table 3.2-12
Localized Significance Thresholds Analysis for Project Construction

Maximum On-Site Emissions	NO_2	CO	PM_{10}	$PM_{2.5}$
	Pounds per Day			
Construction emissions	46.40	30.88	12.47	7.05
SCAQMD LST	118	863	5	4
LST exceeded?	No	No	**Yes**	**Yes**

Source: SCAQMD 2009.
Notes:
NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
See Appendix B-1, Construction (Summer) and Construction (Winter) output, for complete results.
Localized significance thresholds are shown for 1-acre project sites corresponding to a distance to a sensitive receptor of 25 meters.
These estimates implementation of the Proposed Project's fugitive dust control strategies, including watering of an active site two times per day.
Maximum on-site NO_2 and CO emissions would occur in 2021, due to the site preparation during Phase 1. The maximum PM_{10} and $PM_{2.5}$ emissions would occur in 2031, due to the site preparation during Phase 5.

As shown in Table 3.2-12, construction activities would generate PM_{10} and $PM_{2.5}$ emissions in excess of site-specific LSTs. As such, mitigation measures **MM-AQ-1** through **MM-AQ-3** are required to reduce criteria air pollutant emissions generated during construction of the Proposed Project. However, even with the implementation of these mitigation measures, site-specific construction impacts during construction of the Proposed Project would be **significant and unavoidable**.

Carbon Monoxide Hotspots

Less Than Significant Impact. Mobile source impacts occur on two scales of motion. Regionally, travel resulting from development allowed by the MPDSP would add to regional trip generation and increase the vehicle miles traveled within the local airshed and the SCAB. Locally, traffic generated as a result of development allowed by the MPDSP would be added to the area's roadway system near the MPDSP area. If such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles cold-started and operating at pollution-inefficient speeds, and is operating on roadways already crowded with non-Specific Plan area traffic, there is a potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing.

At the time that the SCAQMD 1993 Handbook was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP (Appendix V: Modeling and Attainment Demonstrations, SCAQMD 2003) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. Notably, the Central Avenue and Interstate 10 (I-10) eastbound ramps intersection have the highest average daily traffic volume within the Plan area of 41,526 vehicles per day, as identified in the Proposed Project's TIA. Using CO emission factors for 2002, the peak modeled CO 1-hour concentration was estimated to be 4.6 ppm at the intersection of Wilshire Boulevard and Veteran Avenue. When added to the maximum 1-hour CO concentration from 2016 through

2018 at the Upland monitoring station (see Table 3.2-3, Local Ambient Air Quality Data) which was 1.9 ppm in 2017, the 1-hour CO would be 6.5 ppm, while the CAAQS is 20 ppm.

The 2003 AQMP also projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO hotspot was 3.8 ppm at the Sunset Boulevard and Highland Avenue intersection (2002; 3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002). Adding the 3.8 ppm to the maximum 8-hour CO concentration from 2016 through 2018 at the Upland monitoring station (see Table 3.2-3) which was 1.4 ppm in 2017, the 8-hour CO would be 5.2 ppm, while the CAAQS is 9.0 ppm.

As such, potential operational impacts, from future development allowed by the MPDSP, associated with CO hotspots would be **less than significant**. No mitigation is required.

Toxic Air Contaminants

Construction

Significant and Unavoidable Impact. The Proposed Project could result in TAC exposure to existing or future sensitive land uses during construction. Diesel equipment would be subject to the CARB air toxic control measures for in-use off-road diesel fleets, which would minimize DPM emissions; however, the levels of potential emissions in relation to the location of sensitive receptors cannot be estimated with a level of accuracy due to the absence of construction specific information (i.e., construction phasing, equipment fleet, and haul truck trips, etc.) for the Proposed Project. As such, potential health risk of exposing sensitive receptors to construction-generated TAC emissions, primarily DPM, would be **significant and unavoidable**.

Operation

Significant and Unavoidable Impact. The Proposed Project includes residential and commercial land uses which may result in the generation of TACs. Potential sources of TAC emissions from the Proposed Project include, but are not limited to: emergency generators, boilers, broilers (meat cooking), ovens, offroad equipment (e.g., forklifts), truck idling, and transport refrigeration units. However, because the type and location of Proposed Project land uses and tenants have not been identified, the potential health risk associated with buildout of the Proposed Project cannot be accurately estimated. Due to the uncertainty of Proposed Project land uses and tenants and their associated TAC emissions, as well as the potential location of additional sensitive receptors and the

effectiveness of TAC reduction measures, the Proposed Project would have a **significant and unavoidable** health risk impact during operation.

Health Impacts of Other Criteria Air Pollutants

Significant and Unavoidable Impact. In response to the California Supreme Court's *Sierra Club v. County of Fresno* (2018) 6 Cal. 5th 502 decision (referred to herein as the Friant Ranch decision), this discussion addresses the potential for adverse health effects related to emissions of criteria air pollutants associated with construction and operation of the Proposed Project.

In requiring a health risk type analysis for criteria air pollutants, it is important to understand how ozone is formed, dispersed and regulated. Ground-level ozone (smog) is not directly emitted into the air, but is instead formed when precursor pollutants such as VOCs or NO_x are emitted into the atmosphere and undergo complex chemical reactions in the process of sunlight (SJVUAPCD 2015, p.4). Once formed, ozone can be transported long distances by wind (EPA 2020a). Because of the complexity of ozone formation, a specific tonnage amount of VOCs or NO_x emitted in a particular area does not equate to a particular concentration of ozone in that area (SJVUAPCD 2015, p.4). In fact, even rural areas that have relatively low tonnages of emissions of VOCs or NO_x can have high levels of ozone concentrations simply due to wind transport and other meteorological conditions such as temperature inversion and high pressure systems. Conversely, areas that have substantially more VOCs or NO_x emissions could experience lower concentrations of ozone simply because sea breezes disperse the emissions (SJVUAPCD 2007).

The lack of link between the tonnage of precursor pollutants and the concentration of ozone formed is important because it is not necessarily the tonnage of precursor pollutants that causes human health effects; rather, it is the concentration of resulting ozone that causes these effects (SJVUAPCD 2015, p.5). Indeed, the ambient air quality standards, which are statutorily required to be set by EPA at levels that are requisite to protect the public health, are established as concentrations of ozone and not as tonnages of their precursor pollutants (EPA 2020b). Because the ambient air quality standards are focused on achieving a particular concentration region-wide, the tools and plans for attaining the ambient air quality standards are regional in nature.

The computer models (e.g., Community Multiscale Air Quality [CMAQ] modeling platform)[7] used to simulate and predict an attainment date for ozone are based on regional inventories of precursor pollutants and meteorology within an air basin. At a very basic level, the models simulate future ozone levels based on predicted changes in precursor emissions basin-wide. These computer models are not designed to determine whether the emissions generated by an individual development project will affect the date that the air basin attains the ambient air quality standards. Instead, the models help inform regional planning strategies based on the extent that all of the emission-generating sources within the air basin must be controlled in order to reach attainment (SJVUPCD 2015, pp.6–7).

The SCAQMD and the San Joaquin Valley Air Pollution Control District (SJVAPCD) have indicated that it is not feasible to quantify project-level health impacts based on existing modeling (SCAQMD 2015b; SJVUPCD 2015). Even if a metric could be calculated, it would not be reliable because the models are equipped to model the impact of all emission sources in an air basin on attainment and would likely not yield valid information or a measurable increase in ozone concentrations sufficent to accurately quantify ozone-related health imacts for an individual project.

Construction of the Proposed Project could result in emissions that would exceed the SCAQMD thresholds for criteria air pollutants including regional VOC and NO_x emissions and localized PM_{10} and $PM_{2.5}$ emissions. Operation of the Proposed Project would result in emissions that would exceed the SCAQMD thresholds for criteria air pollutants including VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$. VOCs and NO_x are precursors to O_3, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O_3 are generally associated with reduced lung function. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 ambient air quality standards tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative because of the lack of quantitative methods to assess this impact. Nonetheless, because VOC and NO_x emissions associated with Proposed Project construction and operation would exceed the SCAQMD mass daily construction threshold, it could minimally contribute to regional O_3

[7] The SCAQMD 2016 AQMP ozone attainment demonstration was developed using the U.S. EPA recommended CMAQ (version 5.0.2) modeling platform with SAPRC07 chemistry, and the Weather Research and Forecasting Model (WRF) (version 3.6) meteorological fields.

concentrations and the associated health impacts. Accordingly, the health impacts of other criteria air pollutants are considered significant and unavoidable.

Health impacts that result from NO_2 and NO_x include respiratory irritation. Although the Proposed Project's construction would generate NO_x emissions that would exceed the SCAQMD mass daily thresholds, construction and operation of the Proposed Project is not anticipated to contribute to exceedances of the NAAQS and CAAQS for NO_2 because the SCAB is designated as in attainment of the NAAQS and CAAQS for NO_2 and the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards. Nonetheless, because there are nearby receptors to be affected by off-road construction equipment and operational sources of NO_x, potential health impacts associated with NO_2 and NO_x are considered significant and unavoidable.

CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots were discussed previously and are determined to be a less-than-significant impact. However, operation of the Proposed Project would generate CO emissions that would not exceed the SCAQMD thresholds. Therefore, the Project's CO emissions would minimally contribute to significant health effects associated with this pollutant.

Construction of the Proposed Project would not exceed the SCAQMD threshold for PM_{10} or $PM_{2.5}$; however, operation of the Proposed Project would exceed thresholds for PM_{10} or $PM_{2.5}$. As such, the Proposed Project would potentially contribute to exceedances of the NAAQS and CAAQS for particulate matter or would obstruct the SCAB from coming into attainment for these pollutants. Because the Project's potential contribution of particulate matter during construction and operation, associated health impacts are considered significant and unavoidable.

In summary, because construction and operation of the Proposed Project could result in exceedances of the SCAQMD significance thresholds for VOC, NO_x, PM_{10}, and $PM_{2.5}$, the potential health impacts associated with criteria air pollutants are considered **significant and unavoidable**. Notably, there are numerous scientific and technological complexities associated with correlating criteria air pollutant emissions from an individual project to specific health effects or potential additional nonattainment days, and there are currently no modeling tools that could provide reliable and meaningful additional information regarding health effects from criteria air pollutants generated by individual projects. As previously discussed, at the time of this EIR's preparation, no expert agency, including the SCAQMD (SCAQMD 2015b), the CARB, or the EPA, has approved a quantitative method to reliably, meaningfully, and consistently translate the mass emission estimates for the criteria air pollutants resulting from the proposed project to specific health effects. These subjects are discussed further in Appendix B-2.

D. Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the Plan area and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be less than significant.

Land uses and industrial operations that typically are associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). While the Proposed Project does not propose the aforementioned odor-generating land uses, based on potential types of land uses presented in Table 3.2-7 during the operational phase of the Proposed Project, anticipated odors could be generated from retail land uses, including food-service odors. However, while some odors could be produced by the restaurants and other food and drinking places, these types of uses already exist within the Plan area and are not generally considered sources of objectionable odors. Furthermore, the Proposed Project would comply with SCAQMD Rule 402, Nuisance, which prohibits the release of odors which may cause annoyance to a considerable number of persons. Therefore, the potential for the Proposed Project to generate an odor impact is considered **less than significant**.

3.2.6 Cumulative Impacts

Cumulative localized impacts would potentially occur if a construction project were to occur concurrently with another off-site project. Construction schedules for potential future projects near the Plan area are currently unknown; therefore, potential construction impacts associated with two or more simultaneous projects would be considered speculative.[8] However, future projects would be

[8] The State CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). This discussion is nonetheless provided in an effort to show good-faith analysis and comply with CEQA's information disclosure requirements.

subject to CEQA and would require air quality analysis and, where necessary, mitigation if the project would exceed SCAQMD thresholds. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD. In addition, cumulative VOC emissions would be subject to SCAQMD Rule 1113 (Architectural Coatings).

Based on the construction and operational emissions of VOC, NO_x, PM_{10}, and $PM_{2.5}$ generated by the Proposed Project, the Proposed Project would result in a cumulatively considerable increase in emissions of nonattainment pollutants. Impacts would be potentially significant and, thus, require mitigation. However, even with the incorporation of mitigation measures, cumulative impacts to air quality during construction and operation would be **significant and unavoidable**.

3.2.7 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. The following mitigation measure will be incorporated for the Proposed Project. Mitigation measures **MM-AQ-1** through **MM-AQ-3** are required to reduce criteria air pollutant emissions generated during construction of the Proposed Project:

MM-AQ-1 **Construction Equipment Emissions Reductions.** During Proposed Project construction, the applicant shall incorporate the following measures to reduce construction criteria air pollutant emissions, including VOC, NO_x, PM_{10}, and $PM_{2.5}$, generated by construction equipment used for future development projects implemented under the proposed MPDSP:

a) For off-road equipment with engines rated at 75 horsepower or greater, no construction equipment shall be used that is less than Tier 4 Interim. An exemption from these requirements may be granted by the City in the event that the applicant documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment.[9] Before an exemption may be considered by the City, the applicant shall be required to demonstrate that two construction fleet owners/operators in the Los Angeles Region were contacted and that those owners/operators confirmed Tier 4 Interim or better equipment could not be located within the Los Angeles region.

[9] For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded from a Tier 4 Interim to a higher tier (i.e., Tier 4 Final) or replaced with an alternative-fueled (not diesel-fueled) piece of equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards.

b) Minimize simultaneous operation of multiple construction equipment units. During construction, vehicles in loading and unloading queues shall not idle for more than 5 minutes, and shall turn their engines off when not in use to reduce vehicle emissions.

c) Properly tune and maintain all construction equipment in accordance with manufacturer's specifications;

d) Where feasible, employ the use of electrical or natural gas-powered construction equipment, including forklifts and other comparable equipment types.

e) To reduce the need for electric generators and other fuel-powered equipment, provide on-site electrical hookups for the use of hand tools such as saws, drills, and compressors used for building construction.

f) Develop a Construction Traffic Control Plan to ensure construction traffic and equipment use is minimized to the extent practicable. The Construction Traffic Control Plan shall include measures to reduce the number of large pieces of equipment operating simultaneously during peak construction periods, scheduling of vendor and haul truck trips to occur during non-peak hours, establish dedicated construction parking areas to encourage carpooling and efficiently accommodate construction vehicles, identify alternative routes to reduce traffic congestion during peak activities, and increase construction employee carpooling.

MM-AQ-2 **Fugitive Dust Control.** During Proposed Project construction, the applicant shall incorporate the following measures to reduce construction fugitive dust emissions (PM_{10} and $PM_{2.5}$), generated by grading and construction activities of future development projects implemented under the proposed MPDSP, consistent with SCAQMD Rule 403, with a goal of retaining dust on the site:

a) Water, or utilize another SCAQMD-approved dust control non-toxic agent, on the grading areas at least three times daily to minimize fugitive dust.

b) All permanent roadway improvements shall be constructed and paved as early as possible in the construction process to reduce construction vehicle travel on unpaved roads. To reduce fugitive dust from earth-moving operations, building pads shall be finalized as soon as possible following site preparation and grading activities.

c) Stabilize grading areas as quickly as possible to minimize fugitive dust.

d) Apply chemical stabilizer, install a gravel pad, or pave the last 100 feet of internal travel path within the construction site prior to public road entry, and to on-site stockpiles of excavated material.

e) Remove any visible track-out into traveled public streets with the use of sweepers, water trucks, or similar method as soon as possible.

f) Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. Unpaved construction site egress points shall be graveled to prevent track-out.

g) Wet wash the construction access point at the end of the workday if any vehicle travel on unpaved surfaces has occurred.

h) Cover haul trucks or maintain at least 2 feet of freeboard to reduce blow-off during hauling.

i) Evaluate the need for reduction in dust generating activity, potential to stop work, and/or implementation of additional dust control measures if winds exceed 25 miles per hour.

j) Enforce a 15-mile-per-hour speed limit on unpaved surfaces.

k) Provide haul truck staging areas for the loading and unloading of soil and materials. Staging areas shall be located away from sensitive receptors, at the furthest feasible distance.

l) Construction Traffic Control Plans shall route delivery and haul trucks required during construction away from sensitive receptor locations and congested intersections, to the extent feasible. Construction Traffic Control plans shall be finalized and approved prior to issuance of grading permits.

m) Review and comply with any additional requirements of SCAQMD Rule 403.

MM-AQ-3 **Architectural Coating VOC Emissions.** To address the impact relative to VOC emissions, Super-Compliant VOC-content architectural coatings (0 grams per liter to less than 10 grams per liter VOC) during Proposed Project construction, the applicant shall ensure the construction/application of paints and other architectural coatings to reduce ozone precursors. If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September. The developer shall procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113 (Architectural Coatings).

Mitigation measures **MM-AQ-4** through **MM-AQ-7** are required to reduce criteria air pollutant emissions generated during operation of the Proposed Project:

MM-AQ-4 **Vehicle Miles Traveled Reduction Strategies.** The City shall ensure the implementation of Transportation Demand Management (TDM) measures to facilitate increased opportunities for transit, bicycling, and pedestrian travel, as well as provide the resources, means, and incentives for ride-sharing and carpooling to reduce vehicle miles traveled and associated criteria air pollutant emissions. The following components are to be included in the TDM Program:

Bicycle and Pedestrian Travel

a) Develop a comprehensive pedestrian network designed to provide safe bicycle and pedestrian access between the various internal Proposed Project land uses, which will include design elements to enhance walkability and connectivity and shall minimize barriers to pedestrian access and interconnectivity. Physical barriers, such as walls or landscaping, that impede pedestrian circulation shall be eliminated.

b) The Proposed Project design shall include a network that connects the Proposed Project uses to the existing off-site facilities (e.g., existing off-site bike paths).

c) Proposed Project design shall include pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements. Roadways shall be designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips with traffic calming features. Traffic calming features may include: marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, and others.

d) Provide bicycle parking facilities along main travel corridors: one bike rack space per 20 vehicle/employee parking spaces or to meet demand, whichever results in the greater number of bicycle racks.

e) Provide shower and locker facilities to encourage employees to bike and/or walk to work: one shower and three lockers per every 25 employees.

Ride-Sharing and Commute Reduction

f) Promote ridesharing programs through a multi-faceted approach, such as designating a certain percentage of parking spaces for ridesharing vehicles;

designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles; or providing a website or message board for coordinating rides.

g) Implement marketing strategies to reduce commute trips. Information sharing and marketing are important components to successful commute trip-reduction strategies. Implementing commute trip-reduction strategies without a complementary marketing strategy would result in lower VMT reductions. Marketing strategies may include: new employee orientation of trip reduction and alternative mode options; event promotions; or publications.

h) One percent (1%) of vehicle/employee parking spaces shall be reserved for preferential spaces for car pools and van pools.

i) Coordinate with the Southern California Association of Governments (SCAG) for carpool, vanpool, and rideshare programs that are specific to the Proposed Project.

j) Implement a demand-responsive shuttle service that provides access throughout the MPDSP area, to the park-and-ride lots, and to the nearby transit centers.

Transit

k) Bus pull-ins shall be constructed where appropriate within the Plan area.

l) Coordinate with SCAG on the future siting of transit stops/stations within or near the MPDSP.

MM-AQ-5 **Encourage Electric Vehicles.** The City shall ensure that each development project in the Plan area incorporate the following:

a) Designate 10% of parking spaces to be for electric and alternative fuel vehicles.

b) Install Level 2 EV charging stations in 6% of all parking spaces.

MM-AQ-6 **Idling Restriction.** For Proposed Project land uses that include truck idling, the City shall ensure that each implementing development project minimize idling time of all vehicles and equipment to the extent feasible; idling for periods of greater than five (5) minutes shall be prohibited. Signage shall be posted at truck parking spots, entrances, and truck bays advising that idling time shall not exceed five (5) minutes per idling location. To the extent feasible, the tenant shall restrict idling emission from trucks by using auxiliary power units and electrification.

Each cold storage dock door shall provide electrification for transport refrigeration units (TRUs).

MM-AQ-7 **Energy Conservation.** The City shall ensure that each development project incorporate the following conservation measures into proposed building plans:

a) Install a solar photovoltaic rooftop system to reduce the electric demand from the local grid.

b) Install Energy Star rated heating, cooling, lighting, and appliances.

c) Outdoor lighting shall be light emitting diodes (LED) or other high-efficiency lightbulbs.

d) Provide information on energy efficiency, energy efficient lighting and lighting control systems, energy management, and existing energy incentive programs to future tenants.

e) Non-residential structures shall meet the U.S. Green Building Council standards for cool roofs. This is defined as achieving a 3-year solar reflective index (SRI) of 64 for a low-sloped roof and 32 for a high-sloped roof.

f) Outdoor pavement, such as walkways and patios, shall include paving materials with 3-year SRI of 0.28 or initial SRI of 0.33.

g) Construction of modest cool roof, defined as Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance and 0.75 thermal emittance.

h) Use of Heating, Ventilation and Air Conditioning (HVAC) equipment with a Seasonal Energy Efficiency Ratio (SEER) of 12 or higher.

i) Installation of water heaters with an energy factor of 0.92 or higher.

j) Maximize the use of natural lighting and include daylighting (e.g., skylights, windows) in rooms with exterior walls that would normally be occupied.

k) Include high-efficacy artificial lighting in at least 50% of unit fixtures.

l) Install low-NO_x water heaters and space heaters, solar water heaters, or tank-less water heaters.

m) Use passive solar cooling/heating.

n) Strategically plant trees to provide shade.

o) Structures shall be equipped with outdoor electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment.

Mitigation measures **MM-AQ-8** and **MM-AQ-9** are required to reduce the potential for the Proposed Project to expose sensitive receptors to TACs and the associated health risk.

MM-AQ-8 **Toxic Air Contaminant Reduction.** At the time of discretionary approval of new sources of TAC emissions in close proximity to existing sensitive land uses, the City shall require development projects to implement applicable best management practices, as necessary and feasible, that will reduce exposure to TACs. Such measures may include the installation of non-diesel fueled generators or the installation of diesel generators with an EPA-certified Tier 4 engine or engines that are retrofitted with a CARB Level 3 Verified Diesel Emissions Control Strategy. Specific reduction measures will be evaluated and determined depending on proposed land use TAC sources and feasibility.

MM-AQ-9 **Health Risk Assessment Requirements.** Consistent with the California Air Resources Board's recommendations on siting new sensitive land uses, a formal health risk assessment shall be performed under the following conditions:

a) *Distribution Centers.* For any distribution center that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week located within 1,000 feet of a sensitive receptor. In addition, configuration of entry and exit points of the distribution center shall be considered to minimize exposure to sensitive receptors.

b) *Gasoline Dispensing Facilities*. For any large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater) within 300 feet of a sensitive receptor. For any typical gas dispensing facility (with a throughput of less than 3.6 million gallons per year) within 50 feet of a sensitive receptor.

c) *Dry Cleaners Using Perchloroethylene.* For any dry cleaning operation within 300 feet of a sensitive receptor. For operations with three of more machines, consult with the South Coast Air Quality Management District for when a health risk assessment shall be prepared as the distance to the closest sensitive receptor may be less than 300 feet.

d) *Other Sources of Toxic Air Contaminants*. For other sources of TACs, the City shall evaluate the need to prepare a health risk assessment based on the types of TACs and the distance to sensitive receptors.

3.2.8 Significance After Mitigation

Conflict with AQMP

Implementation of mitigation measures **MM-AQ-1** through **MM-AQ-7** would reduce construction and operational emissions; however, due to the lack of project-specific information, the effectiveness in reducing construction and operational emissions cannot be accurately quantified. Therefore, the potential for the Proposed Project to conflict with the SCAQMD 2016 AQMP is s**ignificant and unavoidable**.

Cumulatively Considerable Net Increase of Any Criteria Pollutant

For the reasons explained above, the potential for the Proposed Project to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable national or California ambient air quality standard is **significant and unavoidable**.

Sensitive Receptor Impacts

All new development undergoing discretionary review would be required to evaluate existing TAC exposure and incorporate available reduction measures, if necessary; however, due to the uncertainty of future sensitive receptor locations and the effectiveness of TAC reduction measures, The Proposed Project's impact related to exposure of sensitive receptors to TAC would remain **significant and unavoidable**.

3.2.9 References

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

17 CCR 93000–93001. Substances Identified as Toxic Air Contaminants, as amended.

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3.3 ENERGY

This section describes the existing setting related to energy, identifies associated regulatory requirements, and evaluates energy impacts related to implementation of the Montclair Place District Specific Plan Project (MPDSP or Proposed Project). This analysis is based on emission calculations, California Emissions Estimator Model (CalEEMod) outputs, and energy calculations provided in Appendix B.

3.3.1 Existing Conditions

Electricity

According to the U.S. Energy Information Administration (EIA), California used approximately 257,268 gigawatt hours of electricity in 2017 (EIA 2019a). By sector in 2017, commercial uses utilized 46% of the state's electricity, followed by 35% for residential uses, and 19% for industrial uses (EIA 2019a). Electricity usage in California for different land uses varies substantially by the types of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Due to the state's energy efficiency building standards and efficiency and conservation programs, California's electricity use per capita in the residential sector is lower than any other state except Hawaii (EIA 2020).

Southern California Edison (SCE) provides electricity to Montclair residents and businesses, including those located on the Plan area. SCE, a subsidiary of Edison International, serves approximately 180 cities in 11 counties across central and Southern California. According to the California Energy Commission (CEC), approximately 83 billion kilowatt-hours (kWh) of electricity were used in SCE's service area in 2018 (CEC 2019a). Demand forecasts anticipate that approximately 75 billion kWh of electricity will be used in SCE's service area in 2020 (CPUC 2019).

SCE receives electric power from a variety of sources. According to CPUC's 2019 California Renewables Portfolio Standard Annual Report, 36% of SCE's power came from eligible renewables, such as biomass/waste, geothermal, small hydroelectric, solar, and wind sources (CPUC 2019a). SCE maintains a lower percentage of renewable energy procurement when compared with California's two other large investor-owned utilities – Pacific Gas and Energy Company and San Diego Gas & Electric Company, both of which procured 39% and 44% of their electric power, respectively, from eligible renewables (CPUC 2019a). SCE also maintains a higher percentage of renewables relative to statewide procurement. The California Energy Commission (CEC) estimates that about 29% of the state's electricity retail sales in 2017 came from renewable energy (CEC 2018b). The California Renewables Portfolio Standard (RPS) Program establishes a goal for California to increase the amount of electricity generated from

renewable energy resources to 20% by 2010 and to 33% by 2020. Recent legislation revised the current RPS target for California to obtain 50% of total retail electricity sales from renewable sources by 2030, with interim targets of 40% by 2024, and 45% by 2027 (CPUC 2016).

Within San Bernardino County, annual residential electricity use is approximately 5 billion kWh per year and annual non-residential electricity use is approximately 10 billion kWh per year, as reported by CEC for 2018 (CEC 2019b).

Natural Gas

According to the EIA, California used approximately 2,110,829 million cubic feet of natural gas in 2017 (EIA 2019b). Natural gas is used for cooking, space heating, generating electricity, and as an alternative transportation fuel. The majority of California's natural gas customers are residential and small commercial customers (core customers). These customers accounted for approximately 32% of the natural gas delivered by California utilities (CPUC 2019b). Large consumers, such as electric generators and industrial customers (noncore customers), accounted for approximately 70% of the natural gas delivered by California utilities in 2017 (EIA 2019b).

The Southern California Gas Company (SoCalGas) provides both Riverside and San Bernardino with natural gas service. SoCalGas' service territory encompasses approximately 20,000 square miles and more than 500 communities. In the California Energy Demand mid-energy demand scenario, natural gas demand is projected to have an annual growth rate of 0.03% in SoCalGas' service territory. As of 2017, approximately 7,206 million therms[1] were used in SoCalGas' service area per year. The Proposed Project is expected to begin construction in 2021. By 2020, natural gas demand is anticipated to be approximately 7,876 million therms per year in SoCalGas' service area (CEC 2017). The total capacity of natural gas available to SoCalGas in 2020 is estimated to be 3.8 billion cubic feet per day. In 2024, the total capacity available is also estimated to be 3.8 billion cubic feet per day[2] (California Gas and Electric Utilities 2018). This amount is approximately equivalent to 2.86 billion thousand British thermal units (kBtu) per day or 28.6 million therms per day. Within the County, annual natural gas consumption is approximately 500 million therms (CEC 2019c).

Petroleum

According to the EIA, California used approximately 683 million barrels of petroleum in 2017, with the majority (585 million barrels) used for the transportation sector (EIA 2019c). This total annual consumption equates to a daily use of approximately 1.9 million barrels of petroleum. There are 42 U.S. gallons in a barrel, so California consumes approximately 78.6 million gallons

1 One Therm is equal to 100,000 Btu or 100 kBtu.
2 One cubic foot of natural gas has approximately 1,020 BTUs of natural gas or 1.02 kBTUs of natural gas.

of petroleum per day, adding up to an annual consumption of 28.7 billion gallons of petroleum. In California, petroleum fuels refined from crude oil are the dominant source of energy for transportation sources. Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. California has implemented policies to improve vehicle efficiency and to support use of alternative transportation, which are described in Section 3.3.2, below.

3.3.2 Regulatory Setting

3.3.2.1 Federal

Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2010, fuel economy standards were set at 27.5 miles per gallon for new passenger cars and 23.5 miles per gallon for new light trucks. Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Intermodal Surface Transportation Efficiency Act of 1991

The Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991 promoted the development of intermodal transportation systems to maximize mobility and address national and local interests in air quality and energy. ISTEA contained factors for metropolitan planning organizations to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, metropolitan planning organizations adopted policies defining the social, economic, energy, and environmental values guiding transportation decisions.

Transportation Equity Act for the 21st Century

The Transportation Equity Act for the 21st Century was signed into law in 1998 and builds on the initiatives established in the ISTEA legislation (previously discussed). The act authorizes highway, highway safety, transit, and other efficient surface transportation programs. The act continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of transportation decisions. The act also provides for investment in research and its application to maximize the performance of the transportation

system through, for example, deployment of intelligent transportation systems to help improve operations and management of transportation systems and vehicle safety.

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law. In addition to setting increased Corporate Average Fuel Economy standards for motor vehicles, the act includes other provisions related to energy efficiency:

- Renewable fuel standard (RFS) (Section 202)
- Appliance and lighting efficiency standards (Sections 301–325)
- Building energy efficiency (Sections 411–441)

This federal legislation requires ever-increasing levels of renewable fuels (the RFS) to replace petroleum (EPA 2017). The U.S. Environmental Protection Agency is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under the act, the original RFS program (RFS1) required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several key ways that lay the foundation for achieving significant reductions in greenhouse gas (GHG) emissions from the use of renewable fuels, reducing imported petroleum, and encouraging the development and expansion of the renewable fuels sector in the United States. The updated program is referred to as RFS2 and includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline.
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022.
- EISA established new categories of renewable fuel and set separate volume requirements for each one.
- EISA required the U.S. Environmental Protection Agency to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of the EISA address energy savings in government and public institutions, research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green" jobs.

EPA and NHTSA Joint Rule for Vehicle Standards

On April 1, 2010, the EPA and the National Highway Traffic Safety Administration (NHTSA) announced a joint final rule to establish a national program consisting of new standards for light-duty vehicles model years 2012 through 2016. The joint rule is intended to reduce GHG emissions and improve fuel economy. The EPA promulgated the first-ever national GHG emissions standards under the Clean Air Act, and NHTSA promulgated Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. This final rule follows the EPA and Department of Transportation's joint proposal on September 15, 2009, and is the result of the President Obama's May 2009 announcement of a national program to reduce GHGs and improve fuel economy. The final rule became effective on July 6, 2010 (EPA and NHTSA 2010).

The EPA GHG standards require new passenger cars, light-duty trucks, and medium-duty passenger vehicles to meet an estimated combined average emissions level of 250 grams of carbon dioxide (CO_2) per mile in model year 2016, equivalent to 35.5 mpg if the automotive industry were to meet this CO_2 level through fuel economy improvements alone. The CAFE standards for passenger cars and light trucks will be phased in between 2012 and 2016, with the final standards equivalent to 37.8 mpg for passenger cars and 28.8 mpg for light trucks, resulting in an estimated combined average of 34.1 mpg. Together, these standards will cut GHG emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program. The rules will simultaneously reduce GHG emissions, improve energy security, increase fuel savings, and provide clarity and predictability for manufacturers (EPA and NHTSA 2010).

In August 2012, the EPA and NHTSA approved a second round of GHG and CAFE standards for model years 2017 and beyond (EPA and NHTSA 2012). These standards will reduce motor vehicle GHG emissions to 163 grams of CO_2 per mile, which is equivalent to 54.5 mpg if this level were achieved solely through improvements in fuel efficiency, for cars and light-duty trucks by model year 2025. A portion of these improvements, however, will likely be made through improvements in air-conditioning leakage and through use of alternative refrigerants, which would not contribute to fuel economy. The first phase of the CAFE standards (for model years 2017 to 2021) are projected to require, on an average industry fleet-wide basis, a range from 40.3 to 41.0 mpg in model year 2021. The second phase of the CAFE program (for model years 2022 to 2025) is projected to require, on an average industry fleet-wide basis, a range from 48.7 to 49.7 mpg in model year 2025. The second phase of standards has not been finalized due to the statutory requirement that NHTSA set average fuel economy standards not more than five model years at a time. The regulations also include

targeted incentives to encourage early adoption and introduction into the marketplace of advanced technologies to dramatically improve vehicle performance, including the following:

- Incentives for electric vehicles, plug-in hybrid electric vehicles, and fuel cell vehicles
- Incentives for hybrid technologies for large pickups and for other technologies that achieve high fuel economy levels on large pickups
- Incentives for natural gas vehicles
- Credits for technologies with potential to achieve real-world GHG reductions and fuel economy improvements that are not captured by the standards' test procedures

In August 2018, EPA and NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light trucks and establish new standards for model years 2021 through 2026. Compared to maintaining the post-2020 standards now in place, the 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2–3 % of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of one degree Celsius by 2100 (EPA and NHTSA 2018). California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives. Thus, the timing and consequences of the 2018 federal proposal are speculative at this time.

3.3.2.2 State

Warren-Alquist Act

The California legislature passed the Warren-Alquist Act in 1974. The Warren-Alquist Act created the CEC. The legislation also incorporated the following three key provisions designed to address the demand side of the energy equation:

- It directed the CEC to formulate and adopt the nation's first energy conservation standards for buildings constructed and appliances sold in California.
- The act removed the responsibility of electricity demand forecasting from the utilities, which had a financial interest in high-demand projections, and transferred it to a more impartial CEC.
- The CEC was directed to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as non-conventional energy sources.

State of California Energy Action Plan

The CEC and CPUC approved the first State of California Energy Action Plan in 2003. The plan established shared goals and specific actions to ensure that adequate, reliable, and reasonably priced electrical power and natural gas supplies are provided, and identified policies, strategies, and actions that are cost-effective and environmentally sound for California's consumers and taxpayers. In 2005, a second Energy Action Plan was adopted by the CEC and CPUC to reflect various policy changes and actions of the prior 2 years.

At the beginning of 2008, the CEC and CPUC determined that it was not necessary or productive to prepare a new energy action plan. This determination was based, in part, on a finding that the state's energy policies have been significantly influenced by the passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (discussed below). Rather than produce a new energy action plan, the CEC and CPUC prepared an update that examines the state's ongoing actions in the context of global climate change.

Senate Bills 1078 (2002), 107 (2006), X1-2 (2011), 350 (2015) and 100 (2018)

Senate Bill (SB) 1078 established the California Renewables Portfolio Standard (RPS) Program and required that a retail seller of electricity purchase a specified minimum percentage of electricity generated by eligible renewable energy resources as defined in any given year, culminating in a 20% standard by December 31, 2017. These retail sellers include electrical corporations, community choice aggregators, and electric service providers. The bill relatedly required the CEC to certify eligible renewable energy resources, design and implement an accounting system to verify compliance with the RPS by retail sellers, and allocate and award supplemental energy payments to cover above-market costs of renewable energy.

SB 107 (2006) accelerated the RPS established by SB 1078 by requiring that 20% of electricity retail sales be served by renewable energy resources by 2010 (not 2017). Additionally, SB X1-2 (2011) requires all California utilities to generate 33% of their electricity from eligible renewable energy resources by 2020. Specifically, SB X1-2 sets a three-stage compliance period: by December 31, 2013, 20% had to come from renewables; by December 31, 2016, 25% had to come from renewables; and by December 31, 2020, 33% will come from renewables.

SB 350 (2015) expanded the RPS because it requires retail seller and publicly owned utilities to procure 50% of their electricity from eligible renewable energy resources by 2030, with interim goals of 40% by 2024 and 45% by 2027.

SB 100 (2018) accelerated and expanded the standards set forth in SB 350 by establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030 be secured from qualifying

renewable energy sources. SB 100 also states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources does not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

Consequently, utility energy generation from non-renewable resources is expected to be reduced based on implementation of the RPS requirements described above. The Proposed Project's reliance on non-renewable energy sources would be reduced accordingly.

Assembly Bill 1007 (2005)

AB 1007 (2005) required the CEC to prepare a statewide plan to increase the use of alternative fuels in California (State Alternative Fuels Plan). The CEC prepared the plan in partnership with the California Air Resources Board (CARB) and in consultation with other state agencies, plus federal and local agencies. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

Assembly Bill 32 (2006) and Senate Bill 32 (2016)

In 2006, the state legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. In 2016, the Legislature enacted SB 32, which extended the horizon year of the state's codified GHG reduction planning targets from 2020 to 2030, requiring California to reduce its GHG emissions to 40% below 1990 levels by 2030. In accordance with AB 32 and SB 32, CARB prepares scoping plans to guide the development of statewide policies and regulations for the reduction of GHG emissions. Many of the policy and regulatory concepts identified in the scoping plans focused on increasing energy efficiencies, using renewable resources, and reducing the consumption of petroleum-based fuels (such as gasoline and diesel). As such, the state's GHG emissions reduction planning framework creates co-benefits for energy-related resources. Additional information on AB 32 and SB 32 is provided in Section 3.5, Greenhouse Gas Emissions, of this draft EIR.

California Building Standards

Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically to incorporate and consider new energy

efficiency technologies and methodologies. The current Title 24 standards are the 2019 Title 24 Building Energy Efficiency Standards, which became effective January 1, 2020. In general, single-family residences built to the 2019 standards are anticipated to use approximately 7% less energy (due to energy efficiency measures) than those built to the 2016 standards; if rooftop solar electricity generation is factored in, single-family residences built under the 2019 standards will use approximately 53% less energy than those under the 2016 standards (CEC 2018a). Nonresidential buildings built to the 2019 standards are anticipated to use an estimated 30% less energy than those built to the 2016 standards (CEC 2018a).

Title 24 also includes Part 11, California's Green Building Standards (CALGreen). CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, high-rise residential, state-owned buildings, schools, and hospitals, as well as certain residential and non-residential additions and alterations. The CALGreen 2019 standards have improved upon the previous 2016 CALGreen standards and went into effect on January 1, 2020. The mandatory standards require the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings
- Mandatory reduction in outdoor water use through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance
- 65% of construction and demolition waste must be diverted from landfills
- Mandatory inspections of energy systems to ensure optimal working efficiency
- Inclusion of electric vehicle (EV) charging stations or designated spaces capable of supporting future charging stations
- Low-pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards

The CALGreen standards also include voluntary efficiency measures that are provided at two tiers and implemented at the discretion of local agencies and applicants. CALGreen's Tier 1 standards call for a 15% improvement in energy requirements, stricter water conservation, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen's more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 80% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs.

Integrated Energy Policy Report

The CEC is responsible for preparing integrated energy policy reports that identify emerging trends related to energy supply, demand, and conservation; public health and safety; and maintenance of a healthy economy. The CEC's 2018 Integrated Energy Policy Report discusses the state's policy goals of decarbonizing buildings, doubling energy efficiency savings, and increasing flexibility in the electricity grid system to integrate more renewable energy (CEC 2018b). Specifically, for the decarbonizing of building energy, the goal would be achieved by designing future commercial and residential buildings to have their energy sourced almost entirely from electricity in place of natural gas. Regarding the increase in renewable energy flexibility, the goal would be achieved through increases in energy storage capacity within the state, increases in energy efficiency, and adjusting energy use to the time of day when the most amount of renewable energy is being generated. Over time these policies and trends would serve to beneficially reduce the Proposed Project's GHG emissions profile and energy consumption as they are implemented.

State Vehicle Standards

In response to the transportation sector accounting for more than half of California's carbon dioxide (CO_2) emissions, AB 1493 was enacted in 2002. AB 1493 required CARB to set GHG emissions standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emissions standards for motor vehicles manufactured in 2009 and all subsequent model years. The 2009–2012 standards resulted in a reduction in approximately 22% of GHG emissions compared to emissions from the 2002 fleet, and the 2013–2016 standards resulted in a reduction of approximately 30%.

In 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot, and global-warming gases with requirements for greater numbers of zero-emissions vehicles into a single package of standards called Advanced Clean Cars. By 2025, when the rules would be fully implemented, new automobiles would emit 34% fewer global-warming gases and 75% fewer smog-forming emissions (CARB 2011).

Although the focus of the state's vehicle standards is on the reduction of air pollutants and GHG emissions, one co-benefit of implementation of these standards is a reduced demand for petroleum-based fuels.

Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or SB 375, coordinates land use planning, regional transportation plans, and funding priorities to help California meet its

GHG emissions reduction mandates established in AB 32. As codified in California Government Code Section 65080, SB 375 requires Metropolitan Planning Organizations to include a sustainable communities strategy in their regional transportation plan. The main focus of the sustainable communities strategy is to plan for growth in a fashion that will ultimately reduce GHG emissions, but the strategy is also part of a bigger effort to address other development issues, including transit and vehicle miles traveled (VMT), which influence the consumption of petroleum-based fuels.

3.3.2.3 Local

City of Montclair General Plan

The City of Montclair General Plan (City of Montclair 1999) includes various policies related to reducing energy and energy conservation. Applicable policies include the following:

Circulation Element

Policy CE-1.1.10 Promote the provision of public modes of transportation between strategic locations such as the Montclair Plaza Shopping Center, and other traffic generators such as the Montclair Transcenter and potential Metrolink station on the Riverside Line.

Policy CE-1.1.14 Develop a more detailed bicycle route plan. Develop a zoning standard to require bicycle racks at public facilities as well as at commercial centers. Where a bicycle route is proposed along a roadway, consider striping for safety purposes, where possible.

Air Quality Element

Policy AQ-2.1.1 Encourage and facilitate mixed use and self-sufficient development which are pedestrian and transit-oriented. The areas north of the Montclair Plaza and within the Montclair Transcenter have been identified by the "North Montclair Specific Plan" as viable sites for such developments.

Policy AQ-2.1.2 Encourage trip reduction through programs such as compressed work weeks, flex schedules, carpooling, and telecommunication.

Policy AQ-2.4.2 Develop a City shuttle between regional land uses, park-n-ride facilities, and neighborhoods, in conjunction with Omnitrans existing service.

Policy AQ-2.4.3 Provide bicycle and pedestrian pathways and facilities to encourage non-motorized trips.

Policy AQ-2.5.1 Provide incentives for ridesharing and non-single occupancy vehicles for those vehicles who use public parking lots.

Policy AQ-2.6.1 Purchase vehicles which use clean fuels for use as part of the City fleet.

Conservation Element

Policy CO-1.1.9 Maintain and expand recycling programs to result in continued diversion of materials to landfill, reuse of materials and conservation of natural resources.

The City of Montclair's General Plan identifies opportunities for energy conservation (City of Montclair 1999). Energy conservation is considered a very important method whereby housing can continue to be affordable in the coming years. This Energy Conservation section within the General Plan states that homes which are designed to conserve energy will require less fossil fuel (electricity, gas and oil) to heat or cool and with the rapidly rising costs of these fuels, conservation efforts are expected to become more and more important. The section lists some basic residential energy conservation strategies, which should be encouraged and/or required in housing construction:

- Locate housing in reasonable close to proximity to employment centers, services, schools, parks and other facilities in order to reduce unnecessary automobile usage.
- Locate housing in areas served by public transportation and provide facilities which may better facilitate the use of that transportation.
- Construct homes utilizing full insulation and weatherization standards as required by State and federal regulations.
- Design subdivisions which will provide adequate solar access for planned and future use of solar energy. Subdivision designs which best provide for solar access include a predominant east/west street pattern, orientation of the major access of homes so as to align within 25 degrees of due south, and provide adequate open space to the south of each home so as to provide a "window" to the sun.
- Design homes which can easily accommodate passive and active solar principles and apparatus. Examples of such design include double thickness window glazing, natural flow-through ventilation, clerestory windows, and adequate, well-located southerly exposure roof area.
- Incorporate landscape around homes as a passive solar element in order to provide natural winter heating and summer cooling. The location of deciduous trees on the south side of a home is a particularly good tool for this purpose.

- Incorporate water conservation planning and design into the construction of homes. Low-flow water restrictors and the use of native, drought-resistant plant materials are ways of accomplishing this conservation.
- Make use of refuse separation techniques and collection points in order to recycle such items as aluminum, glass, and paper.
- Provide assistance to owners of existing housing in order to retrofit for energy conservation devices and technologies.

The General Plan states that any or all of the above strategies may be utilized in achieving energy conservation, in addition to any others which may accomplish conservation. Special care should be taken, however, to assure that energy conservation requirements do not significantly affect the affordability of housing. This affordability determination should analyze the initial cost of the measure, current and projected energy supplies, and cost effectiveness of the measure, and length of time before the measure's cost effectiveness will exceed the initial cost.

Housing Element 1999

Policy HE-1.1.27 Develop housing in a manner which will allow the maximum use of alternative energy sources (e.g., solar, wind, cogeneration).

This policy states that project approvals and construction plan review shall include energy conservation consideration and full implementation of state energy requirements (Title 24).

Housing Element 2014

The City's Housing Element was updated in February of 2014. The new Housing Element called for analysis of opportunities for energy conservation with respect to residential development. The new Housing Element included the following policy:

Policy Action 3.3 Energy Conservation – The City will encourage residents to participate in energy conservation incentive programs through local utility companies by providing information on available programs at City Hall and the City's website. To further promote efficient use of energy resources, the City shall investigate the feasibility and effectiveness of offering additional incentives or developing other conservation strategies.

The City of Montclair continues to promote energy conservation efforts in construction of new housing and the rehabilitation of older units. Energy conservation serves to reduce energy costs, and therefore overall housing costs. The City's Building Division reviews construction drawings for compliance with Title24. Compliance with Title 24 of the California Code of Regulations on

the use of energy efficient appliances and insulation has reduced energy demand stemming from new residential development. Included in Title 24 is the California CalGreen.

SCE, which provides electricity in the City of Montclair, offers public information and technical assistance to developers and homeowners regarding energy conservation. SCE also provides incentives for energy efficient new construction and home improvements. Through the Residential Multifamily Energy Efficiency Rebate Program, property owners and managers receive incentives on a broad list of energy efficiency improvements in lighting, HVAC, insulation and window categories. Owners of existing homes can receive monetary incentives for purchasing Energy Star® qualified appliances or making other energy saving improvements such as installing a whole-house fan. The City of Montclair supports SCE in its efforts to provide public information and technical assistance to developers and homeowners regarding energy conservation measures and programs.

SoCalGas, which also provides service to Montclair, offers various rebates and savings programs that promote reduced energy consumption and sustainable design. Rebates include energy efficient appliances upgrade for both single-family and multi-family residential units.

One of the more recent strategies in building energy-efficient homes is the use and adoption of green building guidelines and programs by cities and developers. Some of the more popular programs within the housing industry include:

- U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) green building programs;
- Build It Green's Green Point Rated program;
- National Association of Home Builders Model Green Home Building program;
- U.S. Environmental Protection Agency's Energy Star® for Homes program; and
- Building Industry Institute's California Green Builder program.

Many of these programs have been designed to reduce the impacts associated with the construction and operation of residential buildings through reduction in energy and water use, use of innovative technologies, reduced maintenance costs, and improved occupant satisfaction. The LEED for Homes program includes standards for new single-family and multi-family home construction. This program and other similar programs have been applied to numerous single-family and multi-family residential projects throughout California and nationwide.

The following items present a variety of ways in which Montclair can further promote energy conservation:

- Provide information regarding rebate programs and energy audits available through the utility companies;
- Refer residents and businesses to green building certification programs such as LEED for Homes;
- Develop incentives, such as expedited plan check, for developments that are utilizing green building;
- Promote funding opportunities for green buildings, including available rebates and funding through the California Energy Commission; and
- Provide resource materials regarding green building and energy conservation.

The General Plan's Conservation Element states that reduction, reuse and recycling of materials such as green waste, paper, glass, aluminum, and plastic helps in the conservation of natural resources and energy.

The General Plan's Implementation Plan identifies a list of issues to be considered and further clarified. One of the issues listed was to identify local opportunities to accommodate alternative fuels (e.g., compressed natural gas, electric), local shuttles and other transit and alternative/mixed land use planning.

City of Montclair's Green Building Standards Code

The City adopted the California Green Building Standards Code, as published by the California Building Standards Commission, as the Green Building Standards Code of the City of Montclair in 2013. This code regulates and controls the planning, design, operation, use and occupancy of every newly constructed building or structure in the City. Future projects that would be allowed under the Proposed Amendment would be required to comply with the City's Green Building Standards Code.

3.3.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criterion based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.). These significance criteria, included for analysis in this EIR, will be used to determine the significance of potential energy impacts. Impacts to energy consumption would be significant if the Proposed Project would:

A. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

B. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.3.4 Impacts Analysis

A. Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Less Than Significant Impact with Mitigation Incorporated. Implementation of the Proposed Project would increase the demand for electricity and natural gas in the MPDSP area, as well as gasoline consumption during construction and operation of future development relative to existing uses.

Electricity

Construction

Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers and heating, ventilation, and air conditioning) during construction would be provided by SCE. The amount of electricity used during construction would be minimal; typical demand would stem from the use of electrically powered hand tools and several construction trailers by managerial staff during the hours of construction activities. The majority of the energy used during construction would be from petroleum. The electricity used for construction activities would be temporary and minimal; therefore, impacts would be **less than significant**. No mitigation is required.

Operation

The operational phase would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. As a conservative analysis, CalEEMod default values for electricity consumption for the Proposed Project and Existing Scenario land uses were applied in this analysis (CAPCOA 2017). Tables 3.3-1 and 3.3-2 presents the electricity demand for the Proposed Project compared to the Existing Scenario.

Table 3.3-1
Operational Electricity Demand – Existing Scenario

Land Use	kWh/Year
Building and Lighting Electricity Demand	
Automobile Care Center	81,344.20

Table 3.3-1
Operational Electricity Demand – Existing Scenario

Land Use	kWh/Year
Health Club	536,560.00
High Turnover (Sit Down Restaurant)	4,016,250.00
Movie Theater (No Matinee)	1,266,410.00
Place of Worship	190,775.00
Regional Shopping Center	19,576,300.00
Strip Mall	230,817.00
Free standing	1,628,640.00
Building Total	**27,527,096.20**
Other Electricity Demand	
All Land Uses – Water/Wastewater Total	**2,896,345.30**
Total	**30,423,441.50**

Source: Appendix B.
Notes: kWh = kilowatt-hour.

Table 3.3-2
Operational Electricity Demand – Proposed Project

Land Use	kWh/Year
Building and Lighting Electricity Demand	
General Office Building	3,151,650.00
Government (Civic Center)	704,766.00
Medical Office Building	1,917,820.00
Hotel	1,795,860.00
Movie Theater (No Matinee)	1,114,840.00
Apartments High Rise	4,362,160.00
Apartments Mid Rise	24,510,300.00
Regional Shopping Center	14,787,900.00
Strip Mall	917,974.00
Building Total	**53,263,270.00**
Other Electricity Demand	
All Land Uses – Water/Wastewater Total	**11,375,364.33**
Total	**64,638,634.33**
Net Electricity Use	
Proposed Project	64,638,634.33
Existing Scenario	30,423,441.50
Net Electricity Use (Proposed – Existing)	**34,215,192.83**

Source: Appendix B.
Notes: kWh = kilowatt-hour.

As shown in Tables 3.3-1 and 3.3-2, buildout of the MPDSP is estimated to have a total electrical demand of 64,638,634 kWh per year (or 64 million kWh per year) for facility

usage and water/wastewater conveyance. Existing land uses are estimated to have a total electrical demand of 30,423,442 kWh per year (or 30 million kWh per year) for facility usage and water/wastewater conveyance. The net change in estimated electricity consumption between the Proposed Project and Existing Scenario is estimated to be a net increase of 34,215,193 kWh per year respectively. As previously discussed, San Bernardino County's annual electricity use is approximately 15 billion kWh per year. Therefore, the net increase in electrical consumption would be a small percentage (0.23%) of the County's annual use. The Proposed Project would be built in accordance with the most current Title 24 standards at the time of construction, which would help reduce energy consumption. In addition, implementation of mitigation measures **MM-AQ-7** and **MM-GHG-1** would require that each future development project within the MPDSP incorporate various energy conservation measures in order to reduce the Proposed Project's overall electrical consumption during operation. Therefore, due to the inherent increase in the efficiency of building code regulations, as well as the implementation of mitigation measures **MM-AQ-7** and **MM-GHG-1**, the Proposed Project would not result in a wasteful use of energy. Impacts related to operational electricity use would be **less than significant with mitigation incorporated**.

Natural Gas

Construction

Natural gas is not anticipated to be required during construction of the Proposed Project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the subsection Petroleum, below. Any minor amounts of natural gas that may be consumed as a result of Proposed Project construction would be temporary and negligible, and would not have an adverse effect; therefore, impacts would be **less than significant**. No mitigation is required.

Operation

Natural gas consumption during operation would be required for various purposes, including building heating and cooling. For building consumption, default natural gas generation rates in CalEEMod for the Proposed Project and Existing land uses and climate zone were used. Table 3.3-3 present the natural gas demand for the MPDS, Existing, and the net change, respectively.

Table 3.3-3
Operational Natural Gas Demand

Land Use	kBTu/Year
Proposed Project Scenario	
General Office Building	1,148,760.00

Table 3.3-3
Operational Natural Gas Demand

Land Use	kBTu/Year
Government (Civic Center)	256,884.00
Medical Office Building	699,038.00
Hotel	5,940,990.00
Movie Theater (No Matinee)	3,568,570.00
Apartments High Rise	14,128,300.00
Apartments Mid Rise	79,385,000.00
Regional Shopping Center	2,599,290.00
Strip Mall	161,354.00
Total	**107,888,186.00**
Existing Scenario	
Automobile Care Center	239,094.00
Health Club	1,577,110.00
High Turnover (Sit Down Restaurant)	20,730,600.00
Movie Theater (No Matinee)	3,722,340.00
Place of Worship	560,744.00
Regional Shopping Center	3,056,220.00
Strip Mall	36,034.70
Free standing	254,260.00
Total	**30,176,402.70**
Net Natural Gas Use (Proposed – Existing)	
Proposed Project	107,888,186.00
Existing Scenario	30,176,402.70
Net Natural Gas Use (Proposed – Existing)	**77,711,783.30**

Source: Appendix B.
Notes: kBtu = thousand British thermal units.

As shown in Table 3.3-3, buildout of the MPDSP would consume approximately 107,888,186 kBtu per year. The Existing Scenario is estimated to consume approximately 30,176,403 kBtu per year. The net change in estimated natural gas consumption between the Proposed Project and the Existing Scenario is estimated to be an increase of 77,711,783 kBtu per year.

As previously discussed, the County's annual natural gas consumption is estimated to be 500 million therms per year. Therefore, the Proposed Project's net increase in natural gas consumption of 77,711,783 kBtu (or 1,078,882 therms) per year would be a small percentage (0.22%) of the County's annual consumption. In addition, the Proposed Project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Title 24, Part 11, contains additional energy measures that are applicable to the Proposed Project under CALGreen. Prior to Specific Plan approval, the

applicant would ensure that the Proposed Project would meet Title 24 requirements applicable at that time, as required by state regulations through the plan review process. Therefore, due to the inherent increase in efficiency of building code regulations, the Proposed Project would not result in a wasteful use of energy. Impacts related to operational natural gas use would be **less than significant**. No mitigation is required.

Petroleum

Construction

Petroleum would be consumed throughout construction of the Proposed Project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities, vendor trucks, and haul trucks would rely on diesel fuel. Construction workers would travel to and from the Plan area throughout the duration of construction. It was assumed that construction workers would travel in gasoline-powered vehicles.

Heavy-duty construction equipment of various types would be used during construction. CalEEMod was used to estimate construction equipment usage. Based on that analysis, diesel-fueled construction equipment would operate for an estimated 477,390 hours, as summarized in Table 3.3-4.

Table 3.3-4
Hours of Operation for Construction Equipment

Phase	Hours of Equipment Use
Demolition 1	2,016
Site Preparation 1	1,400
Grading 1	4,032
Building Construction 1	43,792
Paving 1	2,208
Architectural Coating 1	276
Demolition 2	2,016
Site Preparation 2	1,400
Grading 2	4,032
Building Construction 2	43,792
Paving 2	2,208
Architectural Coating 2	276
Demolition 3	2,016
Site Preparation 3	1,400
Grading 3	4,032

Table 3.3-4
Hours of Operation for Construction Equipment

Phase	Hours of Equipment Use
Building Construction 3	43,792
Paving 3	2,208
Architectural Coating 3	276
Demolition 4	2,016
Site Preparation 4	1,400
Grading 4	4,032
Building Construction 4	43,792
Paving 4	2,208
Architectural Coating 4	276
Demolition 5	2,016
Site Preparation 5	1,400
Grading 5	4,032
Building Construction 5	43,792
Paving 5	2,208
Architectural Coating 5	276
Demolition 6	2,016
Site Preparation 6	1,400
Grading 6	4,032
Building Construction 6	43,792
Paving 6	2,208
Architectural Coating 6	276
Total	**322,344**

Source: Appendix B.

Fuel consumption from construction equipment was estimated by converting the total CO_2 emissions from each construction phase to gallons using conversion factors for CO_2 to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2020). The estimated diesel fuel use from construction equipment is shown in Table 3.3-5.

Table 3.3-5
Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO_2 (MT)	kg CO_2/Gallon	Gallons
Demolition 1	6	71.40	10.21	6,993.30
Site Preparation 1	7	41.79	10.21	4,093.50
Grading 1	8	171.66	10.21	16,812.83
Building Construction 1	9	746.20	10.21	73,084.96
Paving 1	6	46.06	10.21	4,511.37
Architectural Coating 1	1	5.87	10.21	575.17

Table 3.3-5
Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO_2 (MT)	kg CO_2/Gallon	Gallons
Demolition 2	6	71.39	10.21	6,992.32
Site Preparation 2	7	41.82	10.21	4,096.11
Grading 2	8	171.74	10.21	16,820.40
Building Construction 2	9	746.76	10.21	73,140.37
Paving 2	6	46.04	10.21	4,509.72
Architectural Coating 2	1	5.87	10.21	575.17
Demolition 3	6	71.40	10.21	6,992.65
Site Preparation 3	7	41.83	10.21	4,097.33
Grading 3	8	171.69	10.21	16,816.30
Building Construction 3	9	771.38	10.21	75,551.25
Paving 3	6	55.43	10.21	5,428.87
Architectural Coating 3	1	5.87	10.21	575.17
Demolition 4	6	83.42	10.21	8,170.01
Site Preparation 4	7	50.01	10.21	4,897.72
Grading 4	8	206.12	10.21	20,188.43
Building Construction 4	9	846.41	10.21	82,900.24
Paving 4	6	55.43	10.21	5,428.87
Architectural Coating 4	1	5.87	10.21	575.17
Demolition 5	6	83.42	10.21	8,170.00
Site Preparation 5	7	50.01	10.21	4,897.72
Grading 5	8	206.12	10.21	20,188.43
Building Construction 5	9	846.41	10.21	82,900.24
Paving 5	6	55.43	10.21	5,428.87
Architectural Coating 5	1	5.87	10.21	575.17
Demolition 6	6	83.42	10.21	8,170.00
Site Preparation 6	7	50.01	10.21	4,897.72
Grading 6	8	206.12	10.21	20,188.46
Building Construction 6	9	846.41	10.21	82,900.28
Paving 6	6	55.43	10.21	5,428.87
Architectural Coating 6	1	5.87	10.21	575.17
			Total	**688,148.18**

Source: Appendix B.
Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

Fuel consumption from worker, vendor, and haul truck trips was estimated by converting the total CO_2 emissions from the construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline fueled, whereas vendor and haul trucks are assumed to be diesel fueled. The estimated fuel use for worker vehicles, vendor trucks, and haul trucks are presented in Table 3.3-6, Table 3.3-7, and Table 3.3-8, respectively.

Table 3.3-6
Construction Worker Gasoline Demand

Phase	Trips	Vehicle CO_2 (MT)	kg CO_2/Gallon	Gallons
Demolition 1	672	3.21	8.78	365.72
Site Preparation 1	450	2.15	8.78	244.90
Grading 1	1,260	6.02	8.78	685.73
Building Construction 1	602,784	1,757.34	8.78	200,152.13
Paving 1	736	3.17	8.78	361.41
Architectural Coating 1	8,556	36.70	8.78	4,179.78
Demolition 2	672	2.88	8.78	328.29
Site Preparation 2	450	1.93	8.78	219.84
Grading 2	1,260	5.40	8.78	615.54
Building Construction 2	602,784	2,436.08	8.78	277,457.33
Paving 2	736	2.83	8.78	322.35
Architectural Coating 2	8,556	32.90	8.78	3,747.27
Demolition 3	672	2.58	8.78	294.32
Site Preparation 3	450	1.73	8.78	197.08
Grading 3	1,260	4.76	8.78	542.54
Building Construction 3	602,784	2,196.75	8.78	250,199.29
Paving 3	736	2.61	8.78	296.92
Architectural Coating 3	8,556	30.31	8.78	3,451.80
Demolition 4	672	2.34	8.78	266.85
Site Preparation 4	450	1.56	8.78	177.79
Grading 4	1,260	4.37	8.78	497.82
Building Construction 4	602,784	2,044.53	8.78	232,862.13
Paving 4	736	2.43	8.78	277.24
Architectural Coating 4	8,556	28.11	8.78	3,201.51
Demolition 5	672	2.21	8.78	251.45
Site Preparation 5	450	1.48	8.78	168.38
Grading 5	1,260	4.14	8.78	471.47
Building Construction 5	602,784	1,955.31	8.78	222,700.90
Paving 5	736	2.38	8.78	271.58
Architectural Coating 5	8,556	27.72	8.78	3,157.12
Demolition 6	672	21.18	8.78	2,411.97
Site Preparation 6	450	1.46	8.78	166.05
Grading 6	1,260	4.08	8.78	464.93
Building Construction 6	602,784	1,933.29	8.78	220,193.01
Paving 6	736	2.28	8.78	259.73
Architectural Coating 6	8,556	26.51	8.78	3,019.32
			Total	**1,434,481.49**

Source: Appendix B.
Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

Table 3.3-7
Construction Vendor Diesel Demand

Phase	Trips	Vehicle CO_2 (MT)	kg CO_2/Gallon	Gallons
Demolition 1	0	0.00	10.21	0.00
Site Preparation 1	0	0.00	10.21	0.00
Grading 1	0	0.00	10.21	0.00
Building Construction 1	124,936	1,496.54	10.21	146,575.58
Paving 1	0	0.00	10.21	0.00
Architectural Coating 1	0	0.00	10.21	0.00
Demolition 2	0	0.00	10.21	0.00
Site Preparation 2	0	0.00	10.21	0.00
Grading 2	0	0.00	10.21	0.00
Building Construction 2	124,936	1,448.44	10.21	141,864.97
Paving 2	0	0.00	10.21	0.00
Architectural Coating 2	0	0.00	10.21	0.00
Demolition 3	0	0.00	10.21	0.00
Site Preparation 3	0	0.00	10.21	0.00
Grading 3	0	0.00	10.21	0.00
Building Construction 3	124,936	1,427.31	10.21	139,794.86
Paving 3	0	0.00	10.21	0.00
Architectural Coating 3	0	0.00	10.21	0.00
Demolition 4	0	0.00	10.21	0.00
Site Preparation 4	0	0.00	10.21	0.00
Grading 4	0	0.00	10.21	0.00
Building Construction 4	124,936	1,417.49	10.21	138,833.09
Paving 4	0	0.00	10.21	0.00
Architectural Coating 4	0	0.00	10.21	0.00
Demolition 5	0	0.00	10.21	0.00
Site Preparation 5	0	0.00	10.21	0.00
Grading 5	0	0.00	10.21	0.00
Building Construction 5	124,936	1,412.67	10.21	138,361.47
Paving 5	0	0.00	10.21	0.00
Architectural Coating 5	0	0.00	10.21	0.00
Demolition 6	0	0.00	10.21	0.00
Site Preparation 6	0	0.00	10.21	0.00
Grading 6	0	0.00	10.21	0.00
Building Construction 6	124,936	1,412.18	10.21	138,313.04
Paving 6	0	0.00	10.21	0.00
Architectural Coating 6	0	0.00	10.21	0.00
			Total	**843,743.00**

Source: Appendix B.
Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

Table 3.3-8
Construction Haul Diesel Demand

Phase	Trips	Vehicle CO_2 (MT)	kg CO_2/Gallon	Gallons
Demolition 1	184	7.17	10.21	702.09
Site Preparation 1	0	0.00	10.21	0.00
Grading 1	1,250	46.67	10.21	4,570.88
Building Construction 1	0	0.00	10.21	0.00
Paving 1	0	0.00	10.21	0.00
Architectural Coating 1	0	0.00	10.21	0.00
Demolition 2	184	6.78	10.21	663.88
Site Preparation 2	0	0.00	10.21	0.00
Grading 2	1,250	44.13	10.21	4,322.13
Building Construction 2	0	0.00	10.21	0.00
Paving 2	0	0.00	10.21	0.00
Architectural Coating 2	0	0.00	10.21	0.00
Demolition 3	184	6.67	10.21	653.42
Site Preparation 3	0	0.00	10.21	0.00
Grading 3	1,250	43.33	10.21	4,244.00
Building Construction 3	0	0.00	10.21	0.00
Paving 3	0	0.00	10.21	0.00
Architectural Coating 3	0	0.00	10.21	0.00
Demolition 4	184	6.59	10.21	645.28
Site Preparation 4	0	0.00	10.21	0.00
Grading 4	1,250	42.88	10.21	4,199.84
Building Construction 4	0	0.00	10.21	0.00
Paving 4	0	0.00	10.21	0.00
Architectural Coating 4	0	0.00	10.21	0.00
Demolition 5	184	6.55	10.21	641.07
Site Preparation 5	0	0.00	10.21	0.00
Grading 5	1,250	42.61	10.21	4,173.59
Building Construction 5	0	0.00	10.21	0.00
Paving 5	0	0.00	10.21	0.00
Architectural Coating 5	0	0.00	10.21	0.00
Demolition 6	184	6.54	10.21	640.23
Site Preparation 6	0	0.00	10.21	0.00
Grading 6	1,250	42.56	10.21	4,168.10
Building Construction 6	0	0.00	10.21	0.00
Paving 6	0	0.00	10.21	0.00
Architectural Coating 6	0	0.00	10.21	0.00
			Total	**29,624.50**

Source: Appendix B.
Notes: CO2 = carbon dioxide; MT = metric ton; kg = kilogram.

As shown in Tables 3.3-6 through 3.3-8, the Proposed Project is estimated to consume approximately 2,995,997 gallons of petroleum during the construction phase. For disclosure, by comparison, approximately 571 billion gallons of petroleum would be consumed in California over the course of the Proposed Project's construction phase, based on the California daily petroleum consumption estimate of approximately 78.6 million gallons per day (EIA 2019c). Thus, the total expected petroleum use from the Proposed Project's construction represents approximately 0.0005% of California's consumption of petroleum over the construction duration. With the implementation of mitigation measure **MM-AQ-1** and CARB's Airborne Toxics Control Measure, future development projects within the MPDSP would be required to restrict heavy-duty diesel vehicle idling time to five minutes, which would reduce petroleum usage. Overall, because petroleum use during construction would be temporary, and would not be wasteful or inefficient, impacts would be **less than significant**. No mitigation is required.

Operation

The fuel consumption resulting from the Proposed Project's operational phase would be attributable to various vehicles associated with each land use. Petroleum fuel consumption associated with motor vehicles traveling within the City during operation is a function of VMT. The MPDSP is designed to and operate complete streets that enable safe, comfortable, and attractive access and travel for pedestrians, bicyclists, motorists, and transit users. Trip generation rates for the Proposed Project and the Existing Scenario were based on the Traffic Impact Analysis (TIA). Similar to construction worker and vendor trips, fuel consumption for operation was estimated by converting the total mobile source CO_2 emissions from the Proposed Project and Existing land uses to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. The estimated fuel use from the Proposed Project and Existing Scenario land uses operational mobile sources is shown in Table 3.3-9.

Table 3.3-9
Specific Plan Operations

Fuel	Vehicle MT CO_2	kg CO_2/Gallon[a]	Gallons
Proposed Project			
Gasoline	76,234.40	8.78	8,682,733.25
Diesel	7,386.20	10.21	723,428.08
		Total	**9,406,161.34**
Existing Scenario			
Gasoline	64,425.05	8.78	7,337,704.94
Diesel	6,242.02	10.21	611,363.00
		Total	**7,949,067.94**

Table 3.3-9
Specific Plan Operations

Fuel	Vehicle MT CO_2	kg CO_2/Gallon[a]	Gallons
Net Petroleum Consumption (Proposed – Existing)			
Proposed Project			9,406,161.34
Existing Scenario			7,949,067.94
Net Petroleum Consumption (Proposed – Existing)			**1,457,093.40**

Source: Appendix B.
Notes: MT = metric ton; CO_2 = carbon dioxide; kg = kilogram.

As depicted in Table 3.3-9, mobile sources from the MPDSP would result in approximately a maximum of 9,406,161 gallons of petroleum fuel usage per year. The Existing Scenario land use mobile sources would result in approximately 7,949,068 gallons of petroleum fuel usage per year. As such, the net change in petroleum fuel usage between the Proposed Project and the Existing Scenario land uses is 1,457,093 gallons per year. For disclosure, by comparison, California as a whole consumes approximately 28.7 billion gallons of petroleum per year (EIA 2019c).

Over the lifetime of the Proposed Project, the fuel efficiency of the vehicles being used is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the Proposed Project during operation would decrease over time. As detailed in Section 3.3.2, there are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles that combines the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California (CARB 2011). In addition, implementation of mitigation measures **MM-AQ-4** through **MM-AQ-6** would reduce the Proposed Project's petroleum usage during operation. As such, operation of the Proposed Project is expected to use decreasing amounts of petroleum over time due to advances in fuel economy.

In summary, the MPDSP would increase petroleum use during operation as a result of the proposed changes within the City, but due to efficiency increases, this use would diminish over time. Petroleum consumption associated with the Proposed Project would not be considered inefficient or wasteful and would result in a **less-than-significant** impact. No mitigation is required.

Summary

Based on the analysis above, the consumption of energy resources (including electricity, natural gas, and petroleum) during Proposed Project construction and operation would

not be inefficient or wasteful, and therefore, would result in a **less-than-significant impact with mitigation incorporated**.

B. Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Title 24 of the California Code of Regulations contains energy efficiency standards for residential and nonresidential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, wall/floor/ceiling assemblies, and roofs.

Part 6 of Title 24 specifically establishes energy efficiency standards for residential and nonresidential buildings constructed in the State of California in order to reduce energy demand and consumption. Part 11 of Title 24 also includes the CALGreen standards, which established mandatory minimum environmental performance standards for new construction projects. The Proposed Project would comply with Title 24, Part 6 and Part 11, per state regulations. In addition, mitigation measure **MM-AQ-7** would require that each future development project within the MPDSP incorporate various energy conservation measures in order to reduce the Proposed Project's electrical consumption during operation. Based on the foregoing, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts during construction and operation of the Proposed Project would be **less than significant**. No mitigation is required.

3.3.5 Cumulative Impacts

Cumulative projects that could exacerbate the Proposed Project's impacts include any projects that could result in wasteful, inefficient, or unnecessary use of energy. However, the Proposed Project would not result in wasteful, inefficient, or unnecessary use of energy, in large part due to the short-term and temporary nature of the construction period. Additionally, the operational activity of the Proposed Project would be minimized through energy reduction strategies pursuant to Title 24, as described in Section 3.3.2.2. For all other projects in the City are required to comply with Title 24, the long-term energy consumption of those projects would also be reduced. Therefore, cumulative impacts to energy use would be **less than significant**. No mitigation is required.

3.3.6 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize associated adverse impacts. No significant impact would occur to energy as a result of the Proposed Project. As such, no energy-specific mitigation is required.

However, as presented in Section 3.2, Air Quality, implementation of mitigation measure **MM-AQ-1** would indirectly reduce construction-related energy consumption. Furthermore, implementation of the following air quality mitigation measures would indirectly reduce operation-related energy consumption: **MM-AQ-4**, **MM-AQ-5**, **MM-AQ-6**, and **MM-AQ-7**. Additionally, as presented in Section 3.5, Greenhouse Gas Emissions, implementation of mitigation measure **MM-GHG-1** would also indirectly further reduce energy consumption during operation of the Proposed Project.

3.3.7 Significance After Mitigation

Impacts to energy would be **less than significant**.

3.3.8 References

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3.4 GEOLOGY AND SOILS

This section describes the existing geologic and soils conditions of the Montclair Place District Specific Plan (MPDSP or Proposed Project), identifies associated regulatory requirements, and evaluates the potential impacts related to geology and soils as a result of implementation of the Proposed Project. This section addresses seismic conditions, the stability of the underlying geologic units, and surficial soil conditions.

The analysis of the potential Project impacts related to geology and soils is partly based on the following document:

- *Soil and Geology Issues, Proposed Montclair Place Expansion, 5060 East Montclair Plaza Lane, Montclair, California,* prepared by Geotechnologies Inc., dated November 5, 2014 (Appendix C)

Although this geologic report was completed in 2014, the report is still relevant to the Project as the report is not a design-level geotechnical report. The report only describes soils and geologic conditions at the Plan area, irrespective of the design of the Proposed Project. Geologic and soils conditions have not changed since completion of the report in 2014.

3.4.1 Existing Conditions

Regional Geologic Setting

The Plan area is located within the Transverse Ranges Geomorphic Provinces of California. More locally, the Proposed Project is located within the western portion of the Upper Santa Ana Valley, which is generally southwestward sloping and filled with Quaternary alluvium. The western portion of the Upper Santa Ana Valley is located between the San Gabriel Mountains to the north, the San Bernardino Mountains to the northeast, the Puente Hills to the southwest, and the Jurupa Hills to the southeast (City of Montclair 1999; CBWM 2003; DWR 2006).

Topography

The Proposed Project and surrounding area gently descends to the southwest. Total topographic relief across the site is approximately 40 feet. Topographic relief in the area is relatively gentle, with no pronounced topographic highs or lows (Appendix C).

The Plan area and surrounding area is characterized as an urban, developed commercial and residential area. Vegetation within the Proposed Project is limited to ornamental landscaping associated with the existing development and several ornamental trees that currently buffer the Plan area from adjacent residential uses to the west. Planters with ornamental trees, shrubs, and grasses are scattered sparsely throughout the numerous surface parking lots within the Plan area.

Two vacant lots are present within the Plan area, both of which are highly disturbed and only support minimal amounts of low-growing vegetation (mostly annual weeds).

Soils

Soils underlying the MPDSP area are comprised of two soil types: (1) Soboba gravelly loamy sand, and (2) Tujunga gravelly loamy sand. These soils are alluvial in origin and are derived from granitic and sedimentary sources (USDA NRCS 2019).

Soboba gravelly loamy sand comprises approximately 3% of the MPDSP area and is present in the northwest section of the Plan area. This soil type is characterized by a topographic gradient of 0%-9%, is more than 80 inches thick, is excessively drained, and has a low runoff potential. The remainder of the site is comprised of Tujunga gravelly loam. This soil has a gradient of 0%-9%, is more than 80 inches thick, is somewhat excessively drained, and has a very low runoff potential (USDA NRCS 2019).

Geologic Units

Based on published geologic maps, the Plan area is underlain by Quaternary-aged young alluvial fan deposits, consisting of mixtures of medium dense to dense alluvial sands and silty sands (Appendix C). Quaternary aged-young alluvial fan deposits are generally derived from erosion of bedrock and reworked older alluvium, and from the mechanical breakdown of larger fragments within the alluvium. The younger alluvium varies in thickness from over 100 feet near the mountains to just a few feet south of Interstate 10 (immediately south of the MPDSP area) (USGS 2003, CBWM 2003).

Seismicity and Faulting

The MPDSP area is located in a seismically active region. Several large and well-known faults are located in the MPDSP region, and movement along those faults, most notably the San Andreas Fault, has greatly influenced the erosional and depositional history of the area (Figure 3.4-1, Regional Faulting). The San José Fault is the closest fault to the MPDSP area. Other significant faults in the region include the Red Hill, Cucamonga, Chino, and San Jacinto Faults (CGS 2010).

The California Geological Survey (CGS) (2010, 2018) classifies faults as:

- Holocene-active faults: faults that have had surface displacement during the past approximately 11,700 years (i.e., Holocene time). These faults exhibit signs of geologically recent movement, are most likely to experience movement in the near future, and are capable of surface rupture. These faults are considered “active faults.” In

addition, Holocene-active faults that have had surface displacement in the last 200 years can be further classified as "historic faults."

- Pre-Holocene faults: faults that have not had surface displacement in the past 11,700 years (Holocene) but have moved during the past 130,000 years (late Quaternary) or 1.6 million years (Quaternary undifferentiated).These faults are considered "potentially active faults" and may be capable of surface rupture, but are less likely than Holocene-active faults to cause surface rupture. These faults are also capable of generating future earthquakes.
- Age-undetermined faults: faults where the recency of fault movement has not been determined. These faults are considered "inactive faults."

Faults that exhibit signs of geologically recent (active within the past 11,700 years) surface displacement are considered Holocene-active and are most likely to experience movement in the near future. Therefore, active faults are generally thought to have the greatest fault rupture potential. Most agencies, however, would consider potentially active faults (active within the past two million years) as being capable of generating future earthquakes. Faults classified as inactive are not considered a significant fault rupture hazard or seismic event source.

Holocene-active faults have been responsible for large historical earthquakes in southern California, including the 1971 San Fernando earthquake (moment magnitude [Mw] 6.7), the 1992 Landers earthquake (Mw 7.3), the 2019 Searles Valley earthquake (Mw 7.1), the 1952 Kern County earthquake (Mw 7.5), and the 1933 Long Beach earthquake (Mw 6.4). The moment magnitude is the most commonly used method of describing the size of earthquakes. This scale measures the size of seismic events in terms of how much energy is released, and it relates to the amount of movement of rock. The southern California region also includes blind thrust faults, which are faults that do not rupture at the surface but are capable of generating substantial earthquakes. Examples include the 1987 Whittier Narrows earthquake (Mw 5.9) and the 1994 Northridge earthquake (Mw 6.7). Both of these earthquakes occurred on previously unidentified thrust faults. A brief description of active faults in the region are described below. In addition, Table 3.4-1, Regional Faulting, provides a more comprehensive list of Holocene-active and pre-Holocene faults within 25 miles of the MPDSP area.

San Andreas Fault

The San Andreas Fault (Holocene-active) is the best known and longest fault in California. This fault has been responsible for numerous and destructive earthquakes in historical times. At its closest point, the San Andreas Fault is located approximately 21.0 miles to the northeast of the proposed Project (Figure 3.4-1, Regional Faulting). The last recorded surface rupture along the San Andreas Fault in the San Bernardino Valley region was on April 18, 1906. The San Andreas

Fault is capable of producing a Mw 8.0 earthquake (City of Montclair 1999; CGS 2010; CIT 2013; County of San Bernardino 2016).

San José Fault

The San José Fault (Pre-Holocene) is oriented in a northeast-southwest direction and is located approximately 1.5 miles directly west of the MPDSP area (CGS 2010). This fault is capable of producing a Mw 6.5 earthquake. The last significant earthquake associated with the San Jose Fault was a Mw 5.4 on February 28, 1990 (CIT 2013).

Red Hill Fault

The Red Hill Fault (Pre-Holocene to Holocene-active) is oriented in a northeast-southwest direction and is located approximately 4.0 miles to the northeast of the MPDSP area (CGS 2010). The Red Hill Fault is capable of producing a Mw 7.0 earthquake(CIT 2013).

Cucamonga Fault

The Cucamonga Fault (Holocene-active) is oriented in an east-west direction at the foot of the San Gabriel Mountains. At its closest point, this fault is located approximately 4 miles to the north of the MPDSP area (CGS 2010). The Cucamonga Fault is capable of a Mw 7.0 earthquake (City of Montclair 1999; CIT 2013).

Chino Fault

The Chino Fault (Holocene-active), oriented in a northwest-southeast direction, is located at the eastern base of the Chino Hills, approximately 7.5 miles south of the MPDSP area (CGS 2010). The Chino Fault is capable of producing a Mw 7.0 earthquake(City of Montclair 1999; CIT 2013).

Table 3.4.1
Regional Faulting

Fault Name	Approximate Closest Distance to the MPDSP Area (miles)	Fault Age	Probable Magnitude (Mw) [1]
San José Fault	1.5	Pre-Holocene	6.0-6.5
Indian Hill Fault	2	Pre-Holocene	Unknown
Sierra Madre Fault	3	Pre-Holocene to Holocene-active	6.0-7.0

[1] Moment Magnitude (Mw) is a measure of an earthquakes magnitude (size or strength) based on its seismic energy. Magnitudes are based on a logarithmic scale (base 10) which means that every whole number you go up on the magnitude scale, recorded ground motion goes up 10 times in strength. Probable Magnitude is the estimated magnitude of a given fault if it were to activate.

Table 3.4.1
Regional Faulting

Fault Name	Approximate Closest Distance to the MPDSP Area (miles)	Fault Age	Probable Magnitude (Mw) [1]
Red Hill Fault	4	Pre-Holocene to Holocene-active	6.0-7.0
Cucamonga Fault	4	Holocene-active	6.0-7.0
Walnut Creek Fault	7	Pre-Holocene	Unknown
Chino Fault	7.5	Holocene-active	6.0-7.0
San Gabriel Fault	10	Pre-Holocene to Holocene-active	Unknown
Raymond Fault	10	Holocene-active	6.0-7.0
San Jacinto Fault	18	Holocene-active	6.5-7.5
San Andreas Fault	21	Holocene-active	6.8-8.0

Source: CGS 2010; CIT 2013.

Ground Shaking

Ground shaking is the movement of the earth's surface as a result of an earthquake. The ground motion is produced by seismic waves emanating from slow or sudden slip on a fault. The degree of ground shaking felt at a given site depends on the distance from the earthquake source, the magnitude of the earthquake, the type of subsurface material on which the site is situated, and topography. Generally, ground shaking is less severe on rock than on alluvium or fill, but other local phenomena may override this generalization. Ground shaking can produce significant ground horizontal and vertical movement that can result in severe damage to structures that are generally not equipped to withstand such shaking (County of San Bernardino 2016). Within the past 150 years, San Bernardino County has been an area of high seismic activity. During that period, more than 11 earthquakes of Mw 6.0 or more have occurred within a 50-mile radius of the City of Montclair (City of Montclair 1999).

A primary tool that seismologists use to evaluate ground-shaking hazard and characterize statewide earthquake risks is a probabilistic seismic hazard assessment (PSHA). This measurement considers possible earthquake sources for a location and information regarding the earthquake sources, including the estimated characteristic magnitudes of the earthquake sources (the energy released by the fault during rupture) and activity level of the source (how often the fault ruptures) to generate a probability map for exceedance of a level of ground shaking. The PSHA is also used to develop uniform hazard curves, which are used to create a response spectra for an area. The response spectra is a plot that is used to model the level of ground shaking for the design earthquake event. The California Building Code (CBC) requires that new structures be designed to withstand ground motions from the earthquake events that have a 2% probability of

exceedance in 50 years. The peak ground acceleration (PGA) is part of the spectrum and represents the expected level of ground shaking away from the building for a particular site. The other accelerations within the response spectra represent the anticipated shaking for different building periods at the subject site.

Based on a generalized CGS map illustrating anticipated peak ground accelerations with a 10% chance of being exceeded in a 50-year period, the PGA in the MPDSP area ranges from approximately 0.5 to 0.6 percent of gravity (g) (CGS 2019). Similarly, based on a generalized CGS map illustrating the relative intensity of ground shaking in California from anticipated earthquakes, the MPDSP area is located in an area near major active faults that, on average, would experience stronger earthquake shaking more frequently. This intense shaking can damage even strong and modern buildings (City of Montclair 1999; CGS 2016).

Liquefaction/Lateral Spreading

Liquefaction is a condition where ground shaking causes sandy soils saturated with water to become fluid-like, which can lead to ground surface deformation. Liquefaction generally occurs at depths of less than 50 feet in soils that are young (Holocene age), saturated, and loose. Soils that are most susceptible to liquefaction are clay-free deposits of sands and silts, and unconsolidated alluvium. Lateral spreading, a hazard associated with liquefaction, is the finite, lateral movement of gently to steeply sloping, saturated soil deposits caused by earthquake-induced liquefaction (County of San Bernardino 2016).

Soil borings completed in the vicinity of the MPDSP area did not encounter groundwater to a depth of 50 feet below ground surface (bgs). In addition, based on groundwater well data dating back to 1993 in the vicinity of the MPDSP area, groundwater levels are in excess of 400 feet bgs (Appendix C).

According to both the CGS Earthquake Zones of Required Investigation for the Ontario Quadrangle (CGS 2000) and the County of San Bernardino General Plan Geologic Hazard Overlay Maps (County of San Bernardino 2010), the Proposed Project is not located within a liquefaction zone. As a result, the potential for liquefaction to occur within the Plan area is considered low.

Slope Failure/Landslides

A landslide is the downhill movement of masses of earth material under the force of gravity. The factors contributing to landslide potential are steep slopes, unstable terrain, and proximity to earthquake faults. This process typically involves the surface soil and an upper portion of the underlying bedrock. Movement may be very rapid, or so slow that a change of position can be

noted only over a period of weeks or years (creep). The size of a landslide can range from several square feet to several square miles.

The Plan area is situated on a gently sloping ground and is not immediately adjacent to any slopes or hillsides that could be potentially susceptible to slope instability. In addition, according to the CGS Earthquake Zones of Required Investigation of the Ontario Quadrangle, the Plan area is not located within an earthquake-induced landslide zone (CGS 2000). As a result, the potential for on-site slope failure is low.

Subsidence

Subsidence is the permanent collapse of the pore space within a soil or rock and downward settling of the earth's surface relative to its surrounding area. Subsidence can result from the extraction of water or oil, the addition of water to the land surface—a condition called "hydrocompaction", or peat loss. The compaction of subsurface sediment caused by the withdrawal or addition of fluids can cause subsidence. Land subsidence can disrupt surface drainage; reduce aquifer storage; cause earth fissures; damage buildings and structures; and damage wells, roads, and utility infrastructure.

According to the U.S Geological Survey (USGS) Areas of Land Subsidence map, the Plan area is located in a zone of recorded subsidence as a result of groundwater extraction (USGS 2020). In addition, according to the County of San Bernardino Countywide Plan, Safety Background Report, the Proposed Project is underlain by the Chino Groundwater Basin, which is considered to have medium to high risk of subsidence (County of San Bernardino 2016).

Historically, the Chino Basin has experienced up to 4 feet of subsidence caused by excessive groundwater pumping (County of San Bernardino 2016). In response, the courts of California adjudicated the Chino Basin in 1978, setting an annual limit on the amount of groundwater allowed to be extracted. This judgment additionally created the Chino Basin Watermaster, which actively provides oversight of the Chino Basin to ensure that the amount of groundwater being pumped would not cause further subsidence (MVWD 2016).

Collapsible Soils

Collapsible soils typically occur in recently deposited Holocene soils that were deposited in an arid or semi-arid environment. Soils prone to collapse are commonly associated with artificial fill, wind-laid sands, silts, alluvial fan sediments, and mudflow sediments deposited during flash floods. These soils typically contain minute pores and voids. The soil particles may be partially supported by clay or silt, or chemically cemented with carbonates. When saturated, collapsible soils undergo grain rearrangement and water removes the cohesive (or cementing) material, resulting in rapid, substantial settlement. An increase in surface water infiltration—such as from

irrigation or a rise in the groundwater table—combined with the weight of a building or structure, can initiate settlement and cause foundations and walls to crack.

Soils in the vicinity of the Plan area are generally comprised of medium dense to dense alluvial sands and silty sands, which are typically not conducive to soil collapse (Appendix C)

Expansive Soils

Expansive soils are composed largely of clays, which greatly increase in volume when saturated with water and shrink when dried. Expansive soils can cause building foundations to rise during the rainy season and fall during the dry season. If this expansive movement varies underneath different parts of a single building, foundations may crack, structural portions of the building may be distorted, and doors and windows may become warped such that the doors and windows no longer function properly. The potential for soil to undergo shrink and swell is greatly enhanced by the presence of a fluctuating, shallow groundwater table. Changes in the volume of expansive soils can result in the consolidation of soft clays after the lowering of the water table or the placement of fill.

Soils in the vicinity of the Proposed Project site are generally comprised of medium dense to dense alluvial sands and silty sands, which are typically not conducive to soil expansion (Appendix C).

3.4.2 Regulatory Setting

Federal

National Pollution Discharge Elimination System

Direct discharges of pollutants into waters of the United States are not allowed, except in accordance with the National Pollutant Discharge Elimination System (NPDES) program established in Section 402 of the Clean Water Act (CWA). A Storm Water Pollution Prevention Plan (SWPPP) prepared in compliance with an NPDES Permit describes erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of post-construction sediment and erosion control measures and maintenance responsibilities, and non-stormwater management controls. Dischargers are also required to inspect construction sites before and after storms to identify stormwater discharge from construction activity and to identify and implement controls where necessary.

Earthquake Hazards Reduction Act

In October 1977, Congress passed the Earthquake Hazards Reduction Act to reduce the risks to life and property from future earthquakes in the United States through the establishment and

maintenance of an effective earthquake hazards reduction program. To accomplish this goal, the act established the National Earthquake Hazards Reduction Program (NEHRP). This program was substantially amended in November 1990 by the National Earthquake Hazards Reduction Program Act (NEHRPA), which refined the description of agency responsibilities, program goals, and objectives.

The mission of NEHRP includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improved building codes and land-use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improved mitigation capacity; and accelerated application of research results. The NEHRPA designates the Federal Emergency Management Agency as the lead agency of the program and assigns several planning, coordinating, and reporting responsibilities. Other NEHRPA agencies include the National Institute of Standards and Technology, the National Science Foundation, and USGS.

State

Seismic Hazard Mapping Act

In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990 (Public Resources Code Section 2690-2699). Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of the area are investigated, and appropriate mitigation measures, if any, are incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of General Plans and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety.

Under Public Resources Code Section 2697, cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. Each city or county shall submit one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval. Public Resources Code Section 2698 does not prevent cities and counties from establishing policies and criteria that are stricter than those established by the State Mining and Geology Board.

State publications supporting the requirements of the Seismic Hazards Mapping Act include the CGS Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California, and Special Publication 118, Recommended Criteria for Delineating Seismic Hazard Zones in California. The objectives of Special Publication 117A are to assist in the evaluation

and mitigation of earthquake-related hazards for projects within designated zones of required investigations and to promote the uniform and effective statewide implementation of the evaluation and mitigation elements of the Seismic Hazards Mapping Act. Special Publication 118 implements the requirements of the Seismic Hazards Mapping Act in the production of Probabilistic Seismic Hazard Maps for the state.

California Building Standards Code

The state regulations protecting structures from geo-seismic hazards are contained in the CBC (24 CCR, Part 2), which is updated on a triennial basis. These regulations apply to public and private buildings in the state. Until January 1, 2008, the CBC was based on the then-current Uniform Building Code and contained additions, amendments, and repeals specific to building conditions and structural requirements of the State of California. The 2019 CBC, effective January 1, 2020, is based on the current International Building Code and enhances the sections dealing with existing structures. Seismic-resistant construction design is required to meet more stringent technical standards than those set by previous versions of the CBC.

Chapters 16 and 16A of the 2019 CBC include structural design requirements governing seismically resistant construction, including (but not limited to) factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design. Chapters 18 and 18A include (but are not limited to) the requirements for foundation and soil investigations (Sections 1803 and 1803A); excavation, grading, and fill (Sections 1804 and 1804A); damp-proofing and water-proofing (Sections 1805 and 1805A); allowable load-bearing values of soils (Sections 1806 and 1806A); the design of foundation walls, retaining walls, embedded posts and poles (Sections 1807 and 1807A), and foundations (Sections 1808 and 1808A); and design of shallow foundations (Sections 1809 and 1809A) and deep foundations (Sections 1810 and 1810A). Chapter 33 of the 2019 CBC includes (but is not limited to) requirements for safeguards at worksites to ensure stable excavations and cut or fill slopes (Section 3304).

Construction activities are subject to occupational safety standards for excavation and trenching, as specified in the California Safety and Health Administration regulations (Title 8 of the California Code of Regulations) and in Chapter 33 of the CBC. These regulations specify the measures to be used for excavation and trench work where workers could be exposed to unstable soil conditions. The proposed project would be required to employ these safety measures during excavation and trenching.

California Health and Safety Code

Sections 17922 and 17951-17958.7 of the California Health and Safety Code require cities and counties to adopt and enforce the current edition of the CBC, including a grading section. Sections of Volume II of the CBC specifically apply to select geologic hazards.

Construction General Permit (SWRCB Order 2009-0009-DWQ, as amended)

For stormwater discharges associated with construction activity in the State of California, the State Water Resources Control Board (SWRCB) has adopted the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) to avoid and minimize water quality impacts attributable to such activities. In accordance with NPDES Phase I Permit requirements, the Construction General Permit applies to all projects in which construction activity disturbs one acre or more of soil. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling and excavation. The Construction General Permit requires the development and implementation of a SWPPP, which would include and specify water quality Best Management Practices (BMPs) designed to prevent pollutants from contacting stormwater and keep all products of erosion from moving off-site into receiving waters. Routine inspection of all BMPs is required under the provisions of the Construction General Permit, and the SWPPP must be prepared and implemented by qualified individuals as defined by the SWRCB.

Local

City of Montclair General Plan

In 1999, the City of Montclair adopted the Public Safety Element of the General Plan. The Public Safety Element identifies the primary geologic hazards in the City concerning the development of critical structures and structures for human occupancy in relation to those hazards. This public safety element aims to mitigate and minimize potential hazards caused by fault ground rupture, liquefaction, dam failure, and slope failure through the following policies:

Safety Objectives

Natural Disasters

Objectives

SE- 1.1.0. To maintain regulations that would provide a degree of safety from structural failure.

SE- 1.2.0. To promote public awareness of geological and structural hazards.

SE- 1.3.0. To provide guidance to the public during and after a geologic disaster.

SE- 1.4.0. To promote interagency assistance for persons affected by geologic hazards.

SE- 1.5.0. To recognize and consider state-of-the-art advancements relating to geologic hazards Safety Implementing Policies Natural Disasters.

Implementation Policies

SE- 1.1.1. Promote open space land uses on land determined unfit for structures of human occupancy.

SE- 1.1.2. Develop public works projects designed to protect the public and property from geologic hazards.

SE- 1.1.3. Request geologic studies for proposed development for human occupancy, emphasizing all critical facilities and structures of high or involuntary occupancy, within areas needing special management.

SE- 1.1.4. Stress compatibility between structural design and local geologic hazards.

SE- 1.1.5. Support programs that would increase minimum seismic structural resistance standards.

SE- 1.1.6. Develop programs and procedures which would inform the general public and other governmental agencies of the seismic-geologic hazards and policies that concern them.

SE- 1.1.7. Request that public safety facilities be located, designed, and managed in a manner that would maximize their ability to remain functional during and after an earthquake.

SE- 1.1.8. Set aside funds and develop programs to aid in the abatement of unsafe structures.

SE- 1.1.9. Encourage the State of California geologic hazards research programs and acceptable risk studies.

SE- 1.1.10. Support legislation on geological protection.

SE- 1.1.11. Require all new developments to comply with the State of California seismic safety standards.

SE- 1.1.12. Encourage the reduction of risks associated with hazardous buildings through action programs including, but not limited to, renovation, occupancy reduction, and selective demolition.

SE- 1.1.13. Provide relocation assistance to persons or businesses temporarily or permanently dislocated from hazardous buildings.

3.4.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criteria based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.). It was concluded in the Initial Study that there were no impacts or less than significant impacts for the following significance criteria. Therefore, the following significance criteria are not included as part of this EIR:

A. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

   i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Refer to Division of Mines and Geology Special Publication 42).

   ii. Strong seismic ground shaking

   iv. Landslides

B. Result in substantial soil erosion or the loss of topsoil.

E. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

F. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The following significance criteria, included for analysis in this EIR, is based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.), and shall be used to determine the significance of potential geology and soils impacts. Impacts to geology and soils would be significant if the Proposed Project would:

A. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

   iii. Seismic-related ground failure, including liquefaction.

C. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

D. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

3.4.4 Impacts Analysis

A. Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. As previously discussed, previous soil explorations in the vicinity of the MPDSP area did not encounter groundwater to a depth of 50 feet bgs, and multiple well readings in the Proposed Project vicinity suggest that groundwater levels are more than 400 feet bgs. In addition, neither the CGS nor the County of San Bernardino determined that the MPDSP area is in a zone of liquefaction.

Regardless, the Proposed Project would be required to complete a standard geotechnical study during the design phase of the MPDSP, in accordance with the CBC and local construction guidelines. Recommendations provided in the geotechnical report would ensure that any geologic hazards associated with seismic-related ground failure would be mitigated prior to development. Moreover, development of the Proposed Project would not result in an increase of saturated or loose soils compared to existing conditions. As such, the Proposed Project would not increase or exacerbate the potential for liquefaction or lateral spreading to occur and, therefore, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismically-related ground failure. As a result, impacts would be **less than significant,** and no mitigation is required.

C. Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. As previously discussed in Threshold A(iii), the Proposed Project would not increase the potential for liquefaction and lateral spreading to occur, as the Project would not increase the presence of loose, saturated soils beneath the site. In addition, the Plan area is located on gently sloping ground and is not located near any unstable slopes. Although Project construction may result in construction of temporary slopes during soil excavations and trenching, as well as permanent cut- and fill-slopes, these slopes would be constructed in accordance with recommendations in a standard geotechnical report, which would be completed during the design phase of individual MPDSP projects, in accordance with the CBC and local construction guidelines.

Recommendations included in the geotechnical report would ensure that slopes are constructed safely and development of individual projects would not result in or exacerbate geologic hazards associated with unstable soils and seismically-induced ground failure. Therefore, the potential impacts associated with liquefaction/lateral spreading and landslides would be **less than significant**. No mitigation is required.

Subsidence

Less Than Significant Impact. As previously discussed, the Proposed Project is located in an area that has been historically prone to subsidence as a result of groundwater withdrawal. However, as a result of the 1978 adjudication, the Chino Groundwater Basin has incorporated safety measures, including managed groundwater extraction rates and oversight from the Chino Basin Watermaster, to effectively reduce the potential for over-extraction of the basin. In addition, Project construction and operation would not exacerbate the potential for subsidence to occur. Therefore, the Proposed Project would not be located on a geologic unit that is unstable due to subsidence or would become unstable as a result of Project development, and potentially result in on- or off-site subsidence. Impacts associated with subsidence would be **less than significant**. No mitigation is required.

Collapsible Soils

Less Than Significant Impact. As previously discussed, soils in the vicinity of the Plan area are generally comprised of medium dense to dense alluvial sands and silty sands, which are typically not conducive to soil collapse. Nevertheless, Project structures would be constructed in accordance with recommendations of a standard, site-specific geotechnical investigation. In addition, structures would be built in compliance with CBC requirements, including allowable load-bearing values of soils (Sections 1806 and 1806A); the design of embedded posts and poles (Sections 1807 and 1807A), and foundations (Sections 1808 and 1808A); and design of deep foundations (Sections 1810 and 1810A), which are designed to assure safe construction requirements appropriate to site conditions. Therefore, the Proposed Project would not be located on a geologic unit that is unstable due to soil collapse, or would become unstable as a result of Project development, and potentially result in on- or off-site soil collapse. Potential impacts associated with collapsible soils would be **less than significant**. No mitigation is required.

D. Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less Than Significant Impact. Expansive soils are clay-rich soils that shrink when dry and swell when wet. This change in volume can exert substantial pressure on

foundations, resulting in structural distress and/or damage. Soils in the vicinity of the Plan area are generally comprised of medium dense to dense alluvial sands and silty sands, which typically lack substantial amounts of clay, and thus are usually not conducive to soil expansion. In addition, construction of individual projects within the MPDSP would be completed in accordance with recommendations of a standard geotechnical report, which would be completed during the design phase of each project, as required by the CBC and local construction guidelines. Structures would be built in compliance with the CBC and the local building codes, which includes measures to alleviate expansive soil potential, if present. As a result, the Proposed Project would not increase or exacerbate the potential for expansive soils to occur and would not create substantial direct or indirect risks to life or property. As such, impacts would be **less than significant**. No mitigation is required.

3.4.5 Cumulative Impacts

Potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards, including unstable geologic conditions, or contribute substantially to erosion. The majority of impacts from geologic hazards, such as liquefaction, landslides, expansive soils, and unstable soils, are site-specific and are therefore generally mitigated on a project-by-project basis. Each cumulative project would be required to adhere to required building engineering design per the most recent version of the CBC in order to ensure the safety of building occupants and avoid a cumulative geologic hazard. Additionally, as needed, projects would incorporate individual mitigation or geotechnical requirements for site-specific geologic hazards present on each individual cumulative project site. Therefore, a potential cumulative impact related to site-specific geologic hazards such as seismically induced ground failure, subsidence, soil collapse, and expansive soils would not occur. Therefore, the Proposed Project, in combination with other cumulative projects, would not contribute to a significant cumulative impact associated with geology and soils. Cumulative impacts are **less than significant**. No mitigation is required.

3.4.6 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize associated adverse impacts. No significant impact would occur as a result of seismically induced ground failure, subsidence, soil collapse, and expansive soils. As such, no mitigation is required. As included in the Initial Study (Appendix A), implementation of mitigation measure **MM-GEO-1** would reduce impacts to paleontological resources to a less than significant level (Threshold F).

MM-GEO-1 In the event that paleontological resources (fossil materials) are exposed during construction activities for the Proposed Project, all construction work occurring

within 50 feet of the find shall immediately stop until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology, can assess the nature and importance of the find. Depending upon the significance of the find, the paleontologist may record the find and allow work to continue, or may recommend salvage and recovery of the resource. All recommendations will be made in accordance with the Society of Vertebrate Paleontology's 1995 guidelines and shall be subject to review and approval by the City. Work in the area of the find may only resume upon approval of a qualified paleontologist.

3.4.7 Significance After Mitigation

Impacts to geology and soils would be **less than significant**.

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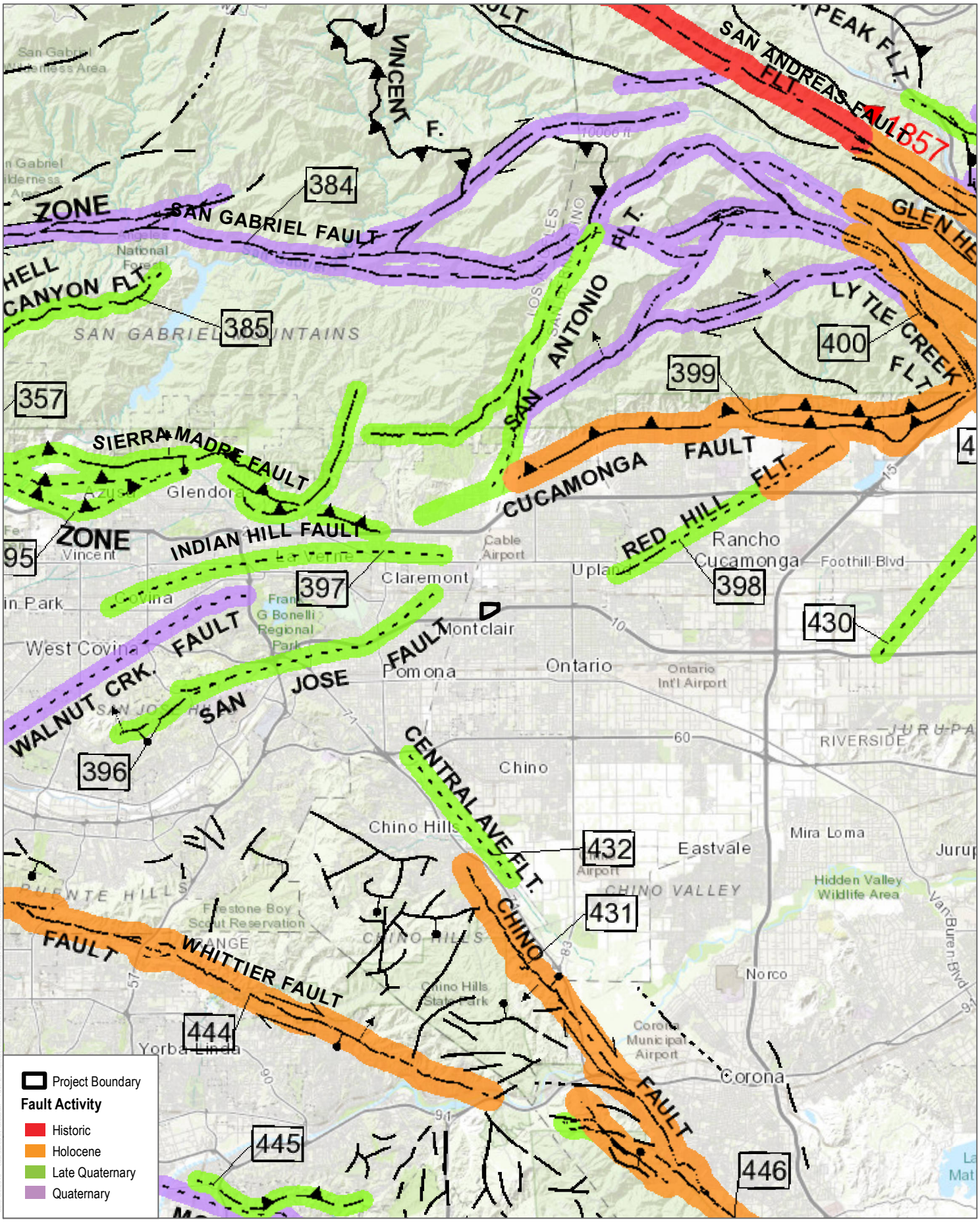

SOURCE: CGS 2010

DUDEK

0 10,000 20,000 Feet

FIGURE 3.4-1

Regional Faulting

Montclair Specific Plan

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3.5 GREENHOUSE GAS EMISSIONS

This section describes the existing setting of the Montclair Place District Specific Plan Project (MPDSP or Proposed Project) site related to greenhouse gas (GHG) emissions and climate change, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the Proposed Project. The May 2019 Initial Study (Appendix A) for the Proposed Project did not identify the potential impacts of the Proposed Project on the creation of GHG emissions. Therefore, this section evaluates the Proposed Project's potential GHG emissions associated with future development under the Proposed Project as follows: would future projects generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and would future projects conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. GHG modeling data and associated information has been included as part of Appendix B.

3.5.1 Existing Conditions

3.5.1.1 The Greenhouse Effect

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in Earth's energy balance, including variations in the sun's energy reaching Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere (U.S. Environmental Protection Agency (EPA) 2017a).

The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth, the Earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature and creates a pleasant, livable environment on the Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise.

The scientific record of the Earth's climate shows that the climate system varies naturally over a wide range of time scales and that, in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes, such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. Recent climate changes, in particular the warming

observed over the past century, however, cannot be explained by natural causes alone. Rather, it is extremely likely that human activities have been the dominant cause of that warming since the mid-twentieth century and is the most significant driver of observed climate change (Intergovernmental Panel on Climate Change (IPCC) 2013; EPA 2017a). Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing, observed warming, and improved understanding of the climate system (IPCC 2013). The atmospheric concentrations of GHGs have increased to levels unprecedented in the last 800,000 years, primarily from fossil fuel emissions and secondarily from emissions associated with land use changes (IPCC 2013). Continued emissions of GHGs will cause further warming and changes in all components of the climate system, which is discussed further in Section 3.5.1.5, Potential Effects of Climate Change.

3.5.1.2 Greenhouse Gases

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3) (see also 14 CCR 15364.5).[1] Some GHGs, such as CO_2, CH_4, and N_2O, occur naturally and are emitted into the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases, such as HFCs, PFCs, and SF_6, which are associated with certain industrial products and processes. The following paragraphs provide a summary of the most common GHGs and their sources.[2]

Carbon Dioxide. CO_2 is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic GHG that affects the Earth's radiative balance. Natural sources of CO_2 include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic out-gassing; and decomposition of dead organic matter. Human activities that generate CO_2 are from the combustion of fuels such as coal, oil, natural gas, and wood and changes in land use.

Methane. CH_4 is produced through both natural and human activities. CH_4 is a flammable gas and is the main component of natural gas. Methane is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition

[1] Climate forcing substances include GHGs and other substances such as black carbon and aerosols. This discussion focuses on the seven GHGs identified in the California Health and Safety Code Section 38505, because impacts associated with other climate forcing substances are not evaluated herein.

[2] The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change's Second Assessment Report and Fourth Assessment Report (IPCC 1995, 2007), CARB's Glossary of Terms Used in GHG Inventories (CARB 2018), and EPA's Glossary of Climate Change Terms (EPA 2016).

of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

Nitrous Oxide. N_2O is produced through natural and human activities, mainly through agricultural activities and natural biological processes, although fuel burning and other processes also create N_2O. Sources of N_2O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil-fuel-fired power plants), vehicle emissions, and using N_2O as a propellant (such as in rockets, racecars, and aerosol sprays).

Fluorinated Gases. Fluorinated gases (also referred to as F-gases) are synthetic powerful GHGs emitted from many industrial processes. Fluorinated gases are commonly used as substitutes for stratospheric ozone-depleting substances (e.g., CFCs, HCFCs, and halons). The most prevalent fluorinated gases include the following:

- **Hydrofluorocarbons:** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals used as alternatives to ozone-depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are used in manufacturing.
- **Perfluorocarbons:** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, with HFCs, to the ozone depleting substances. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.
- **Sulfur Hexafluoride:** SF_6 is a colorless gas soluble in alcohol and ether and slightly soluble in water. SF_6 is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.
- **Nitrogen Trifluoride:** NF_3 is used in the manufacture of a variety of electronics, including semiconductors and flat panel displays.

Chlorofluorocarbons. CFCs are synthetic chemicals that have been used as cleaning solvents, refrigerants, and aerosol propellants. CFCs are chemically unreactive in the lower atmosphere (troposphere) and the production of CFCs was prohibited in 1987 due to the chemical destruction of stratospheric O_3.

Hydrochlorofluorocarbons. HCFCs are a large group of compounds, whose structure is very close to that of CFCs—containing hydrogen, fluorine, chlorine, and carbon atoms—but including

one or more hydrogen atoms. Like HFCs, HCFCs are used in refrigerants and propellants. HCFCs were also used in place of CFCs for some applications; however, their use in general is being phased out.

Black Carbon. Black carbon is a component of fine particulate matter, which has been identified as a leading environmental risk factor for premature death. It is produced from the incomplete combustion of fossil fuels and biomass burning, particularly from older diesel engines and forest fires. Black carbon warms the atmosphere by absorbing solar radiation, influences cloud formation, and darkens the surface of snow and ice, which accelerates heat absorption and melting. Black carbon is a short-lived species that varies spatially, which makes it difficult to quantify the global warming potential. Diesel particulate matter emissions are a major source of black carbon and are TACs that have been regulated and controlled in California for several decades to protect public health. In relation to declining diesel particulate matter from the California Air Resources Board's (CARB's) regulations pertaining to diesel engines, diesel fuels, and burning activities, CARB estimates that annual black carbon emissions in California have reduced by 70% between 1990 and 2010, with 95% control expected by 2020 (CARB 2014).

Water Vapor. The primary source of water vapor is evaporation from the ocean, with additional vapor generated by sublimation (change from solid to gas) from ice and snow, evaporation from other water bodies, and transpiration from plant leaves. Water vapor is the most important, abundant, and variable GHG in the atmosphere and maintains a climate necessary for life.

Ozone. Tropospheric O_3, which is created by photochemical reactions involving gases from both natural sources and human activities, acts as a GHG. Stratospheric O_3, which is created by the interaction between solar ultraviolet radiation and molecular oxygen (O_2), plays a decisive role in the stratospheric radiative balance. Depletion of stratospheric O_3, due to chemical reactions that may be enhanced by climate change, results in an increased ground-level flux of ultraviolet-B radiation.

Aerosols. Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

3.5.1.3 Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo) (EPA 2016). The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to

another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons of CO_2 equivalent (MT CO_2e).

The current version of the California Emissions Estimator Model (CalEEMod) (Version 2016.3.2; California Air Pollution Control Officers Association (CAPCOA) 2017) assumes that the GWP for CH_4 is 25 (so emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007). The GWP values identified in CalEEMod were applied to the Proposed Project.

3.5.1.4 Contributions to Greenhouse Gas Emissions

Per the EPA's *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2018* (EPA 2020), total United States GHG emissions were approximately 6,676.6 MMT CO_2e in 2018. The primary GHG emitted by human activities in the United States was CO_2, which represented approximately 81.3% of total GHG emissions (5,428.1 MMT CO_2e). The largest source of CO_2, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 92.8% of CO_2 emissions in 2018 (5,031.8 MMT CO_2e). Relative to 1990, gross United States GHG emissions in 2018 are higher by 3.7%, down from a high of 15.2% above 1990 levels in 2007. GHG emissions decreased from 2017 to 2018 by 2.9% (188.4 MMT CO_2e) and overall, net emissions in 2018 were 10.2% below 2005 levels (EPA 2020).

According to California's 2000–2017 GHG emissions inventory (2019 edition), California emitted 424.10 MMT CO_2e in 2017, including emissions resulting from out-of-state electrical generation (CARB 2019). The sources of GHG emissions in California include transportation, industrial uses, electric power production from both in-state and out-of-state sources, commercial and residential uses, agriculture, high global-warming potential substances, and recycling and waste. The California GHG emission source categories (as defined in CARB's 2008 Scoping Plan) and their relative contributions in 2017 are presented in Table 3.5-1.

Table 3.5-1
GHG Emissions Sources in California

Source Category	Annual GHG Emissions (MMT CO_2e)	Percent of Total[a]
Transportation	169.86	40%
Industrial uses	89.40	21%
Electricity (in state)	38.45	9%
Electricity (imports)	23.94	6%
Agriculture	32.42	8%
Residential	26.00	6%

Table 3.5-1
GHG Emissions Sources in California

Source Category	Annual GHG Emissions (MMT CO_2e)	Percent of Total[a]
Commercial	15.14	4%
High global-warming potential substances	19.99	5%
Recycling and waste	8.89	2%
Total	**424.19**	**100%**

Source: CARB 2019.
Notes: GHG = greenhouse gas; MMT CO_2e = million metric tons of carbon dioxide equivalent.
Emissions reflect the 2017 California GHG inventory.
[a] Percentage of total has been rounded, and total may not sum due to rounding.

During the 2000 to 2017 period, per capita GHG emissions in California have continued to drop from a peak in 2001 of 14.1 MT per person to 10.7 MT per person in 2017, representing a 24% decrease. In addition, total GHG emissions in 2017 were approximately 5 MMT CO_2e less than 2016 emissions. The declining trend in GHG emissions, coupled with programs that will continue to provide additional GHG reductions going forward, demonstrates that California is just below the 2020 target of 431 MMT CO_2e (CARB 2019).

The City has established a goal to reduce its community-wide GHG emissions to a level that is 20% below its 2008 GHG emissions level by 2020 (SANBAG 2013). The City's community-wide GHG emissions inventory for baseline year 2008 is presented in Table 3.5-2.

Table 3.5-2
City of Montclair Baseline (Year 2008) Community-Wide GHG Emissions Inventory

Community Sector	Total MT CO_2e/year	CO_2e (%)
Building energy	87,088	32%
On-road transportation	144,013	54%
Off-road equipment	16,474	6%
Solid waste management	10,108	4%
Wastewater Treatment	1,455	1%
Water Conveyance	9,687	3%
Total	**268,825**	**100%**

Source: SANBAG 2013.
Note: GHG = greenhouse gas; MT CO_2e = metric tons of carbon dioxide equivalent per year
[1] Total May be slightly off due to rounding.

As shown on Table 3.5-2, approximately 54% of the City's GHG emissions in 2008 were attributed to on-road transportation. Building energy accounted for approximately 32%. Off-road equipment accounted for approximately 6%, solid waste management accounted for 4%, water conveyance accounted for 3%, and wastewater treatment made up the remaining 1% of the City's GHG emissions in 2008.

3.5.1.5 Potential Effects of Human Activity on Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 *Intergovernmental Panel on Climate Change Synthesis Report* indicated that warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, and rising sea levels (IPCC 2014).

In California, climate change impacts have the potential to affect sea level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, and electricity demand and supply (CCCC 2012). The primary effect of global climate change has been a 0.2°C rise in average global tropospheric temperature per decade, determined from meteorological measurements worldwide between 1990 and 2005. Scientific modeling predicts that continued emissions of GHGs at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. A warming of about 0.2°C (0.36°F) per decade is projected, and there are identifiable signs that global warming could be taking place.

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. The average temperatures in California have increased, leading to more extreme hot days and fewer cold nights; shifts in the water cycle have been observed, with less winter precipitation falling as snow, and both snowmelt and rainwater running off earlier in the year; sea levels have risen; and wildland fires are becoming more frequent and intense due to dry seasons that start earlier and end later (CAT 2010).

An increase in annual average temperature is a reasonably foreseeable effect of climate change. Observed changes over the last several decades across the western United States reveal clear signals of climate change. Statewide average temperatures increased by about 1.7°F from 1895 to 2011, and warming has been greatest in the Sierra Nevada (CCCC 2012). By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 4.1 to 8.6°F, depending on emissions levels. Springtime warming—a critical influence on snowmelt—will be particularly pronounced. Summer temperatures will rise more than winter temperatures, and the increases will be greater in inland California, compared to the coast. Heat waves will be more frequent, hotter, and longer. There will be fewer extremely cold nights (CCCC 2012). A decline of Sierra snowpack, which accounts for approximately half of the surface water storage

in California and much of the State's water supply, by 30% to as much as 90% is predicted over the next 100 years (CAT 2006).

Model projections for precipitation over California continue to show the Mediterranean pattern of wet winters and dry summers with seasonal, year-to-year, and decade-to-decade variability. For the first time, however, several of the improved climate models shift toward drier conditions by the mid-to-late 21st century in Central and, most notably, Southern California. By late-century, all projections show drying, and half of them suggest 30-year average precipitation will decline by more than 10% below the historical average (CCCC 2012).

Wildfire risk in California will increase as a result of climate change. Earlier snowmelt, higher temperatures, and longer dry periods over a longer fire season will directly increase wildfire risk. Indirectly, wildfire risk will also be influenced by potential climate-related changes in vegetation and ignition potential from lightning. However, human activities will continue to be the biggest factor in ignition risk. It is estimated that the long-term increase in fire occurrence associated with a higher emissions scenario is substantial, with increases in the number of large fires statewide ranging from 58% to 128% above historical levels by 2085. Under the same emissions scenario, estimated burned area will increase by 57% to 169%, depending on the location (CCCC 2012).

Reduction in the suitability of agricultural lands for traditional crop types may occur. While effects may occur, adaptation could allow farmers and ranchers to minimize potential negative effects on agricultural outcomes by adjusting timing of plantings or harvesting and changing crop types.

Public health-related effects of increased temperatures and prolonged temperature extremes, including heat stroke, heat exhaustion, and exacerbation of existing medical conditions, could be particular problems for the elderly, infants, and those who lack access to air conditioning or cooled spaces (CNRA 2009a).

A summary of current and future climate change impacts to resource areas in California, as discussed in the *Safeguarding California: Reducing Climate Risk* (CNRA 2014), is provided below.

Agriculture. The impacts of climate change on the agricultural sector are far more severe than the typical variability in weather and precipitation patterns that occur year to year. Some of the specific challenges faced by the agricultural sector and farmers include more drastic and unpredictable precipitation and weather patterns; extreme weather events that range from severe flooding to extreme drought, to destructive storm events; significant shifts in water availably and water quality; changes in pollinator lifecycles; temperature fluctuations, including extreme heat stress and decreased chill hours; increased risks from invasive species and weeds, agricultural pests and plant diseases; and disruptions to the transportation and energy infrastructure supporting agricultural production. These challenges and associated short-term and long-term impacts can have both positive and negative effects on agricultural production. Nonetheless, it is predicted that

current crop and livestock production will suffer long-term negative effects resulting in a substantial decrease in the agricultural sector if not managed or mitigated (CNRA 2014).

Biodiversity and Habitat. The state's extensive biodiversity stems from its varied climate and assorted landscapes, which have resulted in numerous habitats where species have evolved and adapted over time. Specific climate change challenges to biodiversity and habitat include species migration in response to climatic changes, range shift and novel combinations of species; pathogens, parasites and disease; invasive species; extinction risks; changes in the timing of seasonal life-cycle events; food web disruptions; threshold effects (i.e., a change in the ecosystem that results in a "tipping point" beyond which irreversible damage or loss has occurs). Habitat restoration, conservation, and resource management across California and through collaborative efforts amongst public, private and nonprofit agencies has assisted in the effort to fight climate change impacts on biodiversity and habitat. One of the key measures in these efforts is ensuring species' ability to relocate as temperature and water availability fluctuate as a result of climate change, based on geographic region.

Energy. The energy sector provides California residents with a supply of reliable and affordable energy through a complex integrated system. Specific climate change challenges for the energy sector include temperature, fluctuating precipitation patterns, increasing extreme weather events and sea level rise. Increasing temperatures and reduced snowpack negatively impact the availability of a steady flow of snowmelt to hydroelectric reservoirs. Higher temperatures also reduce the capacity of thermal power plants since power plant cooling is less efficient at higher ambient temperatures. Natural gas infrastructure in coastal California is threatened by sea level rise and extreme storm events (CNRA 2014).

Forestry. Forests occupy approximately 33% of California's 100 million acres and provide key benefits such as wildlife habitat, absorption of carbon dioxide, renewable energy and building materials. The most significant climate change related risk to forests is accelerated risk of wildfire and more frequent and severe droughts. Droughts have resulted in a greater number of large scale tree mortalities and combined with increasing temperatures have led to an overall increase in wildfire risks. Increased wildfire intensity subsequently increases public safety risks, property damage, fire suppression and emergency response costs, watershed and water quality impacts and vegetation conversions. These factors contribute to decreased forest growth, geographic shifts in tree distribution, loss of fish and wildlife habitat and decreased carbon absorption. Climate change may result in increased establishment of non-native species, particularly in rangelands where invasive species are already a problem. Invasive species may be able to exploit temperature or precipitation changes, or quickly occupy areas denuded by fire, insect mortality or other climate change effects on vegetation (CNRA 2014).

Ocean and Coastal Ecosystems and Resources. Sea level rise, changing ocean conditions and other climate change stressors are likely to exacerbate long-standing challenges related to ocean and coastal ecosystems in addition to threatening people and infrastructure located along the California coastline and in coastal communities. Sea level rise in addition to more frequent and severe coastal storms and erosion are threatening vital infrastructure such as roads, bridges, power plants, ports and airports, gasoline pipes, and emergency facilities as well as negatively impacting the coastal recreational assets such as beaches and tidal wetlands. Water quality and ocean acidification threaten the abundance of seafood and other plant and wildlife habitats throughout California and globally (CNRA 2014).

Public Health. Climate change can impact public health through various environmental changes and is the largest threat to human health in the twenty-first Century. Changes in precipitation patterns affect public health primarily through potential for altered water supplies, and extreme events such as heat, floods, droughts, and wildfires. Increased frequency, intensity and duration of extreme heat and heat waves is likely to increase the risk of mortality due to heat related illness as well as exacerbate existing chronic health conditions. Other extreme weather events are likely to negatively impact air quality and increase or intensify respiratory illness such as asthma and allergies. Additional health impacts that may be impacted by climate change include cardiovascular disease, vector-borne diseases, mental health impacts, and malnutrition injuries. Increased frequency of these ailments is likely to subsequently increase the direct risk of injury and/or mortality (CNRA 2014).

Transportation. Residents of California rely on airports, seaports, public transportation and an extensive roadway network to gain access to destinations, goods and services. While the transportation industry is a source of GHG emissions it is also vulnerable to climate change risks. Particularly, sea level rise and erosion threaten many coastal California roadways, airports, seaports, transit systems, bridge supports and energy and fueling infrastructure. Increasing temperatures and extended periods of extreme heat threaten the integrity of the roadways and rail lines. High temperatures cause the road surfaces to expand which leads to increased pressure and pavement buckling. High temperatures can also cause rail breakages which could lead to train derailment. Other forms of extreme weather events, such as extreme storm events, can negatively impact infrastructure which can impair movement of peoples and goods, or potentially block evacuation routes and emergency access roads. Increased wildfires, flooding, erosion risks, landslides, mudslides and rockslides can all profoundly impact the transportation system and pose a serious risk to public safety (CNRA 2014).

Water. Water resources in California support residences, plants, wildlife, farmland, landscapes, and ecosystems, and bring trillions of dollars in economic activity. Climate change could seriously impact the timing, form, amount of precipitation, runoff patterns, and frequency and severity of precipitation events. Higher temperatures reduce the amount of

snowpack and lead to earlier snowmelt, which can affect water supply availability, natural ecosystems, and winter recreation. Water supply availability during the intense dry summer months is heavily dependent on the snowpack accumulated during the winter. Increased risk of flooding is associated with a variety of public health concerns including water quality, public safety, property damage, displacement, and post-disaster mental health problems. Prolonged and intensified droughts can also negatively affect groundwater reserves and result in increased overdraft and subsidence. Droughts can also negatively impact agriculture and farmland throughout the state. The higher risk of wildfires can lead to increased erosion, which can negatively impact watersheds and result in poor water quality. Water temperatures are also prone to increase, which can negatively affect wildlife that rely on a specific range of temperatures for suitable habitat.

In March 2016, CNRA released Safeguarding California: Implementation Action Plans, a document that shows how California is acting to convert the recommendations contained in the 2014 Safeguarding California plan into action (CNRA 2016). Additionally, in May 2017, CNRA released the draft Safeguarding California Plan: 2017 Update, which is a survey of current programmatic responses for climate change and contains recommendations for further actions (CNRA 2017).

CNRA released *Safeguarding California Plan: 2018 Update* in January 2018, which provides a roadmap for state agencies to protect communities, infrastructure, services, and the natural environment from climate change impacts. The 2018 Safeguarding California Plan includes 69 recommendations across 11 sectors and more than 1,000 ongoing actions and next steps developed by scientific and policy experts across 38 state agencies (CNRA 2018). As with previous state adaptation plans, the 2018 Update addresses the following: acceleration of warming across the state; more intense and frequent heat waves; greater riverine flows; accelerating sea level rise; more intense and frequent drought; more severe and frequent wildfires; more severe storms and extreme weather events; shrinking snowpack and less overall precipitation; and ocean acidification, hypoxia, and warming.

3.5.2 Regulatory Setting

3.5.2.1 Federal

Massachusetts vs. EPA. On April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency*, the U.S. Supreme Court ruled that CO_2 was a pollutant and directed the EPA administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the EPA administrator is required to follow the language of Section 202(a) of the Clean Air Act. On

December 7, 2009, the administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act:

- The elevated concentrations of GHGs—CO_2, CH_4, N_2O, hydrofluorocarbons, perfluorocarbons, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the "endangerment finding."
- The combined emissions of GHGs—CO_2, CH_4, N_2O, and hydrofluorocarbons—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the "cause or contribute finding."

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

Energy Independence and Security Act. On December 19, 2007, President George W. Bush signed the Energy Independence and Security Act of 2007. Among other key measures, the Act would do the following, which would aid in the reduction of national GHG emissions:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
2. Set a target of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by model year 2020 and direct NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
3. Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Federal Vehicle Standards. In response to the U.S. Supreme Court ruling discussed above, the Bush Administration issued Executive Order (EO) 13432 in 2007 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011; and, in 2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016 (75 FR 25324–25728).

In 2010, President Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and NHTSA proposed stringent, coordinated federal GHG and fuel

economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021 (77 FR 62624–63200). On January 12, 2017, EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks (EPA 2017b).

In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion MT and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (EPA and NHTSA 2016).

In August 2018, EPA and NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light trucks and establish new standards for model years 2021 through 2026. Compared to maintaining the post-2020 standards now in place, the 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2%–3% of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of one degree Celsius by 2100 (EPA and NHTSA 2018). California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives. Thus, the timing and consequences of the 2018 federal proposal are speculative at this time.

On September 27, 2019, EPA and NHTSA published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program." (84 Fed. Reg. 51,310), which became effective November 26, 2019. The Part One Rule revokes California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the EPA and NHTSA issued Part Two of the SAFE Rule, which will go into effect 60 days after being published in the Federal Register. The Part Two Rule sets CO_2 emissions standards and corporate average fuel economy standards for passenger vehicles and light duty trucks for model years 2021 through 2026. This issue is evolving as California and 22 other states, as well as the District of Columbia and four cities, filed suit against the EPA and a petition for reconsideration of the rule on November 26, 2019. The litigation is not expected to be resolved for at least several months.

Clean Power Plan and New Source Performance Standards for Electric Generating Units. On October 23, 2015, EPA published a final rule (effective December 22, 2015) establishing the

Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units (80 FR 64510–64660), also known as the Clean Power Plan. These guidelines prescribe how states must develop plans to reduce GHG emissions from existing fossil-fuel-fired electric generating units. The guidelines establish CO_2 emission performance rates representing the best system of emission reduction for two subcategories of existing fossil-fuel-fired electric generating units: (1) fossil-fuel-fired electric utility steam-generating units, and (2) stationary combustion turbines. Concurrently, the EPA published a final rule (effective October 23, 2015) establishing Standards of Performance for Greenhouse Gas Emissions from New, Modified, and Reconstructed Stationary Sources: Electric Utility Generating Units (80 FR 64661–65120). The rule prescribes CO_2 emission standards for newly constructed, modified, and reconstructed affected fossil-fuel-fired electric utility generating units. The U.S. Supreme Court stayed implementation of the Clean Power Plan pending resolution of several lawsuits

3.5.2.2 State

The statewide GHG emissions regulatory framework is summarized below by category: state climate change targets, building energy, renewable energy and energy procurement, mobile sources, solid waste, water, and other state regulations and goals. The following text describes EOs, legislation, regulations, and other plans and policies that would directly or indirectly reduce GHG emissions and/or address climate change issues.

State Climate Change Targets

The state has taken a number of actions to address climate change. These include EOs, legislation, and CARB plans and requirements. These are summarized below.

EO B-30-15. EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in S-3-05. To facilitate achieving this goal, EO B-30-15 called for CARB to update the Scoping Plan to express the 2030 target in terms of MMT CO_2e. The EO also called for state agencies to continue to develop and implement GHG emission reduction programs in support of the reduction targets.

EO S-3-05. EO S-3-05 (June 2005) established California's GHG emissions reduction targets and laid out responsibilities among the state agencies for implementing the EO and for reporting on progress toward the targets. This EO established the following targets:

- By 2010, reduce GHG emissions to 2000 levels

- By 2020, reduce GHG emissions to 1990 levels
- By 2050, reduce GHG emissions to 80% below 1990 levels

EO S-3-05 also directed the California Environmental Protection Agency to report biannually on progress made toward meeting the GHG targets and the impacts to California due to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. CAT was formed, which subsequently issued reports from 2006 to 2010 (CAT 2016).

AB 32. In furtherance of the goals established in EO S-3-05, the Legislature enacted AB 32 (Núñez and Pavley). The bill is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California's GHG emissions at 1990 levels by 2020 and initiate the transformations required to achieve the state's long-range climate objectives.

SB 32 and AB 197. SB 32 and AB 197 (enacted in 2016) are companion bills. SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the state's climate policies. AB 197 also added two members of the Legislature to the Board as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and TACs from reporting facilities; and, requires CARB to identify specific information for GHG emissions reduction measures when updating the scoping plan.

CARB's 2007 Statewide Limit. In 2007, in accordance with California Health and Safety Code, Section 38550, CARB approved a statewide limit on the GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMT CO_2e).

CARB's Climate Change Scoping Plan. One specific requirement of AB 32 is for CARB to prepare a "scoping plan" for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (Health and Safety Code, Section 38561(a)), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan. The *Climate Change Scoping Plan: A Framework for Change* (*Scoping Plan*) included a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the state's long-range climate objectives. The key elements of the Scoping Plan include the following (CARB 2008):

1. Expanding and strengthening existing energy efficiency programs as well as building and appliance standards

2. Achieving a statewide renewable energy mix of 33%
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions
4. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets
5. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard (LCFS 17 CCR, Section 95480 et seq.)
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation

The Scoping Plan also identified local governments as essential partners in achieving California's goals to reduce GHG emissions because they have broad influence and, in some cases, exclusive authority over activities that contribute to significant direct and indirect GHG emissions through their planning and permitting processes, local ordinances, outreach and education efforts, and municipal operations. Specifically, the Scoping Plan encouraged local governments to adopt a reduction goal for municipal operations and for community emissions to reduce GHGs by approximately 15% from then levels (2008) by 2020. Many local governments developed community-scale local GHG reduction plans based on this Scoping Plan recommendation.

In 2014, CARB approved the first update to the Scoping Plan. The *First Update to the Climate Change Scoping Plan: Building on the Framework* (*First Update)* defined the state's GHG emission reduction priorities for the next 5 years and laid the groundwork to start the transition to the post-2020 goals set forth in EOs S-3-05 and B-16-2012. The *First Update* concluded that California is on track to meet the 2020 target but recommended a 2030 mid-term GHG reduction target be established to ensure a continuum of action to reduce emissions. The *First Update* recommended a mix of technologies in key economic sectors to reduce emissions through 2050 including: energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings and industrial machinery; decarbonizing electricity and fuel supplies; and, the rapid market penetration of efficient and clean energy technologies. As part of the *First Update*, CARB recalculated the state's 1990 emissions level, using more recent global warming potentials identified by the Intergovernmental Panel on Climate Change, from 427 MMT CO_2e to 431 MMT CO_2e.

In 2015, as directed by EO B-30-15, CARB began working on an update to the Scoping Plan to incorporate the 2030 target of 40% below 1990 levels by 2030 to keep California on its trajectory

toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in S-3-05. The Governor called on California to pursue a new and ambitious set of strategies, in line with the five climate change pillars from his inaugural address, to reduce GHG emissions and prepare for the unavoidable impacts of climate change. In the summer of 2016, the Legislature affirmed the importance of addressing climate change through passage of Senate Bill (SB) 32 (Pavley, Chapter 249, Statutes of 2016).

In January 2017, CARB released the *2017 Climate Change Scoping Plan Update (2030 Scoping Plan)* for public review and comment (CARB 2017a). The 2030 Scoping Plan builds on the successful framework established in the initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies that will serve as the framework to achieve the 2030 GHG target and define the state's climate change priorities to 2030 and beyond. The strategies' "known commitments" include implementing renewable energy and energy efficiency (including the mandates of SB 350), increased stringency of the Low Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and increased stringency of SB 375 targets. To fill the gap in additional reductions needed to achieve the 2030 target, it recommends continuing the Cap-and-Trade Program and a measure to reduce GHGs from refineries by 20%.

For local governments, the 2030 Scoping Plan replaced the initial Scoping Plan's 15% reduction goal with a recommendation to aim for a community-wide goal of no more than 6 MT CO_2e per capita by 2030 and no more than 2 MT CO_2e per capita by 2050, which are consistent with the state's long-term goals. These goals are also consistent with the Under 2 MOU and the Paris Agreement, which are developed around the scientifically based levels necessary to limit global warming below 2°C. The 2030 Scoping Plan recognized the benefits of local government GHG planning (e.g., through climate action plans (CAPs)) and provide more information regarding tools CARB is working on to support those efforts. It also recognizes the CEQA streamlining provisions for project level review where there is a legally adequate CAP.[3] The Second Update was approved by CARB's Governing Board on December 14, 2017.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32, SB 32, and the EOs and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. A project is considered consistent with the statutes and EOs if it meets the general policies in reducing GHG emissions to facilitate the achievement of the state's goals and does not impede attainment of those goals. As discussed in several cases, a given project need not be in perfect conformity with each and every planning

3 *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490; *San Francisco Tomorrow et al. v. City and County of San Francisco* (2015) 229 Cal.App.4th 498; *San Franciscans Upholding the Downtown Specific Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656; *Sequoyah Hills Homeowners Assn. V. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

policy or goals to be consistent. A project would be consistent, if it will further the objectives and not obstruct their attainment.

CARB's Regulations for the Mandatory Reporting of Greenhouse Gas Emissions. CARB's Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (17 CCR 95100–95157) incorporated by reference certain requirements that EPA promulgated in its Final Rule on Mandatory Reporting of Greenhouse Gases (Title 40, CFR, Part 98). Specifically, Section 95100(c) of the Mandatory Reporting Regulation incorporated those requirements that EPA promulgated in the Federal Register on October 30, 2009; July 12, 2010; September 22, 2010; October 28, 2010; November 30, 2010; December 17, 2010; and April 25, 2011. In general, entities subject to the Mandatory Reporting Regulation that emit over 10,000 MT CO_2e per year are required to report annual GHGs through the California Electronic GHG Reporting Tool. Certain sectors, such as refineries and cement plants, are required to report regardless of emission levels. Entities that emit more than the 25,000 MT CO_2e per year threshold are required to have their GHG emission report verified by a CARB-accredited third-party verified.

EO B-18-12. EO B-18-12 (April 2012) directed state agencies, departments, and other entities under the governor's executive authority to take action to reduce entity-wide GHG emissions by at least 10% by 2015 and 20% by 2020, as measured against a 2010 baseline. EO B-18-12 also established goals for existing state buildings for reducing grid-based energy purchases and water use.

SB 605 and SB 1383. SB 605 (2014) requires CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants (SLCPs) in the state; and SB 1383 (2016) requires CARB to approve and implement that strategy by January 1, 2018. SB 1383 also establishes specific targets for the reduction of SLCPs (40% below 2013 levels by 2030 for methane and HFCs, and 50% below 2013 levels by 2030 for anthropogenic black carbon), and provides direction for reductions from dairy and livestock operations and landfills. Accordingly, and as mentioned above, CARB adopted its *Short-Lived Climate Pollutant Reduction Strategy* (*SLCP Reduction Strategy*) in March 2017. The *SLCP Reduction Strategy* establishes a framework for the statewide reduction of emissions of black carbon, methane, and fluorinated gases (CARB 2017b).

EO B-55-18. EO B-55-18 (September 2018) establishes a statewide policy for the state to achieve carbon neutrality no later than 2045, and achieve and maintain net negative emissions thereafter. The goal is an addition to the existing statewide targets of reducing the state's GHG emissions. CARB will work with relevant state agencies to ensure that future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

Building Energy

Title 24, Part 6. Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated

to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC) (and revised if necessary) (California Public Resources Code, Section 25402(b)(1)). The regulations receive input from members of industry, as well as the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California Public Resources Code, Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code, Section 25402(d)) and cost effectiveness (California Public Resources Code, Sections 25402(b)(2) and (b)(3)). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The current Title 24 standards are the 2019 Title 24 Building Energy Efficiency Standards, which became effective January 1, 2020. In general, single-family residences built to the 2019 standards are anticipated to use approximately 7% less energy due to energy efficiency measures than those built to the 2016 standards; once rooftop solar electricity generation is factored in, single-family residences built under the 2019 standards will use approximately 53% less energy than those under the 2016 standards (CEC 2018). Nonresidential buildings built to the 2019 standards are anticipated to use an estimated 30% less energy than those built to the 2016 standards (CEC 2018).

Title 24, Part 11. In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as California's Green Building Standards (CALGreen), and establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals. The CALGreen 2016 standards became effective January 1, 2017. The mandatory standards require the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings
- Mandatory reduction in outdoor water use through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance

- 65% of construction and demolition waste must be diverted from landfills
- Mandatory inspections of energy systems to ensure optimal working efficiency
- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations
- Low-pollutant emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. CALGreen's Tier 1 standards call for a 15% improvement in energy requirements; stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen's more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 80% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs.

The California Building Standards Commission approved amendments to the voluntary measures of the CALGreen standards in December 2018. The 2019 CALGreen standards became effective January 1, 2020. As with the 2019 Title 24 standards, the 2019 CALGreen standards focus on building energy efficiency.

Title 20. Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. The CEC certifies an appliance based on a manufacturer's demonstration that the appliance meets the standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low-voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing each type of appliance covered under the regulations and appliances must meet the standards for energy performance, energy design, water performance and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Senate Bill 1. SB 1 (Murray) (August 2006) established a $3 billion rebate program to support the goal of the state to install rooftop solar energy systems with a generation capacity of 3,000 megawatts through 2016. SB 1 added sections to the Public Resources Code, including Chapter

8.8 (California Solar Initiative), that require building projects applying for ratepayer-funded incentives for photovoltaic systems to meet minimum energy efficiency levels and performance requirements. Section 25780 established that it is a goal of the state to establish a self-sufficient solar industry. The goals included establishing solar energy systems as a viable mainstream option for both homes and businesses within 10 years of adoption, and placing solar energy systems on 50% of new homes within 13 years of adoption. SB 1, also termed "Go Solar California," was previously titled "Million Solar Roofs."

AB 1470 (Solar Water Heating). This bill established the Solar Water Heating and Efficiency Act of 2007. The bill makes findings and declarations of the Legislature relating to the promotion of solar water heating systems and other technologies that reduce natural gas demand. The bill defines several terms for purposes of the act. The bill requires the commission to evaluate the data available from a specified pilot program, and, if it makes a specified determination, to design and implement a program of incentives for the installation of 200,000 solar water heating systems in homes and businesses throughout the state by 2017.

Renewable Energy and Energy Procurement

SB 1078. SB 1078 (Sher) (September 2002) established the Renewable Portfolio Standard (RPS) program, which required an annual increase in renewable generation by the utilities equivalent to at least 1% of sales, with an aggregate goal of 20% by 2017. This goal was subsequently accelerated, requiring utilities to obtain 20% of their power from renewable sources by 2010 (see SB 107, EO S-14-08, and S-21-09).

SB 1368. SB 1368 (September 2006), required the CEC to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission (CPUC).

AB 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general-purpose lighting, to reduce electricity consumption 50% for indoor residential lighting and 25% for indoor commercial lighting.

EO S-14-08. EO S-14-08 (November 2008) focused on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. This EO required that all retail suppliers of electricity in California serve 33% of their load with renewable energy by 2020. Furthermore, the EO directed state agencies to take appropriate actions to facilitate reaching this target. The CNRA, through collaboration with the CEC and California Department of Fish and Wildlife (formerly the California Department of Fish and Game), was directed to lead this effort.

EO S-21-09 and SB X1-2. EO S-21-09 (September 2009) directed CARB to adopt a regulation consistent with the goal of EO S-14-08 by July 31, 2010. CARB was further directed to work with the CPUC and CEC to ensure that the regulation builds upon the RPS program and was applicable to investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers. Under this order, CARB was to give the highest priority to those renewable resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health and can be developed the most quickly in support of reliable, efficient, cost-effective electricity system operations. On September 23, 2010, CARB initially approved regulations to implement a Renewable Electricity Standard. However, this regulation was not finalized because of subsequent legislation (SB X1-2, Simitian, statutes of 2011) signed by Governor Brown in April 2011.

SB X1 2 expanded the Renewables Portfolio Standard by establishing a renewable energy target of 20% of the total electricity sold to retail customers in California per year by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation (30 megawatts or less), digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

SB X1-2 applies to all electricity retailers in the state including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must meet the renewable energy goals previously listed.

SB 350. SB 350 (October 2015) further expanded the RPS by establishing a goal of 50% of the total electricity sold to retail customers in California per year by December 31, 2030. In addition, SB 350 included the goal to double the energy efficiency savings in electricity and natural gas final end uses (e.g., heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal.

SB 100. SB 100 (2018) increased the standards set forth in SB 350 establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

Mobile Sources

AB 1493. AB 1493 (Pavley) (July 2002) was enacted in a response to the transportation sector accounting for more than half of California's CO_2 emissions. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles that are primarily used for noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. When fully phased in, the near-term (2009–2012) standards will result in a reduction of about 22% in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term (2013–2016) standards will result in a reduction of about 30%.

Heavy Duty Diesel. CARB adopted the final Heavy Duty Truck and Bus Regulation, Title 13, Division 3, Chapter 1, Section 2025, on December 31, 2014, to reduce PM and NO_x emissions from heavy-duty diesel vehicles. The rule requires PM filters be applied to newer heavier trucks and buses by January 1, 2012, with older vehicles required to comply by January 1, 2015. The rule will require nearly all diesel trucks and buses to be compliant with the 2010 model year engine requirement by January 1, 2023. CARB also adopted an Airborne Toxic Control Measure to limit idling of diesel-fueled commercial vehicles on December 12, 2013. This rule requires diesel-fueled vehicles with gross vehicle weights greater than 10,000 pounds to idle no more than 5 minutes at any location (13 CCR 2485).

EO S-1-07. EO S-1-07 (January 2007, implementing regulation adopted in April 2009) sets a declining LCFS for GHG emissions measured in CO_2e grams per unit of fuel energy sold in California. The target of the LCFS is to reduce the carbon intensity of California passenger vehicle fuels by at least 10% by 2020 (17 CCR 95480 et seq.). The carbon intensity measures the amount of GHG emissions in the lifecycle of a fuel, including extraction/feedstock production, processing, transportation, and final consumption, per unit of energy delivered.

SB 375. SB 375 (Steinberg) (September 2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 requires CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035 and to update those targets every 8 years. SB 375 requires the state's 18 regional metropolitan planning organizations (MPOs) to prepare a Sustainable Communities Strategy (SCS) as part of their Regional Transportation Plan (RTP) that will achieve the GHG reduction targets set by CARB. If a MPO is unable to devise an SCS to achieve the GHG reduction target, the MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to Government Code, Section 65080(b)(2)(K), a SCS does not: (i) regulate the use of land; (ii) supersede the land use authority of cities and counties; or (iii) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

In September 2010, CARB adopted the first SB 375 targets for the regional metropolitan planning organizations. The targets for Southern California Association of Governments (SCAG) are an 8% reduction in emissions per capita by 2020 and a 13% reduction by 2035. Achieving these goals through adoption of a SCS is the responsibility of the metropolitan planning organizations. SCAG adopted its first RTP/SCS in April 2012. The plan quantified a 9% reduction by 2020 and a 16% reduction by 2035 (SCAG 2012). In June 2012, CARB accepted SCAG's quantification of GHG reductions and its determination the SCS, if implemented, would achieve SCAG targets. On April 4, 2016, the SCAG Regional Council adopted the 2016 RTP/SCS, which builds upon the progress made in the 2012 RTP/SCS. The updated RTP/SCS quantified an 8% reduction by 2020 and a 13% reduction by 2030 (SCAG 2016). In June 2016, CARB accepted SCAG's quantification of GHG reductions and its determination the SCS, if implemented, would achieve SCAG targets. In March 2018, CARB approved SCAG's updated targets of an 8% reduction by 2020 and a 19% reduction by 2030, effective October 1, 2018, which are consistent with the reduction targets from the Connect SoCal (2020-2045 RTP/SCS), adopted May 2020.

Advanced Clean Cars Program and Zero-Emissions Vehicle Program. The Advanced Clean Cars program (January 2012) is a new emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars (CARB 2012). To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025 cars will emit 75% less smog-forming pollution than the average new car sold today. To reduce GHG emissions, CARB, in conjunction with the EPA and the NHTSA, adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34% in 2025. The ZEV program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles in the 2018 to 2025 model years.

EO B-16-12. EO B-16-12 (March 2012) required that state entities under the governor's direction and control support and facilitate the rapid commercialization of ZEVs. It ordered CARB, CEC, CPUC, and other relevant agencies to work with the Plug-in Electric Vehicle

Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve benchmark goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 established a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050. This directive did not apply to vehicles that have special performance requirements necessary for the protection of the public safety and welfare.

AB 1236. AB 1236 (October 2015) (Chiu) required a city, county, or city and county to approve an application for the installation of electric vehicle charging stations, as defined, through the issuance of specified permits unless the city or county makes specified written findings based upon substantial evidence in the record that the proposed installation would have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact. The bill provided for appeal of that decision to the planning commission, as specified. The bill provided that the implementation of consistent statewide standards to achieve the timely and cost-effective installation of electric vehicle charging stations is a matter of statewide concern. The bill required electric vehicle charging stations to meet specified standards. The bill required a city, county, or city and county with a population of 200,000 or more residents to adopt an ordinance, by September 30, 2016, that created an expedited and streamlined permitting process for electric vehicle charging stations, as specified. The bill also required a city, county, or city and county with a population of less than 200,000 residents to adopt this ordinance by September 30, 2017.

Water

EO B-29-15. In response to the ongoing drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have become permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources has modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

Solid Waste

AB 939 and AB 341. In 1989, AB 939, known as the Integrated Waste Management Act (California Public Resources Code, Sections 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet

diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by the year 2000.

AB 341 (Chapter 476, Statutes of 2011 (Chesbro)) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal. CalRecycle conducted several general stakeholder workshops and several focused workshops and in August 2015 published a discussion document titled AB 341 Report to the Legislature, which identifies five priority strategies that CalRecycle believes would assist the state in reaching the 75% goal by 2020, legislative and regulatory recommendations and an evaluation of program effectiveness (CalRecycle 2015).

AB 1826 Chesbro (Chapter 727, Statutes of 2014, effective 2016) requires businesses to recycle their organic waste (i.e., food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. The minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

Other State Actions

Senate Bill 97. SB 97 (Dutton) (August 2007) directed the Governor's Office of Planning and Research (OPR) to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, OPR issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents. The advisory indicated that the lead agency should identify and estimate a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities (OPR 2008). The advisory further recommended that the lead agency determine significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The CNRA adopted the CEQA Guidelines amendments in December 2009, which became effective in March 2010.

Under the amended Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (14 CCR 15064.4(a)). The Guidelines require a lead agency to consider the extent to which the project complies with regulations or

requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4(b)). The Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures. The adopted amendments do not establish a GHG emission threshold, instead allowing a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or experts. The CNRA also acknowledges that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions (CNRA 2009a).

With respect to GHG emissions, the CEQA Guidelines state in Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines note that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or other performance based standards" (14 CCR 15064.4(a)). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: (1) the extent a project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4(b)).

EO S-13-08. EO S-13-08 (November 2008) is intended to hasten California's response to the impacts of global climate change, particularly sea-level rise. Therefore, the EO directs state agencies to take specified actions to assess and plan for such impacts. The final 2009 California Climate Adaptation Strategy report was issued in December 2009 (CNRA 2009b), and an update, Safeguarding California: Reducing Climate Risk, followed in July 2014 (CNRA 2014). To assess the state's vulnerability, the report summarizes key climate change impacts to the state for the following areas: Agriculture, Biodiversity and Habitat, Emergency Management, Energy, Forestry, Ocean and Coastal Ecosystems and Resources, Public Health, Transportation, and Water. Issuance of the Safeguarding California: Implementation Action Plans followed in March 2016 (CNRA 2016). In January 2018, the CNRA released the Safeguarding California Plan: 2018 Update, which communicates current and needed actions that state government should take to build climate change resiliency (CNRA 2018).

3.5.2.3 Local

South Coast Air Quality Management District

Air districts typically act in an advisory capacity to local governments in establishing the framework for environmental review of air pollution impacts under CEQA. This may include recommendations regarding significance thresholds, analytical tools to estimate emissions and assess impacts, and mitigations for potentially significant impacts. Although air districts will also address some of these issues on a project-specific basis as responsible agencies, they may provide general guidance to local governments on these issues (SCAQMD 2008). As discussed in Section 3.5.3, Thresholds of Significance, the SCAQMD has recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects; however, these thresholds were not adopted. See Section 3.2.2.3, Local (South Coast Air Quality Management District), for additional discussion on the SCAQMD.

Southern California Association of Governments

SB 375 requires MPOs to prepare a SCS in their RTP. The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012 (SCAG 2012), and the 2016–2040 RTP/SCS (2016 RTP/SCS) was adopted in April 2016 (SCAG 2016). Both the 2012 and 2016 RTP/SCSs establish a development pattern for the region that, when integrated with the transportation network and other policies and measures, would reduce GHG emissions from transportation (excluding goods movement). Specifically, the 2012 RTP/SCS links the goals of sustaining mobility with the goals of fostering economic development; enhancing the environment; reducing energy consumption; promoting transportation-friendly development patterns; and encouraging all residents affected by socioeconomic, geographic, and commercial limitations to be provided with fair access. The 2012 and 2016 RTP/SCSs do not require that local general plans, specific plans, or zoning be consistent with it but provide incentives for consistency for governments and developers. Because the current SCAQMD AQMP (2016 AQMP) is based on the SCAG 2016 RTP/SCS demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for their 2016–2040 RTP/SCS, the SCAG 2016 RTP/SCS is discussed in Section 3.5.4, Impacts Analysis. See Section 3.2.2.3, Local (Southern California Association of Governments), for an additional discussion on SCAG.

On May 7, 2020 SCAG's Regional Council certified the Proposed Final Program Environmental Impact Report and adopted the Connect SoCal (2020-2045 RTP/SCS) for federal transportation conformity purposes only. In light of the COVID-19 pandemic, the Regional Council will consider approval of Connect SoCal in its entirety and for all other purposes within 120 days from May 7, 2020. The Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect

SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

City of Montclair

The City of Montclair General Plan (City of Montclair 1999) includes various policies related to reducing GHGs (both directly and indirectly). Applicable policies include the following:

Circulation Element

Policy CE-1.1.1 Ensure the construction of a variety of street types, each designated to serve a specific circulation function and to thus provide for adequate service to the community. These routes include freeways (including on- and off-ramps), divided arterial, arterial, major, secondary, enhanced collector, industrial collector, collector and local streets.

Policy CE-1.1.2 Protect street traffic capacities by controlling access points from adjoining land and by restricting on-street parking when and where necessary.

Policy CE-1.1.8 Continue promotion of the construction of sidewalks in residential areas to provide safe pedestrian circulation.

Policy CE-1.1.9 Ensure, where possible, the development and maintenance of adequate, efficient, safe and attractive pedestrian walkways between major pedestrian generators.

Policy CE-1.1.10 Promote the provision of public modes of transportation between strategic locations such as the Montclair Plaza Shopping Center, and other traffic generators such as the Montclair Transcenter and potential Metrolink station on the Riverside Line.

Policy CE-1.1.14 Develop a more detailed bicycle route plan. Develop a zoning standard to require bicycle racks at public facilities as well as at commercial centers. Where a bicycle route is proposed along a roadway, consider striping for safety purposes, where possible.

Housing Element

Policy HE-1.1.27 Develop housing in a manner which will allow the maximum use of alternative energy sources (e.g., solar, wind, cogeneration).

Air Quality Element

Policy AQ-2.1.1 Encourage and facilitate mixed use and self-sufficient development which are pedestrian and transit-oriented. The areas north of the Montclair Plaza and within the Montclair Transcenter have been identified by the "North Montclair Specific Plan" as viable sites for such developments.

Policy AQ-2.1.2 Encourage trip reduction through programs such as compressed work weeks, flex schedules, carpooling, and telecommunication.

Policy AQ-2.3.1 Provide on-going participation in the CMP process within San Bernardino County.

Policy AQ-2.3.2 Require interconnected signal control systems for all primary arterials including those which cross interjurisdictional boundaries.

Policy AQ-2.4.2 Develop a City shuttle between regional land uses, park-n-ride facilities, and neighborhoods, in conjunction with Omnitrans existing service.

Policy AQ-2.4.3 Provide bicycle and pedestrian pathways and facilities to encourage non-motorized trips.

Policy AQ-2.5.1 Provide incentives for ridesharing and non-single occupancy vehicles for those vehicles who use public parking lots.

Policy AQ-2.6.1 Purchase vehicles which use clean fuels for use as part of the City fleet.

Policy AQ-3.1.1 Prepare and annually update a Capital Improvement Plan (CIP) to include state mandated air quality requirements.

Conservation Element

Policy CO-1.1.2 Encourage and promote programs to conserve water and minimize consumption.

Policy CO-1.1.5 Promote the use of native plant materials for their water-conserving capabilities as well as to reestablish plant materials indigenous to the area.

Policy CO-1.1.9 Maintain and expand recycling programs to result in continued diversion of materials to landfill, reuse of materials and conservation of natural resources.

3.5.3 Thresholds of Significance

The significance criteria used to evaluate the Proposed Project's GHG emissions impacts are based on the recommendations provided in Appendix G of the State CEQA Guidelines. For the purposes of this GHG emissions analysis, the Proposed Project would have a significant environmental impact if it would (14 CCR 15000 et seq.):

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

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. There are currently no established thresholds for assessing whether the GHG emissions of a project, such as the Proposed Project, would be considered a cumulatively considerable contribution to global climate change; however, all reasonable efforts should be made to minimize a project's contribution to global climate change. In addition, while GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008), GHG emissions impacts must also be evaluated at a project level under CEQA.

The State CEQA Guidelines do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the State CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009a). The State of California has not adopted emission-based thresholds for GHG emissions under CEQA. The Governor's Office of Planning and Research's Technical Advisory titled "CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act Review" states that "public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact" (OPR 2008). Furthermore, the advisory document indicates that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice." Section

15064.7(c) of the State CEQA Guidelines specifies that "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (SCAQMD 2008). This guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

Tier 1 Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2 Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3 Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_2e per year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e per year), commercial projects (1,400 MT CO_2e per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4 Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO_2e per service population for project level analyses and 6.6 MT CO_2e per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5 Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

Because the MPDSP involves a mix of different land use, this analysis applies the SCAQMD screening threshold of 3,000 MT CO_2e per year for mixed-use projects for Tier 3. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the project, which is assumed to be 30 years (SCAQMD 2008). This impact analysis, therefore, adds amortized construction emissions to the estimated annual operational emissions and then compares operational emissions to the proposed SCAQMD threshold of 3,000 MT CO_2e per year for the Tier 3 analysis.

3.5.4 Methodology

Construction Emissions

CalEEMod Version 2016.3.2 (CAPCOA 2017) was used to estimate potential Proposed Project-generated GHG emissions during construction. Construction of the Proposed Project would result in GHG emissions primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details for construction criteria air pollutants discussed in Section 3.2.3.2, Approach and Methodology (Construction Emissions), are also applicable for the estimation of construction-related GHG emissions. As such, see Section 3.2.3.2 for a discussion of construction emissions calculation methodology and assumptions used in the GHG emissions analysis.

Operation Emissions

Emissions from the operational phase of the Proposed Project were estimated using CalEEMod Version 2016.3.2. Operational year 2040 was assumed consistent with the traffic impact analysis (TIA) prepared for the Proposed Project (Appendix F). The Proposed Project would include a mix of residential, commercial, and retail land uses totaling 2,058,908 square feet and 6,321 residential units.

Emissions from the existing land uses (Existing Scenario) were also estimated using CalEEMod to present the net change in criteria air pollutant emissions. Operational year 2020 was assumed for the Existing Scenario, which is identified as the last full year in which existing land uses would be operational before construction activity commences in 2021. Total existing land uses evaluated in the Existing Scenario is approximately 1,546,273 square feet.

Potential Proposed Project-generated and Existing Scenario operational GHG emissions were estimated for area sources (landscape maintenance), energy sources (natural gas and electricity), mobile sources, solid waste, and water supply and wastewater treatment. Emissions from each category are discussed in the following text with respect to the Project. For additional details, see Section 3.2.3.2, Approach and Methodology (Operational Emissions), for a discussion of operational emission calculation methodology and assumptions, specifically for area, energy (natural gas), and mobile sources.

Area

CalEEMod was used to estimate GHG emissions from the Proposed Project's area sources, which include operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions. See Section 3.2.3.2 for a discussion of landscaping equipment emissions calculations. Consumer product use and architectural coatings result in VOC emissions, which are analyzed in air quality analysis only, and little to no GHG emissions.

Energy

The estimation of operational energy emissions was based on CalEEMod land use defaults and units or total area (i.e., square footage) of the Proposed Project's and Existing Scenario land uses. The energy use (electricity or natural gas usage per square foot per year) from nonresidential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour for electricity or 1,000 British thermal units for natural gas) for CO_2 and other GHGs. Annual natural gas and electricity emissions were estimated in CalEEMod using the emissions factors for Southern California Edison (SCE), which would be the energy provider for the Proposed Project.

CalEEMod default energy intensity factors (CO_2, CH_4, and N_2O mass emissions per kilowatt-hour) for SCE is based on the value for SCE's energy mix in 2012. As explained in Section 3.5.2.2, State, SB X1 2 established a target of 33% from renewable energy sources for all electricity providers in California by 2020 and SB 350 calls for further development of renewable energy, with a target of 50% by 2030. The CO_2 emissions intensity factor for utility energy use in CalEEMod was adjusted based on the reduction goal of 50% by 2030. For the Existing Scenario, the CO_2 emissions intensity factor was adjusted based on SCE's

2017 Power Content Label, which reported that 36% of the power mix was generated by eligible renewable sources (CPUC 2019).

Mobile Sources

All details for criteria air pollutants discussed in Section 3.2.3.2 are also applicable for the estimation of operational mobile source GHG emissions. Regulatory measures related to mobile sources include AB 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the NHTSA and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the Proposed Project's motor vehicles. The effectiveness of fuel economy improvements was evaluated by using the CalEEMod emission factors for motor vehicles in 2040 for the Proposed Project and 2020 for the Existing Scenario to the extent it was captured in EMFAC 2014.[4]

Solid Waste

The Proposed Project and Existing Scenario would generate solid waste, and therefore, result in CO_2e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste for the Proposed Project and Existing Scenario. It was assumed that the Existing Scenario would have a 50% solid waste diversion rate, consistent with the solid waste diversion requirements of AB 939, Integrated Waste Management Act. In addition, it was assumed that the Proposed Project would be consistent with the 75% diversion goal by 2020 in accordance with AB 341.

Water and Wastewater Treatment

Supply, conveyance, treatment, and distribution of water for the Proposed Project and Existing Scenario require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the Proposed Project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment.

4 The Low Carbon Fuel Standard calls for a 10% reduction in the "carbon intensity" of motor vehicle fuels by 2020, which would further reduce GHG emissions. However, the carbon intensity reduction associated with the Low Carbon Fuel Standard was not assumed in EMFAC 2014 and thus, was not included in CalEEMod 2016.3.2.

3.5.5 Impacts Analysis

A. Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Emissions

Significant and Unavoidable Impact. Construction of the Proposed Project would result in GHG emissions, which are primarily associated with use of off-road construction equipment and on-road vehicles (haul trucks, vendor trucks, and worker vehicles). The SCAQMD *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (2008) recommends that, "construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies." Thus, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the GHG significance threshold of 3,000 MT CO_2e per year. Therefore, the determination of significance is addressed in the operational emissions discussion following the estimated construction emissions.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 3.2.3.2, Approach and Methodology (Construction Emissions).

Construction of the Proposed Project is assumed to last a total of approximately 20 years. On-site sources of GHG emissions include off-road equipment and off-site sources including haul trucks, vendor trucks, and worker vehicles. Table 3.4-3 presents construction emissions for the Proposed Project from on-site and off-site emission sources.

Table 3.5-3
Estimated Annual Construction GHG Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	metric tons per year			
2021	1,397.93	0.17	0.00	1,402.06
2022	2,032.71	0.14	0.00	2,036.16
2023	1,927.01	0.13	0.00	1,930.22
2024	780.17	0.13	0.00	783.40
2025	187.99	0.12	0.00	1,901.09
2026	1,859.12	0.12	0.00	1,862.16
2027	830.51	0.11	0.00	833.24
2028	1,665.79	0.13	0.00	1,669.15
2029	1,767.97	0.12	0.00	1,770.87
2030	1,203.40	0.04	0.00	1,204.38
2031	1,329.44	0.05	0.00	1,330.60

Table 3.5-3
Estimated Annual Construction GHG Emissions

Year	CO_2	CH_4	N_2O	CO_2e
2032	1,754.73	0.05	0.00	1,756.09
2033	1,623.46	0.05	0.00	1,624.71
2034	839.80	0.03	0.00	840.57
2035	1,706.98	0.05	0.00	1,708.23
2036	1,713.52	0.05	0.00	1,714.77
2037	806.03	0.03	0.00	806.70
2038	1,643.78	0.05	0.00	1,645.01
2039	1,700.44	0.05	0.00	1,701.68
2040	1,038.06	0.03	0.00	1,038.78
Total	**27,808.82**	**1.64**	**0.00**	**29,559.88**

Notes: GHG = greenhouse gas; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.
See Appendix B, Construction (Annual) output, for complete results.

As shown in Table 3.5-3, the estimated total GHG emissions during construction of would total approximately 29,560 MT CO_2e over the assumed 30-year construction period. Estimated Proposed Project-generated construction emissions amortized over 30 years would be approximately 985 MT CO_2e per year. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.

Operation Emissions

Significant and Unavoidable Impact. Operation of the Proposed Project and operation under the Existing Scenario would generate GHG emissions through motor vehicle trips; landscape maintenance equipment operation (area source); energy use (natural gas and electricity); solid waste disposal; and water supply, treatment, and distribution and wastewater treatment. CalEEMod was used to calculate the annual GHG emissions based on the operational assumptions described in Section 3.5.3.2, Approach and Methodology (Operational Emissions).

The estimated operational Proposed Project-generated and Existing Scenario GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, and water usage and wastewater generation, and the net change in emissions (Proposed Project minus the Existing Scenario) are shown in Table 3.5-4.

Table 3.5-4
Estimated Annual Operational GHG Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	metric tons per year			
Proposed Project				
Area	1,472.66	0.13	0.00	1,483.31
Energy	16,444.18	0.81	0.25	16,539.11
Mobile	83,620.60	3.02	0.00	83,696.01
Solid waste	399.99	23.64	0.00	990.95
Water supply and wastewater	2,745.90	0.95	0.53	2,928.60
Total	**104,683.33**	**28.54**	**0.78**	**105,637.98**
Existing Scenario				
Area	0.0384	<0.01[a]	0	0.04
Energy	8,679.96	0.393	0.09	8,720.90
Mobile	70,667.07	3.6214	0	70,757.60
Solid waste	362.5	21.42	0	898.07
Water supply and wastewater	802.68	0.24	0.14	849.17
Total	**80,512.24**	**25.67**	**0.23**	**81,225.78**
Net Change in Emissions				
Net Change (Proposed Project – Existing Scenario)	**24,171.09**	**2.87**	**0.55**	**24,412.19**
			Amortized construction emissions	*985.33*
			Total net operational + amortized construction GHGs	**25,397.52**

Notes: GHG = greenhouse gas; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.
See Appendix B, Operations (Annual) output, for complete results.
Totals may not sum due to rounding.
The Proposed Project emissions reflect operational year 2040.
The Existing Scenario emissions reflect operational year 2020.
Limited to sources captured in CalEEMod.
[a] <0.01 = value less than reported 0.01 metric tons per year.

As shown in Table 3.5-4, estimated annual Proposed Project-generated GHG emissions would be approximately 105,638 MT CO_2e per year as a result of Proposed Project operations only. As the Existing Scenario is estimated to generate 81,226 MT CO_2e per year, the net change in GHG emissions is estimated to be 24,412 MT CO_2e per year. After accounting for amortized Proposed Project construction emissions, total net GHGs generated by the Proposed Project would be approximately 25,398 MT CO_2e per year. As such, annual operational GHG emissions with amortized construction emissions would exceed the SCAQMD threshold of 3,000 MT CO_2e per year. Therefore, the Proposed Project's GHG contribution would be cumulatively considerable and mitigation measures **MM-AQ-1**, **MM-AQ-4** through **MM-AQ-7**, and **MM-GHG-1** and **MM-GHG-2**, are required to help reduce the Proposed Project's operational emissions. However, even with the implementation of these mitigation measures, the Proposed Project's GHG contribution during operation would remain **significant and unavoidable**.

B. Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Significant and Unavoidable Impact. As discussed in Section 3.5.2.3, the City does not have an adopted GHG emissions reduction plan. The City's General Plan identifies a wide range of goals and policies to increase the use of renewable energy, conserve energy and water, and improve transportation options.

As described in Section 2.0, the MPDSP objectives including the following:

- Create a pedestrian-oriented, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and anticipated extension of the Foothill Gold Line railway.
- Replace the existing C-3 zoning with new mixed-use zones that permit residential use in standalone and mixed-use configurations and office.
- Reduce automobile trips by creating a mixed-use, pedestrian-oriented, multi-modal, park-once environment with access to alternative modes of transportation, including walking, biking, Metrolink, the proposed Foothill Gold Line railway extension, and curb space for transit network companies such as Uber and Lyft.

Future development within the MPDSP area would be subject to various regulations of local, state, and federal agencies. In addition to the above objectives, which would reduce GHG emissions associated with mobile sources, implementation of mitigation measures **MM-AQ-1**, **MM-AQ-4** through **MM-AQ-7**, and **MM-GHG-1** through **MM-GHG-2,** would reduce the Proposed Project's mobile emissions, energy consumption, water usage, and solid waste generation. Accordingly, the Proposed Project would not conflict with City GHG emission reductions policies or plans.

Consistency with the SCAG's 2016–2040 Regional Transportation Plan and the 2020-2045 SCAQMD AQMP

SCAG's 2020-2045 RTP/SCS is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2020-2045 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans. Typically, a project would be consistent with the RTP/SCS if the project does not exceed the underlying growth assumptions within the RTP/SCS. As discussed in Section 3.10, Population and Housing, the MPDSP would provide a residential population of 18,331, 6,321 dwelling units, and 1,404 jobs. The Proposed Project would exceed the SCAG population, housing, and employment growth projections for the City; however, the Proposed Project would

represent a nominal percentage of the overall projected population, housing, and employment projections for the County and SCAG region.

Implementation of the MPDSP would create a number of temporary, construction related jobs, as well as, permanent jobs associated with the new developments. The City of Montclair is expected to have a jobs-to-housing ratio of 1.87 by 2045, which is higher than San Bernardino County and the SCAG region by 0.04 and 0.55, respectively. This means that the City is considered to be "jobs rich," indicating it would not be required to commute outside the City for employment in 2040.

The total potential increase in population generated by development of the MPDSP (18,331 persons) represents approximately 175% (or 1.7 times) the projected population increase in the City, approximately 2.72% of the projected population increase in the County, and approximately 0.6% of the projected population increase in the SCAG region. Although the Proposed Project exceeds the population growth projections of the City, the Proposed Project is within the population growth projections in the County and the SCAG region. The major goals of the 2020-2045 RTP/SCS are outlined in Table 3.5-5, along with the Proposed Project's consistency with them.

Table 3.5-5
Project Consistency with the SCAG 2020-2045 RTP/SCS

RTP/SCS Goal	Proposed Project Consistency
Goal 1 Encourage regional economic development and global competitiveness.	*Consistent.* The Proposed Project would create a pedestrian-oriented, multi-modal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line.
Goal 2 Improve mobility, accessibility, and travel safety for people and goods	*Consistent.* The Proposed Project's proximity to the anticipated extension of the Foothill Gold Line would increase transit accessibility of jobs and services provided within the Plan area. Further, the MPDSP would provide various multi-modal components and strategies, including bicycle and scooter amenities and parking and transportation network company curb space for Uber and Lyft.
Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	*Consistent.* The Proposed Project would be developed within proximity of the Montclair Transcenter and anticipated extension of the Foothill Gold Line railway.
Goal 4 Increase person and goods movement and travel choices within the transportation system.	*Consistent.* The Proposed Project would include multi-modal street improvements to increase pedestrian, bicycle, and mass-transit activity and connectivity, thereby increasing movement of goods and people. Less reliance on automobiles and support for multi-modal transportation will help preserve and ensure a sustainable regional transportation system. Additionally, the Transportation Demand Management (TDM) measures would be incorporated to maximize the utility of multi-modal investments.

Table 3.5-5
Project Consistency with the SCAG 2020-2045 RTP/SCS

RTP/SCS Goal	Proposed Project Consistency
Goal 5 Reduce greenhouse gas emissions and improve air quality.	*Consistent*. The Proposed Project would reduce criteria air pollutant and GHG emissions through the anticipated extension of the Foothill Gold Line that would extend light rail line service to the City of Montclair. In addition, as discussed in Section 3.13, Transportation, the Proposed Project's vehicle miles traveled (VMT) per service population (8.37) would be less than 15% of the City's existing VMT (15% of 19.27 = 16.38), Furthermore, the Proposed Project would be most directly served by Metrolink's San Bernardino Line which runs west to east from Los Angeles County to San Bernardino County with its terminus at Los Angeles Union Station and San Bernardino – Downtown Station. The Proposed Project would reduce greenhouse gas emissions through proximity of residential land uses and employment opportunities near transit.
Goal 6 Support healthy and equitable communities.	*Consistent.* The Proposed Project would create a network of pedestrian-friendly blocks and streets that promote walking and bicycling. In addition, the MPDSP allows land use designations that creates a mix of land uses that are within walking distance of one another, and streets that are attractive to pedestrians.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network	*Consistent.* The Proposed Project would not inhibit SCAG from optimizing the regional development pattern and transportation system. In addition, the Proposed Project would help reduce GHG emissions by creating a pedestrian-oriented, multi-modal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line.
Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel	*Consistent.* The Proposed Project would support multi-modal transit within the Plan area such as being located near the Montclair Transcenter and anticipated extension of the Foothill Gold Line railway.
Goal 9 Encourage development of diverse housing types in areas that are supported by multiple transportation options.	*Consistent.* The Proposed Project would develop a mixed-use, pedestrian-oriented, multi-modal, park-once environment with access to alternative modes of transportation.
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	*Consistent*. The Proposed Project is located within an urbanized area and would not affect natural lands and agricultural during construction or operation.

Source: SCAG 2020.

As shown in Table 3.5-5, the Proposed Project would be consistent with all goals within SCAG's 2020-2045 RTP/SCS.

Consistency with CARB's Scoping Plan

The Scoping Plan (approved by CARB in 2008 and updated in 2014 and 2017) provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used

for project-level evaluations.[5] Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32 and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. Table 3.5-6 highlights measures that have been, or will be, developed under the Scoping Plan and presents the Proposed Project's consistency with Scoping Plan measures (CARB 2008). The Proposed Project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the Proposed Project.

Table 3.5-6
Proposed Project Consistency with Scoping Plan GHG Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
Transportation Sector		
Advanced Clean Cars	T-1	*Consistent.* The Proposed Project's employees and customers would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase.
Low Carbon Fuel Standard	T-2	*Consistent.* This is a statewide measure that cannot be implemented by a project applicant or lead agency. Nonetheless, this standard would be applicable to the fuel used by vehicles that would access the Plan area (i.e., motor vehicles driven by the Proposed Project's employees and customers would use compliant fuels).
Regional Transportation-Related GHG Targets	T-3	*Not applicable.* The Proposed Project is not related to developing GHG emission reduction targets. To meet the goals of SB 375, the 2020-2045 RTP/SCS is applicable to the Proposed Project. The Proposed Project would not preclude the implementation of this strategy.
Advanced Clean Transit	N/A	*Not applicable.* The Proposed Project would not prevent CARB from accelerating the use of advanced technologies in heavy-duty vehicles to meet air quality, climate, and public health goals.
Last-Mile Delivery	N/A	*Not applicable.* The Proposed Project would not prevent CARB from increasing the deployment of zero-emission trucks primarily

5 The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

Table 3.5-6
Proposed Project Consistency with Scoping Plan GHG Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
		in California.
Reduction in VMT	N/A	*Consistent.* The Proposed Project would be developed within proximity of the Montclair Transcenter and anticipated extension of the Foothill Gold Line railway which would help reduce the Plan area's VMT.
Vehicle Efficiency Measures 1. Tire Pressure 2. Fuel Efficiency Tire Program 3. Low-Friction Oil 4. Solar-Reflective Automotive Paint and Window Glazing	T-4	*Consistent.* These standards would be applicable to the light-duty vehicles that would access the Plan area. Motor vehicles driven by the Proposed Project's residents, employees, and customers would maintain proper tire pressure when their vehicles are serviced. The Proposed Project's employees and customers would replace tires in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase. Motor vehicles driven by the Proposed Project's employees and customers would use low-friction oils when their vehicles are serviced. The Proposed Project's employees and customers would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase. In addition, the Proposed Project would not prevent CARB from implementing this measure.
Ship Electrification at Ports (Shore Power)	T-5	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
Goods Movement Efficiency Measures 1. Port Drayage Trucks 2. Transport Refrigeration Units Cold Storage Prohibition 3. Cargo Handling Equipment, Anti-Idling, Hybrid, Electrification 4. Goods Movement Systemwide Efficiency Improvements 5. Commercial Harbor Craft Maintenance and Design Efficiency 6. Clean Ships 7. Vessel Speed Reduction	T-6	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
Heavy-Duty Vehicle GHG Emission Reduction • Tractor-Trailer GHG Regulation • Heavy-Duty Greenhouse Gas Standards for New Vehicle and Engines (Phase I)	T-7	*Consistent.* Heavy-duty vehicles would be required to comply with CARB GHG reduction measures. In addition, the Proposed Project would not prevent CARB from implementing this measure.
Medium- and Heavy-Duty Vehicle Hybridization Voucher Incentive Proposed Project	T-8	*Consistent.* The Proposed Project medium- and heavy-duty vehicles (e.g., delivery trucks) could take advantage of the vehicle hybridization action, which would reduce GHG emissions through increased fuel efficiency. In addition, the Proposed Project would not prevent CARB from implementing this measure.
Medium and Heavy-Duty GHG Phase 2	N/A	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure. However, all medium and heavy-duty vehicles which would access the Proposed Project would be subject to this regulation.

Table 3.5-6
Proposed Project Consistency with Scoping Plan GHG Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
High-Speed Rail	T-9	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
Electricity and Natural Gas Sector		
Energy Efficiency Measures (Electricity)	E-1	*Consistent.* The Proposed Project would comply with the current Title 24 Building Energy Efficiency Standards. In addition, the Proposed Project would not prevent CARB from implementing this measure.
Energy Efficiency (Natural Gas)	CR-1	*Consistent.* The Proposed Project would comply with the current Title 24 Building Energy Efficiency Standards. In addition, the Proposed Project would not prevent CARB from implementing this measure.
Solar Water Heating (California Solar Initiative Thermal Program)	CR-2	*Consistent.* The Proposed Project would include solar water heating where feasible.
Combined Heat and Power	E-2	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
Renewables Portfolio Standard (33% by 2020)	E-3	*Consistent*. The electricity used by the Proposed Project would benefit from reduced GHG emissions resulting from increased use of renewable energy sources.
Renewables Portfolio Standard (50% by 2050)	N/A	*Consistent*. The electricity used by the Proposed Project would benefit from reduced GHG emissions resulting from increased use of renewable energy sources.
SB 1 Million Solar Roofs (California Solar Initiative, New Solar Home Partnership, Public Utility Programs) and Earlier Solar Programs	E-4	*Consistent*. The Proposed Project would be required to meet at minimum, the applicable current Title 24 Building Energy Efficiency Standards regarding the installation rooftop solar systems.
Water Sector		
Water Use Efficiency	W-1	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure. In addition, the Proposed Project would increase water conservation through implementation of mitigation measure GHG-1.
Water Recycling	W-2	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
Water System Energy Efficiency	W-3	*Not applicable.* This is applicable for the transmission and treatment of water, but it is not applicable for the Proposed Project. The Proposed Project would not prevent CARB from implementing this measure.
Reuse Urban Runoff	W-4	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
Renewable Energy Production	W-5	*Not applicable.* Applicable for wastewater treatment systems. In addition, the Proposed Project would not prevent CARB from implementing this measure.
Green Buildings		
State Green Building Initiative: Leading the Way with State Buildings (Greening New and	GB-1	*Consistent.* The Proposed Project would be required to be constructed in compliance with state or local green building

Table 3.5-6
Proposed Project Consistency with Scoping Plan GHG Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
Existing State Buildings)		standards in effect at the time of building construction.
Green Building Standards Code (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	*Consistent*. The Proposed Project's buildings would meet green building standards that are in effect at the time of design and construction.
Beyond Code: Voluntary Programs at the Local Level (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	*Consistent*. The Proposed Project's buildings would meet green building standards that are in effect at the time of design and construction.
Greening Existing Buildings (Greening Existing Homes and Commercial Buildings)	GB-1	*Consistent.* This is applicable for existing buildings only; it is not applicable for portions of the Proposed Project except as future standards may become applicable to existing buildings. For Proposed Project building that would be retrofitted, the buildings would meet current applicable building standards at the time of design and construction.
Industry Sector		
Energy Efficiency and Co-Benefits Audits for Large Industrial Sources	I-1	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure and does not include industrial uses.
Oil and Gas Extraction GHG Emission Reduction	I-2	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure this measure and does not include industrial uses.
Reduce GHG Emissions by 20% in Oil Refinery Sector	N/A	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure this measure and does not include industrial uses.
GHG Emissions Reduction from Natural Gas Transmission and Distribution	I-3	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure this measure and does not include industrial uses.
Refinery Flare Recovery Process Improvements	I-4	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure this measure and does not include industrial uses.
Work with the Local Air Districts to Evaluate Amendments to Their Existing Leak Detection and Repair Rules for Industrial Facilities to Include Methane Leaks	I-5	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure this measure and does not include industrial uses.
Recycling and Waste Management Sector		
Landfill Methane Control Measure	RW-1	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
Increasing the Efficiency of Landfill Methane Capture	RW-2	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
Mandatory Commercial Recycling	RW-3	*Consistent.* During both construction and operation of the Proposed Project, the Proposed Project would comply with all state regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act, as amended.
Increase Production and Markets for Compost and Other Organics	RW-3	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.

Table 3.5-6
Proposed Project Consistency with Scoping Plan GHG Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
Anaerobic/Aerobic Digestion	RW-3	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
Extended Producer Responsibility	RW-3	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
Environmentally Preferable Purchasing	RW-3	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
Forests Sector		
Sustainable Forest Target	F-1	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
High GWP Gases Sector		
Motor Vehicle Air Conditioning Systems: Reduction of Refrigerant Emissions from Non-Professional Servicing	H-1	*Consistent.* The Proposed Project's residents and employees would be prohibited from performing air conditioning repairs and would be required to use professional servicing.
SF_6 Limits in Non-Utility and Non-Semiconductor Applications	H-2	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure and does not include semiconductor manufacturing.
Reduction of Perfluorocarbons (PFCs) in Semiconductor Manufacturing	H-3	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure and does not include semiconductor manufacturing.
Limit High GWP Use in Consumer Products	H-4	*Consistent.* The Proposed Project's residents and employees would use consumer products that would comply with the regulations that are in effect at the time of manufacture.
Air Conditioning Refrigerant Leak Test During Vehicle Smog Check	H-5	*Consistent*. Motor vehicles driven by the Proposed Project's residents, employees, and customers would comply with the leak test requirements during smog checks.
Stationary Equipment Refrigerant Management Program – Refrigerant Tracking/Reporting/Repair Program	H-6	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure. However, commercial stationary equipment refrigerant would be subject to this regulation.
Stationary Equipment Refrigerant Management Program – Specifications for Commercial and Industrial Refrigeration	H-6	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure. However, commercial stationary equipment refrigerant would be subject to this regulation.
SF_6 Leak Reduction Gas Insulated Switchgear	H-6	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure. In addition, the Proposed Project does not include development of a switchgear
40% Reduction in Methane and Hydrofluorocarbon (HFC) Emissions	N/A	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure.
50% Reduction in Black Carbon Emissions	N/A	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure. However, on-road vehicles accessing the Proposed Project would be subject to this regulation.

Table 3.5-6
Proposed Project Consistency with Scoping Plan GHG Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
Agriculture Sector		
Methane Capture at Large Dairies	A-1	*Not applicable.* The Proposed Project would not prevent CARB from implementing this measure and does not include large dairies.

Source: CARB 2008.
Notes: GHG = greenhouse gas; CARB = California Air Resources Board; VMT = vehicle miles traveled; SB = Senate Bill; N/A = not applicable; SF_6 = sulfur hexafluoride.

Based on the analysis in Table 3.5-6, the Proposed Project would be consistent with the applicable strategies and measures in the Scoping Plan.

Consistency with EO S-3-05 and SB 32

- **EO S-3-05.** This EO establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.
- **SB 32.** This bill establishes for a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030.

This section evaluates whether the GHG emissions trajectory after Proposed Project completion would impede the attainment of the 2030 and 2050 GHG reduction goals identified in EOs B-30-15 and S-3-05.

To begin, CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014, p. ES2). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update to the Climate Change Scoping Plan states the following (CARB 2014, p. 34):

> This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those

> needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, EO B-30-15, and EO S-3-05. This is confirmed in the Second Update which states (CARB 2017b, p. 7):

> The Proposed Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while also identifying new, technologically feasibility and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Proposed Plan is developed to be consistent with requirements set forth in AB 32, SB 32, and AB 197.

As discussed in Section 3.5.4, total Proposed Project emissions, including operation and amortized construction, would be approximately 25,398 MT CO_2e per year. As such, the Proposed Project (without mitigation) would generate GHG emissions that may interfere with the implementation of GHG reduction goals for 2030 and 2050. Therefore, the Proposed Project would potentially conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions, and would result in a **significant and unavoidable impact**.

3.5.6 Cumulative Impacts

As previously discussed in Section 3.5.1, Existing Conditions, GHG emissions inherently contribute to cumulative impacts, and thus, any additional GHG emissions would result in a cumulative impact. As shown in Table 3.5-3 and 3.5-4, the Proposed Project would result in GHG emissions that exceed the applied threshold. Therefore, the Proposed Project would result in a cumulatively considerable impact. Cumulative impacts from GHG emissions is **significant and unavoidable**.

3.5.7 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. The following mitigation measure will be incorporated for the Proposed Project.

As presented in Section 3.2, Air Quality, implementation of mitigation measure **MM-AQ-1** would reduce construction-related GHG emissions. Additionally, implementation of the following air quality mitigation measures would reduce operation-related GHG emissions: **MM-AQ-4**, **MM-AQ-5**, **MM-AQ-6**, and **MM-AQ-7**.

Implementation of mitigation measures **MM GHG-1** and **MM-GHG-2** would reduce GHG emissions generated during operation of the Proposed Project:

MM-GHG-1 Water Conservation. The City shall ensure that each development project incorporate the following water conservation measures into building plans:

a) Install low-water use appliances and fixtures

b) Restrict the use of water for cleaning outdoor surfaces and prohibit systems that apply water to non-vegetated surfaces

c) Implement water-sensitive urban design practices in new construction

d) Install rainwater collection systems where feasible.

MM-GHG-2 Solid Waste Reduction. The City shall ensure that each development project provide storage areas for recyclables and green waste and food waste storage, if a pick-up service is available.

3.5.8 Significance After Mitigation

Implementation of mitigation measures **MM-AQ-1**, **MM-AQ-4**, **MM-AQ-5**, **MM-AQ-6**, **MM-AQ-7**, **MM-GHG-1**, and **MM-GHG-2** would reduce construction and operation GHG emissions; however, due to the lack of project-specific information, the effectiveness in reducing GHG emissions during construction and operation cannot be accurately quantified. Therefore, the potential for the Proposed Project to generate GHG emissions that may have a significant impact on the environment and conflict with an applicable GHG-reduction plan, policy, or regulation is **significant and unavoidable**.

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3.6 HAZARDS AND HAZARDOUS MATERIALS

This section describes the existing conditions related to hazards and hazardous materials within the vicinity of the Plan area, identifies associated regulatory requirements, and evaluates potential impacts with implementation of the proposed Montclair Place District Specific Plan Project (Proposed Project or MPDSP). This section also identifies mitigation measures for reducing potential impacts related to hazards and hazardous materials as a result of implementing the Proposed Project. Information contained in this section is based on the Public Health and Safety Element of the City of Montclair (City) General Plan (City of Montclair 1999). Additionally, this section references the findings contained in a Phase I Environmental Site Assessment (ESA) prepared for the Plan area in June 2010 by The Orin Group, LLC, which is attached to this EIR as Appendix D.

Hazardous Materials Definition

The term "hazardous materials" refers to hazardous substances and hazardous waste. Under federal and state laws, any substance, including waste, may be considered hazardous if it is specifically listed by statute as such or if it is toxic (i.e., causes adverse health effects), ignitable (i.e., has the ability to burn), corrosive (i.e., causes severe burns or damage to materials), or reactive (i.e., causes explosions or generates toxic gases). Hazardous materials are any materials that, because of quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment (California Health and Safety Code, Chapter 6.95, Section 25501(n)(1)). Hazardous wastes are hazardous substances that no longer have a practical use such as material that has been abandoned, discarded, spilled, contaminated, or is being stored prior to proper disposal.

In some cases, past industrial or commercial activities on a site may have resulted in spills or leaks of hazardous materials to the ground, resulting in soil and/or groundwater contamination. Hazardous materials may also be present in building materials and released during building demolition activities. If improperly handled, hazardous materials and wastes can cause public health hazards when released to the soil, groundwater, or air. The four basic exposure pathways through which an individual can be exposed to a chemical agent include inhalation, ingestion, bodily contact, and injection. Exposure can come as a result of an accidental release during transportation, storage, or handling of hazardous materials. Disturbance of subsurface soil during construction can also lead to exposure of workers or the public from stockpiling, handling, or transportation of soils contaminated by hazardous materials from previous spills or leaks.

One of the purposes of hazardous materials studies, such as a Phase I ESA, is to identify whether any "recognized environmental conditions" (RECs) exist on a site. The American Society for

Testing and Materials (ASTM) defines RECs as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimus conditions, a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies, are not RECs.

3.6.1 Existing Conditions

Plan Area

As part of the Phase I ESA that was conducted for the Proposed Project (see Appendix D), the existing and historical uses of the Plan area and its surroundings were assessed through a review of historical aerial photographs and topographic maps, regulatory agency records, interviews, information obtained online, and a site reconnaissance. This information, which is summarized below, enables identification of potentially hazardous conditions on or within the Plan area.

Historic Aerial Photographs

The Plan area, as shown on historic aerial photographs from 1953, 1968, 1977, 1989, 1994, and 2005, is described below.

1953: The Plan area and surrounding land appear to be undeveloped and used for agriculture. The entire Plan area and adjacent land are equal sized agricultural quads that are divided and gridded by roads.

1963: Major development has been done to all areas within and surrounding the Plan area. The Montclair Mall is being constructed at this time, with a majority of the Plan area graded, but not yet developed. Surrounding areas have also started to be graded and developed, many of which are the same land use as today, such as single family residences to the north, commercial and residential to the east, and the I-10, commercial, and residential development to the south.

1977: Major development continues to occur in the area. The Montclair Mall has opened by this time. The Plan area is mostly developed at this stage with some other commercial/retail developments and a large amount of outdoor parking stalls. The southern part of the Plan area is still is fairly undeveloped. New developments at this time are Moreno Elementary School and residential developments to the west, and commercial development to the north and east.

1989: The Plan area is fully developed at this time with additional commercial, retail, and parking stall development. Further residential development to the west and commercial development to the south.

1994: The Plan area and surrounding areas are very similar to 1989 with unnoticeable new developments.

2005: The Plan area and surrounding areas are very similar to 1994 with limited new development north of the Plan area.

According to a review of aerial photographs obtained from Environmental Database Resources, Inc. (EDR) the Plan area has been used as a retail mall since 1968. Prior to its current use, the Plan area was undeveloped land.

Surrounding Uses

The Plan area is surrounded by mostly developed properties on all sides. Figure 2-4 (Plan Area and Surrounding Land Uses; see Section 2, Project Description), depicts the land uses and businesses that surround the Plan area. To the east, across Central Avenue, are a Chase Bank, McDonald's restaurant, and the Montclair East Shopping Center, that includes retail stores such as Petco, Harbor Freight Tools, Chipotle Mexican Grill, and Ross Dress for Less. To the north across Moreno Street, land uses include retail (Target and Gold's Gym), single-family, and multi-family residential properties. To the west, across Monte Vista Avenue, land uses include single-family and multi-family residential properties, assisted living, a dialysis center, an adult development center, and Moreno Elementary School. To the south, the Plan area is bordered by the I-10 Freeway and its right-of-way.

Existing Uses and Hazards/Hazardous Materials Conditions

Under the current conditions, the Plan area contains a two-story retail shopping mall (Montclair Place Mall) strip commercial development, freestanding restaurants, a furniture store, and parking uses. While some units within the Plan area (and Montclair Place Mall) are currently vacant, the Plan area continues to support commercial operations today that are used by the general public. Additionally, construction operations are underway on the eastern portion of the Plan area to expand the eastern portion of the shopping mall. During the Phase I ESA investigation, several instances of hazardous material usage and storage within the Plan area were identified; however, according to the Phase I ESA, there is no evidence of RECs in connection with the activities within the Plan area or uses on the adjacent off-site properties that would warrant further study or that would have an impact on the environmental conditions of the Plan area. For example, the Montclair Place Mall is listed on the HAZNET and RCRA-SQG database for disposing of asbestos-containing waste. However, no violations were reported and it

was determined during the Phase I ESA process that the disposing of asbestos-containing waste is not likely to impact future use within the Plan area. Additionally, two 50-gallon diesel above-ground storage tanks used to power emergency generators were noted within the Plan area, as well as waste oil and new oil containers at the former Mountain View Tires store off Central Avenue. However, no signs of leaks were noted and storage of these materials appeared satisfactory, and Mountain View Tires has since been demolished to accommodate the under-construction mall expansion. A review of historical building records revealed that the existing retail buildings were constructed in 1968 with refurbishments completed in the mid-1980s.[1] Due to the age of those on-site structures, lead-based paint and asbestos-containing materials may be present within the Plan area. However, because federal, state, and local regulations specify proper handling procedures by which structures that possibly contain lead-based paint and asbestos-containing materials may be renovated or demolished, the Phase I ESA determined that the possible presence of lead-based paint and asbestos-containing materials within the Plan area would not be considered a REC. Based on the results of the Phase I field investigation, no further environmental investigation was recommended.

Additionally, on-site conditions relating to hazards and hazardous materials have remained relatively unchanged since the Phase I ESA was prepared, and no new violations have been reported within the Plan area since that time (DTSC 2020; SWRCB 2020). Since the Phase I ESA was prepared, one new active clean-up case has been opened by DTSC within a half-mile radius of the Plan area. However, the site is located approximately 750 feet north of the Plan area and a Phase II subsurface investigation conducted on the site, which defined known isolated areas of contamination, indicated that contamination was localized to the immediate site (Frey Environmental 2018). As such, contamination at this site is not anticipated to affect the Plan area. No other new violations have been reported within a half-mile radius of the Plan area since that time (DTSC 2020; SWRCB 2020).

3.6.2 Regulatory Setting

Federal

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as "Superfund," were enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established

[1] On page 1, Section 1.1 and page 5, Section 3.1 of the Phase I ESA (provided as part of Appendix D), it is incorrectly stated that refurbishments to the existing retail buildings occurred in 1997. Refurbishments to the mall occurred in the mid-1980s.

requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List, which is a list of contaminated sites warranting further investigation by the EPA. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

The Federal Toxic Substances Control Act of 1976 and Resource Conservation and Recovery Act of 1976

The Federal Toxic Substances Control Act of 1976 and RCRA (1976) established a program administered by the EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle-to-grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

Occupational and Safety Health Act

Congress passed the Occupational and Safety Health Act to ensure worker and workplace safety. Its goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. In order to establish standards for workplace health and safety, the Occupational and Safety Health Act also created the National Institute for Occupational Safety and Health as the research institution for the Occupational Safety and Health Administration (OSHA). OSHA is a division of the U.S. Department of Labor that oversees the administration of the Occupational and Safety Health Act and enforces standards in all 50 states.

State

Cortese List/Government Code 65962.5

California Government Code Section 65962.5 requires that information regarding environmental impacts of hazardous substances and wastes be maintained and provided at least annually to the Secretary for Environmental Protection. Commonly referred to as the Cortese list, this information must include the following: sites impacted by hazardous wastes, public drinking water wells that contain detectable levels of contamination, USTs with unauthorized releases, solid waste disposal

facilities from which there is migration of hazardous wastes, and all cease and desist and cleanup and abatement orders. This information is maintained by various agencies, including the DTSC, State Department of Health Services, SWRCB, and local Certified Unified Program Agencies (CUPA). As each of the regulatory agencies typically now maintains these records in an electronic format, those requesting a Cortese list for a site are directed to the individual regulatory agencies. Typically, records searches are conducted via a regulatory database search company. Unless otherwise requested, the records search companies usually conduct the records searches in accordance with American Society for Testing and Materials (ASTM) Standard of Practice E 1527-13 Standard Practice for ESAs. The list of databases searched is more comprehensive than the Cortese list; thus, the Cortese list is not just a single list.

Title 22 of the California Code of Regulations& Hazardous Waste Control Law, Chapter 6.5

The Department of Toxic Substances Control (DTSC) regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose "cradle to grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies.

California Safety and Health Code

In California, the handling and storage of hazardous materials is regulated by Division 20, Chapter 6.95 of the California Health and Safety Code. Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a Hazardous Materials Business Plan. Hazardous Materials Business Plans contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state.

Chapter 6.95 of the Health and Safety Code establishes minimum statewide standards for Hazardous Materials Business Plans. Each business shall prepare a Hazardous Materials Business Plan if that business uses, handles, or stores a hazardous material (including hazardous waste) or an extremely hazardous material in disclosable quantities greater than or equal to the following:

- 500 pounds of a solid substance
- 55 gallons of a liquid
- 200 cubic feet of compressed gas
- A hazardous compressed gas in any amount (highly toxic with a threshold limit value of 10 parts per million or less)

- Extremely hazardous substances in threshold-planning quantities

In addition, in the event that a facility stores quantities of specific acutely hazardous materials above the thresholds set forth by the California Health and Safety Code, facilities are also required to prepare a Risk Management Plan and California Accidental Release Plan. The Risk Management Plan and Accidental Release Plan provide information on the potential impact zone of a worst-case release and require plans and programs designed to minimize the probability of a release and mitigate potential impacts.

California Occupational Safety and Health Act

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR 337–340). The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

Hazardous Materials Worker Safety

Cal/OSHA and the federal Occupational Safety and Health Administration are the agencies responsible for ensuring worker safety by developing and enforcing workplace safety regulations in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR 337–340). The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

California Hazardous Waste Control Act

The DTSC is responsible for the enforcement of the Hazardous Waste Control Act (California Health and Safety Code, Section 25100 et seq.), which creates the framework under which hazardous wastes are managed in California. The law provides for the development of a state hazardous waste program that administers and implements the provisions of the federal RCRA cradle-to-grave waste management system in California. It also provides for the designation of California-only hazardous waste and development of standards that are equal to or, in some cases, more stringent than federal requirements. The Hazardous Waste Control Act lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls;

establishes permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program was created in 1993 by Senate Bill 1082 to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities of environmental and emergency management programs. The program is implemented at the local government level by CUPAs. The program consolidates, coordinates, and makes consistent the following hazardous materials and hazardous waste programs (program elements):

- Hazardous Waste Generation (including on-site treatment under Tiered Permitting)
- Aboveground Petroleum Storage Tanks (only the spill prevention, control, and countermeasure (SPCC) plan)
- USTs
- Hazardous Material Release Response Plans and Inventories
- California Accidental Release Prevention Program
- Uniform Fire Code Hazardous Material Management Plans and Inventories

Local

Certified Unified Program Agency

A CUPA is a local agency that has been certified by California EPA to implement the local Unified Program. The CUPA can be a county, city, or joint powers authority. A participating agency is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. A designated agency is a local agency that has not been certified by California EPA to become a CUPA but is the responsible local agency that would implement the six unified programs until they are certified.

The San Bernardino County Fire Department (SBCFD) is the designated CUPA for the City and is the primary local agency with responsibility for implementing federal and state laws pertaining to hazardous materials management. The SBCFD maintains records regarding location and status of hazardous materials sites in the City and administers programs that regulate and enforce the transport, use, storage, and manufacturing, and remediation of hazardous materials. The City contracts with the SBCFD for hazardous waste inspection and enforcement components of the unified program.

South Coast Air Quality Management District Rule 1403

South Coast Air Quality Management District (AQMD) Rule 1403, adopted by the South Coast AQMD on October 6, 1989, establishes survey, notification, and work practice requirements to prevent asbestos emissions from emanating during building renovation and demolition activities.

Asbestos is a carcinogen and is categorized as a hazardous air pollutant by the EPA. As such, South Coast AQMD Rule 1403 incorporates the requirements of the federal asbestos requirements found in the National Emission Standards for Hazardous Air Pollutants. The EPA delegated to South Coast AQMD the authority to enforce the federal asbestos NESHAP and the South Coast AQMD is the local enforcement authority for asbestos.

City of Montclair General Plan Public Health and Safety Element

The General Plan Public Health and Safety Element (City of Montclair 1999) addresses a variety of natural and human-related hazards, and contains goals and policies aimed at reducing the risk associated with these hazards. These goals and policies related to hazardous materials are listed as follows:

Goal SE-1.0.0 To reduce loss of life, injuries, and damage to property and natural resources due to flooding, fire, seismic hazards, criminal activities, and hazardous materials.

Goal SE-5.1.1 To prevent injury and environmental contamination due to the uncontrolled release of hazardous materials.

Policy SE-5.1.1 Maintain a local permit requirement for the regulation of transportation and storage of hazardous materials.

Policy SE-5.1.2 Develop a monitoring program for the industrial use and storage of hazardous materials.

Policy SE-5.1.3 Promote public awareness of the dangers and proper disposal methods of hazardous materials.

City of Montclair Municipal Code

Section 6.28 of the City of Montclair Municipal Code establishes regulations governing environmental public health and designates the San Bernardino County Department of Environmental Health Services as the enforcement agency. The ordinance adopts the Uniform Environmental Health Code, being Chapters 1—11, Division 3, Title III, of the San Bernardino County Code, and includes regulations that govern the disposal of poisons, medicines and similar material in waste or garbage.

3.6.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criteria based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.). It was concluded in the Initial Study that there were no impacts or less than significant impacts for the following significance criteria. Therefore, the following significance criteria are not included as part of this EIR:

E. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area.

F. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

G. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

The following significance criteria, included for analysis in this EIR, is based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.), and will be used to determine the significance of potential hazards and hazardous materials impacts. Impacts to hazards and hazardous materials would be significant if the Proposed Project would:

A. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

B. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

C. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

D. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

3.6.4 Impacts Analysis

A. Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

AND

B. Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Hazardous Materials Associated with Project Construction

Less Than Significant Impact With Mitigation Incorporated. The following section discusses impacts associated with construction of the Proposed Project, including demolition, grading, and construction activities.

Demolition Activities

Future development and redevelopment projects pursuant to the MPDSP may require the demolition of existing buildings and structures associated with the specific development site. Due to the age of the buildings and structures throughout the Plan area (many over 50 years old), it is likely that asbestos-containing materials (ACM) and lead-based paints (LBP), as well as other building materials containing lead (e.g., ceramic tile), were used in their construction. Demolition of these building and structures can cause encapsulated ACM (if present) to become friable and, once airborne, would be considered a carcinogen.[2] A carcinogen is a substance that causes cancer or helps cancer grow. Demolition of the existing buildings and structures can also cause the release of lead into the air if not properly removed and handled. The United States Environmental Protection Agency (EPA) has classified lead and inorganic lead compounds as "probable human carcinogens" (EPA 2020). Such releases could pose significant risks to persons living and working in and around the Plan area, as well as to project construction workers.

Abatement of all ACM and LBP encountered during any future building demolition activities would be required to be conducted in accordance with all applicable laws and regulations, including those of the EPA (which regulates disposal); US Occupational Safety and Health Administration; US Department of Housing and Urban Development; Cal/OSHA (which regulates employee exposure); and South Coast Air Quality Management District (SCAQMD).

For example, the EPA requires that all asbestos work performed within regulated areas be supervised by a person who is trained as an asbestos supervisor (EPA Asbestos Hazard Emergency Response Act, 40 CFR 763). SCAQMD's Rule 1403 requires that buildings undergoing demolition or renovation be surveyed for ACM prior to any demolition or

[2] When dry, an ACM is considered friable if it can be crumbled, pulverized, or reduced to powder by hand pressure. If it cannot, it is considered non-friable ACM. It is possible for non-friable ACM to become friable when subjected to unusual conditions, such as demolishing a building or removing an ACM that has been glued into place.

renovation activities. Should ACM be identified, Rule 1403 requires that ACM be safely removed and disposed of at a regulated disposal site, if possible. If it is not possible to safely remove ACM, Rule 1403 requires that safe procedures be used to demolish the building with asbestos in place without resulting in a significant release of asbestos to the environment. Additionally, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of Title 8 of the California Code of Regulations, Section 1529 (Asbestos), which provides for exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to asbestos.

Cal/OSHA Regulation 29 (CFR Standard 1926.62) regulates the demolition, renovation, or construction of buildings involving lead-based materials. It includes requirements for the safe removal and disposal of lead, and the safe demolition of buildings containing LBP or other lead materials. Additionally, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of Title 8 of the California Code of Regulations, Section 1532.1 (Lead), which provides for exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead.

However, to further prevent impacts from the potential release of ACM or LBP associated with individual development projects under the MPDSP, an ACM and LBP survey of existing buildings and structures would be required prior to demolition activities, as outlined in mitigation measure **MM-HAZ-1**. Per mitigation measure **MM-HAZ-1**, if ACM or LBP are encountered during the survey, the abatement, containment, and disposal of such materials shall be conducted in accordance with the applicable regulatory measures. Mitigation measure **MM-HAZ-1** would ensure that future persons performing demolition activities on site would not be adversely affected by the release of potentially hazardous materials currently on site.

Therefore, through compliance with all applicable laws and regulations, as well as the implementation of mitigation measure **MM-HAZ-1**, hazardous impacts related to the release of ACMs and LBP would not occur. Compliance with applicable laws and regulations, as well as implementation of mitigation measure **MM-HAZ-1**, would be ensured through the City's development review and building plan check process. As such, impacts during demolition are considered **less than significant with mitigation incorporated**.

Grading Activities

Grading activities of the individual future development projects that would be accommodated by the MPDSP would involve the disturbance of on-site soils. Based on

the results of the Phase I ESA (which included a review of historical aerial photographs and topographic maps, regulatory agency records, interviews, information obtained online, and a site reconnaissance), no RECs were identified within the Plan area. On-site conditions relating to hazards and hazardous materials have remained relatively unchanged since the Phase I ESA was prepared, and no new violations have been reported within the Plan area since that time (DTSC 2020; SWRCB 2020). Additionally, grading activities associated with the shopping mall expansion did not reveal the presence of contaminated soils on-site. Therefore, given that no contaminated materials are anticipated to be encountered within the Plan area, impacts relating to grading activities would be **less than significant**. No mitigation is required.

Construction Activities

Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used during demolition and construction of the Proposed Project. Construction contractors are responsible for accident prevention and containment, and construction specifications would include provisions to properly manage hazardous substances and wastes. Contractors are required to comply with applicable laws and regulations regarding hazardous materials and hazardous waste management and disposal. Examples of hazardous materials management include preventing the disposal or release of hazardous materials onto the ground or into groundwater or surface water during construction and providing completely enclosed containment for all refuse generated in the Plan area. In addition, construction waste, including trash, litter, garbage, solid waste, petroleum products, and any other potentially hazardous materials, would be removed and transported to a permitted waste facility for treatment, storage, and/or disposal from the Plan area. Once construction is complete, fuels and other petroleum products would no longer remain on-site. Through compliance with local, state, and federal regulations, implementation of the Proposed Project would not create a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials. As such, impacts during construction are considered **less than significant**.

Hazardous Materials Associated with Project Operation

Less Than Significant Impact. Future development in the Plan area would be guided by the Land Use and Development Goals and Land Use Matrix of the Montclair Place District Specific Plan. Implementation of the Land Use and Development Goals would create a policy framework for transforming the Plan area into a pedestrian-oriented, multi-modal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line railway.

The Land Use Matrix provides the recommended uses in each of the seven land use categories within the Plan area. The land uses include residential, office, service, retail, civic, and institutional, uses.

Routine operation of the Proposed Project would include the use of various hazardous materials, including chemical reagents, solvents, fuels, paints, and cleansers. These materials would be used for building and grounds maintenance. Many of the hazardous materials used for building and grounds maintenance would be considered household hazardous wastes and/or universal wastes by the EPA, which regards these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment relative to other hazardous wastes, when they are properly stored, transported, used, and disposed of in accordance with local, state, and federal laws.

The Proposed Project could also include operation of medical uses, such as medical research and development, laboratory uses, operation of specialized equipment, outpatient care, medical clinics, and medical offices. These uses could involve a variety of potentially hazardous medical materials, which would be stored and used on-site, as well as transported to and from the site for delivery and disposal. Potentially hazardous medical materials that may be used on-site include pharmaceuticals, regulated medical waste, sterilants, disinfectants, medical oxygen, biohazardous materials, radioactive materials, medical sharps, and stains used in laboratories. The hazardous materials used during operation of the Proposed Project could be used on-site, transported to and from the Plan area, and ultimately disposed of off-site. During these processes, there is the potential for a hazardous materials incident to occur, if hazardous substances are handled improperly or unsafely such that the substance is released or the public is exposed to the substance. However, the use, storage, and transport of hazardous materials and wastes are subject to applicable federal, state, and local health and safety regulations (e.g., RCRA and the Hazardous Waste Control Act "cradle to grave" requirements). All hazardous materials generated and/or used within the Plan area would be managed in accordance with all relevant federal, state, and local laws, including the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (22 CCR 4.5). Furthermore, compliance with OSHA workplace and work practices requirements would avoid the exposure of persons and the environment to hazardous materials.

Medical wastes are regulated by state laws that set forth specific requirements for handling, treating, storing, and disposing medical waste. As stated in Section 3.6.4 of this EIR, any medical-related waste, in the event it is generated, would be stored on-site per regulatory and industry procedures and transported off-site by qualified vendors in accordance with applicable regulations. Pursuant to the California Medical Waste

Management Act of 1990, any potential future medical uses would be required to prepare a medical waste management plan (MWMP) for submittal to the CDPH's Medical Waste Management Program, in the event that any potential future medical uses generate medical wastes. The MWMP must describe the types and amounts of medical waste generated and how the waste would be disposed. Additionally, California Health and Safety Code, Division 20, Chapter 6.95, requires preparation of a hazardous materials business plan (HMBP) for any business using 55 gallons (liquid) or 500 pounds (solid) or more of hazardous materials. HMBPs contain information on hazardous materials inventory, inspections, training, recordkeeping, and reporting and is submitted electronically through the California Environmental Reporting System.

Any future potential medical uses would generate medical waste similar to the types of medical waste currently generated within the vicinity of the Plan area at the nearby medical campuses (namely, the Montclair Hospital Medical Center). In addition to the regulations and practices described above, the following requirements would apply to storage and handling of medical wastes and other hazardous wastes within the Plan area: (1) hazardous materials are required to be stored in designated areas designed to prevent accidental release; (2) OSHA requirements prescribe safe work environments for workers working with materials that present a moderate explosion hazard, high fire or physical hazard, or health hazard; (3) federal and state laws related to the storage of hazardous materials would be complied with to maximize containment and provide for prompt and effective clean-up in case of an accidental release; and (4) Hazardous Materials Inventory and Response Planning Reports would be filed with the City in accordance with Unified Program Permit requirements.

Compliance with applicable regulations involving hazardous materials and potentially hazardous medical materials during operation would ensure that such materials are transported, used, and disposed in a manner that minimizes potential effects to workers, the public, and the environment. Due to the types of materials that could be used within the Plan area and the existing regulations that are required, it is not expected that the Proposed Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Upon compliance with applicable regulations, operational impacts would be **less than significant**. No mitigation is required.

Summary

In summary, under CEQA, impacts associated with the Proposed Project potentially creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during demolition and construction would be **less than**

significant with mitigation incorporated. Additionally, impacts associated with the Proposed Project potentially creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during grading and operation would be **less than significant** with compliance to applicable regulatory requirements.

C. Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. There are five schools located within 0.25 mile of the Plan area. International Montessori School is located on the west side of the Plan area on the Unitarian Universalist church property; Moreno Elementary School is located approximately 0.08 mile west of the Plan area; Serrano Middle School is located approximately 0.16 mile west of the Plan area; US Colleges of San Bernardino is located approximately 0.25 mile east of the Plan area; and OPARC (a center for adults with disabilities) is located approximately 0.25 mile northeast of the Plan area.

As discussed previously, implementation the Proposed Project could result in the handling of hazardous materials, substances, or waste during demolition, grading, and construction activities. However, compliance with local, state, and federal regulations, as well as mitigation measure **MM-HAZ-1**, would ensure that the handling of hazardous materials, substances, and wastes is conducted in a safe manner and does not result in adverse effects to surrounding land uses. As such, construction of the Proposed Project is not expected to create a significant hazard to nearby schools, and children, teachers, staff, and visitors at the nearby schools would not be exposed to hazardous materials.

During operation of the Proposed Project, hazardous materials that are routinely used for building and grounds maintenance would be present on-site, such as chemical reagents, solvents, fuels, paints, and cleansers. The Proposed Project could also involve the use, storage, transport, and disposal of a variety of medical materials and medical wastes, some of which may be considered hazardous. A release or accident involving potentially hazardous materials and/or wastes may create a hazard for the public, with the potential to affect students, staff, and visitors at nearby schools. However, due to the types of materials that would be used on the Plan area and the existing regulations that are required to be put in place, the Proposed Project is not expected to create a significant hazard to nearby schools, and children, teachers, staff, and visitors at the nearby schools would not be exposed to hazardous materials.

Many of the hazardous materials that would be used for building and grounds maintenance are common to businesses and households and pose a lower risk to people and the environment relative to some less common hazardous materials. Furthermore, such materials would be stored, transported, used, and disposed of in accordance with local, state, and federal laws, which would minimize the potential for such materials be released to the environment and to affect nearby schools. Additionally, as described in the discussions above, hazardous materials and medical wastes would be handled in accordance with an MWMP and an HMBP. These plans would set forth safety and management protocols for medical wastes and other hazardous materials. Implementation of these plans would ensure that hazardous materials used any potential future medical use would be handled and treated in a manner that minimizes releases and accidents to the extent practicable. These plans would also require oversight and enforcement from CDPH's Medical Waste Management Program, from the City, and from SBCFD. As described in the discussions above, the hazardous materials used on-site would also be subject to a variety of local, state, and federal laws, which require proper handling and storage of hazardous materials. Upon preparation and implementation of a MWMP and a HMBP, as well as compliance with applicable federal, state, and local regulations for the use of hazardous materials, the Proposed Project is not expected to result in effects related to hazardous materials or hazardous emissions at nearby schools. As such, upon compliance with applicable regulations involving hazardous materials, operational impacts would be **less than significant**. No mitigation is required.

D. Would the Project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

***Less Than Significant Impact with Mitigation Incorporated*.** Government Code, Section 65962.5, combines several regulatory lists of sites that may pose a hazard related to hazardous materials or substances. According to Government Code, Section 65962.5(a), there are no hazardous materials or waste sites located within the Plan area (DTSC 2007). The Phase I Environmental Site Assessment (ESA) prepared for the Plan area by the Orin Group in 2010, is attached as Appendix D.

According to the Phase I ESA, the Plan area is listed on the HAZNET and RCRA-SQG database for disposing of asbestos-containing waste. However, no violations were reported. The Phase I ESA determined that the disposing of asbestos-containing waste is not likely to impact future use of the Plan area. Two 50-gallon diesel above-ground storage tanks were noted for the emergency generators at the Plan area as well as waste oil and new oil containers at Mountain View Tires. However, no signs of leaks were noted and storage of these materials appeared satisfactory, and the Mountain View Tire

facility has since been demolished to accommodate the under-construction mall expansion. The Phase I ESA ultimately concluded that no recognized environmental conditions were identified. Additionally, on-site conditions relating to hazards and hazardous materials have remained relatively unchanged since the Phase I ESA was prepared, and no new violations have been reported within the Plan area since that time (DTSC 2020; SWRCB 2020).

The existing retail buildings were constructed in 1968 with refurbishments in the mid 1980s.[3] Due to the age of the on-site structures, lead-based paint and asbestos-containing materials may be present. To further prevent impacts from the potential release of ACM or LBP associated with individual development projects under the MPDSP, an ACM and LBP survey of existing buildings and structures would be required prior to demolition activities, as outlined in mitigation measure **MM-HAZ-1**. Per mitigation measure **MM-HAZ-1**, if ACM or LBP are encountered during the survey, the abatement, containment, and disposal of such materials shall be conducted in accordance with the applicable regulatory measures. Mitigation measure **MM-HAZ-1** would ensure that future persons performing demolition activities on-site are not be adversely affected by the release of any on-site potentially hazardous materials. Based on the above discussion, implementation of both phases of the Proposed Project would result in a **less than significant impact with mitigation incorporated**.

3.6.5 Cumulative Impacts

The geographic scope of the cumulative hazards and hazardous materials analysis is the immediate Plan area, including surrounding land uses and other nearby properties. Adverse effects of hazards and hazardous materials tend to be localized, and thus, the area near the Plan area would be most affected by the Proposed Project's activities.

Cumulative impacts related to hazards and hazardous materials would result from projects that combine to increase exposure to hazards and hazardous materials. As described in Sections 3.6.1 through 3.6.6, the Proposed Project would have less than significant impacts with mitigation measures incorporated. The Proposed Project would comply with all federal, state, and local regulations pertaining to the use, transport, and release of hazardous materials. The potential release of hazardous materials during demolition or renovation of older buildings and ground-disturbing activities would be reduced from compliance with applicable regulations and incorporation of the mitigation measures outlined in Section 3.6.6. Thus, the Proposed Project would not result in hazardous impacts on nearby properties.

[3] On page 1, Section 1.1 and page 5, Section 3.1 of the Phase I ESA (provided as part of Appendix D), it is incorrectly stated that refurbishments to the existing retail buildings occurred in 1997. Refurbishments to the mall occurred in the mid-1980s.

Cumulative projects would also be subject to federal, state, and local regulations pertaining to the use, storage, transport and disposal of hazards and hazardous materials. Cumulative projects may also require similar mitigation measures to help further reduce potential impacts. For these reasons, the Proposed Project's contribution to cumulative impacts to the public or environment resulting from hazards and hazardous materials would be **less than cumulatively considerable with mitigation incorporated**.

3.6.6 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. The following mitigation measure would ensure that future persons performing demolition and construction activities at the Plan area are not adversely affected by the release of any potentially hazardous materials:

MM-HAZ-1 Prior to the issuance of demolition permits for any buildings or structures that would be demolished in conjunction with individual development projects that would be accommodated by the Montclair Place District Specific Plan, the project applicant/developer shall conduct the following inspections and assessments for all buildings and structures on site and shall provide the City of Montclair Building Official with a copy of the report of each investigation or assessment.

1. The project applicant shall retain a California Certified Asbestos Consultant (CAC) to perform abatement project planning, monitoring (including air monitoring), oversight, and reporting of all asbestos-containing materials (ACM) encountered. The abatement, containment, and disposal of all ACM shall be conducted in accordance with the South Coast Air Quality Management District's Rule 1403 and California Code of Regulation Title 8, Section 1529 (Asbestos).
2. The project applicant shall retain a licensed or certified lead inspector/assessor to conduct the abatement, containment, and disposal of all lead waste encountered. The contracted lead inspector/assessor shall be certified by the California Department of Public Health (CDPH). All lead abatement shall be performed by a CDPH-certified lead supervisor or a CDPH-certified worker under the direct supervision of a lead supervisor certified by CDPH. The abatement, containment, and disposal of all lead waste encountered shall be conducted in accordance with the US Occupational Safety and Health Administration Rule 29, CFR Part 1926, and California Code of Regulation, Title 8, Section 1532.1 (Lead).

3. Evidence of the contracted professionals attained by the project applicant shall be provided to the City of Montclair Community Development Department. Additionally, contractors performing ACM and lead waste removal shall provide evidence of abatement activities to the City of Montclair Community Development Department and to the South Coast Air Quality Management District.

3.6.7 Significance After Mitigation

With the implementation of mitigation measure **MM-HAZ-1**, potentially significant impacts from hazards and hazardous materials would be **less than significant**.

3.6.8 References

City of Montclair. 1999. *City of Montclair General Plan*. Prepared with assistance by L.D. King, Inc. Accessed August 8, 2019. https://www.cityofmontclair.org/home/showdocument?id=5290

DTSC (Department of Toxic Substances Control). 2020. EnviroStor Data Management System. Accessed May 26, 2020. https://www.envirostor.dtsc.ca.gov/public/

EPA (U.S. Environmental Protection Agency). 2020. "Health Effects Notebook for Hazardous Air Pollutants." Updated March 27, 2020. Accessed April 30, 2020. https://www.epa.gov/haps/health-effects-notebook-hazardous-air-pollutants.

Frey Environmental. 2018. Additional Shallow Soil Assessment, Alexan Montclair, 4791 East Arrow Highway, Montclair, California 91763. April 17, 2018. https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/3570851206/2018%2004%2017%20Additional%20Shallow%20Soil%20Assessment%20report%20dated%204-17-2018.pdf

SWRCB (State Water Resources Control Board). 2020. Geotracker Data Management System. Accessed May 26, 2020. https://geotracker.waterboards.ca.gov/

3.7 HYDROLOGY AND WATER QUALITY

This section describes the hydrologic and water quality environmental setting of the proposed Montclair Place District Specific Plan Project (MPDSP or Proposed Project) site and general vicinity. Based on the environmental setting, this section describes the associated regulatory requirements and evaluates potential impacts related to hydrology and water quality as a result of implementing the Proposed Project.

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following issues as they relate to hydrology and water quality: violation of water quality standards or waste discharge requirements; substantial decrease of groundwater supplies or substantial interference with groundwater recharge; alteration of the existing drainage pattern of the site or area; creation or contribution of runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; placement of structures within a 100-year flood hazard area which would impede or redirect flood flows; inundation by flooding resulting in release of pollutants; and obstruction of the implementation of water quality control or sustainable groundwater management plans. The information in this section is based partly on the Water Supply Assessment completed by Dudek (2019) and approved by the Monte Vista Water District (Appendix H-1).

Please note that the nomenclature of the zoning areas in the WSA differs from the nomenclature identified in the MPDSP and this EIR. However, the overall buildout and density ranges are the same in all documents related to the Proposed Project. Furthermore, the difference in zoning area nomenclature does not affect the demand on water supplies.

3.7.1 Existing Conditions

Regional Watershed

The Proposed Project is located within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB), which administers the Basin Plan and other water quality programs within the upper and lower Santa Ana River Watersheds, the San Jacinto River watershed, and several other small drainage areas within San Bernardino, Riverside, and Orange Counties. The Santa Ana RWQCB is a 2,800-square-mile area that encompasses all coastal drainages flowing to the Pacific Ocean between Seal Beach (the coastal boundary between Los Angeles and Orange Counties) and Reef Point (between Newport Beach and Laguna Beach in Orange County).

Table 3.7.1 shows the watersheds that encompass the Plan area, as designated by the United States Geological Survey (USGS) Watershed Boundary Dataset (Figure 3.7-1, USGS Watersheds), as well as the Santa Ana RWQCB Basin Plan (Figure 3.7-2, RWQCB Hydrologic

Areas). The USGS Watershed Boundary Dataset delineates watersheds according to hydrologic units, which are nested within one another according to the scale of interest. USGS identifies hydrologic units by name and by hydrologic unit code (HUC), which are increasingly specific in proportion to the specificity of the watershed boundaries. The Santa Ana RWQCB Basin Plan identifies watersheds in a hierarchical system similar to the USGS Watershed Boundary Dataset, but with somewhat different watershed names and boundaries. These geographic boundaries are likewise watershed-based, but are typically referred to as hydrologic units, areas, and sub-areas. These generally constitute the geographic basis around which many surface water quality problems and goals/objectives are defined in the Basin Plan.

The Proposed Project is located within the Santa Ana River hydrologic unit (No. 801), and more specifically within the Middle Santa Ana River hydrologic area (No. 801.2), and the Chino hydrologic sub-area (801.21) (see Table 3.7-1) (Santa Ana RWQCB 2019; Figure 3.7-2). The USGS Watershed Boundary Dataset indicates the Plan area lies within the 232-square-mile Chino Creek watershed of the Santa Ana sub-basin in the Santa Ana basin (Figure 3.7-1, USGS Watersheds). The northwest corner of the subject property lies within the Upper Chino Creek sub-watershed, while the majority of the subject properties is located within the Middle Chino Creek sub-watershed (USGS 2018).

Table 3.7.1
Watershed Designations by Agency/Source

Agency/Source	HUC/ Basin No.	Analysis Scale	Name	Size (Sq. Mi.)
USGS Watershed Boundary Dataset	180702	Basin	Santa Ana	2,781
	18070203	Sub-basin	Santa Ana	1,694
	1807020307	Watershed	Chino Creek	232
	180702030702	Sub-watershed	Upper Chino Creek	38
	180702030703		Middle Chino Creek	30
Santa Ana RWQCB Basin Plan	8	RWQCB Region	Santa Ana	2,742
	801.00	Hydrologic Unit (HU)	Santa Ana River	1,906
	801.20	Hydrologic Area (HA)	Middle Santa Ana River (Split)	530
	801.21	Hydrologic Sub-Area (HSA)	Chino (Split)	274

Sources: USGS 2018; Santa Ana RWQCB 2019.
Notes: HUC = hydrologic unit code; sq. mi = square miles

Topography and Drainage

The overall Plan area is currently divided amongst 31 different parcels in and around the current Montclair Place Mall. Existing site drainage can generally be described as flowing slightly southwest to the nearest storm drainage. The Plan area topographic high point is near the northeast corner, at approximately 1,140 feet above mean sea level (amsl), and the low points, at

about 1,090 feet amsl, lie at the southwest corner of the site. This 50-foot grade difference over the Plan area creates a relatively flat area with slopes generally being at around 1.5%.[1]

The City receives storm water in two main forms: in concentrated flows emerging from the San Gabriel Mountains, and in generalized flows resulting from direct rainfall to the area (City of Montclair 1999).

Stormwater planning and management within the City and its sphere of influence are under the jurisdiction of the San Bernardino County Flood Control District (SBCFCD). SBCFCD, as the regional flood control agency, is responsible for the protection of life and property from uncontrolled stormwater and also captures and recharges some stormwater runoff (City of Montclair 1999).

In the Plan area, the City-owned storm drain currently has four known connections to the municipal storm drain. The municipal storm drain is owned by the City of Montclair and discharges to the groundwater recharge basins located approximately ¼ mile due west of the Plan area, along the San Antonio Creek channel. Therefore, the "receiving waters" for the Proposed Project (i.e., all waters within the flow network downstream of the Plan area) include San Antonio Creek and downstream Chino Creek, the Prado Flood Control Basin, the Santa Ana River, and its discharge into the Pacific Ocean (Figure 3.7-1, USGS Watersheds).

The municipal storm drain begins as a 72-inch reinforced concrete pipe (RCP) storm drain at approximately the southeast-most corner of the Plan area, near the I-10 on-ramp from Central Avenue. South of the southeast corner of the mall, the 72-inch RCP transitions to an approximate 900 linear feet of open concrete-lined channel. The final channel transitions to a 7-foot by 4-foot reinforced concrete box and eventually discharges to a regional retention facility approximately 1,500 feet west of the Plan area. Further description of the stormwater system and connection is available in Section 3.15, Utilities and Service Systems.

Water Supply

Potable and recycled water supplied to the MPDSP is provided by the Monte Vista Water District (MVWD). Water supplies for the MVWD are derived from four principal sources: local groundwater, imported water, entitlement water deliveries, and recycled water. In 2018, MVWD received approximately 45.3% of its water supply from groundwater pumped from the Chino Groundwater Basin; 42.4% from imported water from the Metropolitan Water District of Southern California (MWD), which receives local water from the Inland Empire Utility Agency

[1] Google Earth 2018. Elevation Profile and Slope Information Tool, Montclair Plaza Mall, Montclair, California 91763. Accessed 7/31/2019.

(IEUA) and Water Facilities Authority (WFA); 2.3% from entitlement water deliveries from the San Antonio Water Company; and 10% from recycled water from the IEUA (Appendix H-1).

In accordance with the Sustainable Groundwater Management Act (SGMA), the California Department of Water Resources (DWR) has classified the Chino Groundwater Basin as having a very low priority in regards to prioritizing the completion of a Groundwater Sustainability Plan (GSP) (California DWR 2020). In addition, the Chino Groundwater Basin is adjudicated through the Chino Basin Judgment and thus has a managed groundwater extraction rate, reducing the potential for over-extraction. The Judgment designated a safe yield for the basin of 140,000 acre-feet-per year (AFY). In the event that groundwater pumping rates exceed the safe yield, water is generally purchased from the MWD, through the IEUA and WFA, for basin recharge. However, supplemental water may also be obtained from any available source, including recycled water and imported water. The Chino Basin Judgment also allows for the transfer and storage of excess rights and supplemental supplies (MVWD 2016).

Surface Water Quality

Several water bodies within and adjacent to the watershed, and located downstream of the subject property are designated as "water quality-limited" for water quality impairments under the federal Clean Water Act (CWA) Section 303(d) (Table 3.7.2). Being "water quality-limited" means that a water body is "not reasonably expected to attain or maintain water quality standards" without additional regulation. The law requires that the U.S. Environmental Protection Agency (EPA) develop total maximum daily loads (TMDLs) for each impaired water body in the nation. The TMDLs specify the maximum amount of a pollutant a water body can receive and still meet water quality standards. A TMDL may also include a plan for restoring an impaired water body to acceptable standards. The most recently approved Section 303(d) List of Water Quality Limited Segments, as listed in the 2014-2016 Integrated Report, lists San Antonio Creek, Chino Creek, the Prado Flood Control Basin, the Santa Ana River, Talbert Channel and the Newport Slough as impaired water bodies under Section 303(d) of the CWA (Figure 3.7-3, 303(d) Impaired Waterbodies).

Table 3.7.2
CWA Section 303(d) Impairments

Name	Pollutant/ Stressor	Potential Sources	TMDL Status	Year
San Antonio Creek	pH	Source Unknown	Scheduled	2021
Chino Creek Reach 2 (Beginning of concrete channel to confluence with San Antonio Creek	pH	Source Unknown	Scheduled	2021
	Indicator Bacteria	Unknown Nonpoint Source	Approved	2007
Chino Creek Reach 1B (Mill Creek confluence to start of concrete lined	Indicator Bacteria	Unknown Nonpoint Source	Approved	2007
	Chemical Oxygen	Source Unknown	Revised	2019

Table 3.7.2
CWA Section 303(d) Impairments

Name	Pollutant/ Stressor	Potential Sources	TMDL Status	Year
channel)	Demand (COD)			
	Nutrients	Source Unknown	Scheduled	2019
Chino Creek Reach 1A (Santa Ana River R5 confluence to just downstream of confluence with Mill Creek)	Indicator Bacteria	Agriculture/ Dairies/ Urban Runoff/ Storm Sewers	Approved	2007
	Nutrients	Source Unknown	Scheduled	2019
Prado Flood Control Basin	pH	Source Unknown	Scheduled	2027
Santa Ana River Reach 3	Copper	Source Unknown	Scheduled	2023
	Lead	Source Unknown	Scheduled	2023
	Indicator Bacteria	Dairies	Approved	2007
Talbert Channel (Orange County)	Toxicity	Source Unknown	Scheduled	2029
Newport Slough	Indicator Bacteria	Source Unknown	Scheduled	2021

Source: SWRCB 2018.
Notes: CWA = Clean Water Act; TMDL = Total Maximum Daily Load

Pursuant to listing, the Santa Ana RWQCB will be tasked with developing TMDLs for the listed impairments currently lacking USEPA-approved TMDLs, which include pH, nutrients, copper, lead, and toxicity. There are currently TMDLs approved by the U.S. EPA that apply to the receiving waters for the Proposed Project for the indicator bacteria and chemical oxygen demand (COD). These impairments are relevant to the Proposed Project because runoff from the Plan area (along with runoff from the whole watershed) eventually discharges into or adjacent to these 303(d) impaired waters, listed above.

Flood Hazards

Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) identify flood zones and areas that are susceptible to 100-year (1% annual chance of occurrence) and 500-year floods (0.2% annual chance of occurrence). These areas are referred to as Special Flood Hazard Areas and Moderate Flood Hazard Areas, respectively. The entire Plan area is identified by the Federal Emergency Management Agency as being within Zone X (FEMA 2019), which indicates an area of minimal flood hazard.

Dam Failure

The Plan area is not located downstream of a dam and thus would not be subject to inundation in the event of a dam failure; nor is the Plan area subject to seiche or tsunami, due to the large distance to the ocean or large enclosed body of water.

3.7.2 Regulatory Setting

Federal

Clean Water Act

The Clean Water Act or CWA (33 U.S.C. 1251 et seq.), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Key sections of the act are as follows:

- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. Under Section 303(d) of the CWA, the State of California is required to develop a list of impaired water bodies that do not meet water quality standards and objectives and establish TMDLs for each pollutant/stressor. The water quality impairments of the Plan area receiving waters and associated TMDLs are shown in Table 3.7.2 above.
- Section 401 (Water Quality Certification) requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the act. As there are no federal jurisdictional waters within the Plan area, no water quality certification under CWA Section 401 would be required.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the State Water Resources Control Board (SWRCB) and the nine RWQCBs, which have several programs that implement individual and general permits related to construction activities, municipal stormwater discharges, and various kinds of non-stormwater discharges. State and regional water quality related permits and approvals, including through NPDES, are shown in Table 3.7.3 below.
- Section 404 establishes a permit program for the discharge of dredged or fill material into waters of the United States. This permit program is jointly administered by the U.S. Army Corps of Engineers and the U.S. EPA. As there are no federal jurisdictional waters within the Plan area, the Proposed Project would not require a permit under CWA Section 404.

Numerous agencies have responsibilities for administration and enforcement of the CWA. At the federal level this includes the U.S. EPA and the U.S. Army Corps of Engineers. At the state level, with the exception of tribal lands, the California EPA and its sub-agencies, including the

SWRCB, have been delegated primary responsibility for administering and enforcing the CWA in California.

Federal Antidegradation Policy

The Federal Antidegradation Policy (40 CFR 131.12) requires states to develop statewide antidegradation policies and identify methods for implementation. Pursuant to the Code of Federal Regulations (CFR), state antidegradation policies and implementation methods shall, at a minimum, protect and maintain: 1) existing in-stream water uses; 2) existing water quality where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and 3) water quality in waters considered an outstanding national resource.

State

Porter-Cologne Water Quality Act (California Water Code)

The Porter–Cologne Act (codified in the California Water Code, Section 13000 et seq.) is the primary water quality control law for California. Whereas the CWA applies to all waters of the United States, the Porter–Cologne Act applies to waters of the state, which includes isolated wetlands and groundwater in addition to federal waters. It is implemented by the SWRCB and the nine RWQCBs. In addition to other regulatory responsibilities, the RWQCBs have the authority to conduct, order, and oversee investigation and cleanup where discharges or threatened discharges of waste to waters of the state could cause pollution or nuisance, including impacts to public health and the environment.

The act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. California Water Code Section 13260 subdivision (a) requires that any person discharging waste or proposing to discharge waste, other than to a community sewer system that could affect the quality of the waters of the state, to file a Report of Waste Discharge with the applicable RWQCB. For discharges directly to surface water (waters of the United States), an NPDES permit is required, which is issued under both state and federal law. For other types of discharges, such as waste discharges to land (e.g., spoils disposal and storage), erosion from soil disturbance, or discharges to waters of the state (such as groundwater and isolated wetlands), Waste Discharge Requirements (WDRs) are required and are issued exclusively under state law. WDRs typically require many of the same best management practices (BMPs) and pollution control technologies as required by NPDES-derived permits.

California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the *Statement of Policy with Respect to Maintaining High Quality Water in California*, was adopted by the SWRCB (State Board Resolution No. 68-16) in 1968. Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the state (e.g., isolated wetlands and groundwater), not just surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained, and discharge to that water body shall not unreasonably affect present or anticipated beneficial use of such water resource.

California Toxics Rule

The U.S. EPA has established water quality criteria for certain toxic substances via the California Toxics Rule. The California Toxics Rule established acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water, such as inland surface waters and enclosed bays and estuaries, that are designated by each RWQCB as having beneficial uses protective of aquatic life or human health.

Basin Planning

The California legislature has assigned the primary responsibility to administer and enforce statutes for the protection and enhancement of water quality, including the Porter–Cologne Act and portions of the CWA, to the SWRCB and its nine RWQCBs. The SWRCB provides state-level coordination of the water quality control program by establishing statewide policies and plans for implementation of state and federal regulations. The nine RWQCBs throughout California adopt and implement Basin Plans that recognize the unique characteristics of each region with regard to natural water quality, actual and potential beneficial uses, and water quality problems. The Santa Ana RWQCB is responsible for the protection of the beneficial uses of waters within the upper and lower Santa Ana River watersheds, the San Jacinto River watershed, and several other small drainage areas within San Bernardino, Riverside, and Orange Counties.

The *Water Quality Control Plan for the Santa Ana River Basin* (Basin Plan) designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan (California Water Code Sections 13240–13247) (Santa Ana RWQCB 2019). The Santa Ana RWQCB Basin Plan must conform to the policies set forth in the Porter-Cologne Act, as established by the SWRCB in its state water policy. The Porter-Cologne Act also provides the RWQCBs with authority to include within their Basin Plan water discharge prohibitions applicable to particular conditions, areas, or types of waste. The Basin Plan is continually being updated to include amendments related to implementation of TMDLs of potential pollutants or water quality stressors, revisions

of programs and policies within the Santa Ana RWQCB region, and changes to beneficial use designations and associated water quality objectives.

NPDES and WDR Permits

NPDES and WDR programs regulate construction, municipal, and industrial stormwater and non-stormwater discharges under the requirements of the CWA and the Porter–Cologne Water Quality Control Act. The construction stormwater program is administered by the SWRCB, while the municipal stormwater program and other WDRs are administered by the Santa Ana RWQCB. Table 3.7-3 lists the water-quality-related permits that would apply directly or indirectly (through implementing City ordinances) to the Proposed Project, each of which is further described below.

Table 3.7.3
State and Regional Water Quality-Related Permits and Approvals

Program/ Activity	Order Number/ NPDES Number	Permit Name	Affected Area
Construction Stormwater Program	2009-0009-DWQ/ CAS000002, as amended	NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit)	Statewide
Municipal Stormwater Program	Santa Ana RWQCB Order No. R8-2010-0036 / CAS618036	NPDES Permit and Waste Discharge Requirements for the San Bernardino County Flood Control District, the County of San Bernardino, and the Incorporated Cities of San Bernardino County within the Santa Ana Region	San Bernardino County within Santa Ana Region
Discharge of Groundwater from Construction and Project Dewatering to Surface Waters	Santa Ana RWQCB Order No. Order No. R8-2015-0004 / CAG998001	General Waste Discharge Requirements for Discharges to Surface Waters that Pose an Insignificant (De Minimis) Threat to Water Quality	Santa Ana Region

Notes: NPDES = National Pollutant Discharge Elimination System

Construction General Permit (SWRCB Order 2009-0009-DWQ, as amended)

For stormwater discharges associated with construction activity in the State of California, the SWRCB has adopted the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit) to avoid and minimize water quality impacts attributable to such activities. The Construction General Permit applies to all projects in which construction activity disturbs one acre or more of soil. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling and excavation. The Construction General Permit requires the development and

implementation of a stormwater pollution prevention plan (SWPPP), which would include and specify water quality BMPs designed to prevent pollutants from contacting stormwater and keep all products of erosion from moving off site into receiving waters. Routine inspection of all BMPs is required under the provisions of the Construction General Permit, and the SWPPP must be prepared and implemented by qualified individuals as defined by the SWRCB.

As nearly all of the 104.35-acre Plan area would be disturbed for construction activity, the Proposed Project would require coverage under the Construction General Permit.

San Bernardino County Municipal NPDES Storm Water Permit (Order No. R8-2010-0036, NPDES No. CAS618036)

The NPDES Permit and Waste Discharge Requirements for the San Bernardino County Flood Control District, the County of San Bernardino, and the Incorporated Cities of San Bernardino County within the Santa Ana Region (Municipal Separate Storm Sewer System [MS4] Permit) covers 17 cities and most of the unincorporated areas of San Bernardino County within the jurisdiction of the Santa Ana RWQCB. Under the MS4 Permit, the San Bernardino County Flood Control District is designated as the Principal Permittee. The Co-Permittees are the 17 San Bernardino County cities, including the City of Montclair, and San Bernardino County. The Principal Permittee helps to facilitate activities necessary to comply with the requirements outlined in the MS4 Permit but is not responsible for ensuring compliance of any of the other Co-Permittees.

The MS4 Permit requires Co-Permittees, including the City of Montclair, to implement a development planning program to address stormwater pollution. These programs require project applicants for certain types of projects to implement Water Quality Management Plans (WQMP) throughout the operational life of their projects. The purpose of WQMP is to reduce the discharge of pollutants in stormwater and to eliminate increases in pre-existing runoff rates and volumes by outlining BMPs, which must be incorporated into the design plans of new development and redevelopment. The Proposed Project is a regulated project for this purpose because it is a redevelopment project that would create and/or replace more than 5,000 square feet of impervious surface. Therefore, the applicant must prepare and submit WQMPs to the City for each respective development as part of the development review process. The City of Montclair enforces the provisions of the San Bernardino County MS4 Permit issued by the Santa Ana RWQCB through its City Storm Drain System Regulations (Municipal Code Chapter 9.24 – Storm Drain System).

General Waste Discharge Requirements for Discharges to Surface Waters that Pose an Insignificant (De Minimis) Threat to Water Quality (Santa Ana RWQCB Order No. R4-2015-0004)

This general order is intended to authorize discharges of treated or untreated groundwater generated from permanent or temporary dewatering operations, or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits. Discharges from facilities to waters of the United States that do not cause, have the reasonable potential to cause, or contribute to an in-stream excursion above any applicable state or federal water quality objectives/criteria or cause acute or chronic toxicity in the receiving water are authorized discharges in accordance with the conditions set forth in this order. To demonstrate coverage under the order, dischargers must submit documentation to show that the discharge would not cause or contribute to a violation of any applicable water quality objective/criteria for the receiving waters, or any other discharge prohibition listed in the order. In addition, dischargers must perform reasonable potential analysis using a representative sample of groundwater or wastewater to be discharged. The sample shall be analyzed and the data compared to the water quality screening criteria for the constituents listed in the order, and if results show exceedance of water quality screening criteria, the discharge will be required to treat the wastewater to acceptable standards prior to discharge.

As previously discussed in Section 3.4, Geology and Soils, groundwater was not encountered to a depth of 50 feet below ground surface within or near the Plan area. As such, dewatering would not occur as a result of Project development, and the Proposed Project would not require coverage under the Discharge of Groundwater from Construction and Project Dewatering to Surface Waters.

California Green Building Standards Code

The California Green Building Standards Code (CALGreen Code), Part 11 of the California Building Standards Code (Title 24) is designed to improve public health, safety, and general welfare by utilizing design and construction methods that reduce the negative environmental impact of development and to encourage sustainable construction practices.

The CALGreen Code provides mandatory direction to developers of all new construction and renovations of residential and non-residential structures with regard to all aspects of design and construction, including, but not limited to, site drainage design, stormwater management, and water use efficiency. Required measures are accompanied by a set of voluntary standards designed to encourage developers and cities to aim for a higher standard of development.

California Water Plan

Required by the California Water Code Section 10005(a), the California Water Plan, prepared by the DWR, is the state government's strategic plan for managing and developing water resources statewide for current and future generations and provides a framework for water managers, legislators, and the public to consider options and make decisions regarding California's water future. The California Water Plan, which is updated every five years, presents basic data and information on California's water resources, including water supply evaluations and assessments of agricultural, urban, and environmental water uses to quantify the gap between water supplies and uses. The California Water Plan also identifies and evaluates existing and proposed statewide demand management and water supply augmentation programs and projects to address the state's water needs.

The goal for the California Water Plan Update is to meet California Water Code requirements. This plan received broad support among those participating in California's water planning, and is a useful document for the public, water planners throughout the state, legislators, and other decision-makers.

Local

Montclair General Plan

The City of Montclair General Plan is intended to provide direction for future development in the City of Montclair. Applicable goals and policies include, but are not limited to:

Objectives

- **CO-1.2.0:** To promote the conservation of water and groundwater resources to ensure that adequate supplies of water will be available with the highest water quality attainable.
- **SE-2.0.0:** To provide an adequate level of emergency services to the community in the event of a catastrophic situation.
- **SE-2.1.0:** To maintain procedures that will safeguard the public from structural failure associated with flood hazards.
- **SE-2.2.0:** To promote public awareness of potential flood dangers.
- **SE-2.3.0:** To provide for public safety prior, during, and after hazardous floods.
- **SE-2.4.0:** To promote interagency assistance for persons affected by hazardous floods.
- **SE-2.5.0:** To recognize and consider state-of-the-art advancements relating to flood control.

- **SE-2.6.0:** To promote local and regional programs directed toward developing a regional system to respond to emergencies in cooperation with the county and neighboring communities.

Implementation Policies

- **CO-1.1.1:** Protect areas capable of replenishing groundwater supplies.
- **CO-1.1.2:** Encourage and promote programs to conserve water and minimize consumption.
- **CO-1.1.3:** Promote the implementation of regional programs directed toward reclaiming wastewaters for subsequent re-use.
- **CO-1.1.8:** Maintain wastewater testing and stormwater runoff programs, consistent with federal, State, County, and regional programs

Montclair Municipal Code

Chapter 9.24 of the Montclair Municipal Code sets forth the City's Storm Drain System Regulations. The ordinance prohibits the discharge of the following into any storm drain system:

- Any liquids, solids, or gases which by reason of their nature or quantity are flammable, reactive, explosive, corrosive, or radioactive, or by interaction with other materials could result in fire, explosion or injury.
- Any solid or viscous materials, which could cause obstruction to the flow or operation of the storm drain system.
- Any pollutant that injures or constitutes a hazard to human, animal, plant, or fish life, or creates a public nuisance.
- Any noxious or malodorous liquid, gas, or solid in sufficient quantity, either singly or by interaction with other materials, which creates a public nuisance, hazard to life, or inhibits authorized entry of any person into the storm drain system.
- Any medical, infectious, toxic or hazardous material or waste.

Additionally, unless otherwise permitted by a NPDES permit, the ordinance prohibits industrial and commercial developments from discharging untreated wastewater or untreated runoff into the storm drain system. Furthermore, the ordinance prohibits trash or any other abandoned objects/materials from being deposited such that they could be carried into the storm drains. Lastly, the ordinance not only makes it a crime to discharge pollutants into the storm drain system and imposes fines on violators, but also gives City public officers the authority to issue

citations or arrest business owners or residents who deliberately and knowingly dump or discharge hazardous chemicals or debris into the storm drain system.

Sediment and Erosion Control of Construction Sites are addressed in Article X of Chapter 9.24 of the Municipal Code. This article includes regulations pertaining to erosion and sediment control plans, erosion control systems, prohibited discharges and erosion control BMPs. This section incorporates the requirements of the statewide Construction General Permit.

Low Impact Development (LID) Ordinance

The 2010 MS4 Permit, adopted by the Santa Ana RWQCB and issued to San Bernardino County, requires all new development and significant redevelopment projects to incorporate Low Impact Development (LID) BMPs to the maximum extent practicable. The primary goal of LID is to preserve the pre-development hydrology of a project site. LID promotes the use of natural infiltration systems, evapotranspiration, and the re-use of stormwater. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, and rain barrels that will store, evaporate detain, and/or treat runoff may be used. The intended benefits of implementing LID in the City of Montclair is to:

- Reduce stormwater/urban runoff while improving water quality;
- Maintain pre-development hydrology;
- Reduce off-site runoff and provide increased groundwater recharge;
- Reduce erosion and hydrologic impacts downstream; and
- Enhance the recreational and aesthetic values in our communities.

San Bernardino County Hydrology Manual

The Plan area is located within the City of Montclair; drainage collection, treatment, and conveyance of surface water are regulated by the City. The City has adopted the San Bernardino County Department of Public Works Hydrology Manual as its basis of design for storm drainage facilities. The San Bernardino County Department of Public Works' Hydrology Manual requires projects to have drainage facilities that provide 100-year return frequency flood protection for all habitable structures and other non-flood-proof structures. A 100-year frequency design storm has a probability of 1/100 of being equaled or exceeded in any given year. Additionally, flood protection levels for 10- and 25-year floods may be required by the County for major street travel-ways, catch basin sump design, and other conditions.

3.7.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criteria based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.). It was concluded in the Initial Study that there were no impacts or less than significant impacts for the following significance criteria. Therefore, the following significance criteria are not included as part of this EIR.

C. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

   iii. impede or redirect flood flows?

D. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The following significance criteria, included for analysis in this EIR, is based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.), and will be used to determine the significance of potential hydrology and water quality impacts. Impacts to hydrology and water quality would be significant if the Proposed Project would:

A. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

B. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

C. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

   i. result in substantial erosion or siltation on or off site;

   ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;

   iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

3.7.4 Impacts Analysis

A. Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Short Term Impacts of Construction and Demolition

Less Than Significant Impact With Mitigation Incorporated. The Proposed Project would include demolition and construction activities that together would result in land disturbances of approximately 104.35 acres. Such activities have the potential to adversely affect the quality of stormwater runoff through increases in turbidity, sedimentation, and construction-related pollutants, including building materials (e.g., paint, stucco), chemicals, liquid products, and petroleum products used in building construction or the maintenance of heavy equipment.

Because land disturbance for Proposed Project construction activities would exceed one acre, a General Construction Activity Stormwater Permit (Construction General Permit, Order 2009-0009-DWQ) issued by the SWRCB would be required prior to the start of construction within the Plan area. Specifically, the Construction General Permit requires that the following be kept on-site at all times: (i) a copy of the Notice of Intent to Comply with Terms of the General Permit to Discharge Water Associated with Construction Activity; (ii) a waste discharge identification number issued by the SWRCB; (iii) a SWPPP and Monitoring Program Plan for the construction activity requiring the construction permit; and (iv) records of all inspections, compliance and non-compliance reports, evidence of self-inspection, and good housekeeping practices.

The SWPPP requires the construction contractor to implement water quality BMPs to ensure that water quality standards are met, and that stormwater runoff from the construction work areas do not cause degradation of water quality in receiving water bodies (in this case the regional storm drain system, San Antonio Creek, Chino Creek, the Prado Flood Basin, the Santa Ana River, and its discharge into the Pacific Ocean). The SWPPP must describe the type, location, and function of stormwater BMPs to be implemented, and must demonstrate that the combination of BMPs selected are adequate to meet the discharge prohibitions, effluent standards, and receiving water limitations contained in Construction General Permit. Mitigation measure **MM-HYD-1** includes examples of construction water quality BMPs that are standard for most construction sites subject to the Construction General Permit and would be implemented as part of the Proposed Project. These BMPs would include, but are not limited to, the installation of runoff control devices, stockpiling of contaminated and exposed soils, and materials pollution management. These measures would be refined and/or added to as necessary by a qualified SWPPP professional during the construction phase of the Proposed Project to meet the performance standards in the Construction General Permit. Construction stormwater quality-related mitigation measure **MM-HYD-1** would reduce impacts associated with erosion-induced siltation of

downstream drainages and incidental spills of petroleum products, by providing preventative and management BMPs, such that impacts during construction are **less than significant with mitigation incorporated**.

Long Term Impacts of Project Operation and Maintenance

Less Than Significant Impact With Mitigation Incorporated. Land uses on-site that could contribute pollutants to stormwater runoff in the long term include uncovered parking areas (through small fuel and/or fluid leaks), uncovered refuse storage/management areas, landscape/open space areas (if pesticides/herbicides and fertilizers are improperly applied), and general litter/debris (e.g., generated during facility loading/unloading activities). In addition, as described in Section 3.6, Hazards and Hazardous Materials, there is the potential for small quantities of lead, asbestos, and petroleum-based fuel wastes to be generated, stored, and/or handled on site. To the extent these wastes are stored in areas exposed to stormwater runoff, there could be water quality impacts as a result. However, the implementation of mitigation measure **MM-HAZ-1** would ensure that proper characterization and disposal of such waste occurs, and that such wastes are not exposed to stormwater runoff.

During storm events, the first few hours of moderate to heavy rainfall could wash a majority of pollutants from the paved areas where, without proper stormwater controls and BMPs, those pollutants could enter the municipal storm drain system before eventually being discharged to San Antonio Creek and Chino Creek. The majority of pollutants entering the storm drain system in this manner would be dust, litter, and possibly residual petroleum products (e.g., motor oil, gasoline, diesel fuel). Certain metals, along with nutrients and pesticides from landscape areas, can also be present in stormwater runoff. Between periods of rainfall, surface pollutants tend to accumulate, and runoff from the first significant storm of the year ("first flush") would likely have the largest concentration of pollutants. Given the large size (232 square miles) and highly urbanized character of the Chino Creek watershed, the Plan area contribution to pollutant loads to receiving waters would be negligible (even if uncontrolled). However, because water quality is a cumulatively significant issue in the region, even small contributions could be cumulatively significant.

As a permittee subject to the MS4 permit, the City of Montclair is responsible for ensuring that all new development and redevelopment projects comply with the performance criteria contained in the MS4 Permit and does so primarily through enforcement of Montclair Municipal Code Chapter 9.24 (Storm Drain System). The Proposed Project is a redevelopment project, which is defined as the addition or replacement of 5,000 or more square feet of impervious surface on an already developed site, and thus, will be required to control pollutants, pollutant loads, and runoff volume emanating from the Plan area by: (1) minimizing the impervious surface area and implementing source control measures, (2) controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention and/or rainfall harvest and re-use), and (3)

ensuring all structural BMPs are monitored and maintained for the life of the Proposed Project. More specifically, implementation of a WQMP, LID strategies, and water quality-related mitigation measure **MM-HYD-2** would reduce potential water quality impacts by filtering out pollutants during Proposed Project operations, prior to discharge from the Plan area. As a result, impacts would be **less than significant with mitigation incorporated.**

B. Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Groundwater Recharge

Less Than Significant Impact. Updated figures of the Chino Groundwater Basin completed for the Chino Basin Watermaster's 2016 State of the Basin Report (Watermaster 2017) indicate groundwater is present at a depth of approximately 550 feet below ground surface in the Plan area. This groundwater appears to be mounded below the San Antonio Creek recharge basins to the west of the Plan area. These basins are operated by the Chino Basin Water Conservation District and the Chino Basin Watermaster, and are designed to recharge groundwater that would otherwise be lost to local communities (Chino Basin Water Conservation District 2020). As part of the Chino Basin Facilities Improvement Program, 17 existing flood retention facilities were modified and two new spreading facilities/percolation ponds were constructed, from 2004 to 2014. The waters recharged at these facilities include stormwater, recycled water, imported water, and dry-weather runoff. The recharge of dry-weather runoff is intermittent and can occur at most of the spreading basins. The recharge basins have enabled the Chino Basin Water Conservation District and the Chino Basin Watermaster to recharge about 360,000 acre-feet of stormwater and supplemental water into the Chino Basin (Chino Basin Watermaster and IEUA 2018). Specific to the Proposed Project, Montclair Basin #3 captures all flows from the Plan area (personal communication, Joe Rosales, NPDES Coordinator, City of Montclair). The average stormwater recharge in Montclair Basin #3 from 2004 to 2017 was 953 AFY Basin (Chino Basin Watermaster and IEUA 2018). Since the Plan area currently has mostly impervious surfaces, it is unlikely that groundwater mounding beneath the recharge basins has occurred as a result of recharge at the Plan area. Construction and operation of the Proposed Project is not expected to negatively affect groundwater recharge in the area, or the general direction and velocity of groundwater movement within the underlying groundwater table, as the Proposed Project would not increase impervious surfaces and associated denied recharge. Proposed Project landscaping, as illustrated in the proposed Montclair Place District Zoning figure in the Water Supply Assessment prepared for this EIR (Appendix H-1), would increase the amount of groundwater recharge below the Plan area, resulting in beneficial impacts. Impacts would be **less than significant**. As such, construction and implementation of the Proposed Project would not adversely impact groundwater recharge in the Plan area.

Groundwater Supply

Based on the MVWD 2015 UWMP, MVWD's groundwater supply is pumped from the Chino Groundwater Basin. As previously discussed, the DWR has determined that the Chino Groundwater Basin has a very low priority in regards to enacting a GSP. In addition, this basin is adjudicated, limiting the amount of groundwater that can be extracted, thus reducing the potential for groundwater overdraft to occur.

According to the site-specific WSA,2 in 2018, MVWD received approximately 45.3% of its water supply from groundwater pumped from the Chino Groundwater Basin. The Proposed Project is estimated to generate a water demand of 767 AFY in 2040, which is 531 AFY greater than calculated water demand under current development conditions. This increase in water demand would represent an increase of less than 4.5% in MVWD service area demand or an approximate 2.0% increase in groundwater demand (Appendix H-1).

The 2015 MVWD UWMP has planned growth within the MVWD service area over the next 20 years. MVWD has made an allowance for future demand estimates based on historical growth rates in its service area. Based on these projections, MVWD has adequately made allowance for water supply-demand increases for both domestic and commercial water supply, including groundwater, over the next 20 years. According to the MVWD 2015 UWMP, MVWD projects an increase in water demand of 1,164 AFY from 2020 (35,200 AFY) to 2040 (36,364 AFY) (MVWD 2016). As a result, the Proposed Project would represent approximately 45.6% of this projected growth. If recent trends continue, groundwater would represent approximately 20.3% of this growth.

As demonstrated in Table 3.7-4, Table 3.7-5, and Table 3.7-6, an analysis of water supply and demand projections for MVWD (Appendix H-1), including the Proposed Project, demonstrates that projected supplies exceed demand through the year 2040, under normal, single-dry, and multiple-dry year scenarios. These projections consider land use, water development programs and projects, and water conservation.

Table 3.7-4
20-Year Water Supply and Demand Comparison Normal Year Including the Project (AFY)

	2020	2025	2030	2035	2040
Chino Groundwater Basin	29,841	29,841	29,841	29,841	29,841
Water Facilities Authority	21,776	21,776	21,776	21,776	21,776
San Antonio Water Company	800	800	800	800	800

[2] Please note that the nomenclature of the zoning areas in the WSA differs from the nomenclature identified in the Montclair Place District Specific Plan and this EIR. However, the overall buildout data and density ranges are the same in all documents related to this Project. Furthermore, the difference in zoning area nomenclature does not affect the demand on water supplies.

Table 3.7-4
20-Year Water Supply and Demand Comparison Normal Year Including the Project (AFY)

	2020	2025	2030	2035	2040
Recycled Water	1,031	990	1,019	1,069	1,069
Total Supply	**53,448**	**53,407**	**53,436**	**53,486**	**53,486**
Total Demand	**38,037**	**38,250**	**38,600**	**38,969**	**39,270**
Difference	**15,411**	**15,157**	**14,836**	**14,517**	**14,216**

Table 3.7-5
20-Year Water Supply and Demand Comparison Single Dry Year Including the Project (AFY)

	2020	2025	2030	2035	2040
Chino Groundwater Basin	29,841	29,841	29,841	29,841	29,841
Water Facilities Authority	21,776	21,776	21,776	21,776	21,776
San Antonio Water Company	656	656	656	656	656
Recycled Water	1,031	990	1,019	1,069	1,069
Total Supply	**53,304**	**53,263**	**53,292**	**53,342**	**53,342**
Total Demand	**38,037**	**38,250**	**38,600**	**38,969**	**39,270**
Difference	**15,267**	**15,013**	**14,692**	**14,373**	**14,072**

Table 3.7-6
20-Year Water Supply and Demand Comparison Multiple Dry Years Including the Project (AFY)

	2020	2025	2030	2035	2040
Year 1					
Chino Groundwater Basin	29,841	29,841	29,841	29,841	29,841
Water Facilities Authority	21,776	21,776	21,776	21,776	21,776
San Antonio Water Company	656	656	656	656	656
Recycled Water	1,031	990	1,019	1,069	1,069
Total Supply	**53,304**	**53,263**	**53,292**	**53,342**	**53,342**
Total Demand	**38,037**	**38,250**	**38,600**	**38,969**	**39,270**
Difference	**15,267**	**15,013**	**14,692**	**14,373**	**14,072**
Year 2					
Chino Groundwater Basin	29,841	29,841	29,841	29,841	29,841
Water Facilities Authority	21,776	21,776	21,776	21,776	21,776
San Antonio Water Company	560	560	560	560	560
Recycled Water	1,031	990	1,019	1,069	1,069
Total Supply	**53,208**	**53,167**	**53,196**	**53,246**	**53,246**

In addition, MVWD has the opportunity to increase supply to meet future demands through the following measures: 1) production of groundwater based on safe yield allocation and utilization of water in storage; 2) increasing imported water purchases, if available and if there is available WFA capacity; and 3) purchasing additional recycled water, if available. Collectively, these additional options, when coupled with regional groundwater management plans and the regulatory bindings of the groundwater basin, would enable MVWD to maintain a sustainable supply of groundwater from now into the future, including sufficient groundwater supply for the Proposed Project (Appendix H-1). Therefore, the Project would not substantially decrease groundwater supplies and would not impede sustainable groundwater management of the basin. Impacts would be **less than significant**.

C. Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. result in substantial erosion or siltation on or off-site?

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site?

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact With Mitigation Incorporated. The Proposed Project would redevelop a currently developed site that includes asphalt-parking areas, pavements, and buildings. Construction activities associated with Project development would temporarily alter existing drainage patterns, which could result in an increase of on- and off-site erosion or siltation rates, runoff rates, and downstream pollutants. However, as previously discussed in Threshold A, mitigation measure **MM-HYD-1** would reduce impacts associated with erosion-induced siltation of downstream drainages and incidental spills of petroleum products, by providing preventative and management BMPs, such that construction impacts are reduced to a less than significant level.

Once developed, no increases in impermeability, impermeable surface area, nor slope are planned for the Proposed Project, and no increases in stormwater runoff are expected. Additionally, stormwater management practices mandated by the City's LID Ordinance are intended to encourage stormwater capture, infiltration, and re-use, resulting in beneficial impacts associated with a decrease in the rate and amount of surface runoff from the Plan area.

A WQMP would be required because the Proposed Project is a redevelopment project that would create and/or replace more than 5,000 square feet of impervious surface. WQMP requirements impose rainwater LID strategies with goals to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. LID promotes the use of natural infiltration systems, evapotranspiration, and the re-use of stormwater. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, and rain barrels that will store, evaporate detain, and/or treat runoff may be used.

Inorder to prevent urban pollutant introduction into the municipal storm drain system, the Proposed Project would also be designed in compliance with Section 402(p) of the Clean Water Act and the Porter-Cologne Water Quality Act. This mandates that MS4 discharges to surface waters be regulated by an NPDES permit, as well as Santa Ana RWQCB requirements regulating the issuance of waste discharges to City drainages and requirements regulating stormwater discharges and non-stormwater discharges. In addition, as previously discussed, upon exiting the Plan area, all stormwater would be captured by Montclair Basin #3. Stormwater infiltration into this sandy recharge basin would remove residual concentrations of pollutants. Therefore, stormwater infiltration in the recharge basin, implementation of a WQMP, LID strategies, and water quality-related mitigation measure **MM-HYD-2** would reduce potential water quality impacts by filtering out pollutants during Proposed Project operations, such that impacts would be **less than significant with mitigation incorporated.**

3.7.5 Cumulative Impacts

The cumulative effect of past projects—both point sources of pollution and non-point sources caused by urbanization—have resulted in substantial water quality problems in the region's major waterways. The existing impairments identified under Section 303(d) of the CWA and Table 3.7.2 represent cumulative impacts of urban development within the watersheds draining to San Antonio and Chino Creeks and eventually the Pacific Ocean. The pollutants causing impairments include bacteria, copper, lead, eutrophic conditions/nutrients, high/low pH, toxicity, and high chemical oxygen demand. Therefore, the overall cumulative impact associated with past projects is significant.

Proposed Project pollutants of concern would be associated with the construction phase (e.g., sediment, fuels, litter), private vehicle use (e.g., any leakage of grease/oils), landscaping/grounds work (e.g., improper/excessive use of pesticides, herbicides, and/or fertilizers), and/or trash (e.g., due to improper waste disposal). Trash and/or fertilizers, however, could indirectly contribute to a bacteria, pathogen or dissolved oxygen problem by contributing to excessive algae growth and/or eutrophication. The release of such pollutants, however, would be highly localized,

periodic in nature, and minor in magnitude; especially when compared to the total volume of stormwater discharges that would be entering the Plan area receiving waters from the entire watershed (i.e., San Antonio and Chino Creeks). Furthermore, such impacts would be avoided or substantially minimized through compliance with implementation of mitigation measures **MM-HYD-1** and **MM-HYD-2**, as well as terms and conditions of the regional NPDES permits, the Montclair Municipal Code Chapter 9.24, and the ordinance codes of other authorities in the region—which all require implementation of a SWPPP and a WQMP for development and redevelopment projects.

Similarly, reasonably foreseeable future projects located within the same watershed would be subject to the terms and conditions of the regional NPDES permits, the Montclair Municipal Code Chapter 9.24, and the ordinance codes of other authorities in the region—which all require implementation of a SWPPP and a WQMP for development and redevelopment projects. For these reasons, the Proposed Project's contribution to impacts on hydrology and water quality, in combination with reasonably foreseeable future projects, would be not be cumulatively considerable. Cumulative impacts are considered **less than significant with mitigation incorporated**.

3.7.6 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. The following mitigation measures shall be incorporated into the Proposed Project.

MM-HYD-1 Prior to issuance of a grading permit by the City of Montclair Public Works Department for individual projects within the Specific Plan area, a Storm Water Pollution Prevention Plan (SWPPP) shall be developed. The SWPPP shall be implemented during Project grading, excavations, and construction. The following list includes, but is not limited to, examples of construction water quality Best Management Practices (BMPs) that are standard for most construction sites subject to the Construction General Permit:

a) Silt fences and/or fiber rolls installed along limits of work and/or the Project construction site;

b) Stockpile containment and exposed soil stabilization structures (e.g., visqueen plastic sheeting, fiber rolls, gravel bags and/or hydroseed);

c) Runoff control devices (e.g., fiber rolls, gravel bag barriers/chevrons, etc.) used during construction phases conducted during the rainy season;

d) Wind erosion (dust) controls;

e) Tracking controls at the site entrance, including regular street sweeping and tire washes for equipment;

f) Prevention of fluid leaks (inspections and drip pans) from construction vehicles;

g) Materials pollution management;

h) Proper waste/trash management; and

i) Regular inspections and maintenance of BMPs.

These BMPs shall be refined and/or added to as necessary by a Construction General Permit SWPPP Practitioner (QSP) and/or Qualified SWPPP Developer (QSD), as certified by the California Stormwater Quality Association, to meet the performance standards in the Construction General Permit.

MM-HYD-2 Prior to issuance of a building permit by the City of Montclair Public Works Department for individual projects within the Plan area, the Applicant shall include operational non-structural BMPs to address water quality impacts as part of the proposed Business Plan. These BMPs shall be annually inspected by the City NPDES Coordinator for compliance with the regional NPDES permit and Montclair Storm Water Ordinance. These operational BMPs shall include, but not be limited to:

a) Regular sweeping of all open and planter areas, at a minimum, on a weekly basis in order to prevent dispersal of pollutants that may collect on those surfaces;

b) Regular pruning of the trees and shrubs in the planter areas to avoid formation of dried leaves and trigs, which can clog surface inlets and drains;

c) Use of trash and recycling containers that, if located outside, are fully enclosed and watertight in order to prevent contact of stormwater with wastewater, which can be a potential source of bacteria and other pollutants in runoff;

d) Provide educational training materials for the property owners, such that the owners are aware of the structural BMPs installed in the Plan area, and their maintenance requirements;

e) Provide materials to brief property owners about chemical management and proper methods of handling and disposing of wastes; and

f) Minimization of pesticide and fertilizer use, to the maximum extent practicable, with on-site landscaping.

3.7.7 Significance After Mitigation

With the implementation of mitigation measures **MM-HYD-1** and **MM-HYD-2**, potential impacts related to hydrology and water quality would be **less than significant**.

3.7.8 References

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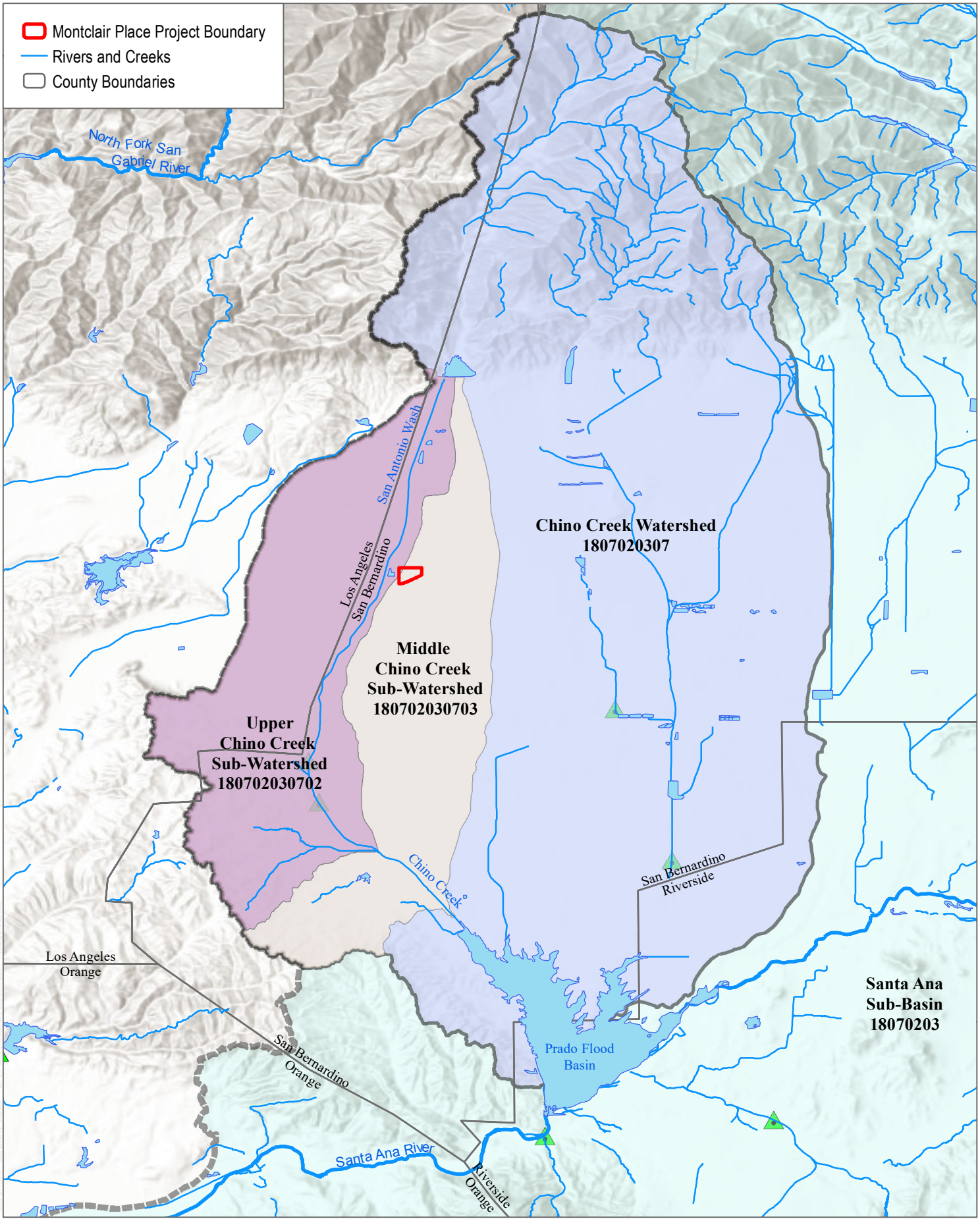

SOURCE: USGS 2018

DUDEK

0 8,000 16,000 Feet

FIGURE 3.7-1

USGS Watersheds

Montclair Place District Specific Plan EIR

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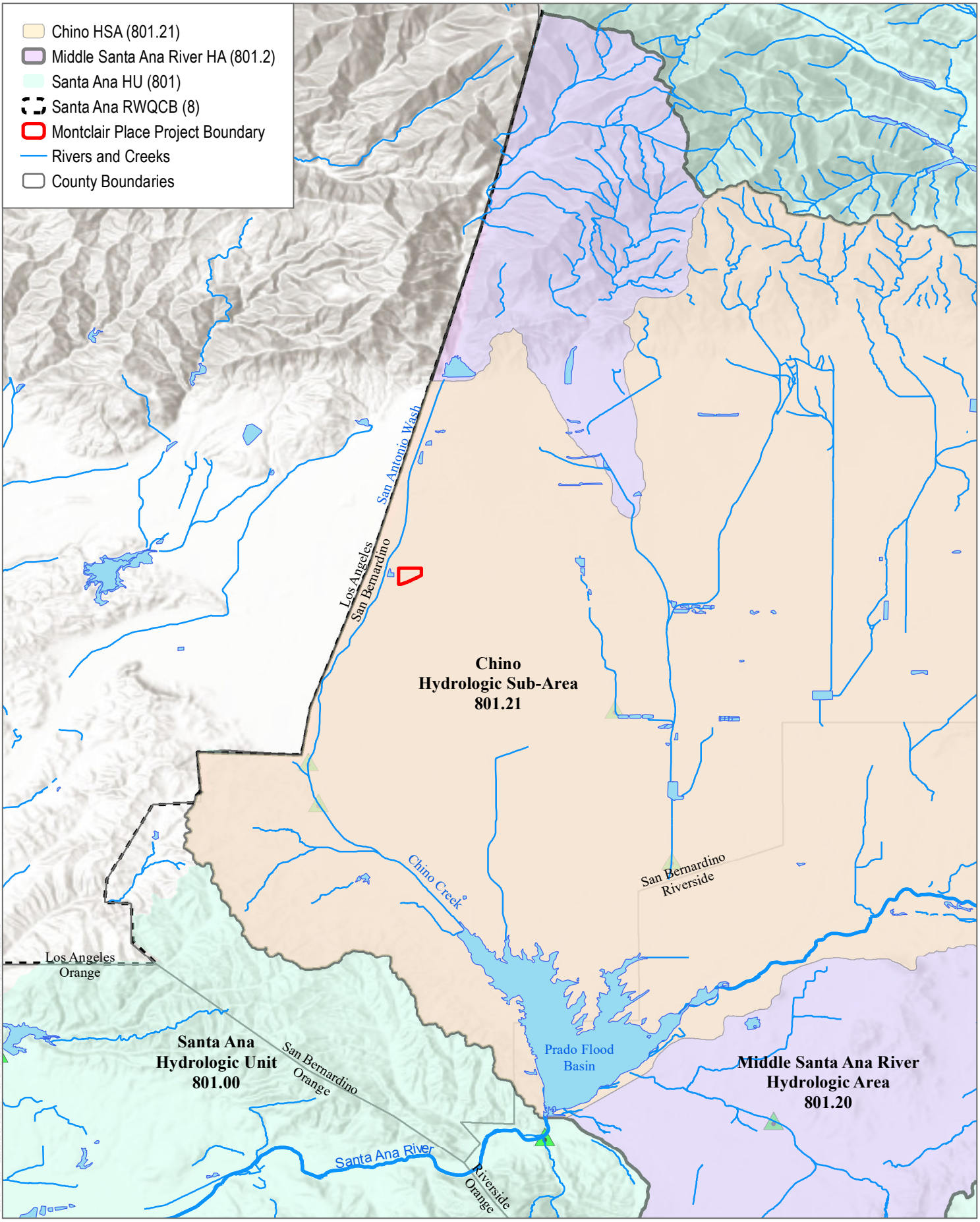

SOURCE: Santa Ana RWQCB 2019

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FIGURE 3.7-2

RWQCB Hydrologic Areas

Montclair Place District Specific Plan EIR

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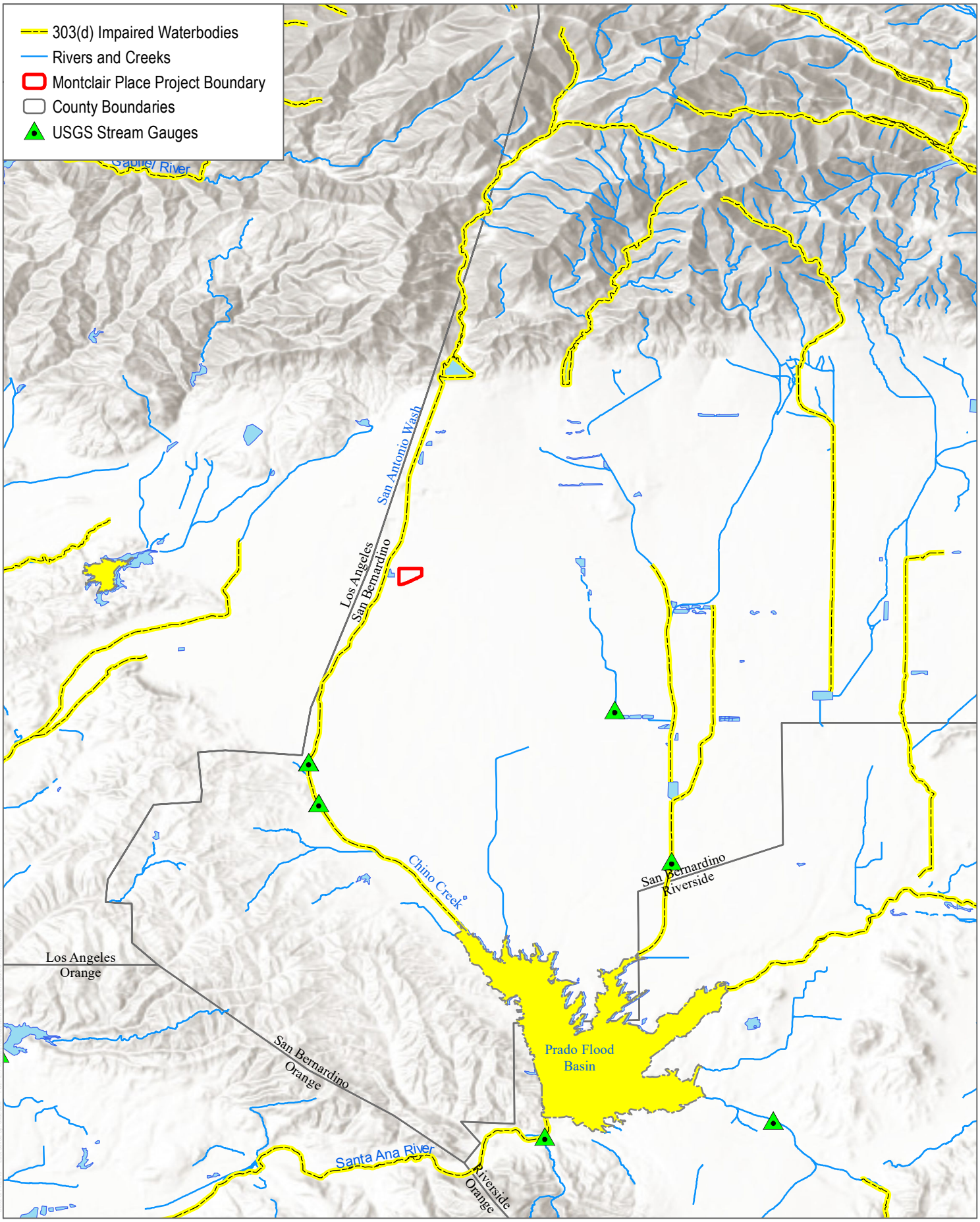

SOURCE: SWRCB 2018

DUDEK

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FIGURE 3.7-3

303(d) Impaired Waterbodies

Montclair Place District Specific Plan EIR

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3.8 LAND USE AND PLANNING

This section is related to potential conflicts with an applicable land use plan, policy, or regulation resulting from implementation of the Montclair Place District Specific Plan Project (MPDSP or Proposed Project). Analysis within this section describes the existing land use and planning setting of the Plan area, identifies associated regulatory requirements, and evaluates potential impacts of conflict with any land use plan, policy, or regulation related to implementation of the Proposed Project. In addition to other documents, the following references were used in the preparation of this section of the EIR:

- SCAG 2016-2040 RTP/SCS (SCAG 2016)
- City of Montclair General Plan (City of Montclair 1999)
- City of Montclair Housing Element (City of Montclair 2014)
- City of Montclair Municipal Code (Title 11) (City of Montclair 2019)
- North Montclair Specific Plan (City of Montclair 1998)
- North Montclair Downtown Specific Plan (City of Montclair 2017)

3.8.1 Existing Conditions

3.8.1.1 Land Use Setting

On-Site Land Uses

The Plan area and surrounding area is characterized as an urban, developed commercial and residential area. The approximately 104.35-acre Plan area is currently developed with primarily commercial land uses. The existing, freestanding mix of commercial uses in the southern portion of the Plan area include the Montclair Entertainment Plaza, various restaurant uses, an LA Fitness Center, an Ashely Furniture store, and an optometrist's office. Montclair Place (formerly known as Montclair Plaza), a major regional mall, largely dominates the remaining planning area. There is a Unitarian Universalist Church and small commercial strip center in the northwest portion of the Plan area. Existing buildings within the Plan area range in height between approximately 30 feet and 75 feet (refer to Figure 2-4, Plan Area and Surrounding Land Uses in Chapter 2, Project Description).

Surrounding Land Uses

The Plan area is surrounded by mostly developed properties on all sides. Figure 2-4, Plan Area and Surrounding Land Uses (see Chapter 2, Project Description), depicts the land uses and businesses that surround the Plan area. The current pattern of commercial development in the

North Montclair Downtown Specific Plan (NMDSP) area (located just north of the MPDSP area) consists predominately of standalone large structures surrounded wholly or in part by paved surface parking. Typical residential development in the surrounding area ranges from one to three stories in height. Most of the surrounding commercial structures are one story in height.

To the east, across Central Avenue, are a Chase Bank, McDonald's restaurant, and the Montclair East Shopping Center, which includes retail stores such as Petco, Harbor Freight Tools, Chipotle Mexican Grill, and Ross Dress for Less. To the north across Moreno Street, land uses include retail (Target and Gold's Gym), single-family residential, and multi-family residential. To the west, across Monte Vista Avenue, land uses include single-family and multi-family residential, assisted living, a dialysis center, an adult development center, and Moreno Elementary School. To the south, the Plan area is bordered by the Interstate 10 (I-10) freeway and its right-of-way.

General Plan and Zoning

The City's General Plan (General Plan) was adopted in 1999, though the General Plan Housing Element has been subsequently updated. The General Plan is currently being updated. The Plan area is located within the Regional Commercial land use designation and is within Sub-area 1 of the General Plan study area (Figure 3.8-1, General Plan Land Use). The total area classified as Regional Commercial within the City, including the Mall property, totals approximately 125 acres. The General Plan characterizes the Montclair Plaza (Place) Mall as a major regional shopping center that provides for the sale of general merchandise, apparel, furniture, and home furnishings, along with support services. The Montclair Plaza (Place) Mall and surrounding commercial areas are intended to draw shoppers from a relatively large regional market area. As a regional shopping center located in close proximity to a variety of urban areas, the mall attracts shoppers from Los Angeles, San Bernardino, Orange, and Riverside counties. The General Plan notes that the major expansion to the mall in 1985 and the subsequent addition of other promotional centers around the mall since that time have helped maintain the strength of the retail sector of the local economy (City of Montclair 1999).

The 1998 North Montclair Specific Plan (NMSP) is the guiding zoning document for the Plan area and surrounding areas south of Moreno Street. According to the NMSP, the Plan area is designated in the Montclair Zoning and Development Code (the Zoning Code) as General Commercial and is zoned C-3 (City of Montclair 1998) (Figure 3.8-2, Zoning). The C-3 General Commercial Zone is the designation intended for general business uses in the City of Montclair. The uses that would be located within the Plan area (such as retail stores, restaurants/cafes, and theaters) are all permitted or conditionally permitted uses within the C-3 zone. These uses would be consistent with those allowed in the C-3 zone and would also be consistent with the Regional Commercial General Plan designation. However, the proposed residential uses under the Plan would not be consistent with the current designation. Thus, a General Plan Amendment would be

required to change the land use designation of the Plan area from General Commercial to Planned Development. In addition, a Specific Plan Amendment would be required to remove the Plan area from the underlying NMSP boundary.

Montclair Place District Specific Plan

The MPDSP would guide land uses for the approximately 104.35-acre Plan area and allow development within this Plan area as defined in the MPDSP. The key project components of the MPDSP include the following:

New Form-Based Zoning

The MPDSP creates a policy framework for transforming the Plan area into a pedestrian-oriented, multi-modal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line railway. Figure 2-5, Illustrative Build-Out Scenario, shows the Plan area upon buildout of the Plan. (The buildout scenario shown in Figure 2-5 assumes that the Mall would be completely replaced by mixed-use development. It is currently unknown whether the entire Mall would ultimately be removed or whether portions of the Mall may remain upon buildout. However, full buildout of the Plan is analyzed in this EIR as a worst-case scenario.)

Key components of the MPDSP include:

- **The Plan.** This chapter describes the vision for the overall plan, as well as for each of the Plan area's subareas. The document is illustrated with plans, perspective renderings, and precedent images.
- **Infrastructure.** This chapter describes recommended transportation improvements to the Plan area and its vicinity. It includes a street network plan and associated cross sections; a bicycle and pedestrian connectivity plan to nearby transit (the Montclair Transcenter and adjacent bus lines), nearby schools, and parks; the approach for parking, including on-street parking, park-once structures, and parking management strategies; and, descriptions of various multi-modal components and strategies, including bicycle and scooter amenities and parking and transportation network company curb space for Uber and Lyft. The MPDSP introduces street standards derived from the NMDSP. This chapter also describes the proposed distribution, location, and extent of the utilities infrastructure (water, sewer, storm water, power, natural gas, telephone, and cable) and other facilities to support the proposed development within the Plan area.
- **Open Space and Landscape.** This chapter describes the various components of the Plan area's public realm, including streetscape improvements and proposed open spaces. It

includes standards for streetscapes, such as a street tree master plan and conceptual layouts for various streets within the Plan area.

- **Development Code.** This chapter is a form-based code that enables a varied mix of uses, including residential, office, service, retail, civic, and institutional, uses, and provides development standards (building height, setbacks, frontage requirements, on-site open space, parking placement and standards) and building design standards (massing, articulation, materials, openings, landscape, screening, signage, etc.). This chapter also provides subdivision and block size requirements and standards for streetscape, landscape, hardscape, and public art within public streets and publicly accessible parks, plazas, and greens. The Development Code would replace the underlying zoning with four new zones. These zones are depicted in Figure 2-6, Proposed Zones, and are described below:
    - **District Corridor (COR).** The District Corridor zone would apply to parcels along the western portion of the Plan area adjacent to Monte Vista Avenue. Mixed-use buildings accommodating a mix of residential and commercial uses would be allowed to extend up to 55 feet in height. Buildings with retail ground floor uses would be located at or near the sidewalk, while buildings with residential ground floors would be set back behind small front yards. To encourage pedestrian activity, all buildings would be accessed directly from the sidewalk through appropriate frontage types or through lobbies. New buildings within the District Corridor zone would be required to have a minimum floor area ratio of 1.0.
    - **District Place (PLA).** The District Place zone would apply to the southern portion of the Plan area. Buildings would be allowed to extend up to 55 feet in height and would accommodate office, and other commercial uses. While residential uses would be allowed in this district, they would be generally discouraged due freeway proximity. Buildings with retail ground floor uses would be located at or near the sidewalk, while buildings with residential ground floors would be set back behind small front yards. To encourage pedestrian activity, all buildings would be accessed directly from the sidewalk through appropriate frontage types or through lobbies. New buildings within the District Place zone would be required to have a minimum floor area ratio of 1.0.
    - **District Commons (COM).** The District Commons zone would allow for urban, mixed-use buildings extending up to 90 feet in height and situated at or near the sidewalk. Primary building access would be from the sidewalk, and parking would be behind buildings or subterranean. Buildings with retail ground floors would be located at the back of sidewalk while buildings with residential ground floors would be set back with small front yards. New buildings within the District Commons zone would be required to have a minimum floor area ratio of 1.3.

- **District Center (CEN).** The District Center zone would allow for urban, mixed-use buildings ranging between 55 feet and 240 feet in height. This zone would be located in the area primarily occupied by the existing Mall building. Buildings would be located at the back of sidewalk and would be accessed from the sidewalk. Parking would be behind buildings or subterranean. New buildings within the District Center zone would be required to have a minimum floor area ratio of 2.0.

- **Implementation.** This chapter discusses the key economic goals, policies, and actions for implementation of the MPDSP, the subdivision of property, any necessary on-site street, park, and infrastructure improvements, and a description of strategies for funding these improvements. It also discusses strategies for funding public art and provides a framework for transferring development rights from one zone to another in response to market conditions.

3.8.2 Regulatory Setting

Federal

There are no federal plans, policies, or ordinances applicable to the land use considerations of the Proposed Project.

State

California Government Code Section 65300

California Government Code Section 65300 et seq. mandates that every city and county must prepare, adopt and implement a general plan to guide and shape its physical as well as social and economic development, environmental resources, and to address various growth-related statutes of the State over a long-term (typically 20-year) timeframe. This law discusses the substantive and procedural requirements of general plans and places general plans atop the hierarchy of the tools of local government that regulate land use. This law also provides for changes in community development by allowing amendments to be made to a general plan.

California Government Code Section 65450

Pursuant to California Government Code Section 65450 et seq. authorizes cities to prepare, adopt, and administer Specific Plans for portions of their jurisdictions, as a means of implementing the City's General Plan. All Specific Plans must comply with Sections 65450–65457 of the Government Code. A Specific Plan must include text and a diagram or diagrams, which specify all of the following in detail:

- The distribution, location, and extent of the uses of land, including open space within the area covered by the plan.

- The proposed distribution, location, extent, and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy and other essential facilities proposed to be located within the land area covered by the plan and needed to support the land uses described in the plan.
- Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable.
- A program of implementation measures including regulations, programs, public works projects and financing measures necessary to carry out the above items.
- A discussion of the relationship of the Specific Plan to the General Plan.

Regional

Regional Transportation Plan/Sustainable Communities Strategy

Southern California Association of Governments (SCAG) is the designated Metropolitan Planning Organization (MPO) for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for transportation, growth management, hazardous waste management, and air quality. The City of Montclair is one of the many jurisdictions that fall under SCAG.

The 2016–2040 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/ SCS) was adopted in April 2016, and presents the land use and transportation vision for the region through the year 2040, providing a long-term investment framework for addressing the region's challenges. The RTP/SCS includes goals to increase mobility and enhance sustainability for the region's residents and visitors. The RTP/SCS encompasses three principles to improve the region's future: mobility, economy, and sustainability. The RTP/SCS provides a regional investment framework to address the region's transportation and related challenges, while enhancing the existing transportation system and integrating land use into transportation planning.

The 2020–2045 RTP/ SCS (also known as the Connect SoCal Plan) was made available in March 2020, and presents the land use and transportation vision for the region through the year 2045, providing a long-term investment framework for addressing the region's challenges. The RTP/SCS explicitly lays out goals related to housing, transportation technologies, equity and resilience in order to adequately reflect the increasing importance of these topics in the region, and where possible the goals have been developed to link to potential performance measures and targets. The RTP/SCS encompasses various guiding principles to improve the region's future, including mobility, economy, and sustainability. Federal policy also requires that SCAG sets performance measures and targets in Connect SoCal. Under the RTP/SCS, SCAG coordinated closely with the State of California Department of Transportation (Caltrans) in the establishment of specific performance targets for the state and for our region in the various transportation

performance areas established under the 'Moving Ahead for Progress in the 21st Century' (MAP-21)/ federal transportation authorization package (FAST) Act. These targets provide quantifiable objectives to achieve each measure during the performance period.

The RTP/SCS development process also involved working closely with local governments throughout the region to collect and compile data on land use and growth trends. The core vision of the RTP/SCS is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

The Proposed Final Connect SoCal Plan has not yet been adopted by SCAG's Regional Council; however, in May 2020 the Regional Council approved Connect SoCal for the limited purpose of submitting the plan to the Federal Highway Administration and Federal Transit Administration for review prior to the June 1, 2020 deadline, as required by the Clean Air Act.

Local

City of Montclair General Plan

The City of Montclair General Plan is intended to provide direction for future development of the City. It represents a formal expression of community goals and desires, provides guidelines for decision making about the City's development, and fulfills the requirements of California Government Code Section 65302 requiring local preparation and adoption of General Plans. The General Plan should be viewed as a dynamic guideline to be refined as the physical environment of the City's changes. The General Plan includes the following mandated and optional elements: Land Use Element, Circulation Element, Public Safety Element, Community Design Element, Noise Element, Public Utilities and Facilities Element, Air Quality Element, Conservation Element, and Open Space Element.

Housing Element

The Housing Element is one of the seven required General Plan elements mandated by State law. State law requires that each jurisdiction's Housing Element consist of "identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled program actions for the preservation, improvement and development of housing." The Housing Element must analyze and plan for housing for all segments of the community.

This Housing Element covers the Planning Period from October 2013 to October 2021, consistent with the State-mandated update required for all jurisdictions within the SCAG region. The Housing Element of the City's General Plan for the 2014-2021 cycle was adopted by the City Council in February 2014.

City of Montclair Zoning Ordinance

The Zoning Ordinance, Title 11 of the Montclair Municipal Code, includes regulations concerning where and under what conditions various land uses may occur in the City. It also establishes zone-specific height limits, setback requirements, parking ratios, and other development standards, for residential, commercial, industrial, and all other types of sites. The Zoning Ordinance is a primary tool for implementing the City's General Plan. The purpose of the Zoning Ordinance is to encourage, classify, designate, regulate and restrict the highest and best locations and uses of buildings and structures, for residential, commercial, and industrial or other purposes.

1998 North Montclair Specific Plan

In 1998, the City adopted the NMSP in order to provide more detailed planning for the part of the City adjacent to the I-10 freeway. The majority the NMSP plan area is located north of the freeway with a smaller portion on the south of the freeway where the Costco Warehouse and three auto dealerships are developed. The NMSP addressed issues associated with economic vitality, design, redevelopment, compatibility, transportation, and pedestrian access within its approximately 640-acre planning area. Although the NMSP provided new design concepts for the area, including pedestrian-oriented design, the City had mixed success implementing the Plan. The NMSP sets forth applicable development criteria and standards for the Plan area, including a maximum building height of 75 feet. The Plan area is also subject to the provisions of the Zoning Code that are not replaced or modified by the NMSP (City of Montclair 1998).

North Montclair Downtown Specific Plan

The North Montclair Downtown Specific Plan (NMDSP) is an independent specific plan carved out of the original NMSP adopted in 1998 (described above). The areas north of Moreno Street (across from the Plan area) are within the NMDSP area. This plan was adopted in 2006 and sets forth transit-oriented development land use regulations for the areas near the Montclair Transcenter, which is currently a stop on the Metrolink San Bernardino Line and is a planned future stop for the Metro Gold Line light rail line. The Plan area is approximately 0.5 mile south of the existing railroad tracks and is not within the NMDSP area (City of Montclair 2017). The NMDSP was amended in 2017 to expand the boundaries of the North Montclair Specific Plan area and introduce certain land use concepts and clarify certain standards.

3.8.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criteria based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.). It was concluded in the Initial Study that there was a

less than significant impact for the following significance criterion. Therefore, the following significance criterion is not included as part of this EIR:

A. Would the project physically divide an established community?

The following significance criterion, included for analysis in this EIR, is based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.), and will be used to determine the significance of potential land use and planning impacts. Impacts to land use and planning would be significant if the Proposed Project would:

B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

3.8.4 Impacts Analysis

B. Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. To evaluate the Proposed Project's impacts related to land use and planning, this analysis examines the Proposed Project's consistency with both regional and local plans, policies, and regulations that regulate uses on the Plan area. These plans are as follows:

- SCAG 2020-2045 RTP/SCS
- City of Montclair General Plan
- City of Montclair Housing Element
- City of Montclair Municipal Code

SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

Consistency with SCAG's 2020-2045 RTP/SCS Goals, below, demonstrates that the Proposed Project would not conflict with the applicable goals in the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Table 3.8-1 demonstrates how the Proposed Project promotes consistency with the guiding principles and policies of the RTP/SCS.

Table 3.8-1
Consistency with SCAG 2020-2045 RTP/SCS Goals

RTP/SCS Goal	Proposed Project Applicable Component(s)	Consistency Finding
Goal 1 Encourage regional economic development and global competitiveness.	The primary goal of the MPDSP is to create a pedestrian-oriented, multi-modal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line that would extend light rail line service to the City of Montclair. As such, the Proposed Project would improve regional economic development through its proximity to the anticipated Foothill Gold Line extension. Additionally, an objective of the Proposed Project is to provide zoning that is flexible and responsive to changing market demands. Therefore, the MPDSP is consistent with this goal.	Consistent.
Goal 2 Improve mobility, accessibility, and travel safety for people and goods	The Proposed Project's proximity to the anticipated extension of the Foothill Gold Line would increase transit accessibility of jobs and services provided within the Plan area. Further, the MPDSP would provide various multi-modal components and strategies, including bicycle and scooter amenities and parking and transportation network company curb space for Uber and Lyft. Therefore, the MPDSP is consistent with this goal.	Consistent.
Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	The MPDSP contains a combination of design guidelines to provide for the safety and security of the Plan area, both in the public realm and on private property. The MPDSP contains street and infrastructure guidelines to improve pedestrian crossing safety, reduce automobile speeds, and facilitate navigation. The clear wayfinding systems and outdoor lighting requirements also enhance the Plan area's overall sense of safety and security. Therefore, the MPDSP is consistent with this goal.	Consistent.
Goal 4 Increase person and goods movement and travel choices within the transportation system.	The MPDSP contains planned multi-modal street improvements to increase pedestrian, bicycle, and mass-transit activity and connectivity, thereby increasing movement of goods and people. Less reliance on automobiles and support for multi-modal transportation will help preserve and ensure a sustainable regional transportation system. Additionally, the Transportation Demand Management (TDM) measures would be incorporated to maximize the utility of multi-modal investments. Therefore, the MPDSP is consistent with this goal.	Consistent.
Goal 5 Reduce greenhouse gas emissions and improve air quality.	The Proposed Project would support the use of the anticipated extension of the Foothill Gold Line that would extend light rail line service to the City of Montclair. Other TDMs proposed include reduced price passes for transit agencies. As further described in Section 3.13, Transportation, the Proposed Project's vehicle miles traveled (VMT) per service population (8.37) would be less than 15% of the City's existing/base year VMT (15% of 19.27 = 16.38), Furthermore, the Proposed Project would be most directly served by Metrolink's San Bernardino Line which runs west to east from Los Angeles County to San Bernardino County with its terminus at Los Angeles Union Station and San Bernardino – Downtown Station. As such the Project would reduce greenhouse gas emissions through proximity of	Consistent.

Table 3.8-1
Consistency with SCAG 2020-2045 RTP/SCS Goals

RTP/SCS Goal	Proposed Project Applicable Component(s)	Consistency Finding
	residential land uses and employment opportunities near transit. Further, the Project's impacts related to VMT would be less than significant. Therefore, the MPDSP is consistent with this goal.	
Goal 6 Support healthy and equitable communities.	The intent of the MPDSP is to create a network of pedestrian-friendly blocks and streets that promote walking and bicycling. In addition, the MPDSP allows land use designations that creates a mix of land uses that are within walking distance of one another, and streets that are attractive to pedestrians. Thus, the Proposed Project would promote healthy communities. One of the goals of the Open Space and Landscape chapter of the MPDSP is to create public realms through planted shaded trees, medians that accommodate multiple uses, and open space in the surrounding neighborhoods. Further, the Proposed Project would seek to provide additional transit opportunities to the City to support an equitable community. Therefore, the MPDSP is consistent with this goal.	Consistent.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network	The Proposed Project would support multi-modal transit within the Plan area, such as being located near the Montclair Transcenter and anticipated extension of the Foothill Gold Line railway. Therefore, the MPDSP is consistent with this goal.	Consistent.
Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel	The Proposed Project would provide access to multimodal transit options within the Plan area. As such, the Proposed Project would be consistent with this goal.	Consistent.
Goal 9 Encourage development of diverse housing types in areas that are supported by multiple transportation options.	The Proposed Project would redevelop areas near the anticipated extension of the Foothill Gold Line, and thus, would contribute to a sustainable land use pattern. To further facilitate transit and active transportation, the land use designations of the MPDSP are designed to mix employment and residential uses with supporting amenities so that employees and residents do not need to use a car to access basic needs throughout the day. As such, the MPDSP is consistent with this goal.	Consistent.
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	The Plan area is located in a highly urbanized area away from existing agricultural lands and restoration habitat. Given the Proposed Project would redevelop an existing, underutilized site, the Proposed Project would not encroach upon agricultural lands and natural habitat. Therefore, the MPDSP is consistent with this goal.	Consistent.

City of Montclair General Plan

The MPDSP land uses designations are consistent with the 1999 City of Montclair General Plan. Table 3.7-2 provides a consistency analysis for the proposed MPDSP and the City's applicable General Plan elements. General Plan elements evaluated for

consistency include the Land Use Element, Circulation Element, Community Design Element, and Open Space Element. All other General Plan Elements (i.e., Public Facilities, Noise Element, Safety Element, Air Quality, and Conservation Element) do not have an applicable land use component and are, therefore, not analyzed for consistency in this chapter. See Section 3.2, Air Quality; Section 3.6, Hazards and Hazardous Materials; Section 3.9, Noise; and Section 3.11, Public Services, for a discussion on the Air Quality Element, Safety Element, Noise Element, and Public Facilities Element, respectively.

Table 3.8-2
Consistency with City of Montclair General Plan

General Plan Goal or Objective	Proposed Project Applicable Component(s)	Consistency Finding
Land Use Element		
Goal LU-1.0.0. To establish an effective balance of land use, circulation, transportation, and community design and housing patterns that will promote the optimum degree of health, safety, well-being, and beauty for all areas of the community while maintaining a sound economic base.	The MPDSP is designed to implement the goals and policies Montclair General Plan. The MPDSP proposes to create an urban design strategy that transforms the existing Plan area into pedestrian-oriented, multi-modal, mixed-use downtown districts within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line light rail to Montclair. The MPDSP would replace the existing C-3 zoning with a new form-based development code that is flexible and responsive to changing market demands. The buildout of the MPDSP would result in approximately 6,321 residential dwelling units and up to 512,600 square feet of additional commercial area. The mix of land uses within the Plan area, include single- and multi-family residential, and commercial uses, which would reduce automobile trips by creating a pedestrian-oriented, multi-modal, park-once environment. The building design utilized to guide this development would include a variety of building types, concentration of main street retail facing streets, and diverse housing choices. Additionally, the walkable, interconnected streets are intended to provide an inviting public realm with a transit-oriented mix of uses, and also enable a variety of alternative path movements. Limited lane widths, tight curb radii, and narrow street crossings provide a safe environment for pedestrians, cyclists, and automobiles. Energy-efficient, pedestrian-oriented lighting would be provided that generates an inviting and safe environment for pedestrians, cyclists, and commerce.	Consistent.
Objective LU-1.1.0. To encourage compatible land uses within the City.	Development of new land uses proposed within the Plan area are guided by the MPDSP Development Code. The Development Code provides a regulating plan, land use standards, urban standards, and architectural standards to ensure compatibility within the Plan area. As described in Section 3.8.1, the surrounding land uses consist of residential	Consistent.

Table 3.8-2
Consistency with City of Montclair General Plan

General Plan Goal or Objective	Proposed Project Applicable Component(s)	Consistency Finding
	and commercial uses. As such, the residential and commercial land uses proposed within the Plan area are consistent with uses within the City and in the surrounding area.	
Objective LU-1.2.0. To promote the mitigation of existing land use conflicts.	The MPDSP would maintain consistency with existing and surrounding land uses. Additionally, the MPDSP proposes Planning Compatibility and Architectural Review as part of the Development Code in order to maintain consistency within the Plan area. As such, the Proposed Project would be consistent with this objective to promote the mitigation of existing land use conflicts through Development Code compliance.	Consistent.
Objective LU-1.3.0. To promote the rational utilization of underdeveloped and undeveloped parcels.	The existing Plan area is currently developed with the Montclair Place Mall, a strip mall, and the Unitarian Universalist Congregation Church. With the rise of online shopping and changing consumer preferences, the popularity of shopping malls have been in decline. In addition, consumers are looking for experiences that go beyond traditional shopping. These two trends are having a direct impact on the economic performance and place character of many malls across the United States, hastening their slow but certain transformation into mixed-use Town Centers. Since Montclair is a city without a Downtown, introducing the genuine urban environment that a Town Center offers to the MPDSP Plan area, will attract consumers, residents, and employees to retail offerings and entertainment experiences that can never be satisfied online. In addition, the creation of a successful, mixed-use Downtown demands a significant residential population. This population is not only necessary to animate streets with pedestrians, but to also provide a market for local-serving retail. In the North Montclair area there are currently relatively few residences. The creation of a resident population is critical to creating such a successful new Downtown. Thus, promoting the rational utilization of parcels within the City.	Consistent.
Objective LU-1.4.0. To continually improve as a place for living by ensuring that those portions of the City which are best suited for residential use will be developed and maintained as healthful, safe, pleasant, attractive neighborhoods which are served by adequate open space and appropriate community facilities for all citizens.	The Plan area, located adjacent to the I-10 freeway and less than half a mile from the Montclair Transcenter, is very accessible by both auto and transit. Due to the location, and regional accessibility, the Plan area is well suited for residential use. The MPDSP proposes to provide residences with a variety of transit options. Additionally, the walkable, interconnected streets are intended to provide an inviting public realm with a transit-oriented mix of uses and enable a variety of alternative path movements. Limited lane widths, tight curb radii, and narrow street crossings provide a safe environment for pedestrians, cyclists, and automobiles.. Energy-efficient, pedestrian-oriented lighting that generates an inviting and safe environment for pedestrians, cyclists, and commerce.	Consistent.

Table 3.8-2
Consistency with City of Montclair General Plan

General Plan Goal or Objective	Proposed Project Applicable Component(s)	Consistency Finding
Objective LU-1.5.0. To ensure that commercial areas within the City are conveniently located, efficient, attractive, safe for pedestrian and vehicular circulation and concentrated into districts and centers in order to better serve a larger portion of the City's needs, while also continuing to provide regional commercial services as the dominant proportion of the regional market in recognition of the economic contribution and image identification associated with regional centers.	Since Montclair is a city without a Downtown, introducing the genuine urban environment that a Town Center offers to the MPDSP Plan area, will attract consumers, residents, and employees to retail offerings and entertainment experiences that can never be satisfied online. In addition, the creation of a successful, mixed-use Downtown demands a significant residential population. This population is not only necessary to animate streets with pedestrians, but to also provide a market for local-serving retail. In the North Montclair area there are currently relatively few residences. The creation of a resident population is critical to creating such a successful new Downtown. The MPDSP would provide revitalized commercial areas within this new Downtown. The MPDSP would create four districts, including the District Corridor, District Place, District Commons, and District Center. Each of these districts within the Plan area creates transit-oriented mix of uses by incorporating a variety of building and project types. Further, the Plan area's location and proximity to the I-10 freeway and the Montclair Transcenter provides for regional connectivity between people and goods.	Consistent.
Objective LU-1.6.0. To continually improve as a place for industrial development by encouraging the development of modern, attractive plants and industrial parks which will not produce detrimental effects on surrounding properties while providing employment opportunities for the residents.	The MPDSP does not propose industrial development; however, given the Plan area is not currently designated or zoned for industrial, the Proposed Project would not conflict with that goal.	Consistent.
Objective LU-1.7.0. To coordinate all aspects of City development in accordance with the General Plan, including land use (commercial, industrial, housing), population densities, public facilities, circulation, transportation, and utilities, based on public need.	The MPDSP is designed to coordinate development with the City's General Plan, the 1998 North Montclair Specific Plan, and the North Montclair Downtown Specific Plan (NPDSP 2017). The Proposed Project would implement a Development Code for the Plan area as part of the MPDSP. Thus, approval of the Proposed Project, which would result in a zone change, would result in General Plan consistency.	Consistent.
Objective LU-1.8.0. To play a significant role in planning the long-range development of the region and to seek a maximum coordination of growth and development.	One of the objectives of the Proposed Project is to enable phased redevelopment of the existing Montclair Place Mall and the area south of the Mall including the Ashley Furniture site and the Montclair Entertainment Plaza area. The timeframe for build-out in the Plan area is anticipated to take up to 20 years. As such, the Proposed Project would assist the City in creating a long-range development for the Plan area. Additionally, the design guidelines promote the creation of a pedestrian-oriented, mixed-use downtown district with walking and biking distance from the Montclair Transcenter and anticipated extension of the Foothill Gold Line railway. The Plan area's proximity to transit and also the I-10 freeway, makes it regionally accessible.	Consistent.

Table 3.8-2
Consistency with City of Montclair General Plan

General Plan Goal or Objective	Proposed Project Applicable Component(s)	Consistency Finding
Objective LU-1.9.0. To attract a solid core of residents and occupations in an effort to provide community stability and enhance the general character of the City.	The Proposed Project includes design guidance for a variety of building types, including mixed-use commercial blocks, rowhouses, condominiums, and apartment buildings. Varying the size and massing of these buildings and carefully considering their placement, attracts a variety of residents, enhances pedestrian friendliness of the streets and open space, and ensures the new buildings are compatible with those in adjacent nearby neighborhoods. Thus, the Proposed Project seeks to attract residents to the City and provide a public realm, which would enhance the general character of the City. Additionally, the Proposed Project would result in a total of 512,000 additional square feet of commercial/office uses; therefore, the Proposed Project would attract occupations to the City,	Consistent.
Policy LU-1.1.1. Promote the joint use of parking areas and access for commercial properties to reduce pedestrian/vehicular conflicts due to the multiplicity of access points.	The design principles guiding the MPDSP includes creating a parking space to be dedicated for several tasks. The mixed-use nature of the Plan area lends itself to parking just once and completing multiple daily tasks on foot. This pattern reduces traffic, limits the amount of parking that needs to be built, and generates street-friendly retail uses. Therefore, the MPDSP would encourage a greater number of pedestrians to reduce pedestrian/vehicular conflicts.	Consistent.
Policy LU-1.1.2. Prepare and implement Specific Plans for large and unique areas of the community to promote the efficient utilization and consolidation of land.	The Proposed Project itself considers the implementation of the MPDSP, which would redevelop the existing Montclair Place Mall and strip commercial malls into a mixed-use, transit-oriented development. As such, the Proposed Project would implement a Specific Plan for a large area and promote efficient utilization of land.	Consistent.
<u>Underutilized Commercial Parcels</u> Policy LU-1.1.5. Promote the assemblage of commercial parcels found in strip commercial areas along Central, Holt, Moreno and Mission. Policy LU-1.1.6. Consolidate and require reciprocal parking and mutual access with adjoining parcels and parking areas. Policy LU-1.1.7. Promote the development of commercial centers rather than strip commercial areas.	The existing Plan area is currently developed with the Montclair Place Mall, a strip mall, and the Unitarian Universalist Congregation Church. With the rise of online shopping and changing consumer preferences, the popularity of shopping malls have been in decline. In addition, consumers are looking for experiences that go beyond traditional shopping. These two trends are having a direct impact on the economic performance and place character of many malls across the United States, hastening their slow but certain transformation into mixed-use Town Centers. Since Montclair is a city without a Downtown, introducing the genuine urban environment that a Town Center offers to the MPDSP Plan area, will attract consumers, residents, and employees to retail offerings and entertainment experiences that can never be satisfied online. In addition, the creation of a successful, mixed-use Downtown demands a significant residential population. This population is not only necessary to animate streets with pedestrians, but to also provide a market for local-serving retail. In the North Montclair area there are currently relatively few residences. The creation of	Consistent.

Table 3.8-2
Consistency with City of Montclair General Plan

General Plan Goal or Objective	Proposed Project Applicable Component(s)	Consistency Finding
	a resident population is critical to creating such a successful new Downtown. Further, the Plan area's locating along Central Avenue creates accessibility with the rest of the City. Thus, the Proposed Project would promote redevelopment of the Plan area, as a regional commercial area. The design principles guiding the MPDSP includes creating a parking space to be dedicated for several tasks. The mixed-use nature of the Plan area lends itself to parking just once and completing multiple daily tasks on foot. This pattern reduces traffic and limits the amount of parking that needs to be built and generates street-friendly retail uses. Therefore, the MPDSP would consolidate parking areas.	
Central Avenue Policy LU-1.1.8. Promote the utilization and consolidation of smaller parcels, both commercial and residential uses, into larger, more usable properties.	The Proposed Project would promote the redevelopment of the existing Montclair Place Mall and the area south of the Mall including the Ashley Furniture site and the Montclair Entertainment Plaza area. Therefore, the Proposed Project would utilize the existing Montclair Place Mall and other smaller parcels.	Consistent.
Residential Land Uses Policy LU-1.1.13. Encourage the use of specific plans/community plans in problem areas due to difficulty in applying traditional zoning, while recognizing unique conflict of land uses. Policy LU-1.1.15. Provide each neighborhood with adequate and convenient public facilities and amenities including schools, parks and recreational facilities. Policy LU-1.1.17. Discourage through traffic as a means of assuring safe neighborhoods. Policy LU-1.1.20. Protect residential property values and privacy by preventing the intrusion and detrimental effects of noise, air pollution and vibration.	The MPDSP proposes to create an urban design strategy for a 104.35-acre Plan area, currently developed with the existing Montclair Place Mall and surrounding commercial uses. Due to recent trends leading to the decline in economic performance of malls, the Proposed Project seeks to implement an urban design strategy to allow for up to 6,321 residential dwelling units and up to approximately 512,600 square feet of additional commercial square footage for a total of approximately 2,058,900 square feet of commercial area. As such, the MPDSP would revitalize a largely underutilized commercial area within the City. Additionally, the creation of a neighborhood within close proximity to Montclair Transcenter and anticipated extension of the Foothill Gold Line railway would promote safe pedestrian-oriented features throughout the Plan area. The MPDSP proposes to reconfigure the Plan area with an interconnected street grid of blocks that provide multiple routes to get to destinations. These street types would absorb and distribute traffic, slow traffic down, and accommodate pedestrians, bicycles, and automobiles. Thus, neighborhoods would be walkable and pedestrian-friendly. Additionally, open space would be provided in the neighborhoods surrounding the neighborhood-retail stores. Open space within the streetscapes would encourage the beautification of neighborhoods within the Plan area. Further, the MPDSP introduces a street tree palette to include shade for pedestrians walking along the sidewalk.	Consistent.
Policy LU-1.1.14. Identify residential patterns	Implementation of the MPDSP would regulate land use in	Consistent.

Table 3.8-2
Consistency with City of Montclair General Plan

General Plan Goal or Objective	Proposed Project Applicable Component(s)	Consistency Finding
as a means of assisting in their planning and protection.	the Plan area through the Development Code, which provides subdivision and block size requirements and standards for streetscape, landscape, hardscape, and public art within public streets and publicly accessible parks, plazas, and greens. The Development Code would replace the underlying zoning with four new zones. Each of the four new zones would identify residential regulations to assist in their planning and protection. For instance, the District Place would generally discourage residential uses due to the freeway proximity.	
Policy LU-1.1.16. Protect residential property values and privacy by preventing the intrusion of incompatible land uses.	The Proposed Project would redevelop an underutilized property in close proximity to existing residential uses, thereby protecting residential property value. Additionally, the Proposed Project would include an internal street network to protect the privacy of proposed residences. Further implementation of the MPDSP would introduce commercial and residential uses in an area surrounded by commercial and residential land uses. Therefore, the Proposed Project would not result in incompatible land uses. The MPDSP would be consistent with this policy.	Consistent.
Policy LU-1.1.18. Encourage the improvement, maintenance and beautification of residential areas through a continuous program of street tree planting and maintenance, street cleaning, and other measures designed to preserve residential attractiveness and to encourage residents to improve and maintain their property.	The MPDSP would include standards for streetscapes, such as a street tree master plan and conceptual layouts for various streets within the Plan area. The Development Code of the MPDSP provides subdivision and block size requirements and standards for streetscape, landscape, hardscape, and public art within public streets and publicly accessible parks, plazas, and greens. Therefore, the MPDSP would preserve residential attractiveness through planned streetscapes and would encourage residents to maintain their property through the Development Code.	Consistent.
Policy LU-1.1.19. Provide adequate streets (rights-of-way and paved widths), sidewalks, utilities, water, sewers, storm drainage and street lighting systems in balance with the varying neighborhood population densities.	With regards to infrastructure, incremental upgrades, expansions, or replacements of utilities (water, sewer, storm systems) infrastructure may be required as lots are subdivided or consolidated and as new and higher density land uses are constructed. Based on the Project-specific Water Supply Assessment (Appendix H-1), the Proposed Project would exceed the projected supplies for the year 2040. However, additional groundwater production, increased imported water purchases, and potential increased use of recycled water would enable the Monte Vista Water District to serve the MPDSP. With regard to wastewater, upgrades to the existing system would occur, as necessary, to accommodate increased wastewater flows from the Plan area. Further, given the Plan area is within a developed portion of the City, it is anticipated utilities would continue to serve the Plan area. As such, adequate utilities would be provided for neighborhoods within the Plan area.	Consistent.
Policy LU-1.1.21. Plan and design future residential areas which will provide for a	The Proposed Project includes design guidance for a variety of building types, including mixed-use commercial blocks,	Consistent.

Table 3.8-2
Consistency with City of Montclair General Plan

General Plan Goal or Objective	Proposed Project Applicable Component(s)	Consistency Finding
variety of housing types.	rowhouses, condominiums, and apartment buildings. Varying the size and massing of these buildings and carefully considering their placement, attracts a variety of residents, enhances pedestrian friendliness of the streets and open space, and ensures the new buildings are compatible with those in adjacent nearby neighborhoods.	
Policy LU-1.1.22. Maximize the use of remaining residential parcels in the City in accordance with the Land Use Plan.	The Proposed Project would maximize the use of the Plan area through redevelopment of an underutilized parcel, totaling approximately 104.35 acres. The MPDSP would include 6,321 residential units in an urbanized area with surrounding residential development. Therefore, the MPDSP would be consistent with this policy,	Consistent.
Commercial Land Uses Policy LU-1.1.23. Provide adequate land in proper locations for the various types of commercial activities, in order to realize optimum benefits for the residents of the community.	The existing Plan area is currently developed with the Montclair Place Mall, a strip mall, and the Unitarian Universalist Congregation Church. With the rise of online shopping and changing consumer preferences, the popularity of shopping malls have been in decline. In addition, consumers are looking for experiences that go beyond traditional shopping. These two trends are having a direct impact on the economic performance and place character of many malls across the United States, hastening their slow but certain transformation into mixed-use Town Centers. Since Montclair is a city without a Downtown, introducing the genuine urban environment that a Town Center offers to the MPDSP Plan area, will attract consumers, residents, and employees to retail offerings and entertainment experiences that can never be satisfied online. In addition, the creation of a successful, mixed-use Downtown demands a significant residential population. This population is not only necessary to animate streets with pedestrians, but to also provide a market for local-serving retail. In the North Montclair area there are currently relatively few residences. The creation of a resident population is critical to creating such a successful new Downtown. Further, the Plan area's locating along Central Avenue creates accessibility with the rest of the City. Thus, the Proposed Project would promote redevelopment of the Plan area, as a regional commercial area.	Consistent.
Policy LU-1.1.24. Provide, through public and private investment, for the development of commercial properties designed to complement existing developments.	The MPDSP would allow up to 6,321 residential dwelling units and up to approximately 512,600 square feet of additional commercial square footage for a total of approximately 2,058,900 square feet of commercial area. The MPDSP proposes to create pedestrian-oriented, multimodal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line light rail to Montclair. This Downtown environment would be built on an interconnected network of tree-lined streets and blocks that include inviting parks, greens, and plazas. Its buildings, in a	

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	variety of types, will be built close to and directly accessible from the sidewalk with parking located behind buildings or subterranean.	
Policy LU-1.1.25. Encourage the design of these properties to create an enjoyable environment for shopping by promoting improved architectural appearance of buildings, excellent landscaping, and appropriate regulated signing, parking and traffic circulation.	The Proposed Project includes approximately 512,000 square feet of commercial use, which would be designed in accordance with the proposed Development Code of the MPDSP. The Proposed Project would promote the beautification of streets through its implementation of the Street Tree Master Plan, which locates specific tree species amongst the proposed street network, open spaces, and greenways. Additionally, the MPDSP proposes an entry park, which would be visible from Central Avenue, and a freeway park, which would be visible from the I-10 freeway.	Consistent.
Policy LU-1.1.26. Promote the development of commercial centers which have distinctive and unique character or appearance relating to Montclair's community design objective.	The MPDSP would implement design principles to guide development, which allows for mixed-use commercial blocks within these districts. Varying the size and massing of these commercial buildings and carefully considering their placement, attracts a variety of residents, enhances the pedestrian friendliness of the streets and open spaces they face, and insures that new buildings are compatible with those in adjacent nearby neighborhoods. As such, implementation of the MPDSP would promote development of the Plan area for a distinctive design.	Consistent.
Policy LU-1.1.27. Improve the relationship between commercial areas and adjacent non-commercial land through landscaped buffer strips to ensure the protection of the adjacent residential land from such annoyances as noise, light, and traffic.	The MPDSP would include commercial and non-commercial land uses within the Plan area. The Proposed Project seeks to improve the public realm in the areas surrounding the Plan area through standards for streetscapes, such as a street tree master plan and conceptual layouts for various streets within the Plan area. These standards would improve the relationship between commercial areas and adjacent non-commercial land. Additionally, the portion of the Plan area which is in close proximity to I-10 would be primarily commercial, as to buffer residential land uses from noise, light, and traffic impacts of I-10.	Consistent.
Policy LU-1.1.28. Ensure adequate municipal services for all commercial areas, and provide for the improvement of street appearance through a program of street tree planting, suitable street lighting, the under grounding of unsightly overhead utility lines, and the regulation of signs and outdoor advertising.	As previously discussed, with regards to infrastructure, incremental upgrades, expansions, or replacements of utilities (water, sewer, storm systems) infrastructure may be as part of the Proposed Project. Based on the Project-specific Water Supply Assessment (Appendix H-1), the Proposed Project would exceed the projected supplies for the year 2040. However, additional groundwater production, increased imported water purchases, and potential increased use of recycled water would enable the Monte Vista Water District to serve the MPDSP. With regard to wastewater, upgrades to the existing system would occur, as necessary, to accommodate increased wastewater flows from the Plan area. With regards to electricity, depending on the final layout of these early phases, there will be a need for multiple relocation orders	Consistent.

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	with Southern California Edison (SCE) to reconfigure the existing underground electrical facilities to match with the proposed development layout. The relocation work orders may also require some updating to the existing electrical systems to bring the system up to the current standards and to account for the potential increase in load demand. In a worst-case scenario, SCE may require that the Applicant balance the overall electrical load of the development on different Edison circuits. This task may mandate additional off-site infrastructure improvements by the Applicant, including new or extended off-site backbone system upgrades on the three surrounding streets in order to bring additional electrical circuits to the Plan area. However, implementation of MM-UTIL-1 would ensure SCE has sufficient infrastructure capacity to accommodate the electric power requirements for completion of each Specific Plan phase. Regarding telecommunications, existing Frontier and Spectrum infrastructure may not be sufficient to support Phases E through G of the Proposed Project. At a minimum, infrastructure relocation would be required and new or extended off-site backbone system work may be required on the three surrounding streets in order to bring additional telephone and CATV facilities to the Plan area. At a minimum, infrastructure relocation would be required and new or extended off-site backbone system work may be required on the three surrounding streets in order to bring additional telephone and CATV facilities to the Plan area. As such, MM-UTIL-2 is required to ensure the telecommunication provider has sufficient infrastructure capacity to accommodate the telecommunication requirements for completion of each Specific Plan phase. . As such, with implementation of mitigation, adequate utilities would be provided for neighborhoods within the Plan area. Additionally, the MPDSP would include standards for streetscapes, such as a street tree master plan and conceptual layouts for various streets within the Plan area. Therefore, the Proposed Project is consistent with this policy.	
Policy LU-1.1.29. Recognize the importance of retaining the economic viability of the Montclair Plaza and promote the maintenance and improvement of the Plaza to attract new patronage.	The MPDSP seeks to redevelop the existing Montclair Place Mall and the area south of the Mall including the Ashley Furniture site and the Montclair Entertainment Plaza area. The MPDSP creates a policy framework for transforming the Plan area into a pedestrian-oriented, multi-modal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line railway. Thus, the Proposed Project would revitalize the economic condition of the Montclair Place Mall through implementation of MPDSP.	Consistent.

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General Plan Goal or Objective	Proposed Project Applicable Component(s)	Consistency Finding
Policy LU-1.1.30. Consider the establishment of new complementary uses around the Plaza perimeter to maximize its utilization and intensify the area's activity.	As previously discussed, the MPDSP seeks to redevelop the existing Montclair Place Mall and the area south of the Mall including the Ashley Furniture site and the Montclair Entertainment Plaza area. Thus, the Proposed Project would establish a cohesive Specific Plan of the Montclair Place Mall, along with the existing uses along the perimeter to increase utilization of the area.	Consistent.
Circulation Element		
Goal CE-1.0.0. To provide residents and visitors of the City of Montclair a circulation network which provides for safe and efficient travel within and through the community	The MPDSP contains a combination of design guidelines to provide for the safety and security of the Plan area, both in the public realm and on private property. The MPDSP contains street and infrastructure guidelines to improve pedestrian crossing safety, reduce automobile speeds, and facilitate navigation. The clear wayfinding systems and outdoor lighting requirements also enhance the Plan area's overall sense of safety and security. Therefore, the MPDSP is consistent with this goal.	Consistent.
Policy CE-1.1.1. Ensure the construction of a variety of street types, each designated to serve a specific circulation function and to thus provide for adequate service to the community. These routes include freeways (including on- and off-ramps), divided arterial, arterial, major, secondary, enhanced collector, industrial collector, collector and local streets.	The MPDSP would provide a wide palette of street types, including modifications to the existing arterial and collectors streets surrounding the Plan area (Central Avenue, Moreno Street, and Monte Vista Avenue), as well as designs for new streets to be introduced within the Plan area. The Rambla, which runs in an east-west direction to the north of the existing Mall building, and the new diagonal street that connects San Jose Street to Fremont Avenue, would be the main internal streets. The Rambla is a tree-lined, linear thoroughfare with travel lanes on either side of a wide, hardscaped median. The new diagonal street is conceived as a grand thoroughfare with a wide median down its center that could accommodates a multiuse path for cyclists, pedestrians, electric scooter riders, and other emerging forms of transportation. Additional internal street types would include a series of mixed-use streets with various on-street parking configurations (angled parking both sides; angled parking along one side and parallel along the other; and parallel parking along both sides); narrow free-flow streets which would provide narrow travel lanes and with parallel parking on both sides in residential neighborhoods or office districts;; alleys, which would provide access to parking and services; and pedestrian passages which would provide mid-block crossings.	Consistent.
Policy CE-1.1.2. Protect street traffic capacities by controlling access points from adjoining land and by restricting on-street parking when and where necessary.	The MPDSP would create its own internal street network with consideration of compatibility with the existing Moreno Street, Monte Vista Avenue, and Central Avenue street networks. The MPDSP proposes to create an internal street network with ample sidewalks, crosswalks, and street trees, in order to	Consistent.

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	create a pedestrian-oriented, mixed-use, downtown district. As such, the street network would diversify the modes of transportation throughout the Plan area, thereby reducing automobile trips through the existing street network. The proposed internal streets include a series of mixed-use streets with various parking configurations to accommodate the neighborhoods and commercial uses. The MPDSP would implement a mix of on-street parallel and angled parking, park-once parking structures, and surface parking lots. However, the on-street parking would be located in front of stores, restaurants, entertainment venues, and residences for convenience, and would be located on small internal streets not the surrounding arterial and collector streets. Therefore, the Proposed Project would not conflict with this policy.	
Policy CE-1.1.3. Discourage commercial, industrial, and through traffic from traveling on local residential streets.	The Proposed Project proposes a walkable, mixed-use residential and commercial redevelopment of the Montclair Place Mall and surrounding commercial uses. By integrating residential and commercial uses within the Plan area, the Proposed Project encourages residences to utilize alternative modes of transportation, such as walking, biking, the existing Metro Link commuter rail, and the anticipated Gold Line railway. Additionally, residences within the Plan area could utilize the proposed commercial uses and are not anticipated to generate additional through traffic in other residential streets within the City. Therefore, the Proposed Project would not conflict with this policy.	Consistent.
Policy CE-1.1.4. Discourage the parking of commercial/industrial vehicles and recreational vehicles on residential streets.	The commercial uses within the Plan area are accessible to automobiles through a mix of parking options, including on-street parallel and angled parking, park-once parking structures, and surface parking lots. The on-street parking would be located in front of stores, restaurants, entertainment venues, and residences for the convenience of visitors and customers. Off street parking spaces/areas to accommodate delivery vehicles for businesses or to assist tenants moving in and out of residential units would be a required element of the design for each project proposed for development. The MPDSP would allow a minimum of one off-street loading space for every non-residential or mixed-used building over 3,000 square feet in gross area. The loading spaces would be located near the rear of the building and may be striped "loading zone" to generally discourage parking of commercial/industrial vehicles on residential streets. As such, the Proposed Project does not encourage parking of commercial vehicles on residential streets within the Plan area.	Consistent.
Policy CE-1.1.5. Promote the beautification of streets by promoting and maintaining a tree planting, tree replacement, tree	The Proposed Project would promote the beautification of streets through its implementation of the Street Tree Master Plan, which locates specific tree species amongst the	Consistent.

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maintenance and landscaping program on all streets, with special emphasis on the entrance to the city, to screen from view service road areas, and along major/minor roadway corridors and median dividers.	proposed street network, open spaces, and greenways. Additionally, the MPDSP proposes an entry park, which would be visible from Central Avenue, and a freeway park, which would be visible from the I-10 freeway. Therefore, the Proposed Project would be consistent with this policy.	
Policy CE-1.1.7. Coordinate the local circulation system with adjacent communities, the county and the state.	The City would review the proposed circulation system associated with the MPDSP to ensure coordination with adjacent communities, the county, and the state.	Consistent.
Policy CE-1.1.8. Continue promotion of the construction of sidewalks in residential areas to provide safe pedestrian circulation. Policy CE-1.1.9. Ensure, where possible, the development and maintenance of adequate, efficient, safe and attractive pedestrian walkways between major pedestrian generators.	The proposed internal network associated with the Proposed Project would create sidewalks within the Plan area. The on-street parking would provide a buffer between the moving traffic and pedestrians on the sidewalk. Additionally, sidewalks would be provided from the ground floors for residential buildings and commercial buildings. Additionally, the MPDSP contains street and infrastructure guidelines to improve pedestrian crossing safety, reduce automobile speeds, and facilitate navigation.	Consistent.
Policy CE-1.1.10. Promote the provision of public modes of transportation between strategic locations such as the Montclair Plaza Shopping Center, and other traffic generators, such as the Montclair Transcenter and potential Metrolink station on the Riverside Line.	The primary goal of the MPDSP is to create a pedestrian-oriented, multi-modal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line that would extend light rail line service to the City of Montclair. As such, the Proposed Project would promote the use of alternative modes of transportation through its proximity to the anticipated Foothill Gold Line extension.	Consistent.
Policy CE-1.1.11. Establish and review improvement priorities for dealing with problem intersections and traffic-impacted circulation.	The Proposed Project would inform the City of potential impacts associated with the implementation of the MPDSP to identify potential improvements to traffic-impacted circulation. The Proposed Project would not conflict with the City's ability to establish and review improvement priorities for dealing with problem intersections and traffic-impacted circulation. Thus, the MPDSP is consistent with this policy.	Consistent.
Policy CE-1.1.13. Examine existing truck routings and establish alternate routes for truck travel as a result of problem vehicular conflict.	The MPDSP could result in truck routes for commercial deliveries. Both Central Ave and Monte Vista Ave in the vicinity of the Plan area are designated as truck routes by the City, north of the I-10 freeway. The truck routes would follow those established by the City, and would not impede the City's ability to alter existing truck routes.	Consistent.
Policy CE-1.1.14. Develop a more detailed bicycle route plan. Develop a zoning standard to require bicycle racks at public facilities as well as at commercial centers. Where a bicycle route is proposed along a roadway, consider striping for safety purposes, where possible.	The MPDSP is connected to the Montclair Transcenter and to the City's proposed regional bicycle network via Fremont Avenue and Monte Vista Avenue. A Cycle Track along the east side of Monte Vista Avenue will connect the Plan area to the Transcenter and Pacific Electric Trail to the north and residential neighborhoods to the south of the freeway. Class II bike lanes will be introduced along Moreno Street), providing connections to Moreno Elementary School and residential neighborhoods to the west. The new diagonal street connecting San Jose Street with Fremont Avenue through the Plan area provides a bike path down its center	Consistent.

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	median, facilitating bicycle access Serrano Middle School to the west and the Transcenter to the north and support first/last mile connections Gold Line and Metrolink trains. The remainder of the streets within the Plan area, designed with built-in traffic calming strategies such as narrow lanes, on-street parking, and street trees, will provided comfortable streets for bicyclists and users of alternative forms of transportation such as motorized scooters and segways. Additionally, the Proposed Project would provide bike racks and scooter parking throughout the Plan area. As such, the Proposed Project would be consistent with this policy.	
Policy CE-1.1.15. Encourage the development of a recreational and commuter bicycle trail along San Antonio Wash.	The Proposed Project would enhance multi-modal transportation, including bicycling, within the City. As such, the Proposed Project would encourage the development of an additional recreational bicycle trail within the City.	Consistent.
Policy CE-1.1.16. Develop a program for improved freeway service that includes ramp improvements at Monte Vista Avenue.	The City has entered into a cooperative agreement with SBCTA to improve the I-10 freeway through the City. The project is now underway, and will provide travel options for commuters on the I-10 freeway between the Los Angeles/San Bernardino line and I-15 freeway. The project includes the addition of two express lanes in each direction to offer trip reliability and ease congestion. In addition, lanes to assist drivers getting on and off the freeway (auxiliary lanes) will be constructed in selected locations. Finally, the project involves major improvements to the Monte Vista and Central Avenue on and off ramps to improve access and services (SBCTA 2020).	Consistent.
Community Design Element		
Goal CD- 1.0.0. To coordinate, through the General Plan, the physical elements of the City into an attractive as well as a functional relationship in order to establish, preserve and enhance the City's setting and identity.	The MPDSP is designed to implement the goals and policies of the Montclair General Plan. The MPDSP proposes to create an urban design strategy that transforms the existing Plan area into pedestrian-oriented, multi-modal, mixed-use downtown districts within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line light rail to Montclair. The MPDSP expands mobility choices and creates a safe, efficient, balanced, and multimodal network to accommodate all travelers. The MPDSP contains development regulations and design guidelines to address land use compatibility and enhance the aesthetics, functionality, mobility, and open space amenities in the Plan area. Thus, the Proposed Project would establish, preserve, and enhance the City's setting and identity.	Consistent.
Goal CD- 2.0.0. To develop a comprehensive framework plan and program for the protection and enhancement of the scenic environment adjacent to selected state highways, county roads and travel	Development permitted under the MPDSP would result in similar (if not improved) visual character of the area. Nonetheless, implementation of the MPDSP would enhance the scenic environment along local roads, including Central Avenue and Monte Vista, through requirements and	Consistent.

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routes of unique or local importance within the City of Montclair.	standards for streetscape, landscape, hardscape, and public art that occurs within public streets and publicly accessible parks, plazas, and greens.	
Objective CD-1.1.0. To develop parkway improvement programs to enhance scenic qualities.	The Proposed Project would include the provision of eight neighborhood parks and amenities (plazas, pedestrian paseos etc.) surrounded by multi-family residences and/or offices lined with ground floor neighborhood-serving retail stores. These open space and park area would accommodate a variety of passive and informal recreational uses commensurate with their respective sizes and locations. Passive and informal recreational activities could include playgrounds, dog parks, basketball courts, walking paths, and open lawns for informal picnics, benches, and sunbathing. Such uses would develop opportunities for recreation within the Plan area irrespective of the size of the private and public open spaces. The Street Trees and Parkways standards would enhance the scenic quality within the Plan area.	Consistent.
Objective CD-1.2.0. To encourage the design of road and street improvements that protect or enhance the scenic values along the city's roadsides.	The open space within the Plan area is arranged within the street network to promote a walkable, mixed-use community. Additionally, a greenway is proposed adjacent to the I-10 freeway, which would enhance scenic values along roadsides.	Consistent.
Objective CD-1.3.0. To continue to develop and reexamine policies and programs regulating public and private improvement as they relate to enhancing the community aesthetic image.	The MPDSP would regulate landscaping and other design considerations within the Plan area, and thus, would create a public realm to enhance the community aesthetic image.	Consistent.
Objective CD-1.4.0. To promote the maintenance of compatible land uses and mitigate existing land use conflicts through redevelopment and/or incorporating the design principles and concepts contained in this element.	The land surrounding the Plan area consists of a mix of residential and commercial. As such, the MPDSP's proposed residential and commercial land uses would not conflict with the surrounding area. In addition, implementation of MPDSP would restrict land use development within the Plan area to maintain consistency with the City's General Plan designations and the adjacent North Montclair Downtown Specific Plan. The design guidelines set forth as part of the Proposed Project would support the maintenance of compatible land uses.	Consistent.
Objective CD-1.5.0. To promote community identity and community aesthetics as a means for creating a positive living and working environment as well as to maintain high economic stability.	The MPDSP development standards allow for a variety of outdoor uses, including open space and pedestrian-level streetscapes, focusing on the types of active and passive open spaces that will enhance the Plan area. The proximity of residential uses to neighborhood retail and outdoor space would promote community identity. Specifically, the MPDSP would organize the Plan area into Districts to further establish a community identity within each District.	Consistent.
Objective CD-1.6.0. To encourage the development of parcels along Central Avenue and Holt and Mission Boulevards where	Implementation of the MPDSP would encourage development on a parcel that is currently developed with the existing Montclair Place Mall and surrounding commercial uses. Due to	Consistent.

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development has previously been hindered due to parcel size and configuration, access and multiple ownership.	recent trends leading to the decline in economic performance of malls, the Proposed Project seeks to implement an urban design strategy to redevelop the parcel.	
Policy CD- 1.1.1. Continue the establishment of an individual and distinctive identity by encouraging the highest quality design in architecture, landscape architecture, sign graphics, and in the design of street furniture and fixtures.	The MPDSP's architectural style guidelines are intended to foster high-quality environmental design and architecture to enhance the identity, environment, and built form of the Plan area.	Consistent.
Policy CD- 1.1.2. Prepare and adopt a comprehensive landscape design program for the streets, parks, and open spaces n the community. This program shall include standards and locations for types of trees, street and park furniture, sign graphics, paving, lighting and other community design elements.	A key component of the MPDSP is the Open Space and Landscape chapter, which describes the various components of the public realm, including streetscape improvements and proposed open spaces. It also includes standards for streetscape, landscape, hardscape, and public art that occurs within public streets and public parks, plazas, and greens.	Consistent.
Policy CD- 1.1.3. Devise development standards that will fully integrate the regional shopping center with commercial development on Central Avenue and the Civic Center. This coordination will obtain the maximum benefit from both private and public investments.	The MPDSP includes both design and development standards to guide the preparation of plans for subsequent projects within the Plan area. The Plan area includes the existing regional shopping center with commercial development on Central Avenue. The MPDSP itself is a coordinated effort between private and public, and thus, would be consistent with this policy.	Consistent.
Policy CD.1.1.4. Encourage the state to install the highest quality of planting along the freeway to ensure the compatibility of the freeway with the total environment of the community, except where the noise level has an adverse impact where sound walls should be installed.	This policy refers to actions by the state in regards to planting along the freeway. However, the MPDSP proposes a greenway adjacent to the I-10 freeway, which would provide a noise barrier between the I-10 freeway and the residential buildings to the north. The strategic location of residential uses, away from the southern border of the Plan area, ensure compatibility between the freeway and proposed uses within the Plan area.	Consistent.
Policy CD.1.1.7. Continually review new opportunities for design concepts to be implemented through the zoning ordinance for buildings and landscaping in order to encourage quality development.	Once the Proposed Project is approved, the MPDSP would replace the current development and design standards with those contained in the MPDSP. The MPDSP design standards are designed to encourage quality development within the Plan area. Thus, the MPDSP would not conflict with the General Plan's policy to encourage quality development through the zoning code.	Consistent.
Policy CD.1.1.8. Require and promote public utility agencies to beautify their facilities by under grounding power lines and the painting and landscaping of substations and corporation yards.	Currently as proposed, the MPDSP would not install utilities above ground. Additionally, the MPDSP encourages improvements to the streetscapes through landscaping and public art to enhance the public realm.	
Policy CD.1.1.9. Existing or indispensable conflicting land uses should be effectively screened from view from the roadway. Effective screening can be accomplished by proper use of plantings, grading or attractive	The Plan area is currently consistent with the surrounding land uses; however, the parcel is underutilized. Thus, the MPDSP would redevelop the Plan area with residential and commercial uses, which is consistent with the uses to the north, east, and west. The southern portion of the Plan area	Consistent.

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fencing.	would include a greenway to create a barrier between the residential uses and the I-10 freeway.	
Signs and Outdoor Advertising Policy CD- 1.1.10. The size, height, number and type of on-premises signs allowed should be the minimum necessary for identification. The design, materials, color, texture, and location should relate to and be in harmony with the surrounding environment. Sign regulations should be based on the premise that the purpose of signing is for identification and not as a means of advertising. Policy CD- 1.1.11. Off-premises outdoor advertising should not be permitted to intrude or impact upon residential, commercial, or light industrial areas.	The MPDSP provides guidelines for installation of exterior signs and other graphics. These guidelines would ensure signs within the Plan area would be in harmony with the surrounding environment and not intrude upon commercial or residential areas.	Consistent.
Utility Lines Policy CD- 1.1.12. New or relocated utility lines should be placed underground whenever feasible. Policy CD- 1.1.13. Alignment of new transmission and distribution lines should be situated such that the lines do not harm scenic resources nor the visual environment.	The Proposed Project does not involve the installation of transmission and distribution lines. Further, with exception of an existing utility pole on the Monte Vista Avenue side of the Plan area, there are no other utility poles and overhead lines within the MPDSP area. New projects within the Plan area will be required to underground all utilities to maintain the current situation.	Consistent.
Grading and Erosion Policy CD- 1.1.14. Grading or earth moving operations should be done with a minimum of disturbance to the natural ground and result in natural or sculpture forms. Quarries and other excavations should be restored to an attractive appearance.	Construction activities associated with the Proposed Project could result in grading or earth moving. However, in compliance with the NPDES permit, and the City's LID ordinance, minimum disturbance would occur.	Consistent.
Trees and Plan Materials Policy CD- 1.1.15. Existing specimens and stands of trees and other plant materials of outstanding scenic value should be protected. Policy CD- 1.1.16. Older mature trees provide a sense of age and permanence. Every effort should be made to retain these trees, even in new development and in instances where the tree can be saved in the event of a disorder. As a policy, the City should adopt and maintain a Master Plan of Street Trees that includes a minimum	The Proposed Project would not conflict with Title 9, Public Facilities and Public Places, of the City's Municipal Code (which includes regulations adopted for the purpose of the protecting and preserving trees planted within the City rights-of-way and at City facilities, and are therefore regulations pertaining to scenic quality). Existing ornamental trees are located throughout the Plan area within raised planters and landscape islands throughout the parking lot, as well as immediately adjacent to the Plan area within raised landscape medians within the public right-of-way. Should future development pursuant to the MPDSP include landscape improvements located within the public right-of-way (i.e., between a private property line and the curb or street), the future developer would be required to replace City Street trees at a minimum ratio of 1:1 for each tree	Consistent.

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maintenance and replacement program.	removed. For trees located on private property, the City has the discretion to require future development to mitigate for the loss of any trees. More importantly, however, the MPDSP includes Street Trees and Parkways standards to ensure that future development pursuant to the MPDSP provides trees and landscaping (and includes minimum landscape standards) to enhance the streetscape and supplement open space areas within the Plan Area. Because these Street Trees and Parkways standards would be part of the MPDSP, future development projects would be required to undergo an external peer review to ensure future projects meet these tree provision requirements and provide for a high standard of landscape quality.	
Development Design Policy CD- 1.1.17. Site planning, architectural and landscape architectural design should result in an attractive appearance and a harmonious relationship among the various elements of the development to blend with the image of the community.	The intent of the MPDSP is to create a network of pedestrian-friendly blocks and streets that promote walking and bicycling. In addition, the MPDSP allows land use designations that creates a mix of land uses that are within walking distance of one another, and streets that are attractive to pedestrians. One of the goals of the Open Space and Landscape chapter of the MPDSP is to create public realms through planted shaded trees, medians that accommodate multiple uses, and open space in the surrounding neighborhoods.	Consistent.
Property Maintenance Policy CD- 1.1.18. Structure on private or public properties should be maintained in good condition and proper attention should be given to a neat appearance and replacement of dead or dying plant material. The grounds should be kept free of trash or other objectionable uses or effectively and attractively screened from view.	Landscaping within the Plan area would be maintained in good condition and proper attention would be given to the neat appearance.	Consistent.
Historic Preservation Policy CD- 1.1.19. All efforts should be made to identify, protect and enhance all historical and archaeological points of interest. CD- 1.1.20. Establish a historical resource library and museum where important City and community archives and memorabilia can be preserved for future generations.	As discussed in Appendix A, Initial Study, of this Draft EIR, the Proposed Project would not result in significant impacts to historical and archaeological resources.	Consistent.
Open Space Element		
Goal OS-1.0.0. To protect and preserve open space resources in the community and maintain scenic, recreation or productive values.	The Plan area is located in a highly urbanized and developed portion of the City. There are no scenic views from area roadways or other vantage points within the surrounding area onto the Plan area. By redeveloping within an already disturbed area, the MPDSP would protect and preserve other open space resources within the community.	Consistent.
Objective OS-1.2.0. To recognize that open	One of the goals of the Open Space and Landscape chapter	Consistent.

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General Plan Goal or Objective	Proposed Project Applicable Component(s)	Consistency Finding
space provides visual relief from highly urbanized areas and is an important element when evaluating human scale, urban transition, and relief from environmental pollutants.	of the MPDSP is to create public realms through planted shaded trees, medians that accommodate multiple uses, and open space in the surrounding neighborhoods. Thus, the MPDSP would provide visual relief within a highly urbanized landscape.	
Objective OS-1.5.0. To promote the design and development of an attractive system of local parks and open spaces which will provide facilities for a full range of recreational activities for all age groups. Objective OS-1.1.1. Determine future park and recreation requirements and design facilities and programs to satisfy the needs within each service area. Objective OS-1.1.2. Provide a balanced park system by locating playgrounds in convenient areas where they will serve the residents of the residential neighborhood.	Open space would be provided in the neighborhoods surrounding the neighborhood-retail stores. Open space within the streetscapes would encourage the beautification of neighborhoods within the Plan area. These parks would accommodate a variety of locally-oriented activities, such as playgrounds, dog parks, basketball courts, walking paths, and open lawns for informal picnics, , and sunbathing.	Consistent.
Objective OS-1.1.10. Promote the utilization, where feasible, of the water retention basins, adjacent vacant parcels, and existing park channel rights-of-way in order to expand the existing park and open space areas.	The Proposed Project involves controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention and/or rainfall harvest and re-use) to increase the amounts of impervious areas within the Plan area.	Consistent.

Source: City of Montclair 1999

City of Montclair Housing Element

The City's Housing Element was updated in 2014. Table 3.8-2 below provides a consistency analysis for the updated Housing Element.

Table 3.8-3
Consistency with City of Montclair Housing Element

2014 Housing Element Goal/Policy	Project Applicable Component (s)	Consistency Finding
Housing Goal 1: Maintenance and Rehabilitation of Housing Stock **Policy Action 1.1: Code Enforcement** Provide ongoing inspection services to review code violations on a proactive and complaint basis. Examples of code violations include families living in illegal units, such as garages and recreational vehicles, construction of illegal buildings,	The buildout of the MPDSP would result in approximately 6,321 residential dwelling units. Since the Proposed Project would add more housing units than jobs to the Plan area, it would lower the City's job-to-housing ratio to meet the projected value. Thus, the Project would positively contribute to the attainment of the jobs-to-housing ratio of 1.64. In addition, due to the mixed-use nature of the MPDSP, the Proposed Project would not cause an imbalance among jobs, housing, and population. Rather, the Project would achieve the City's market objectives for the region	Consistent.

Table 3.8-3
Consistency with City of Montclair Housing Element

2014 Housing Element Goal/Policy	Project Applicable Component (s)	Consistency Finding
and households living in unsafe buildings. **Policy Action 1.2: Housing Improvement Task Force** The City will continue to utilize the Housing Improvement Task Force within the City's identified Foundation Areas to create a sense of neighborhood, instill a feeling of security, and improve the aesthetic environment of the City's targeted neighborhoods for rehabilitation.	through the redevelopment of the existing Montclair Place Mall. Further, redevelopment of an existing commercial use would be consistent with the City's goal of maintaining the current housing stock.	
Policy Action 1.4: Community-Based Neighborhood Enhancement The City will continue to encourage the involvement of residents in the conservation, preservation and enhancement of quality of life in neighborhoods. Efforts will focus on community participation related to planning activities, strategies and programs that directly address quality of life in Montclair. The City will continue focused outreach efforts, through a variety of marketing techniques, including the City's website, to directly engage residents in improving local neighborhoods.	The MPSDP would serve as a policy framework for transforming the Plan area into a pedestrian-oriented, multi-modal, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and the anticipated extension of the Foothill Gold Line railway. Thus, the Proposed Project would encourage preservation and enhancement of quality of life in the Plan Area.	Consistent.
Housing Goal 2: Preservation of Housing Cost Affordability **Policy Action 2.1: Monitor and Preserve "At-Risk" Units** The City has identified 230 units at-risk of converting from income-restricted to market-rate during the planning period. To preserve affordability of these units, the City shall proactively meet with the property owners and identify funding sources and other incentives to continue income restrictions. The City shall develop strategies to act quickly should the property owners decide not to continue income restrictions. The strategy program may include, but is not limited to, identifying potential funding sources and organizations and agencies to purchase the property. The City will also ensure that proper noticing requirements are followed	The existing Plan area is currently developed with the Montclair Place Mall, a strip mall, and the Unitarian Universalist Congregation Church. As such, the Plan area is not developed with residential uses. Approval of the Proposed Project would result in a General Plan Amendment and zone change to allow more housing within the City. The Proposed Project includes design guidance for a variety of building types, including mixed-use commercial blocks, rowhouses, condominiums, and apartment buildings. The variety of housing would diversify the affordability of housing within the Plan area. Additionally, the Proposed Project includes 15% affordable and senior housing density bonus.	Consistent.

Table 3.8-3
Consistency with City of Montclair Housing Element

2014 Housing Element Goal/Policy	Project Applicable Component (s)	Consistency Finding
and tenant education is conducted. **Policy Action 2.2: Single-Room Occupancy Units** State law requires that jurisdictions identify zoning districts available to encourage and facilitate a variety of housing types, including single-room occupancy units (SROs). Currently, the City's Zoning Code does not define or address SROs. The City shall revise the Zoning Code to define SROs, identify the zones in which they are permitted and establish regulatory standards that encourage and facilitate single-room occupancy units.		
Housing Goal 3: Ensure Equal Housing Opportunity **Policy Action 3.1: Reasonable Accommodation Procedures** Develop and adopt procedures to provide reasonable accommodations for persons with disabilities in compliance with the provisions of SB 520. These procedures shall include a formal written application and process.	The Proposed Project would ensure compliance with the provisions of SB 520 through the decision-making process. As discussed in Section 2.9, Intended Uses of this EIR, the MPDSP requires approval from the City, including compliance with all applicable state and local regulations, such as SB 520.	No Conflict.
Policy Action 3.2: Density Bonus To encourage and facilitate development of housing affordable to lower-income households, the City shall revise the Municipal Code in accordance with SB 1818 and AB 2280 to reflect changes in Density Bonus Law.	The Proposed Project does include a 15% affordable and senior housing density, which allows up to an addition 825 units. Implementation of the MPDSP would not conflict with the City's ability to meet these policies.	No Conflict.
Policy Action 3.3: Energy Conservation The City will encourage residents to participate in energy conservation incentive programs through local utility companies by providing information on available programs at City Hall and the City's website. To further promote efficient use of energy resources, the City shall investigate the feasibility and effectiveness of offering additional incentives or developing other conservation strategies.	As discussed in Section 3.3, Energy, of this Draft EIR, the Proposed Project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Title 24, Part 11, contains additional energy measures that are applicable to the Proposed Project under CALGreen. Prior to Specific Plan approval, the applicant would ensure that the Proposed Project would meet Title 24 requirements applicable at that time, as required by state regulations through the plan review process. Therefore, the Proposed Project would promote efficient use of energy resources.	Consistent.
Policy Action 3.4: Fair Housing Information	The Proposed Project would involve implementation of a Specific Plan and would not educate residences throughout the City on a	No Conflict.

Table 3.8-3
Consistency with City of Montclair Housing Element

2014 Housing Element Goal/Policy	Project Applicable Component (s)	Consistency Finding
The City will continue to supply fair housing materials, including pertinent resources, posters and information available through the Department of Fair Employment and Housing (DFEH) and the Department of Housing and Urban Development (HUD) to educate residents on a variety of fair housing issues. The City currently contracts with Inland Fair Housing for fair housing services and will continue to contract with them, or another similar organization.	variety of fair housing issues.	
Policy Action 3.6: Housing for Extremely Low-Income Households The City will encourage the development of housing units for households earning 30% or less of the Median Family Income for San Bernardino County. The City will encourage development of housing for extremely low-income households through a variety of activities that may include annual outreach to nonprofit and for-profit housing developers to assist with site identification and funding priorities, providing in-kind technical assistance for housing developers, financing and funding assistance, and expedited processing.	The Proposed Project would include 825 affordable single-family dwelling units, including 165 condominiums and 660 apartments. Thus, the Proposed Project would encourage development of affordable housing units.	Consistent.
Policy Action 3.10: Senior Housing Seniors generally have limited resources and require more specialized housing needs and facilities that are not generally available in the marketplace. The City will encourage development of senior housing through incentives, which may parking reductions and regulatory waivers. These may include independent living to assisted living with services onsite, including healthcare, nutrition, transportation, and other appropriate services. **Policy Action 3.11: Incentives for Development of Housing Affordable to Extremely Low-, Very Low-, Low- and Moderate-Income Households** The City recognizes the need for housing affordable to all income segments of the population, especially low- and moderate-	The development potential allowed under the MPDSP would provide for an additional 6,321 dwelling units in the MPDSP area (assuming the full 15% affordable/senior housing density bonus is applied). The Proposed Project would include 825 affordable single-family dwelling units, including165 condominiums and 660 apartments. Thus, recognizing the need for housing affordable in the City.	Consistent.

Table 3.8-3
Consistency with City of Montclair Housing Element

2014 Housing Element Goal/Policy	Project Applicable Component (s)	Consistency Finding
income households. The City shall encourage the development of housing affordable to extremely low-, very low-, low-, and moderate-income households through a variety of regulatory procedures and incentives such as density bonus provisions, expedited processing, fee deferrals, modified development standards, and information on available funding sources.		
Policy Action 4.4: Encourage and Facilitate Lot Consolidation The City will encourage and facilitate the consolidation of vacant and underutilized lots for residential development through a variety of incentives, including, but not limited to: technical assistance to property owners and developers in support of lot consolidation, identifying opportunities for potential consolidation and offering development incentives such as reduction in setbacks, parking requirements, and other standards. Consolidation will provide the opportunity to develop vacant and underutilized lots to their fullest potential. The City will evaluate the appropriateness of a variety of incentives and provide this information to the developers and other interested parties through the City's website and print material at City Hall.	The Proposed Project itself involves the redevelopment of the existing Montclair Place Mall, and underutilized commercial development. The Proposed Project would develop approximately 5 million square feet of residential uses (or 6,321 dwelling units), inclusive of a 15% affordable and senior housing density bonus, and the total additional commercial square footage envisioned by the MPDSP is approximately 512,000 square feet. Therefore, the Proposed Project would utilize incentives to develop underutilized lots to their fullest potential.	Consistent.
Policy Action 4.5: Large Sites for Housing for Lower Income Households To assist the development of housing for lower income households on larger sites, the City will facilitate land divisions, lot line adjustments, and specific plans resulting in parcel sizes that facilitate multifamily developments affordable to lower income households in light of state, federal and local financing programs (i.e., 2-10 acres). The City will work with property owners and non-profit developers to target and market the availability of sites with the best potential for development. In addition, the City will offer the following incentives for the development of affordable housing including but not	The proposed MPDSP would assign and create land use zones for parcels within the approximately 104.35-acre site. Part of the Proposed Project involves the construction of 6,321 units, inclusive of a 15% affordable and senior housing density bonus, totaling 825 affordable units.	Consistent.

Table 3.8-3
Consistency with City of Montclair Housing Element

2014 Housing Element Goal/Policy	Project Applicable Component (s)	Consistency Finding
limited to: • Streamlining and expediting the approval process for land division for projects that include affordable housing units; • deferral or waiver of fees related to the subdivision for projects affordable to lower income households; • provide technical assistance to acquire funding; and modification of development requirements.		

Source: City of Montclair 2014

City of Montclair Municipal Code

The Montclair Zoning Code (Title 11), in conformance with the General Plan, regulates land use development in the City. In each zone, the zoning regulations specify the permitted and prohibited uses, and the development standards, including setbacks, height, parking, and design standards, among others.

When a specific plan is adopted, the specific plan may effectively supersede portions or all of the current zoning regulations for specified parcels or plan area, and becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted, and may define other types of design and permitting criteria. The MPDSP is adopted by ordinance and serves as the primary zoning document for the Plan area. Where the MPDSP is silent, the relevant sections and requirements of the zoning regulations shall apply.

Decision Making Authority

The Planning Commission shall administer the regulations of Title 11 and amendments, act as a Board of Zoning Adjustment, hear and act upon all matters involving variances and conditional use permits, recommend the revocation of conditions use permits, hear and act upon suspensions or modifications of planned rights-of-way, hear and act on appeals from any action taken by an administrative official in the administration and/or enforcement of the provisions of this title, and perform such other duties as are requested by the City Council.

Prior to the Planning Commission hearing in consideration of a project, the City has set forth provisions as part of the development review process to streamline the review process involved in properly coordinating the physical aspects of a proposed development. A Development-Review Committee, established by the City Council, reviews the preliminary development proposal and provides a list of recommendations and conditions. The list is then forwarded to the Planning Commission for consideration as a condition of project approval. All final considerations for project approvals are made by the Planning Commission, and not the Development-Review Committee (Montclair Zoning Code Chapter 11.06).

Should the project require a zoning amendment, as is the case with the Proposed Project, applications shall be filed with the Secretary of the Planning Commission and accompanied by enough information to ensure the Planning Commission has the fullest practical presentation of facts for the permanent record. A public hearing is then scheduled and appropriate notice is given per the provisions described in Chapter 11.84.040 of the Montclair Zoning Code. If, from the facts presented to the Planning Commission in the application, at the public hearing, the Planning Commission approves the proposed change or amendment by a two-thirds vote, the Planning Commission shall recommend such proposed change or amendment to City Council. The City Council will then consider the Planning Commission report, after it has conducted a public hearing, to approve, modify, or disapprove the recommendations of the Planning Commission (Montclair Zoning Code Chapter 11.84)

Approval of the Proposed Project, in accordance with the provisions outlined in Title 11 of the Montclair Zoning Code, would ensure compliance with applicable development standards. Additionally, through the application process, the City would thoroughly review all plans for the Proposed Project to ensure compliance with the Montclair Municipal Code, and other relevant plans, policies, and regulations. Therefore, the Proposed Project would not conflict with the Montclair Zoning Code.

Conclusion

Based on the analysis provided above, the Proposed Project would be consistent with the SCAG 2020-2045 RTP/SCS, City of Montclair General Plan, City of Montclair Housing Element, City of Montclair Municipal Code (Title 11), NMSP, and NMDSP. The proposed MPDSP proposes to implement design guidelines to create a mix of residential and commercial land uses. The design guidelines would promote the transformation of the Plan area from the underutilized Montclair Place Mall and surrounding commercial uses, into a mixed-use downtown district within walking and biking distance of the Montclair Transcenter and anticipated extension of the Foothill Gold Line. The mix of

land uses within the Plan area, including single- and multi-family residential, and commercial uses, which would reduce automobile trips by creating a pedestrian-oriented, multi-modal, park-once environment. The building design utilized to guide this development would include a variety of building types, concentration of main street retail facing streets, and diverse housing choices. Additionally, the walkable, interconnected streets are intended to provide an inviting public realm with a transit-oriented mix of uses and enable a variety of alternative path movements. The MPDSP sets forth the development standards of the Plan area; however, where the document does not specific development standards, the existing NMSP and Montclair Municipal Code shall be the controlling documents. Thus, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be **less than significant**. No mitigation is required.

3.8.5 Cumulative Impacts

As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for land use. The cumulative study area used to assess potential cumulative land use impacts include the areas and land uses surrounding the MPDSP area.

Continued development in Montclair, including that which might occur as a result of the MPDSP, and the surrounding region could result in increased urbanization, including the density of residential, commercial, office, recreational, and public uses. Under cumulative conditions, conflicts between land uses may occur. Generally, land use conflicts would be related to noise, traffic, air quality, and hazards/human health and safety issues, which are discussed in the relevant sections of the Draft EIR. Land use conflicts are also typically site-specific and not cumulative in nature; in other words, despite the number of cumulative projects in a given area, they wouldn't necessarily compound to create cumulative land use conflicts. Cumulative incompatibility issues associated with surrounding developments or projects are anticipated to be addressed and mitigated for on a project-by-project basis. In addition, the cumulative environmental effects associated with implementation of the MPDSP have been addressed in the technical sections of this Draft EIR. Land use impacts would not be cumulatively considerable and are considered **less than significant**. No mitigation is required.

3.8.6 Mitigation Measures

Potential impacts associated with land use conflicts are considered **less than significant** and no mitigation is required.

3.8.7 Significance After Mitigation

Impacts to land use and planning would be **less than significant**.

3.8.8 References

City of Montclair. 1998. *North Montclair Specific Plan*. Prepared by Urban Design Studio and LSA Associates, Inc. Adopted January 5, 1998.

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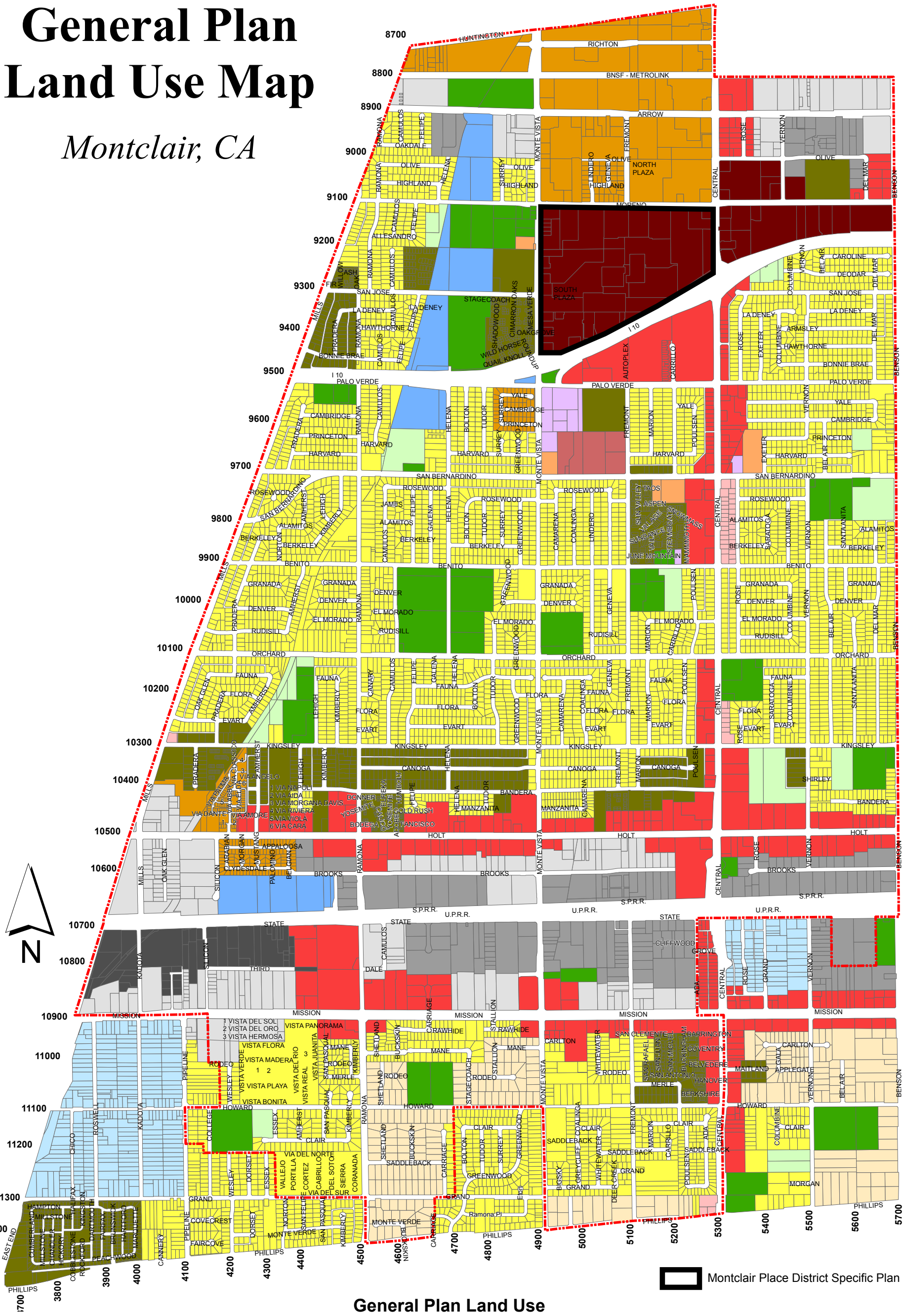
General Plan Land Use Map

Montclair, CA



General Plan Land Use

- Very Low, 0-2 units/acre
- Low, 3-7 units/acre
- Medium, 8-14 units/acre
- High, 15-30 units/acre
- Senior Housing
- Office Professional
- Neighborhood Commercial
- General Commercial
- Regional Commercial
- Business Park
- Industrial Park
- Limited Manufacturing
- Public/Quasi Public
- Neighborhood Park
- Conservation Basins
- Community Plan
- Planned Development
- Medical Center
- City Boundary

SOURCE: City of Montclair 2013

FIGURE 3.8-1

General Plan Land Use

Montclair Place District Specific Plan EIR

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Zoning Map

Montclair, CA

Zoning

- R1 Single-Family Residential
- R2 Two-Family (Duplex) Residential
- R3 Multiple Family Residential
- AP Administrative Professional
- C2 Restricted Commercial
- C3 General Commercial
- MIP Manufacturing Industrial
- M1 Limited Manufacturing
- M2 General Manufacturing
- SP Specific Plan

Zoning Overlay

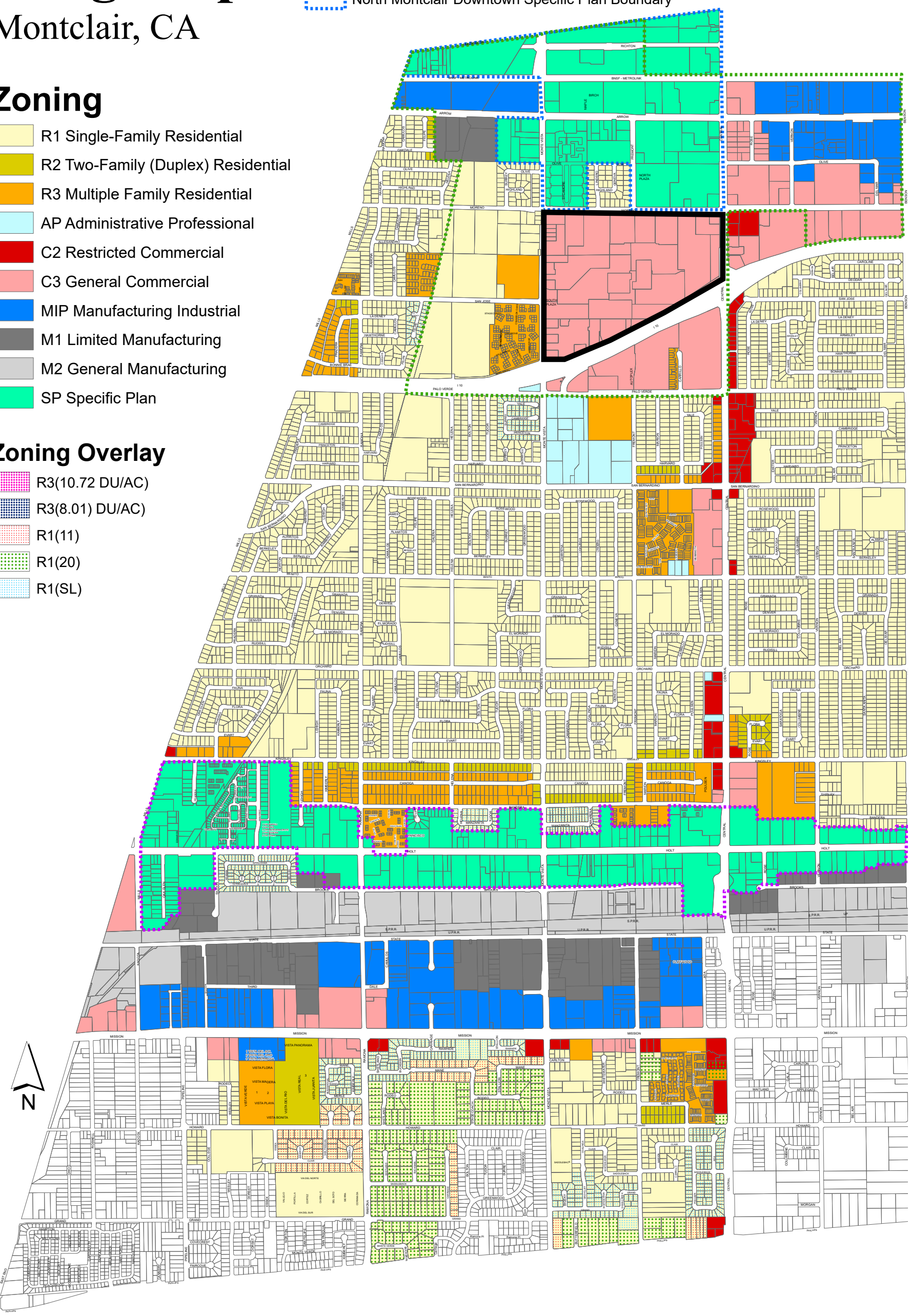
- R3(10.72 DU/AC)
- R3(8.01) DU/AC)
- R1(11)
- R1(20)
- R1(SL)

North Montclair Specific Plan

Holt Specific Plan Boundary

North Montclair Downtown Specific Plan Boundary

Montclair Place District Specific Plan



SOURCE: City of Montclair 2018

FIGURE 3.8-2

Zoning

Montclair Place District Specific Plan EIR

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3.9 NOISE

This section describes the existing noise conditions of the Montclair Place District Specific Plan Project (MPDSP or Proposed Project) site and surrounding vicinity, identifies associated regulatory requirements, evaluates potential environmental noise and vibration impacts, and where anticipated identifies mitigation measures related to implementation of the Proposed Project.

The May 2019 Initial Study (Appendix A) for the Proposed Project concluded that there were potentially significant impacts with respect to generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; and, potentially significant impacts relating to generation of excessive groundborne vibration or groundborne noise levels. These potentially significant impacts are evaluated herein for the Proposed Project. Noise measurement and predictive modeling data and related information are included in Appendix E.

While not required by the California Environmental Quality Act (CEQA) at the State level, for purposes of information disclosure, the analysis herein includes an assessment of proximate roadway traffic noise to future occupants of new residential land uses associated with the Proposed Project.

3.9.1 Existing Conditions

3.9.1.1 Noise Characteristics

Sound, Noise, and Acoustics

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is defined as loud, unexpected, or annoying sound.

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receptor, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receptor determine the sound level and characteristics of the noise perceived by the receptor. The field of acoustics deals primarily with the propagation and control of sound.

Frequency

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low-frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz (kHz), or thousands of Hertz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

Sound Pressure Levels and Decibels

The amplitude of pressure waves generated by a sound source determines the loudness of that source. Sound pressure amplitude is measured in micro-Pascals (mPa). One mPa is approximately one hundred billionth (0.00000000001) of normal atmospheric pressure. Sound pressure amplitudes for different kinds of noise environments can range from less than 100 to 100,000,000 mPa. Because of this huge range of values, sound is rarely expressed in terms of mPa. Instead, a logarithmic scale is used to describe sound pressure level (SPL) in terms of decibels (dB). The threshold of hearing for young people is about 0 dB, which corresponds to 20 mPa.

Addition of Decibels

Because decibels are logarithmic units, SPL cannot be added or subtracted through ordinary arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3-dB increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dB higher than one source under the same conditions. For example, if one automobile produces an SPL of 70 dB when it passes an observer, two cars passing simultaneously would not produce 140 dB—rather, they would combine to produce 73 dB. Under the decibel scale, three sources of equal loudness together produce a sound level 5 dB louder than one source.

A-Weighted Decibels

The decibel scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness or human response is determined by the characteristics of the human ear.

Human hearing is limited in the range of audible frequencies as well as in the way it perceives the SPL in that range. In general, people are most sensitive to the frequency range of 1,000–8,000 Hz, and perceive sounds within that range better than sounds of the same amplitude in higher or lower frequencies. To approximate the response of the human ear, sound levels of individual frequency bands are weighted, depending on the human sensitivity to those frequencies. Then, an "A-weighted" sound level (expressed in units of dBA) can be computed based on this information.

The A-weighting network approximates the frequency response of the average young ear when listening to most ordinary sounds. When people make judgments of the relative loudness or annoyance of a sound, their judgments correlate well with the A-scale sound levels of those sounds. Other weighting networks have been devised to address high noise levels or other special problems (e.g., B-, C-, and D-scales), but these scales are rarely used in conjunction with

highway-traffic noise. Noise levels for traffic noise reports are typically reported in terms of A-weighted decibels or dBA. Table 3.9-1 describes typical A-weighted noise levels for various noise sources.

Table 3.9-1
Typical A-Weighted Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	— 110 —	Rock band
Jet fly-over at 1000 feet		
	— 100 —	
Gas lawn mower at 3 feet		
	— 90 —	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	— 80 —	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawn mower, 100 feet	**— 70 —**	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	**— 60 —**	
		Large business office
Quiet urban daytime	**— 50 —**	Dishwasher next room
Quiet urban nighttime	**— 40 —**	Theater, large conference room (background)
Quiet suburban nighttime		
	— 30 —	Library
Quiet rural nighttime		Bedroom at night, concert hall (background)
	— 20 —	
		Broadcast/recording studio
	— 10 —	
Lowest threshold of human hearing	**— 0 —**	Lowest threshold of human hearing

Source: Caltrans 2013a.

Human Response to Changes in Noise Levels

As discussed above, doubling sound energy results in a 3-dB increase in sound. However, given a sound level change measured with precise instrumentation, the subjective human perception of a doubling of loudness will usually be different than what is measured.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear is able to discern 1-dB changes in sound levels, when exposed to steady, single-frequency ("pure-tone") signals in the mid-frequency (1,000 Hz–8,000 Hz) range (Caltrans 2013a). In typical noisy environments, changes in noise of 1 to 2 dB are generally not perceptible. However, it is widely

accepted that people are able to begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5-dB increase is generally perceived as a distinctly noticeable increase, and a 10-dB increase is generally perceived as a doubling of loudness. Therefore, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dB increase in sound, would generally be perceived as barely detectable.

Noise Descriptors

Noise in our daily environment fluctuates over time at varying rates. Various noise descriptors have been developed to describe time-varying noise levels. The following are the noise descriptors are utilized in this analysis.

- **Equivalent Sound Level (L_{eq}):** L_{eq} represents an energy average of the sound level occurring over a specified period. The 1-hour A-weighted equivalent sound level ($L_{eq}[h]$) is the energy average of A-weighted sound levels occurring during a one-hour period, and is the basis for noise abatement criteria (NAC) used by Caltrans and the Federal Highway Administration (FHWA). Note that L_{eq} is not an arithmetic average of varying dB levels over a period of time, it accounts for greater sound energy represented by higher decibel contributions.
- **Percentile-Exceeded Sound Level (L_{xx}):** L_{xx} represents the sound level exceeded for a given percentage of a specified period (e.g., L_{10} is the sound level exceeded 10% of the time, and L_{90} is the sound level exceeded 90% of the time).
- **Maximum Sound Level (L_{max}):** L_{max} is the highest instantaneous sound level measured during a specified period.
- **Day-Night Level (L_{dn}):** L_{dn} is the energy average of A-weighted sound levels occurring over a 24-hour period, with a 10-dB penalty applied to A-weighted sound levels occurring during nighttime hours between 10 p.m. and 7 a.m.
- **Community Noise Equivalent Level (CNEL):** Similar to L_{dn}, CNEL is the energy average of the A-weighted sound levels occurring over a 24-hour period, with a 10-dB penalty applied to A-weighted sound levels occurring during the nighttime hours between 10 p.m. and 7 a.m., and a 5-dB penalty applied to the A-weighted sound levels occurring during evening hours between 7 p.m. and 10 p.m.

Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The manner in which noise reduces with distance depends on the following factors:

- **Geometric Spreading** – Sound from a localized source (i.e., an ideal point source) propagates uniformly outward in a spherical pattern (or hemispherical when near a

surface). The sound level attenuates (or decreases) at a rate of 6 decibels for each doubling of distance from a point source. Roadways consist of several localized noise sources on a defined path, and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 decibels for each doubling of distance from a line source.

- **Ground Absorption** – The propagation path of noise from a sound emission source to a receptor is usually horizontal and proximate to the ground. Under these conditions, noise attenuation from ground absorption and reflective-wave canceling can add to the attenuation associated with geometric spreading. For acoustically "hard" paths over which sound may traverse (i.e., sites with a reflective surface between the source and the receptor, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or "soft" sites (i.e., those sites with an absorptive ground surface between the source and the receptor, such as fresh-fallen snow, soft dirt, or dense vegetative ground cover), an additional ground-attenuation value of +1.5 decibels per doubling of distance is normally assumed. When added to cylindrical spreading for line source sound propagation, the excess ground attenuation results in an overall drop-off rate of 4.5 decibels per doubling of distance.
- **Atmospheric Effects** – Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound pressure levels can also be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also have significant effects when distances between a source and receptor are large.
- **Shielding by Natural or Human-Made Features** – A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Natural terrain features (e.g., hills and dense woods) and human-made features (e.g., buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor specifically to reduce noise. A barrier that breaks the line of sight between a source and a receptor will typically result in at least 5 dB of noise reduction. Taller barriers provide increased noise reduction. While a line of trees may visually occlude the direct line between a source and a receptor, its actual noise-reducing effect is usually negligible because it does not create a solid barrier. Deep expanses of dense wooded areas, on the other hand, can offer noise reduction under the right conditions.

Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. Sensitive receptors near the Plan area area include the following:

- Moreno Elementary School (Moreno Street, West of Monte Vista Avenue)
- Single family residences
    - West side of Monte Vista Avenue (Moreno Street to Arrow Highway)
    - East/west side of Mills Avenue
    - North side of Moreno Street (Fremont Avenue to Mills Avenue); South side of Moreno Street (Mills Avenue to Helena Street)
    - East side of Central Avenue (north of Metrolink Railway) along Ninth Street in the City of Upland
- Multi-Family Residences
    - South side of Arrow Highway (Central Avenue to Monte Vista Avenue)
    - West side of Central Avenue (north of Arrow Highway in the City of Upland)
    - West side of Monte Vista Avenue (north of I-10 Freeway to Moreno Street)
    - Carrillo Avenue (south of I-10 Freeway)

The above existing sensitive receptors represent the nearest land uses with the potential to be impacted by construction and operation of future projects under the Proposed Project, including noise levels associated with the addition of project-related traffic on the local roadway network. Additional sensitive receptors are located farther from the Plan area in the surrounding community and would be less impacted by noise and vibration levels than the above-listed sensitive receptors. In addition to the off-site receptors listed above, the residential uses to be constructed as part of the Proposed Project are considered sensitive receptors.

3.9.1.2 Vibration Characteristics

Vibration is oscillatory movement of mass (typically a solid) over time. It is described in terms of frequency and amplitude and, unlike sound, can be expressed as displacement, velocity, or acceleration. For environmental studies, vibration is often studied as a velocity that, akin to the discussion of sound pressure levels, can also be expressed in dB as a way to cast a large range of

quantities into a more convenient scale. Vibration impacts to buildings are generally discussed in terms of inches per second (ips) peak particle velocity (PPV), which will be used herein to discuss vibration levels for ease of reading and comparison with relevant standards. Vibration can also be annoying and thereby impact occupants of structures, and vibration of sufficient amplitude can disrupt sensitive equipment and processes (Caltrans 2013b), such as those involving the use of electron microscopes and lithography equipment. Common sources of vibration within communities include construction activities and railroads. Groundborne vibration generated by construction projects is usually highest during pile driving, rock blasting, soil compacting, jack hammering, and demolition-related activities where sudden releases of subterranean energy or powerful impacts of tools on hard materials occur. Depending on their distances to a sensitive receptor, operation of large bulldozers, graders, loaded dump trucks, or other heavy construction equipment and vehicles on a construction site also have the potential to cause high vibration amplitudes. The maximum vibration level standard used by the California Department of Transportation (Caltrans) for the prevention of structural damage to typical residential buildings is 0.3 ips PPV (Caltrans 2013b). For human annoyance, Caltrans guidance indicates that a more stringent threshold of 0.2 ips PPV due to continuous vibration (e.g., nearby roadway traffic) would be "annoying". Vibration velocity limits for transient or single events tend to be less stringent than those for continuous or "steady-state" vibration sources.

3.9.1.3 Existing Noise Measurements

Noise Level Measurements and Modeling of Ambient Noise Levels

Sound pressure level measurements were conducted proximate to and on the Plan area in November 2014 and July 2019 to determine the existing outdoor ambient noise levels. Table 3.9-2 provides the location, date, and time the noise measurements were taken; noise measurement data is also included in Appendix E-1, Field Noise Measurement Data.

The noise level measurements conducted in 2014 at positions (ST1 through ST7, noted as M1 through M7 in Appendix E-1) used a Piccolo Integrating Sound Level Meter (SLM, serial number [SN] 130625005) equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. A similar Piccolo-brand SLM (SN: 140317004) was used to perform the measurement at ST8 in 2019. Both SLM meet the current American National Standards Institute (ANSI) standard for a Type 2 precision sound level meter. Each SLM had its calibration status checked before and after the field measurements with a portable calibrator, and the measurements were conducted with the microphone positioned approximately five feet above the ground.

As illustrated in Figure 3.9-1, Noise Measurement Locations, locations ST1 and ST2 were west of the Plan area adjacent to Monte Vista Avenue. Location ST3 was northwest of the Plan area at the Unitarian Universalist Congregation sharing the same property boundary as the Plan area. Locations ST4, ST5 and ST8 were north of the Plan area adjacent to Moreno Street. Location ST6 was east of

the Plan area adjacent to Central Avenue and location ST7 was on the Plan area. The measured energy-average noise levels (L_{eq}) and maximum measured level (L_{max}) values appear in Table 3.9-2. The primary noise source at the sites was from traffic along the adjacent roads and Interstate 10.

The noise level measurement at ST-8 was taken in 2019 and approximately five years after similar measurements were performed at nearby locations ST-4 and ST-5 along the north side of Moreno Street. Although its value is higher than that of ST-4 and ST-5, the measurement at ST-8 was performed closer to Moreno Street traffic. After accounting for the difference in measurement proximity with respect to Moreno Street, and the observed difference in traffic counts during the 15-minute measurement duration samples, the measured noise levels between ST-5 and ST-8 are comparable and support the suitability of the measurement set presented in Table 3.9-2 as being representative of the traffic-dominated outdoor ambient sound environment of the Plan area.

Table 3.9-2
Ambient Noise Level Measurements

Receptors	Receptor Type/Location/Address	Date	Time	Description	Leq (dBA)	Lmax (dBA)
ST1	Multi-family residential, 9355 Monte Vista Avenue, Montclair, California 91763	Nov. 4, 2014	1:24-1:39 p.m.	Along west side of Monte Vista Avenue, approximately 90 feet from the center line	65.0	81.3
ST2	Multi-family residential, 9200 Monte Vista Avenue, Montclair, California 91763	Nov. 4, 2014	2:07-2:22 p.m.	Along west side of Monte Vista Avenue, approximately 150 feet from the center line	56.2	69.1
ST3	Unitarian Universalist Congregation, 9185 Monte Vista Avenue, Montclair, California 91763	Nov. 4, 2014	2:44-2:59 p.m.	Along east side of Monte Vista Avenue, approximately 315 feet from the center line	49.8	56.6
ST4	Multi-family residential, 9065 Sycamore Avenue, Montclair, California 91763	Nov. 4, 2014	3:23-3:38 p.m.	Along north side of Moreno Street, approximately 150 feet from the center line	57.3	71.0
ST5	Single family residential, 5082 Moreno Street, Montclair, California 91763	Nov. 4, 2014	4:20-4:35 p.m.	Along north side of Moreno Street, approximately 90 feet from the center line	64.3	75.8
ST6	Commercial, 9177 Central Avenue Suite B, Montclair, California 91763	Nov. 5, 2014	2:54-3:09 p.m.	Along east side of Central Avenue, approximately 140 feet from the center line	71.6	82.5
ST7	Project Site, 5060 East Montclair Plaza Lane, Montclair, California 91763	Nov. 5, 2014	3:42-3:57 p.m.	Project Site	70.7	79.9
ST8	Single family residential, 5052 Moreno Street, Montclair, California 91763	July 9, 2019	9:11-9:26 a.m.	Along north side of Moreno Street, approximately 10 feet from edge of pavement	71.3	72.7

3.9.3 Regulatory Setting

Federal

Federal Transit Administration

In its Transit Noise and Vibration Impact Assessment guidance manual, the Federal Transit Administration (FTA) recommends a daytime construction noise level threshold of 80 dBA L_{eq} over an 8-hour period (FTA 2006) when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project. Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such noise limits at the state and local jurisdictional levels.

State

Government Code Section 65302(g)

California Government Code Section 65302(g) requires the preparation of a Noise Element in a general plan, which shall identify and appraise the noise problems in the community. The Noise Element shall recognize the guidelines adopted by the Office of Noise Control in the State Department of Health Services and shall quantify, to the extent practicable, current and projected noise levels for the following sources:

- Highways and freeways
- Primary arterials and major local streets
- Passenger and freight on-line railroad operations and ground rapid transit systems
- Aviation and airport-related operations
- Local industrial plants
- Other ground stationary noise sources contributing to the community noise environment

California General Plan Guidelines

The California General Plan Guidelines, published by the Governor's Office of Planning and Research (OPR), provides guidance for the acceptability of specific land use types within areas of specific noise exposure. Table 3.9-3, Land Use Compatibility for Community Noise Environments, presents guidelines for determining acceptable and unacceptable community noise exposure limits for various land use categories. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's

assessment of the relative importance of noise pollution. OPR guidelines are advisory in nature. Local jurisdictions, including the City of Montclair, have the responsibility to set specific noise standards based on local conditions.

Table 3.9-3
Land Use Compatibility for Community Noise Environments

	Community Noise Exposure (CNEL)			
	Normally Acceptable[1]	*Conditionally Acceptable*[2]	*Normally Unacceptable*[3]	*Clearly Unacceptable*[4]
Residential-low density, single-family, duplex, mobile homes	50–60	55–70	70–75	75–85
Residential – multiple-family	50–65	60–70	70–75	70–85
Transit lodging – motel, hotels	50–65	60–70	70–80	80–85
Schools, libraries, churches, hospitals, nursing homes	50–70	60–70	70–80	80–85
Auditoriums, concert halls, amphitheatres	NA	50–70	NA	65–85
Sports arenas, outdoor spectators sports	NA	50–75	NA	70–85
Playgrounds, neighborhood parks	50–70	NA	67.5–77.5	72.5–85
Golf courses, riding stables, water recreation, cemeteries	50–70	NA	70–80	80–85
Office buildings, business commercial and professional	50–70	67.5–77.5	75–85	NA
Industrial, manufacturing, utilities, agriculture	50–75	70–80	75–85	NA

Source: OPR 2003
Notes: CNEL = community noise equivalent level; NA = not applicable
1 Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
2 Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features have been included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.
3 Normally Unacceptable: New construction or development should be discouraged. If new construction of development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise-insulation features must be included in the design.
4 Clearly Unacceptable: New construction or development should generally not be undertaken.

California Code of Regulations Title 24

The State of California has adopted noise standards in areas of regulation not preempted by the federal government. State standards regulate noise levels of motor vehicles, sound transmission through buildings, occupational noise control, and noise insulation. State regulations governing noise levels generated by individual motor vehicles and occupational noise control are not applicable to planning efforts, nor are these areas typically subject to CEQA analysis. State noise regulations and policies applicable to the Proposed Project include Title 24 requirements and noise exposure limits for various land use categories.

The 2019 California Building Code (CBC, Part 2, Title 24, Section 1204.6, California Code of Regulations) stipulates "interior noise levels attributable to exterior sources shall not exceed 45

dB in any habitable room. The noise metric shall be either the day-night average sound level (Ldn) or the community noise equivalent level (CNEL)" (ICC 2019).

Local

City of Montclair General Plan Noise Element

The City of Montclair General Plan prescribes noise standards for interior and exterior noise, as well as maximum residential/non-residential noise levels. Refer to Table 3.9-4 for a summary of City noise standards. Refer to Table 3.9-3 for a chart of noise compatibility standards.

Table 3.9-4
City of Montclair Interior and Exterior Noise Standards

Categories	Land Use	Noise Standards (CNEL)	
		Interior [1,2]	*Exterior*
Residential	Single and multi-family, duplex, mobile homes	45	65 [3]
Commercial	Hotel, motel, transient lodging	45	65 [3]
	Commercial retail, bank, restaurant	55	-
	General office, reception/clerical	50	-
	Private offices, research and development	45	-
	Amphitheater, concert hall, auditorium, theater	45	-
Institutional	Hospital, nursing home, school classroom, church, library	45	65 [3]
Industrial	Manufacturing, warehousing, etc.	65	-

Source: City of Montclair General Plan, Noise Element (1999)
Notes:
1 Noise standard with windows closed. Mechanical ventilation shall be provided per UBC requirements.
2 Indoor environment excluding bathrooms, toilets, closets, and corridors.
3 Outdoor environment limited to rear yard of single family residences, multi-family patios and balconies.

In addition, the following objectives and policies are contained within the City's General Plan Noise Element:

Objectives

N0-1.1.0. Noise mitigation measures for future development should comply with the standards included in the City of Montclair Noise Element; and,

N0-1.2.1. Potential noise impacts due to stationary sources should be mitigated in the planning stage.

Implementing Policies

NE-1.1.2. For all areas within the year 2020 65 dBA CNEL roadway contours, future residential lots and dwellings shall be sound attenuated against present and

projected noise, which shall be the sum of all noise impacting the project, so as not to exceed an exterior standard of 65 dBA CNEL in outdoor living areas and an interior standard of 45 dBA CNEL in all habitable rooms. An acoustical study shall be prepared under the supervision al a person experienced in the field of acoustical engineering;

NE-1.1.4. Prior to the issuance of any building permits, an acoustical analysis report describing the acoustical design features of the structures required to satisfy the exterior and interior noise standards shall be submitted to the City for approval along with satisfactory evidence which indicates that the sound attenuation ·measures specified in the approved acoustical report(s) have been incorporated into the design of projects;

NE-1.1.5. Prior to the issuance of any Certificates of Use and Occupancy, field testing in accordance with California Administration Code Title 25 regulations may be required by the City, to verify compliance with Sound Transmission Class (STC) and Impact Insulation Class (IIC) design standards;

NE-1.1.6. Noise mitigation measures shall be developed from a list of City approved measures. The approved noise mitigation measures include: site design, such as set-backs from the roadways, grade separations and exterior living area orientations, noise barriers, mechanical ventilation (i.e., air conditioning) and upgraded windows. Additional measures shall be approved at the discretion of the City of Montclair;

NE-1.1.9. All sources of temporary noise shall comply with the City of Montclair Noise Ordinance;

NE-1.2.2. New noise generators shall not be located in the vicinity of noise sensitive receptors unless they can be adequately mitigated. Land use should be zoned such that high noise generators such as industrial or manufacturing activities are buffered from sensitive uses by moderate uses such as commercial or office-uses;

NE-1.2.5. All construction vehicles and equipment, fixed or mobile operated, shall be equipped with properly operating and maintained mufflers;

NE-1.2.6. Stock piling and/or vehicle staging areas shall be located as far as practical from residential homes;

NE-1.2.7. The noisiest operations shall be arranged to occur together in the construction programs to avoid continuing periods of greater annoyance; and,

NE-1.2.8. Construction which can impact noise sensitive receptors shall be limited to the hours of 7:00 AM to 8:00 PM on any given day and provided that the building official determines that the public health and safety will not be impaired.

The 65 dBA CNEL standard is applicable for proposed zones containing residential units. These proposed residential zones are "Neighborhood Residential" and "Corridor Residential" under the Proposed Project. In the proposed Town Center zones, the 65 dBA CNEL standard is applicable wherever transient lodging, such as hotels, are proposed.

Based on these criteria, noise levels in the plan area over 65 dBA CNEL for residential uses would require noise reduction measures. Land uses involving transient lodging would also require noise reduction measures for levels above 65 dBA CNEL.

City of Montclair Noise Ordinance

Per Table 6.12.040 of the City of Montclair noise ordinance, the default "base" exterior ambient sound environment can be defined by the following A-weighted levels by land zone and time of day:

- Residential daytime (7:00 a.m. to 10:00 p.m.) – 55 dB
- Residential nighttime (10:00 p.m. to 7:00 a.m.) – 45 dB
- Commercial daytime (7:00 a.m. to 10:00 p.m.) – 65 dB
- Commercial nighttime (10:00 p.m. to 7:00 a.m.) – 55 dB
- Industrial daytime (7:00 a.m. to 10:00 p.m.) – 70 dB
- Industrial nighttime (10:00 p.m. to 7:00 a.m.) – 60 dB

These base exterior ambient sound levels can be exceeded, but only for up to portions of an hour as follows:

- Exceed Base Ambient Noise Level (BANL) – up to 30 minutes in any hour;
- Exceed BANL by 5-9 dBA – up to 15 minutes in any hour;
- Exceed BANL by 10-14 dBA – up to 5 minutes in any hour;
- Exceed BANL by 15-16 dBA – up to 1 minutes in any hour; and,
- Exceed BANL by greater than 16 dBA – is not allowed.

Construction noise is exempt from the above City limits, so long as it occurs between 7:00 a.m. and 8:00 p.m. and is determined by the City's Building Official to not impair public health and safety. Further, the City allows the Director of Community Development to approve short duration construction projects that may fall outside these allowable hours (City of Montclair 2009).

3.9.4 Thresholds of Significance

The following significance criteria, included for analysis in this EIR, are based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.), and will be used to determine the significance of potential noise impacts. Noise impacts would be significant if the Proposed Project would:

A. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

B. Result in generation of excessive groundborne vibration or groundborne noise levels; and,

C. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in exposure of people residing or working in the project area to excessive noise levels.

Quantitative thresholds of significance have been established for the purposes of this analysis based on the local polices and regulations described in Section 3.9.2, and are listed below.

- Through adherence to the limitation of allowable construction times provided in the City's municipal code, the construction-related noise levels would not exceed any standards. However, the existing residential receptors to the west and north of the Plan area suggest that distances between such noise-sensitive receptors and noise-producing construction activities of individual projects implemented under the Proposed Project would be as close as 130 feet and may not be consistent with FTA guidance mentioned in Section 3.9-2. Hence, this analysis will use 80 dBA L_{eq} over an 8-hour period as the construction noise impact criterion during daytime hours 7:00 a.m. and 8:00 p.m. on any given day.
- Off-site noise impacts due to project-generated traffic would be considered significant if the project-generated traffic causes an increase of 3 dBA CNEL compared to existing traffic noise levels.
- Noise emission from project-attributed stationary sources, such as rooftop HVAC systems operating at night to provide interior comfort for new residential and non-residential land uses implemented as a result of the Proposed Project, would be limited to 45 dBA hourly L_{eq} at the nearest off-site existing residential receptors.
- Construction or operation of the Proposed Project would be considered significant if the project resulted in vibration levels of 0.01 inches/second (ips) or greater peak particle velocity (PPV) at or beyond the property boundary.

For informational purposes, roadway traffic noise exposures that exceed 65 dBA CNEL at newly created residential exterior uses (patios, balconies, etc.) would be recognized as exceedances of the City's compatibility threshold.

3.9.5 Impacts Analysis

A. Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

On-site noise-generating activities associated with the Proposed Project would include short-term construction as well as long-term operational noise associated with the Proposed Project. The Proposed Project would also generate off-site traffic noise along various roadways in the area. These potential effects are analyzed below.

Construction Noise (Short-Term Impacts)

Less Than Significant Impact. Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use, the operations performed, and the distance between the source and receptor.

Equipment that would be in use during construction would include, in part, graders, backhoes, excavators, dump trucks, loaders, cranes, dozers, scrapers, cement pump trucks, pavers, rollers, welders, concrete saws, and air compressors. The typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet are presented in Table 3.9-5. Usually, construction equipment operates in alternating cycles of full power and low power, producing average noise levels over time that are less than the listed maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 3.9-5
Typical Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment (L_{max}, dBA at 50 Feet)
Air compressor	78
Backhoe	78
Concrete pump truck	81
Concrete Saw	90
Dozer	85

Table 3.9-5
Typical Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment (L_{max}, dBA at 50 Feet)
Grader	85
Crane	81
Gradall	85
Scraper	85
Dump Truck	76
Roller	80
Generator	72
Front End Loader	79
Paver	77
Welder	74

Source: DOT 2006.
Note: L_{max} = maximum sound level; dBA = A-weighted decibels.

Aggregate noise emission from Proposed Project construction activities, broken down by sequential phase, was predicted for two distances to the nearest existing noise-sensitive receptor: 1) from the nearest position of the construction site boundary; and, 2) from the geographic center of the construction site of each phase location, which serves as the time-averaged location or geographic *acoustical centroid* of active construction equipment for the phase under study. The intent of the former distance is to help evaluate anticipated construction noise from a limited quantity of equipment or vehicle activity expected to be at the boundary for some period of time, which would be most appropriate for phases such as site preparation, grading, and paving. The latter distance is used in a manner similar to the general assessment technique as described in the FTA guidance for construction noise assessment, when the location of individual equipment for a given construction phase is uncertain over some extent of (or the entirety of) the construction site area. Because of this uncertainty, all the equipment for a construction phase is assumed to operate—on average—from the acoustical centroid. For each of the seven proposed buildout phases (A through G) associated with the Proposed Project, Table 3.9-6 summarizes these two distances to the apparent closest noise-sensitive receptor for each of the six sequential construction phases as well as the overall nearest position of the construction site boundary. Where other technical disciplines in this EIR may refer to only six Proposed Project buildout phases, this construction noise analysis considers seven distinct geographic areas associated with progressive buildout as depicted in "Chapter 6 Implementation" of the April 30, 2020 Draft Specific Plan because the intensity of construction activity would geographically shift over time, and thus, result in different site boundary and acoustical centroid locations, which result in different distance to nearest receptors, as shown in Table 3.9-6. At both the site boundary and

acoustical centroid case, this analysis assumes that equipment of each listed type per phase will be involved in the construction activity for the entire 8-hour period.

Table 3.9-6
Estimated Distances between Construction Activities and the Nearest Noise-sensitive Receptors for Each Buildout Phase of the Proposed Project

Construction Phase (and Equipment Types Involved)	Distance from Nearest Noise-Sensitive Receptor to Construction Site Boundary (Feet)	Distance from Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (Feet)
Phase A		
Demolition (Concrete Saw, Excavator, Dozer)	115	330
Site Preparation (Dozer, Front End Loader)	115	330
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	115	330
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	115	330
Architectural Coating (Air Compressor)	115	330
Paving (Paver, Dump Truck, Roller)	115	330
Phase B		
Demolition (Concrete Saw, Excavator, Dozer)	135	315
Site Preparation (Dozer, Front End Loader)	135	315
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	135	315
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	135	315
Architectural Coating (Air Compressor)	135	315
Paving (Paver, Dump Truck, Roller)	135	315
Phase C		
Demolition (Concrete Saw, Excavator, Dozer)	145	385
Site Preparation (Dozer, Front End Loader)	145	385
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	145	385
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	145	385
Architectural Coating (Air Compressor)	145	385
Paving (Paver, Dump Truck, Roller)	145	385
Phase D		
Demolition (Concrete Saw, Excavator, Dozer)	120	470
Site Preparation (Dozer, Front End Loader)	120	470
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	120	470
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	120	470
Architectural Coating (Air Compressor)	120	470
Paving (Paver, Dump Truck, Roller)	120	470
Phase E		
Demolition (Concrete Saw, Excavator, Dozer)	415	740
Site Preparation (Dozer, Front End Loader)	415	740
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	415	740
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	415	740

Table 3.9-6
Estimated Distances between Construction Activities and the Nearest Noise-sensitive Receptors for Each Buildout Phase of the Proposed Project

Construction Phase (and Equipment Types Involved)	Distance from Nearest Noise-Sensitive Receptor to Construction Site Boundary (Feet)	Distance from Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (Feet)
Architectural Coating (Air Compressor)	415	740
Paving (Paver, Dump Truck, Roller)	415	740
Phase F		
Demolition (Concrete Saw, Excavator, Dozer)	180	590
Site Preparation (Dozer, Front End Loader)	180	590
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	180	590
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	180	590
Architectural Coating (Air Compressor)	180	590
Paving (Paver, Dump Truck, Roller)	180	590
Phase G		
Demolition (Concrete Saw, Excavator, Dozer)	145	360
Site Preparation (Dozer, Front End Loader)	145	360
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	145	360
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	145	360
Architectural Coating (Air Compressor)	145	360
Paving (Paver, Dump Truck, Roller)	145	360

A Microsoft Excel–based noise prediction model emulating and using reference data from the Federal Highway Administration Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at the nearest occupied noise-sensitive land use. (Although the RCNM was funded and promulgated by the Federal Highway Administration, it is often used for non-roadway projects, because the same types of construction equipment used for roadway projects are often used for other types of construction.) Input variables for the predictive modeling consist of the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of time within a specific time period, such as an hour, when the equipment is expected to operate at full power or capacity and thus make noise at a level comparable to what is presented in Table 3.9-5, and the distance from the noise-sensitive receiver. The predictive model also considers how many hours that equipment may be on site and operating (or idling) within an established work shift. Conservatively, no topographical or structural shielding was assumed in the modeling. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise

analysis, which is detailed in Appendix E-2, Construction Noise Modeling Input and Output, and produce the predicted results displayed in Table 3.9-7.

Table 3.9-7
Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)
Phase A		
Demolition (Concrete Saw, Excavator, Dozer)	80	70
Site Preparation (Dozer, Front End Loader)	78	69
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	80	71
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	78	69
Architectural Coating (Air Compressor)	65	56
Paving (Paver, Dump Truck, Roller)	74	64
Phase B		
Demolition (Concrete Saw, Excavator, Dozer)	78	71
Site Preparation (Dozer, Front End Loader)	76	69
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	79	71
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	77	69
Architectural Coating (Air Compressor)	64	57
Paving (Paver, Dump Truck, Roller)	72	65
Phase C		
Demolition (Concrete Saw, Excavator, Dozer)	77	69
Site Preparation (Dozer, Front End Loader)	76	67
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	78	70
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	76	68
Architectural Coating (Air Compressor)	63	55
Paving (Paver, Dump Truck, Roller)	72	63
Phase D		
Demolition (Concrete Saw, Excavator, Dozer)	79	67
Site Preparation (Dozer, Front End Loader)	77	66
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	80	68
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	78	66
Architectural Coating (Air Compressor)	65	53
Paving (Paver, Dump Truck, Roller)	73	61
Phase E		
Demolition (Concrete Saw, Excavator, Dozer)	68	63
Site Preparation (Dozer, Front End Loader)	67	62
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	69	64
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	67	62
Architectural Coating (Air Compressor)	54	49

Table 3.9-7
Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)
Paving (Paver, Dump Truck, Roller)	62	57
Phase F		
Demolition (Concrete Saw, Excavator, Dozer)	76	65
Site Preparation (Dozer, Front End Loader)	74	64
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	76	66
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	74	64
Architectural Coating (Air Compressor)	62	51
Paving (Paver, Dump Truck, Roller)	70	59
Phase G		
Demolition (Concrete Saw, Excavator, Dozer)	77	70
Site Preparation (Dozer, Front End Loader)	76	68
Grading (Excavator, Grader, Dozer, Scraper, Backhoe)	78	70
Building Construction (Crane, Gradall, Generator, Backhoe, Welder)	76	68
Architectural Coating (Air Compressor)	63	56
Paving (Paver, Dump Truck, Roller)	72	64

As presented in Table 3.9-7, the estimated construction noise levels are predicted to be as high as 80 dBA L_{eq} over an 8-hour period at the nearest existing residences (as close as 130 feet away) when site preparation activities take place near the western and northern project boundaries. Note that these estimated noise levels at a source-to-receiver distance of 130 feet would occur when noted pieces of heavy equipment would each operate for a cumulative period for 8 hours a day. The predicted operation of construction equipment and processes do not exceed noise levels of 80 dBA L_{eq}, which the FTA recommends as a daytime threshold for construction noise exposure over an 8-hour period at a residential receptor. Construction activities associated with the Proposed Project would take place within the hours of 7:00 a.m. and 8:00 p.m. in accordance with the City's General Plan and Municipal Code. In summary, typical construction noise during allowable daytime hours would not exceed the aforementioned FTA guidance-based standard. Thus, temporary construction-related noise impacts would be **less than significant**. No mitigation is required.

Roadway Traffic Noise

Estimation Methodology

Potential noise effects from vehicular traffic were assessed using the FHWA Traffic Noise Model (TNM) version 2.5 (FHWA 2004) as well as FHWA Traffic Noise Model algorithms to calculate distances to noise contours for each of the roadway segments surrounding the Proposed Project boundary. The FHWA model takes into account traffic mix, speed, and volume; roadway gradient; relative distances between sources, barriers, and sensitive receptors; and shielding provided by intervening terrain or structures for the following four cases:

I. Existing (year 2020);

II. Existing plus project;

III. Horizon (year 2040) without project;

IV. Horizon (year 2040) plus project;

The analysis of the traffic noise environment conservatively assumed that the topography was flat with no intervening terrain between sensitive land uses and roadways. Because there are no obstructions, predicted noise levels are likely higher than would actually occur. In actuality, the presence of buildings and other obstructions, including natural terrain features, along the roadways would shield distant receivers from some portion of the traffic noise exposure.

Average daily traffic (ADT) volumes for the studied roadways are from the traffic impact assessment (TIA) prepared for the Proposed Project (Dudek 2020).

On-site Traffic Noise Effects

Less Than Significant Impact. Aside from exposure to aviation traffic noise, current CEQA noise-related guidelines do not require an assessment of exterior-to-interior noise intrusion, environmental noise exposure to occupants of newly-created project residences, or environmental noise exposure to exterior non-residential uses attributed to the development of the Proposed Project. Nevertheless, the California Building Code (CBC) requires that interior background noise levels not exceed a CNEL of 45 dB within habitable rooms. Hence, the following predictive analysis of traffic noise exposure at the exteriors of occupied residences and outdoor living areas is provided for informational purposes.

Table 3.9-8 presents the estimated distances (in feet) to the 55, 60, 65, 70, and 75 dBA CNEL noise contours for studied major roadways for the Horizon (2040) plus project

scenario. Distances to the noise contours assume a soft, flat site with no intervening barriers or obstructions.

Table 3.9-8
Predicted Traffic Exterior Noise Contour Distances – Buildout (2040)

Roadway Segment	Exterior Traffic Noise Contour Distances between Roadway Segment and the Adopted Project Area (feet)				
Existing	*55 CNEL*	*60 CNEL*	*65 CNEL*	*70 CENL*	*75 CNEL*
Moreno Street	1346	426	135	43	13
Monte Vista Ave	2748	869	275	87	27
Central Ave	3972	1256	397	126	40

The on-site traffic noise information (as presented in Table 3.9-8) identifies expected outdoor noise exposure levels, which can be utilized for future site planning within the Proposed Project boundaries. As needed, future site-specific projects implemented as part of Proposed Project buildout would be required to demonstrate compatibility with respect to the appropriate jurisdictional guidance and policies, which may include project-specific acoustical analyses that evaluate the effects of adequate building sound insulation and other noise-reducing measures. By way of example, an exterior traffic noise level of 70 dBA CNEL predicted at the façade of a newly-built residential unit would indicate that the exterior-to-interior sound insulation performance of the façade's wall assembly (including fenestration, as applicable) would need to be at least 25 dBA (i.e., 70-25=45) so as to yield a CBC-required 45 dBA CNEL interior noise level due to exterior noise intrusion. In some cases, such predictive analyses of proposed development may conclude that noise and vibration impacts may be significant. Thus, implementation of project design feature **PDF-1** would help demonstrate that the expected resultant interior background noise level for planned project inhabited rooms would meet the state and City interior noise standard of 45 dBA CNEL. On-site traffic noise impacts would be **less than significant**. No mitigation is required.

PDF-1 Prior to the issuance of any building permits, an acoustical analysis report describing the acoustical design features of the structures required to satisfy the exterior and interior noise standards shall be submitted to the City for approval along with satisfactory evidence which indicates that the sound attenuation ·measures specified in the approved acoustical report(s) have been incorporated into the design of projects. Additionally, prior to the issuance of any Certificates of Use and Occupancy, field-testing in accordance with California Administration Code Title 25 regulations may

be required by the City, to verify compliance with Sound Transmission Class (STC) and Impact Insulation Class (IIC) design standards.

Off-site Traffic Noise Impacts

Less Than Significant Impact. The Proposed Project would result in the creation of additional vehicle trips on local arterial roadways (i.e., Moreno Street, Monte Vista Avenue, and Central Avenue), which could result in increased traffic noise levels at adjacent noise-sensitive land uses. Appendix E-3, Traffic Noise Modeling Input and Output, contains a spreadsheet with traffic volume data (average daily traffic) for the Project and surrounding arterial roadways. In particular, the Proposed Project would create additional traffic along Moreno Street, Monte Vista Avenue, and Central Avenue, which according to traffic impact assessment (Dudek 2020) would add an estimated 27,042 average daily trips to these segments and adjacent roadways surrounding the Plan area.

Noise levels were modeled at representative noise-sensitive receivers ST1 through ST8, as shown in Figure 3.9-1. Demonstrating validity of the TNM model, predicted traffic noise levels for the existing (2020) without Proposed Project case shown in Table 3.9-9 compare well (i.e., within an average difference of 1.9 dBA) with the measured L_{eq} magnitudes from Table 3.9-2. Hence, on the basis of the TNM model accuracy for the existing (2020) without project case, future traffic noise levels can be predicted with confidence in the method.

The City's Noise Element establishes a policy for exterior sensitive areas to be protected from high noise levels. The Noise Element sets 65 dBA CNEL for the outdoor areas and 45 dBA CNEL for interior areas as the normally acceptable levels. However, existing levels from traffic already exceed this threshold. For the purposes of this noise analysis, such impacts are considered significant when they cause an increase of 3 dB from existing noise levels. An increase or decrease in noise level of at least 3 dB is required before any noticeable change in community response would be expected (Caltrans 2013a). The receivers were modeled to be 5 feet above the local ground elevation. The noise model results are summarized in Table 3.9-9.

Table 3.9-9
Roadway Traffic Noise Modeling Results

Modeled Receiver Tag (Location Description)	Existing (2020) Noise Level (dBA CNEL)	Existing (2020) Plus Project Noise Level (dBA CNEL)	Horizon (2040) Noise Level (dBA CNEL)	Horizon (2040) Plus Project Noise Level (dBA CNEL)	Maximum Project-Related Noise Level Increase (dB)
ST1	67.2	68.5	67.5	68.3	1.3
ST2	56.9	57.9	57.2	57.7	1.0

Table 3.9-9
Roadway Traffic Noise Modeling Results

Modeled Receiver Tag (Location Description)	Existing (2020) Noise Level (dBA CNEL)	Existing (2020) Plus Project Noise Level (dBA CNEL)	Horizon (2040) Noise Level (dBA CNEL)	Horizon (2040) Plus Project Noise Level (dBA CNEL)	Maximum Project-Related Noise Level Increase (dB)
ST3	49.8	50.7	50.4	50.8	0.9
ST4	60.5	61.4	61.2	61.5	0.9
ST5	66.5	67.3	67.2	67.5	0.8
ST6	71.4	72.4	72.4	72.8	1.0
ST7	66.6	67	67.2	67.3	0.4
ST8	66.4	67.3	67.2	67.5	0.9

Notes: dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level; dB = decibel.

Table 3.9-9 shows that at all eight listed representative receivers, the addition of Proposed Project traffic to the roadway network would result in a CNEL increase of less than 3 dB, which is below the discernible level of change for the average healthy human ear. Thus, a **less-than-significant impact** is expected for Proposed Project–related off-site traffic noise increases affecting existing residences in the vicinity. No mitigation is required.

Stationary Operations Noise

Less Than Significant Impact. Whereas the previous section discusses potential off-site traffic noise impacts from the Proposed Project to the surrounding community, the following paragraphs assess the potential impact of non-transportation or "stationary" sources of noise attributed to implementation of the Proposed Project. Stationary sources of noise can include a variety of on-site intermittent acoustical contributors such as amplified music from outdoor dining or other commercial areas (or what may be the result of interior space music momentarily emanating from an open door), speech from pedestrians or patrons of an outdoor dining area, audible safety or security alarms, and occasional vehicle door closures. But of larger concern are stationary sources of noise such as electro-mechanical equipment (e.g., rooftop HVAC systems) that must continuously operate to provide required ventilation and reliable indoor comfort for Proposed Project residential and non-residential uses.

Because individual site development details within the Proposed Project boundary are preliminary or speculative at this time, this stationary operational noise analysis broadly considers two scenarios as follows:

- Typical *daytime* conditions – during daytime or "business hours" (i.e., between 7:00 a.m. and 10:00 p.m.), this includes:
    - steady-state noise emission from operating building HVAC; and,

  - a set of hypothetical intermittent sound sources including normal speech from an average quantity of pedestrians (including residents and commercial business patrons) and concurrent amplified music from one establishment in each of the seven Project development phases (A through G).

- Typical *nighttime* conditions – during nighttime or external to "business hours" (i.e., between 10:00 p.m. and 7:00 a.m.), this includes only steady-state noise emission from operating building HVAC.

Prediction of stationary operational noise from amplified music, speech, and major sources of sound-producing mechanical equipment (e.g., rooftop HVAC systems) attributed to the Proposed Project involved creation of a sound propagation model using the CadnaA software program. CadnaA (Computer Aided Noise Abatement) is a commercially available computer-modeling program for calculation, presentation, assessment, and prediction of environmental noise. While design-level details of HVAC systems for new residential and non-residential buildings constructed as a result of implementing the Proposed Project development phases are unknown at this time, this noise assessment presumes that most HVAC noise would be generated from rooftop equipment exposed to the outdoors. Hence, estimated sound levels from air handling unit (AHU) fans were entered into the CadnaA computer model space as point-type sources of sound emission atop rendered "blocks" of building masses (as depicted in Figure 2-6, Proposed Zones, see Section 2, Project Description) having heights consistent with maximum elevations consistent with the MPDSP information.

The relevant outdoor noise propagation algorithms in CadnaA follow those described in the International Organization of Standardization (ISO) Standard 9613-2, "Attenuation of Sound During Propagation Outdoors, Part 2: General Method of Calculation" (ISO 1996). In addition to the above-mentioned sound source inputs and building-block structures that define the three-dimensional sound propagation model space, the following assumptions and parameters are included in this CadnaA-supported stationary noise source assessment:

- Ground effect acoustical absorption coefficient equal to 0.25, which on the zero-to-one scale of acoustical reflection and absorption (i.e., 0 = reflective, 1 = absorptive) intends to represent what will largely be a paved or concrete surface on the Plan area;
- Reflection order of 1, which allows for a single reflection of sound paths on encountered structural surfaces such as the modeled building masses;
- Off-site residential structures and the commercial buildings have not been rendered in the model;

- Calm meteorological conditions (i.e., no wind) with 68 degrees Fahrenheit and 70% relative humidity.

For daytime speech and amplified music, the CadnaA model features the following inputs:

- The pedestrian walkways and parks feature, on average, a geographic density of two people per ten square meters having conversation-level speech (60 dBA at a distance of one meter); and,
- On a site-facing façade of one building mass for each of the seven Proposed Project development phases, two wall-mounted speakers, each spaced roughly ten meters apart, ten feet above grade, and emitting music at a level of 90 dBA at one meter.

Derivation of the individual AHU sound power levels modeled as point-type sources on the rooves of the building masses is based on consideration of gross square footage, primary building function/usage, and recommended indoor air quality air volume rates per industry guidance. Details of these calculations can be found in Appendix E-4, Operational Noise Modeling Input and Output, and are based on a methodology described in "Screening Noise Analysis with Preliminary Building Project Information" (Storm 2018).

Table 3.9-10 compares the predicted aggregate Proposed Project operation noise immission levels from HVAC, speech, and amplified music (i.e., at the modeled receptor locations at three elevations above grade appearing in Figure 3.9-1) and the applicable City of Montclair daytime noise thresholds.

Table 3.9-11 compares the predicted aggregate Proposed Project operation noise immission levels from HVAC (i.e., at the modeled receptor locations at three elevations above grade appearing in Figure 3.9-1) and the applicable City of Montclair nighttime noise thresholds. Contrast of only the predicted HVAC noise levels with these more stringent nighttime limits is appropriate because the HVAC systems would be expected to operate continuously and through nighttime hours while daytime intermittent sound sources from pedestrians, potential outdoor music, etc. would diminish or not occur outside of commercial business hours.

Appendix E-4, Operational Noise Modeling Input and Output, provides details of the calculated values appearing in Tables 3.9-10 and 3.9-11 and shows sample graphical displays of predicted noise levels across and surrounding the Plan area at three studied elevation planes (i.e., the horizontal plane on which the sound levels are predicted) corresponding with the same heights above grade appearing in Tables 3.9-10 and 3.9-11.

Even under these conservative sound modeling conditions, no exceedances with respect to the municipal standards are expected; thus, operational noise impact from stationary sources during daytime and nighttime hours should be **less than significant**. No mitigation is required.

Table 3.9-10
Predicted Project Daytime Stationary Operations Noise at Nearest Off-site Sensitive Receptors

Modeled Receiver	Location/description	Full Buildout operating HVAC, speech, and amplified music predicted noise level (dBA L_{eq})				
		dBA @ 5 ft above grade	*dBA @ 15 ft above grade*	*dBA @ 25 ft above grade*	*hourly L_{eq} Limit (residential zone)*	*Exceedance?*
ST1	Multi-family residential – 9355 Monte Vista Avenue Montclair, California 91763	40	41	42	55	no
ST2	Multi-family residential – 9200 Monte Vista Avenue Montclair, California 91763	45	46	47	55	no
ST4	Multi-family residential – 4914 Olive Street Montclair, California 91763	48	48	48	55	no
ST5	Single family residential – 5082 Moreno Street Montclair, California 91763	44	45	45	55	no
ST6	Commercial – 9177 Central Avenue Suite B Montclair, California 91763	53	53	53	55	no
ST8	Single family residential – 5052 Moreno Street Montclair, California 91763	43	44	44	55	no

Table 3.9-11
Predicted Project Nighttime Stationary Operations Noise at Nearest Off-site Sensitive Receptors

Modeled Receiver	Location/description	Full Buildout operating HVAC predicted noise level (dBA L_{eq})				
		dBA @ 5 ft above grade	*dBA @ 15 ft above grade*	*dBA @ 25 ft above grade*	*hourly L_{eq} Limit (residential zone)*	*Exceedance?*
ST1	Multi-family residential –	39	40	42	45	no

Table 3.9-11
Predicted Project Nighttime Stationary Operations Noise at Nearest Off-site Sensitive Receptors

Modeled Receiver	Location/description	Full Buildout operating HVAC predicted noise level (dBA L_{eq})				
		dBA @ 5 ft above grade	*dBA @ 15 ft above grade*	*dBA @ 25 ft above grade*	*hourly L_{eq} Limit (residential zone)*	*Exceedance?*
	9355 Monte Vista Avenue Montclair, California 91763					
ST2	Multi-family residential – 9200 Monte Vista Avenue Montclair, California 91763	41	43	44	45	no
ST4	Multi-family residential – 4914 Olive Street Montclair, California 91763	41	42	43	45	no
ST5	Single family residential – 5082 Moreno Street Montclair, California 91763	41	42	43	45	no
ST6	Commercial – 9177 Central Avenue Suite B Montclair, California 91763	41	42	42	45	no
ST8	Single family residential – 5052 Moreno Street Montclair, California 91763	41	41	42	45	no

B. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Construction activities may expose persons to excessive groundborne vibration or groundborne noise, causing a potentially significant impact. Caltrans has collected groundborne vibration information related to construction activities (Caltrans 2013b). Information from Caltrans indicates that continuous vibrations with a PPV of approximately 0.2 ips is considered annoying. For context, heavier pieces of construction equipment, such as a bulldozer that may be expected on the Plan area, have peak particle velocities of approximately 0.089 ips or less at a reference distance of 25 feet (DOT 2006).

Groundborne vibration attenuates rapidly, even over short distances. The attenuation of groundborne vibration as it propagates from source to receptor through intervening soils and rock strata can be estimated with expressions found in FTA and Caltrans guidance. By way of example, for a bulldozer operating on site and as close as the western project boundary (i.e., 130 feet from the nearest receiving sensitive land use) the estimated vibration velocity level would be 0.008 ips per the equation as follows (FTA 2006):

$$PPV_{rcvr} = PPV_{ref} * (25/D)^{1.5} = 0.008 = 0.089 * (25/130)^{1.5};$$

where PPV_{rcvr} is the predicted vibration velocity at the receiver position, PPV_{ref} is the reference value at 25 feet from the vibration source (the bulldozer), and D is the actual horizontal distance to the receiver. Therefore, at this predicted PPV, the impact of vibration-induced annoyance to occupants of nearby existing homes would be **less than significant**. No mitigation is required.

Construction vibration, at sufficiently high levels, can also present a building damage risk. However, the predicted 0.008 ips PPV at the nearest residential receiver 130 feet away from on-site operation of the bulldozer during grading would not surpass the guidance limit of 0.3 to 0.5 ips PPV for preventing damage to residential structures (Caltrans 2013b). Because the predicted vibration level at 130 feet is less than both the annoyance and building damage risk thresholds, vibration from project conventional construction activities is considered **less than significant**. No mitigation is required.

Once operational, the Proposed Project would not be expected to feature major on-site producers of groundborne vibration. Anticipated mechanical systems like pumps are designed and manufactured to feature rotating components (e.g., impellers) that are well-balanced with isolated vibration within or external to the equipment casings. On this basis, potential vibration impacts due to Proposed Project operation would be **less than significant**. No mitigation is required.

C. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

Less Than Significant Impact. Cable Airport is located approximately 1.44 miles northeast of the Plan area. However, the Plan area is not located within Cable Airport's safety zone area. The Plan area is located within the Airport Influence Area (AIA) of the Ontario International Airport and thus is subject to the ONT ALUCP. According to the ONT ALUCP Compatibility Policy Map 2-3, the Plan area is not located within a noise impact zone (City of Ontario 2011). Therefore, the Proposed Project would not expose

people residing or working in the project area to excessive aviation traffic noise levels. Impacts would be **less than significant**. No mitigation is required.

3.9.6 Cumulative Impacts

Noise in Excess of Standards

The Proposed Project and related development projects within its area would all be subject to applicable noise standards (descriptions of the standards applicable within the City of Montclair are described throughout this section). The Proposed Project would incorporate project design feature **PDF-1**, as described in Section 3.9.4, to help ensure project-specific compliance with applicable noise standards as the build-out phasing proceeds. On this basis, and because noise impacts with respect to relevant standards are predicted to be less than significant, the Proposed Project would not contribute to cumulative exceedances of noise standards, and its incremental effect is considered a **less than significant** impact. No mitigation is required.

Temporary/Periodic Increases in Ambient Noise Levels

The Proposed Project would result in temporary noise increases during construction of future developments arising from its implementation, as discussed under item 3.9.4(a) above. The construction period of future developments under the Proposed Project has the potential to overlap with the construction of other projects in the City. Due to the decrease in noise levels with distance and the presence of physical barriers (i.e., intervening buildings and topography), noise due to construction of other projects would not meaningfully combine with future development under the Proposed Project to produce a cumulative noise effect during construction. By way of illustration, if there are two concurrent construction projects of comparable sound emission intensity, and the activity nearest to the studied noise-sensitive receptor is compliant with the aforementioned FTA guidance (i.e., 80 dBA 8-hour L_{eq}), the other activity could be no closer than three times the distance of the receptor to the nearest activity and not make a cumulatively measurable contribution to the total noise exposure level. If two concurrent projects were close to a receptor, the cumulative noise would be one of the following:

- The louder (in dBA) of the two concurrent activities; or,
- A logarithmic sum of the two activity noise levels that, per acoustic principles, cannot be more than 3 dBA greater than the louder of the two individual noise-producing activities.

In sum, cumulative construction noise is likely to be dominated by the closest or loudest activity to the receptor, and the combination will be no more than a barely perceptible difference (i.e., up to a 3 dBA change).

Among the cumulative projects appearing in Table 2.4 (Related Projects), only those listed as being in the City of Montclair would be close enough for consideration as having a potential cumulative contribution. Beyond the City limits, other projects are at least one quarter-mile away from the Proposed Project boundary and its nearest noise-sensitive receptors studied herein, and would thus be located well outside the above-mentioned distance buffer to avoid a cumulatively measurable contribution to the noise exposure level. Approximate distances to several of the listed City of Montclair projects are as follows:

- Bravo (750 feet north of the Proposed Project, at the southeastern corner of Fremont Ave. and Arrow Highway);
- Village at Montclair (in the vicinity of the future Montclair Metro Gold Line station, 2,000 feet north of the Proposed Project);
- Arrow Highway Warehouse (2,300 feet northeast of the Proposed Project);
- Montclair Senior Assisted Living (600 feet south of the Proposed Project);
- Vista Court (900 feet north of the Proposed Project); and,
- Alexan Montclair (700 feet north-northwest of the Proposed Project).

Because the nearest noise-sensitive residential off-site receptors range between 115 and 145 feet to the Proposed Project boundary, all six of the above-listed projects (and any others that would be located at least 600 feet from the Proposed Project boundary) would be at least 455 feet away, and thus, satisfy the three-times distance buffer guidance (i.e., 3 x 145 = 435 feet, which is less than 455 feet) to avoid potential cumulative acoustic contribution. Additionally, all future development under the Proposed Project, as well as other unrelated construction projects within City limits, would be required to comply with limits on allowable construction hours per relevant portions of the City's noise ordinance. Hence, for the above reasons, cumulative impacts due to cumulative construction noise are considered **less than significant**. No mitigation is required.

Vibration Impacts

Construction-related vibration from future development under the Proposed Project was addressed under item 3.9.4(b) above. Other foreseeable projects within the vicinity of the Plan area would not be close enough to create a combined excessive generation of groundborne vibration. Among the cumulative projects listed in Table 2.4 (Related Projects), the closest appears to be the Montclair Senior Assisted Living project at an approximate distance of 600 feet south of the Proposed Project boundary. Like airborne sound, and as discussed in Section 3.9.4, groundborne vibration attenuates rapidly with increasing distance from the source. At a distance of 600 feet, groundborne vibration from construction activity associated with this other project would be less than 0.001 ips PPV, and thus, indistinguishable from ambient groundborne

vibration due to normal existing sources such as roadway traffic—especially given the proximity of the Interstation 10 freeway. Thus, cumulative impacts associated with excessive groundborne vibration would be considered **less than significant**. No mitigation is required.

Permanent Increase in Ambient Noise Levels

Stationary Sources

Long-term operational noise would result from operation of future development under the Proposed Project, such as permanent on-site noise sources (e.g., HVAC equipment), as addressed under item 3.9.4(a) above. A cumulative impact could result if noise produced resulting from implementation of the Proposed Project were to combine with noise produced from the operation of other related projects in the vicinity to create a cumulatively significant permanent increase in ambient noise levels. However, the operation of future projects under the Proposed Project, along with the operation of other related projects, would be subject to applicable requirements from the City's noise ordinance, which limits the exterior noise levels at residences. Hence, cumulative impacts to outdoor ambient noise levels resulting from Proposed Project stationary sources are considered **less than significant**. No mitigation is required.

Off-Site Traffic Noise

Future development under the Proposed Project along with other related projects would generate off-site traffic noise. When calculating future traffic impacts, the traffic study included traffic from related projects in the traffic model. Thus, future traffic results with and without the Proposed Project already account for the cumulative impacts from related projects contributing to traffic increases. Since the noise impacts are generated directly from the traffic analysis results, the Existing and Year 2040 traffic with and without Proposed Project predicted increases in traffic noise levels described herein already reflect cumulative impacts. As described herein, the noise level increases associated with both of these scenarios would generate a noise level increase of less than 3 dBA along the studied sample roadways in the vicinity of the Proposed Project. As such, anticipated increases would be below the significance threshold of 3 dBA; hence, the incremental effect of the Proposed Project on off-site traffic noise is not cumulatively considerable. Cumulative off-site traffic noise impacts are, thus, considered **less than significant**. No mitigation is required.

3.9.7 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. No significant noise impacts would occur during construction or operation of the Proposed Project. As such, no mitigation is required.

Project design feature **PDF-1** has been presented herein because future site-specific projects implemented as part of Proposed Project buildout would be required to demonstrate compatibility with respect to the appropriate jurisdictional guidance and policies, which may include project-specific acoustical analyses that evaluate the effects of adequate building sound insulation and other noise-reducing measures. Acoustical analyses, like the predicted noise contour distances appearing in Table 3.9-8, would include attention on the intrusion of community noise to future occupants of the site-specific project implemented under the Proposed Project, and in so doing result in site-specific further project design features to keep potential impacts at a less than significant level.

3.9.8 Significance After Mitigation

Noise impacts would be **less than significant.**

3.9.9 References

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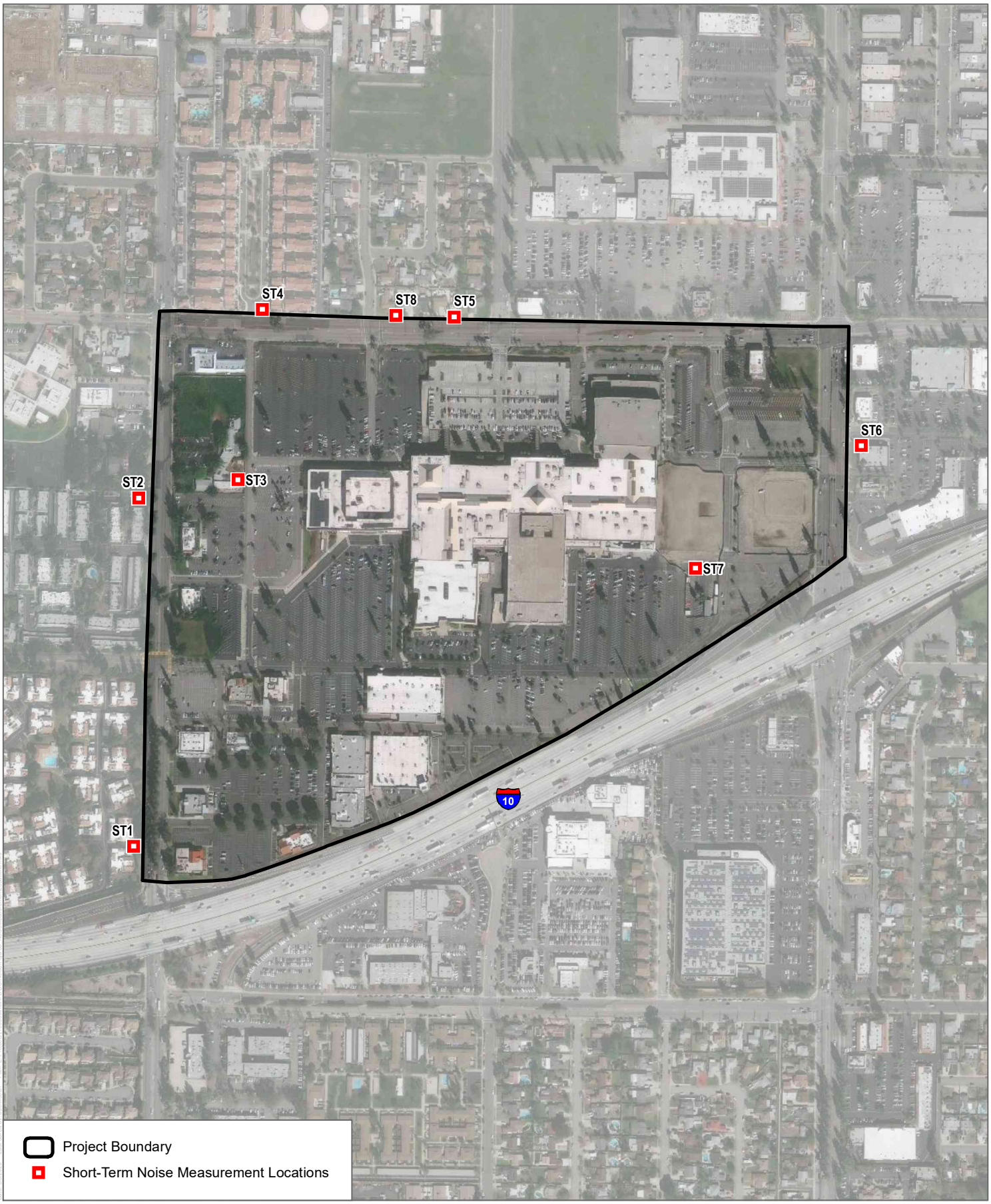

SOURCE: ESRI (Accessed 2020)

DUDEK

0 250 500 Feet
0 70 140 Meters
1:6,000

FIGURE 3.9-1

Noise Measurement Locations

Montclair Expansion Project

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3.10 POPULATION AND HOUSING

This section describes the existing population and housing setting related to the Montclair Place District Specific Plan Project (MPDSP or Proposed Project) and analyzes the Proposed Project's impacts to population and housing. The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following issue areas as they relate to population and housing: displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere and displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. Analysis within this section identifies associated regulatory requirements and identifies the potential impacts of substantial population growth, either directly or indirectly as it relates to implementation of the Proposed Project.

3.10.1 Existing Conditions

Project Site

The Plan area is developed with a regional mall, strip commercial development, freestanding restaurants, a major furniture store, and surface parking uses. None of the existing on-site uses includes housing, and thus, the Plan Area does not currently support a residential population. The existing Montclair Place and outparcels currently provide a number of jobs within the Plan Area. Table 3.10-1 presents the existing number of employees within the Plan Area.

Table 3.10-1
Existing Employees

Property	Building Category	Gross Leasable Area (sf)[1]	Employee per square foot[2]	Employees (jobs)
Montclair Place	Regional Retail	1,289,845	0.0026	3,354
Outparcels	Regional Retail	256,428	0.0026	667
			Total	**4,021**

1 The gross leasable area shown in this table is per the August 2018 Initial Study Montclair Place District Specific Plan.
2 To calculate the number of existing employees on-site, the non-residential square footage was multiplied by the employee generation rate created by the Ontario-Montclair School District's School Facilities Needs Analysis (Schoolhouse Services 2019).

Population, Housing, and Employment Projections

The Southern California Association of Governments (SCAG) is a federally designed Metropolitan Planning Organization for six counties in Southern California, including Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles. SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and a portion of the South Coast Air Quality Management District's plans.

SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) develops a regional growth forecast, which reflects recent and past trends; key demographic and economic assumptions; and local, regional, and state policies (SCAG 2019a). Additionally, SCAG prepares Local Profiles report for each City about every two years. The Local Profiles report provides a variety of demographic, economic, education, housing, and transportation information (SCAG 2018). Population and housing forecasts for the City of Montclair, the County of San Bernardino, and the entire SCAG region from SCAG's most recent RTP/SCS and Local Profiles report are shown on Table 3.10-2.

Table 3.10-2
Population, Housing, and Employment for the City of Montclair and County of San Bernardino

				Change		% Change		% Change/Year	
	2016	2018	2045	*2016-2018*	*2016-2045*	*2016-2018*	*2016-2045*	*2016-2018*	*2016-2045*
City of Montclair									
Total Population	38,700	40,402	49,200	1,702	10,500	4.4%	21.3%	2.2%	0.7%
Total Households	9,900	10,546	11,200	646	1,300	6.5%	20.8%	3.25%	0.7%
Total Employment	19,300	18,791	20,900	-509	1,600	-2.6%	11.6%	-1.3%	0.04%
County of San Bernardino									
Total Population	2,140,400	2,174,938	2,815,100	34,538	674,700	1.6%	31%	0.8%	1.1%
Total Households	630,300	644,242	875,000	13,942	244,700	2.2%	38.0%	1.1%	1.3%
Total Employment	659,000	775,176	1,063,700	116,176	404,700	17.6%	53.6%	0.9%	1.8%
SCAG									
Total Population	18,832,000	19,145,421	22,507,000	313,421	3,675,000	1.7%	19.5%	0.9%	0.7%
Total Households	6,012,000	6,132,938	7,639,000	120,938	1,627,000	2%	27%	1%	0.9%
Total Employment	8,389,000	8,465,304	10,050,000	76,304	1,661,000	0.1%	19.8%	0.1%	0.7%

Source: SCAG 2019a; SCAG 2019b; SCAG 2019

Population

According to SCAG's 2020-2045 RTP/SCS, the City's population is anticipated to increase from 38,700 persons in 2016 to 49,200 persons in 2045, an increase in 10,500 persons. This represents a 21.3% increase (approximately 0.7% per year) between 2016 and 2045. As shown on Table 3.10-2, the City experienced a population increase of approximately 4.4% per year between 2016

to 2018. Assuming the City increased population growth at a consistent rate between 2016 and 2045, the City would add approximately 362 persons per year. At this rate, the City would have added 742 persons between 2016 and 2018. However, as shown on Table 3.10-2, the City added 1,702 persons. Thus, population growth within the City has been exceeding SCAG's population growth projections by approximately 960 persons between 2016 and 2018.

Comparatively, the County's population is anticipated to increase from 2,140,400 persons in 2016 to 2,815,100 persons in 2045, an increase in 674,700 persons. This represents a 31% increase (approximately 1.1% per year). As shown on Table 3.10-2, the County experienced a population increase of approximately 0.8% per year between 2016 to 2018. Assuming the County increased population growth at a consistent rate between 2016 and 2045, the County would add approximately 23,679 persons per year. At this rate, the County would have added 47,358 persons between 2016 and 2018. However, as shown on Table 3.10-2, the County added 34,538 persons. Thus, population growth within the County was below the projected population growth by approximately 12,820 persons from 2016 to 2018.

For the entire SCAG region, the projected population is anticipated to increase from 18,832,000 persons in 2016 to 22,507,000 persons in 2045, an increase of 3,675,000 persons. This represents a 19.5% increase (approximately 0.7% per year). As shown on Table 3.10-2, the SCAG region experienced a population increase of approximately 1.7% per year between 2016 to 2018. Assuming the SCAG region increased population growth at a consistent rate between 2016 and 2045, the SCAG region would add approximately 136,285 persons per year. At this rate, the SCAG region would have added 272,570 persons between 2016 and 2018. However, as shown on Table 3.10-2, the SCAG region added 313,421 persons. The population growth within the County was above the projected population growth by approximately 40,851 persons from 2016 to 2018.

Housing

According to SCAG's 2020-2045 RTP/SCS, the City is projected to add approximately 1,300 households by 2045. Assuming the City added to the housing stock at a consistent rate between 2016 and 2045, the City would add approximately 55 dwelling units per year. At this rate, the City would have added approximately 110 households by 2018. Between 2016 and 2018, the City added 646 households (approximately 5.9 times the projected households). Therefore, the City exceeded the projected housing growth by 536 dwelling units from 2016 to 2018.

Comparatively, the County is expected to add approximately 244,700 households by 2045. Assuming the County added to the housing stock at a consistent rate between 2016 and 2045, the County would add approximately 8,438 dwelling units per year. At this rate, the County would have added approximately 16,856 households between 2016 and 2018. Between 2016 and 2018,

the County added 13,942 households (approximately 6.9% of the projected households by 2045). Therefore, the County was below the projected housing growth by 2,914 dwelling units from 2016 to 2018.

The SCAG region is expected to add approximately 1,627,000 households by 2045. Between 2016 and 2018, the SCAG region added 120,938 households (approximately 7.4% of the projected households by 2045). Assuming the SCAG region added to the housing stock at a consistent rate between 2016 and 2045, the SCAG region would add approximately 63,130 dwelling units per year. At this rate, the SCAG region would have added approximately 126,260 households between 2016 and 2018. Therefore, the SCAG region was below the projected housing growth by 5,322 dwelling units from 2016 to 2018.

Employment

According to SCAG's 2020-2045 RTP/SCS, the City is projected to add approximately 1,600 jobs between 2016 and 2045. This represents an increase of approximately 11.6% between 2016 and 2045 (approximately 0.04% a year). The percentage of jobs in the City decreased approximately 2.6% between 2016 and 2018 (a decrease of approximately 1.3% per year). Assuming the City added to employment opportunities at a consistent rate between 2016 and 2045, the City would add approximately 55 jobs per year. At this rate, the City would have added approximately 110 jobs between 2016 and 2018. As shown on Table 3.10-2, the City resulted in a loss of approximately 509 jobs between 2016 and 2018. Therefore, the City experienced a projected employment reduction of approximately 619 jobs compared to SCAG projections.

Comparatively, the County is projected to add approximately 404,700 jobs between 2016 and 2045. This represents an increase of approximately 53.6% between 2016 and 2044 (approximately 1.8% per year). The percentage of jobs in the County increased approximately 17.6% between 2016 and 2018 (approximately 0.9% per year). Assuming the County added employment opportunities at a consistent rate between 2016 and 2045, the County would add approximately 13,955 jobs per year. At this rate, the County would have added approximately 27,910 jobs between 2016 and 2018. As shown on Table 3.10-2, the County added 116,176 jobs between 2016 and 2018. Therefore, the County exceeded the projected employment growth by approximately 88,266 jobs.

The SCAG region is projected to add approximately 1,661,000 jobs by 2045. This represents an increase of approximately 19.8% between 2016 and 2045 (approximately 0.7% per year). The percentage of jobs in the SCAG region increased approximately 0.1% between 2016 and 2018 (approximately 0.1% per year). Assuming the SCAG region added employment opportunities at a consistent rate between 2016 and 2045, the region would add approximately 55,517 jobs per year. At this rate, the region would have added approximately 111,034 jobs between 2016 and

2018. As shown on Table 3.10-2, the SCAG region added approximately 76,304 jobs between 2016 and 2018. Therefore, the SCAG region fell behind the projected employment growth by approximately 34,730 jobs.

Jobs-to-Housing Ratio

The "jobs-to-housing ratio" measures the extent to which job opportunities in a given geographic area are sufficient to meet the employment needs of area residents. A sub-area of the region with a jobs-to-housing ratio that is lower than the standard of the region would be considered a "jobs poor" area, indicating that many of the residents must commute to places of employment outside of that sub-area. Table 3.10-3 provides the projected jobs-to-housing ratios, based on SCAG's 2020-2045 RTP/SCS, for the City and County.

Table 3.10-3
Projected Future Jobs-to-Housing Ratios

	Employment in 2016	Number of Dwelling Units in 2016	2016Jobs-to-Housing Ratio	Employment in 2045	Number of Dwelling Units in 2045	2045 Jobs-to-Housing Ratio
City of Montclair	19,300	9,900	1.95	20,900	11,200	1.87
County of San Bernardino	659,000	630,300	1.05	1,603,700	875,000	1.83
SCAG	8,389,000	6,012,000	1.40	10,050,000	7,639,000	1.32

Source: SCAG 2019b

As shown on Table 3.10-3, the projected jobs-to-housing ratio for the City, County, and SCAG region are 1.87, 1.83, and 1.32, respectively. As the projected 2040 jobs-to-housing ratio for the City is higher than both the County and SCAG region ratio, the City would be "jobs rich," meaning it is projected that residents would not be required to commute outside the City for employment in 2040.

Summary

Although the City of Montclair is exceeding the SCAG's population growth projections for the 2016-2045 planning horizon, the overall population growth within the SCAG region between 2016 and 2018 has been within the 2020-2045 RTP/SCS projected population growth rates. It should be noted that the County was below the projected population growth between 2016 to 2018. Similarly, the City exceeded the projected housing growth by 536 dwelling units from 2016 to 2018. However, the County and SCAG region were below projected housing growth by 2,914 dwelling units and 5,322 dwelling units, respectively between 2016 and 2018. In regards to available employment opportunities, the County and entire SCAG region's employment rates are increasing at rates lower than projected in the 2020-2045 RTP/SCS, while the City's

employment rates are decreasing. For these reasons, it can be concluded that the projected percentage of growth per year for 2016-2045 is slightly higher for housing than population, while employment is declining in the City and growing at a slower rate than projected in the County and SCAG region. While the SCAG region is well within the projected growth for population, the SCAG region was below the projected housing growth by 5,322 dwelling units from 2016 to 2018.

3.10.2 Regulatory Setting

Federal

There are no federal laws or regulations related to housing that are applicable to the Proposed Amendment.

State

Regional Comprehensive Plan

The SCAG Regional Comprehensive Plan (RCP) provides a growth management strategy for the region. The overall goal of the RCP is to strengthen the integration of local and regional land use, transportation, and natural resource planning. As stated in the RCP's Land Use and Housing Element, growth should be focused on existing and emerging centers and along major transportation corridors. In addition to this, the RCP's Housing and Land Use Element includes the goal to pursue more infill residential development (SCAG 2008). Additionally, new housing opportunities should be provided, with building types and locations that respond to the region's changing demographics.

Regional Housing Needs Assessment

A Regional Housing Needs Assessment (RHNA) is mandated by state law as part of the periodic process of updating local housing elements of general plans. The most recently completed SCAG RHNA planning period was January 1, 2006 to June 30, 2014. The fifth cycle RHNA Allocation Plan, which covers the planning period from October 2013 to October 2021, was adopted by the Regional Council on October 4, 2012. SCAG is currently in the process of developing the sixth cycle RHNA allocation plan which will cover the planning period October 2021 through October 2029. Communities use the RHNA in land use planning; prioritizing local resource allocation; and in deciding how to address identified existing and future housing needs resulting from population, employment, and household growth (SCAG 2012). Based on a methodology that weighs a number of factors (e.g., projected population growth, employment, commute patterns, and available sites), SCAG determined quantifiable needs for dwelling units in the region according to various income categories. In its 6th Cycle RHNA, SCAG identifies the City of

Montclair's, the County of San Bernardino's, and the SCAG region's share of the region's housing needs as 2,589, 137,796, and 1,341,934 new housing units for the 2021—2029 Housing Element Cycle, respectively. The 2021—2029 Housing Element (6th) Cycle covers the planning period from October 2021 through October 2029 (SCAG 2020). The construction of the Proposed Project would commence in 2021 and have a duration of 20 years, with full build-out of the Proposed Project completed by 2040. Therefore, although the 6th cycle has not yet been adopted, the 2021—2029 Housing Element Cycle is the appropriate planning cycle to use for this analysis since the dwelling units will not be ready for occupancy until after 2021.

Local

City of Montclair General Plan

The Housing Element is one of the seven required General Plan elements mandated by State law. State law requires that each jurisdiction's Housing Element adequately plans to meet the existing and project housing needs; provide goals, policies, and quantified objectives to meet such needs; and schedule actions for the preservation, improvement, and development of housing. The Housing Element must analyze and plan for housing for all segments of the community. Housing policy in the state rests largely upon the effective implementation of local general plans and, in particular, local housing elements.

The City of Montclair's General Plan Housing Element identifies goals, objectives, and programs for the 2014-2021 Housing Element Cycle that directly address the City's housing needs. The Housing Policy Program is organized into four Housing Strategy Areas: 1) Maintenance and Rehabilitation of Housing Stock, 2) Preserving Housing Cost Affordability, 3) Equal Housing Opportunity, and 4) Adequate Housing Supply. These goals will be implemented through a number of City plans and programs, including the City's Municipal Code (City of Montclair 2014).

City of Montclair Municipal Code

The City's Zoning Code establishes specific allowable uses, development standards, and limitations within the City. The purpose of the Zoning Code is to regulate the distribution and density of land uses and developments for residential, commercial, and industrial or other uses. The Zoning Code establishes four districts, which permit residential uses:

- A: Estate
- R-1: Single Family Residential
- R-2: Two-Family (Duplex) Residential
- R-3: Residential Medium-High Density

The Zoning Code also establishes the Small-Lot Detached Housing Overlay (SL), which is applied in combination with the R-1 zone.

In cases where alternative development standards and a mix of uses are intended that could not be achieved through conventional zoning standards, the City can utilize Planned Residential Developments or Specific Plans. There are currently two Specific Plans adopted by the City that provide for residential development: the Holt Boulevard Specific Plan and the North Montclair Downtown Specific Plan. The zoning districts in the Holt Boulevard Specific Plan are consistent with the zoning districts outlined in the Municipal Code. The North Montclair Downtown Specific Plan establishes four zoning districts:

- SD - Station District
- TC - Town Center
- CR - Corridor Residential
- NR - Neighborhood Residential

Additionally, Section 11.81.130, New Specific Plans, of the City's Zoning Code requires new specific plan to include an inclusionary housing plan within the specific plan document. The inclusionary housing plan shall include, at a minimum the following:

A. The number of market-rate units in the specific plan;

B. The number of required affordable units for very low-income households, lower-income households, and moderate-income households over the entire specific plan;

C. A general provision stipulating that an affordable housing agreement shall be made a condition of all future discretionary permits for development within the master or specific plan area, such as tentative maps, parcel maps, planned unit developments, and site development plans. The provision shall establish that all relevant terms and conditions of any affordable housing agreement shall be filed and recorded as a restriction on the project as a whole and those individual lots, units, or projects that are designated as affordable units. The affordable housing agreement shall be consistent with Section 11.81.140 of the Zoning Code.

3.10.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criterion based on Appendix G of the State CEQA Guidelines. It was concluded in the Initial Study, that there was no impact for the following significance criterion. Therefore, the following significance criterion is not included in this EIR.

B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The following significance criterion, included for analysis in this EIR, is based on Appendix G of the State CEQA Guidelines, and will be used to determine the significance of potential population and housing impacts. Impacts to population and housing would be significant if the Proposed Project would:

A. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

3.10.4 Impacts Analysis

A. Would the Project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Construction

Less Than Significant Impact. The Proposed Project involves the demolition of all or a portion of the existing Montclair Place Mall, some or all appurtenant free-standing outbuildings, and portions of the surface parking lots, to construct a pedestrian-oriented, mixed-use downtown district, with structured parking facilities through a series of planned phases. The Proposed Project would generate part-time and full-time jobs associated with construction of the Proposed Project between the start of construction and the MPDSP buildout. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, it is anticipated that construction workers would work on construction sites, including the Plan area, on a temporary basis only, and thus, are not likely to relocate their households as a consequence of the construction job opportunities presented by the Proposed Project. Therefore, the Proposed Project's population growth impacts related to construction activities are considered **less than significant**. No mitigation is required.

Operation

Significant and Unavoidable Impact. Implementation of the MPDSP would alter the development potential for the planning area when compared to the existing condition. The development potential refers to the ultimate development scenario, including dwelling units and commercial space, proposed at the culmination of the MPDSP

timeframe. Tables 3.10-4 and 3.10-5 present the MPDSP Residential Buildout and MPDSP Non-Residential Buildout compared to existing conditions.

Table 3.10-4
MPDSP Residential Buildout

Land Use	Total Buildout				Proposed Change
	Existing Total	*Proposed Base* [1]	*Proposed 15% Density Bonus*	*Proposed Total*	
Dwelling Units					
Single-Family (du)	0	0	0	0	0
Multi-Family (du)	0	5,496	825	6,321	6,321
Condominium	0	1,099	165	1,264	1,264
Apartment	0	4,397	660	5,057	5,057
Total Dwelling Units (du)	**0**	**5,496**	**825**	**6,321**	**6,321**

1 Base residential buildout derived by multiplying the total net area within each zone by 130.4 du/acre for the Urban Core Zone, 87.0 du/acre for the Urban Center Zone, 52.2 du/acre for the Neighborhood West Zone, and 55.6 du/acre for the Southwest District Zone. Residential buildout calculations do not include private right-of-ways or pubic open spaces.

2 Total includes 165 condominiums and 660 apartments. No Single-Family dwelling units are proposed.

Table 3.10-5
MPDSP Non-Residential Buildout[1]

Land Use	Existing Total	Zone				Total Non-Residential Buildout	Change
		Neighborhood West	*Southwest District*	*Urban Center*	*Urban Core*	*Proposed Total*	
Montclair Place	1,289,845	156,212	0	858,909	862,960	1,878,081	588,236
Out Parcels	256,428	0	180,827	0	0	180,827	-75,601
Non-Residential (sf)	**1,546,273**	**156,212**	**180,827**	**858,909**	**862,960**	**2,058,908**	**512,635**

1 Nonresidential Build-out includes, office, retail, and service uses. Non-residential buildout derived by multiplying the total net area within each applicable zone by a floor area ratio (FAR) of 1.25 for the Urban Core Zone, 0.66 for the Urban Center Zone, 0.50 for the Neighborhood West Zone, and 0.49 for the Southwest District Zone. Non-residential buildout calculations do not include private rights-of-way or pubic open spaces.

As shown in Tables 3.10-4 and 3.10-5, the development potential allowed under the MPDSP would provide 6,321 dwelling units and an additional 512,635 square feet of non-residential space.

Population

Demographic projections developed as part of the SCAG's adopted 2020-2045 includes the Plan area and regional vicinity. As previously shown on Table 3.10-2, the City's population is anticipated to increase from 38,700 person in 2016 to 49,200 persons in 2045, an increase in 10,500 persons (SCAG 2019a; SCAG 2019b).

To determine the Proposed Project's population generation, the number of proposed units is multiplied by the average household size in the SCAG region. According to SCAG's 2020-2045 RTP/SCS, there was an increase in average household size in the SCAG region from 3.0 in 2010 to 3.1 in 2016, but it is anticipated the average household size will decline from 3.1 in 2016 to 2.9 in 2045 (SCAG 2019b). Using this factor of 2.9 persons per household and a total of 6,321 dwelling units, the Proposed Project could support a residential population of approximately 18,331 persons.[1]

The total potential increase in population generated by development of the MPDSP (18,331 persons) represents approximately 175% (or 1.7 times) the projected population increase in the City, approximately 2.72% of the projected population increase in the County, and approximately 0.6% of the projected population increase in the SCAG region. Although the Proposed Project exceeds the population growth projections of the City, the Proposed Project is within the population growth projections in the County and the SCAG region.

Section 5.4, Growth-Inducing Impacts, contains a detailed analysis of the Proposed Project's potential to induce growth. Regional population forecasting is affected by many variables such as economic cycles and demographics. Additionally, the removal of impediments to growth (e.g., constructing utility infrastructure and service systems in a previously undeveloped region) can induce growth. The Proposed Project does involve a street network plan and associated cross sections, proposed distribution locations, extension of utilities infrastructure (water, sewer, storm water, power, telephone, and cable), solid waste disposal, and other facilities to support the proposed development within the Plan area. However, the Plan area and surrounding area is developed and supported by existing infrastructure. As such, the Proposed Project would not result in the extension of infrastructure or roads into an undeveloped area. Further, the Proposed Project's infrastructure plan would support the development potential of the MPDSP, and would not accommodate the growth beyond what is proposed. Future nearby land owners could propose to connect to or build upon the Proposed Project's infrastructure to serve future development and redevelopment in the surrounding area. Any such future proposals would be subject to environmental analysis pursuant to CEQA, and must include the level of detail required for a future project-level review process. Therefore, given the urbanized nature of the City, the Proposed Project would not stimulate substantial growth outside of the Plan area.

[1] The 18,331 persons represents a conservative estimate and assumes that all residents of the Proposed Project would be new transplants to the City. Under a more realistic scenario, it is probable that a portion of the Proposed Project's residential population will have already been living within the City prior to moving onto the Project Site.

Housing

Based on SCAG's household projected growth, the Proposed Project's 6,321 dwelling units would represent approximately 486% of the 1,300 dwelling units projected for the City between 2016 and 2045. The total number of dwelling units for the Proposed Project represents approximately 2.6% and 0.4% of the projected household increase for the County and SCAG region, respectively, between 2016 and 2045.

As previously discussed in Section 3.10.1, Existing Conditions, between 2016 and 2018, the City already developed 49.7% of the 1,300 dwelling units projected for the City between 2016 and 2045. Conversely, between 2016 and 2018, the County and SCAG region have only developed 5.7% and 7.4% of the projected household units between 2016 and 2045, respectively. Assuming a consistent rate of growth between 2016 and 2045, the City has exceeded projected housing by approximately 464 dwelling units for 2016 to 2018. However, the County was below the projected housing growth by 21,914 dwelling units from 2016 to 2018, and the SCAG region was below the projected housing growth by 5,322 dwelling units from 2016 to 2018. Although the Proposed Project would exceed the projected increase in housing units within the City, the County and SCAG region are below the projected housing units and since the Proposed Project represents a nominal percentage of the overall projected housing projections for the SCAG region. Therefore, the Proposed Project would be consistent with SCAG's projected household increase.

Additionally, the Proposed Project would contribute to the State-mandated RHNA housing production goals for the County and would be consistent with the regional effort to boost housing production to meet regional housing needs. In its RHNA, SCAG identifies the City of Montclair's, the County of San Bernardino's, and the SCAG region's share of the region's housing needs as 2,589, 137,796, and 1,341,934 new housing units for the 2021—2029 Housing Element Cycle, respectively (SCAG 2020). Given the Plan area's proximity to the Montclair Transcenter and anticipated Foothill Gold Line railway, the Proposed Project would provide 6,321 dwelling units within walking and biking distance of transit. Due to the Proposed Project's regional connectivity, the Proposed Project would contribute to the County's housing production goals. The Proposed Project would also include 15% affordable and senior housing units, including 825 affordable dwelling units (165 condominiums and 660 apartments). Of these 825 affordable dwelling units, 40% would be very low affordable dwelling units, as per the City's Inclusionary Housing Ordinance. This would equate to a total of 330 very low affordable dwelling units to be provided as part of the Proposed Project. Per SCAG, the City's total projected RHNA allocation for the 2021—2029 Housing Element Cycle is 2,589 units, including 382 low income units and 696 very low-income units (SCAG 2020). Therefore, the Proposed Project would make up 130% of the City's RHNA 6th

Cycle allocation for total affordable (low income) units and 47% of the City's RHNA 6th Cycle allocation for very low-income units.[2]

Employment

The existing use within the Plan area currently supports employment associated with the Mall, strip commercial development, freestanding restaurants, and major furniture store. As such, to calculate the number of new employees generated by the Proposed Project, the non-residential square footage was multiplied by the employee generation rate created by the Ontario-Montclair School District's School Facilities Needs Analysis, and compared to the existing conditions (Schoolhouse Services 2019).

Table 3.10-6
Employee Generation

Land Use/Zone	Building Category	Proposed in Non-Residential Square Footage	Employee per square foot	Estimated Number of Employees
District Corridor	Neighborhood Retail	156,212	0.0026	406
District Place	Business Offices/ Neighborhood Retail	180,827	0.0026/ 0.0034	542[1]
District Commons	Neighborhood Retail	858,909	0.0026	2,233
District Center	Neighborhood Retail	862,960	0.0026	2,244
			Total Proposed	**5,425**
			Total Existing	**4,021**
			Net Change from Existing	**1,404**

Source: Schoolhouse Services 2019

1 Since this zone would allow for both office and retail, this number assumes 50% business offices and 50% neighborhood retail.

As shown in Table 3.10-6, the Proposed Project would result in an increase in approximately 1,404 employees in the Plan area. Based on SCAG's projected employment growth, the Proposed Project's 1,404 employees represents approximately 88% of the City's projected 1,600 jobs, approximately 0.3% of the County's projected 404,700 jobs, and approximately 0.08% of the SCAG region's projected 1,661,000 jobs, for the 2016 to 2045 planning horizon.

2 At the time of publication of this Draft EIR, the 6th cycle RHNA Allocation Plan has not yet been adopted. The 6th cycle RHNA is anticipated to be adopted in October 2020. While construction of the Proposed Project would start by 2021, the dwelling units proposed at part of the Project would be occupied beyond 2021. Therefore, the analysis relies on the RHNA 6th cycle, which provides housing needs for 2021-2029. However, for informational purposes, per SCAG, the City's total projected RHNA allocation for the 5th cycle, which includes the 2014—2021 Housing Element Cycle, is 697 total affordable units and 164 very low-income units (SCAG 2012). As such, using the 5th cycle RHNA Allocation Plan, he Proposed Project would make up 118% of the City's RHNA allocation for total affordable units and 201% of the City's RHNA allocation for very low-income units.

According to SCAG's 2020-2045 RTP/SCS, the City is projected to add approximately 1,600 jobs by 2045; however, the City has been deficient in jobs by 509 between 2016 and 2018. As such, the Proposed Project would result in the addition of jobs, which would off-set the City's recent loss of jobs. Assuming a consistent rate of growth between 2016 and 2045, the County has exceeded SCAG projections by the projected employment growth by approximately 88,266 jobs, but the SCAG region fell behind the projected employment growth by approximately 34,730 jobs. Therefore, the Proposed Project would result in the addition of jobs in both the City and SCAG region, which have experienced deficiencies compared to employment projections for the City and SCAG region.

Jobs-to-Housing Ratio

As shown on Table 3.10-3, the 2045 jobs-to-housing ratio is projected to decrease for the City, which is considered to be "jobs rich" and a slight decrease for the SCAG region, and increase for the County compared to the 2016 jobs-to-housing ratio. The Proposed Project would add approximately 6,321 units and 1,404 jobs, thus the Plan area itself has a jobs-to-housing ratio of 0.22. Since the Proposed Project would add more housing units than jobs to the Plan area, it would lower the City's job-to-housing ratio (1.95 in 2016) to meet the projected value. Thus, the Project would positively contribute to the attainment of the jobs-to-housing ratio of 1.87, which was the estimated 2045 jobs-to-housing ratio for the City (see Table 3.10-3). In addition, due to the mixed-use nature of the MPDSP, the Proposed Project would not cause an imbalance among jobs, housing, and population. Rather, the Project would achieve the City's market objectives for the region through the redevelopment of the existing Montclair Place Mall.

Summary

In summary, the maximum development potential allowed under the MPDSP would provide a residential population of 18,331, 6,321 dwelling units, and 1,404 jobs. The Proposed Project would exceed the SCAG population, housing, and employment growth projections for the City; however, the Proposed Project would represent a nominal percentage of the overall projected population, housing, and employment projections for the County and SCAG region. Although the Proposed Project exceeds the City's projected population growth, the Proposed Project would not stimulate substantial growth outside of the Plan area. Additionally, the Proposed Project would contribute to the County's RHNA housing production goals. Further, the Proposed Project would contribute to the City's job-housing balance, but providing more housing units than jobs in a "jobs rich" City.

Nonetheless, the Proposed Project's estimated population of 18,331 persons, 6,321 dwelling units, and 1,404 jobs would exceed SCAG's growth projections for the City. To reduce potential impacts that substantial population growth could have on the environment, mitigation measures **MM-AES-1**, **MM-AQ-1** through **MM-AQ-9**, **MM-GHG-1, MM-GHG-2**, **MM-HAZ-1, MM-HYD-1, MM-HYD-2**, **MM-PUB-1**, **MM-TCR-1**, and **MM-TCR-2** are included within Section 3, Environmental Analysis, of this EIR. Additionally, as further discussed in Section 4, Alternatives, Alternative 3 (Reduced Residential Alternative) and Alternative 4 (Reduced Commercial/Office Alternative) present reduced project alternatives, both of which discuss a reduction in development potential and its potential to lessen environmental impacts associated with the Proposed Project. However, even upon implementation of mitigation measures identified throughout this EIR, implementation of the MPDSP would still exceed SCAG's forecasted population growth within the City. Therefore, impacts related to population growth are considered **significant and unavoidable**.

3.10.5 Cumulative Impacts

As defined in the State CEQA Guidelines Section 15130, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for population, housing, and employment. The cumulative study area used to assess potential cumulative population and housing impacts includes the City of Montclair, the County of San Bernardino, and the SCAG region because employees of the MPDSP may live within or outside the City's jurisdictional boundaries.

SCAG's 2020-2045 RTP/SCS services as a regional guide for future development in the counties of San Bernardino, Imperial, Los Angeles, Orange, Riverside, and Ventura. As previously discussed in Section 3.10.4, Impacts Analysis, the Proposed Project would exceed the SCAG population, housing, and employment growth projections for the City; however, the Proposed Project would represent a nominal percentage of the overall projected population, housing, and employment projections for the County and SCAG region. The Proposed Project would contribute to the RHNA housing production targets for the County. Additionally, the Proposed Project is consistent with increasing the number of households compared to jobs within the City.

As discussed in Section 3.10.1, Existing Conditions, projected percentage of growth per year for 2016-2045 is slightly higher for housing than population, while employment is declining in the City and growing at a slower rate than projected in the County and SCAG region. While the SCAG region is well within the projected growth for population, the SCAG region was below the projected housing growth by 5,322 dwelling units from 2016 to 2018. Further, based on 2016 to 2018 data, the housing projections within the SCAG region are not being met. Although the Proposed Project's residential population would exceed the SCAG's population, housing, and

employment growth projections for the City, the proposed 6,321 housing units aims to create a balance of jobs and housing within the City, and help the region meet housing projections. Nonetheless, since the Proposed Project would induce substantial population growth, a cumulatively considerable effect would result when combined with population growth caused by other projects within the City, County, or SCAG region. Even with the implementation of mitigation measures **MM-AES-1**, **MM-AQ-1** through **MM-AQ-9**, **MM-GHG-1, MM-GHG-2**, **MM-HAZ-1, MM-HYD-1**, **MM-HYD-2**, **MM-PUB-1**, **MM-TCR-1**, and**MM-TCR-2**, the effects of substantial population growth combined with other future projects would be cumulatively considerable. As such, cumulative impacts to population and housing would be **significant and unavoidable**.

3.10.6 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. Mitigation measures **MM-AES-1** (see Section 3.1 Aesthetics), **MM-AQ-1** through **MM-AQ-9** (see Section 3.2 Air Quality), **MM-GHG-1** and **MM-GHG-2** (see Section 3.5 Greenhouse Gas Emissions), **MM-HAZ-1** (see Section 3.6 Hazards and Hazardous Materials), **MM-HYD-1** and **MM-HYD-4** (see Section 3.7 Hydrology and Water Quality), **MM-PUB-1** (see Section 3.11 Public Services), and **MM-TCR-1** and **MM-TCR-2** (see Section 3.14 Tribal Cultural Resources) would be required to help reduce potential impacts to population and housing.

3.10.7 Significance After Mitigation

As indicated in the impact analysis above, impacts associated with the MPDSP and the potential for induced population growth would be **significant and unavoidable**.

3.10.8 References

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SCAG. 2012. *5th Cycle RHNA Final Allocation Plan, 1/12014–10/1/2021*. August 2012. .

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SCAG. 2019a. *Draft Connect SoCal Plan: The 2020–2045 RTP/SCS (Draft)*. Approved November 2019. SCAG. 2019b. *Draft Connect SoCal Plan: The 2020–2045 RTP/SCS, Demographics and Growth Forecast Appendix.* Approved November 2019.

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3.11 PUBLIC SERVICES

This section discusses potential impacts to public services, including fire protection, police protection, schools, and additional public services, resulting from implementation of the Montclair Place District Specific Plan Project (MPDSP or Proposed Project). The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis on public services in the Plan area based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. The Initial Study concluded that impacts on public services as a result of the Proposed Project would be potentially significant. Accordingly, the analysis in this section describes the existing conditions, identifies associated regulatory requirements, and evaluates potential impacts of the Proposed Project on fire protection services, police protection services, schools, parks, and other public facilities.

3.11.1 Existing Conditions

Fire Protection

Fire prevention and emergency services for the Plan area is provided by the City of Montclair Fire Department (Fire Department), operating out of two stations located at 8901 Monte Vista Avenue (Fire Station #151) and 10825 Monte Vista Avenue (Fire Station #152), approximately 0.2-mile north and 1.75-mile south of the Plan area, respectively. According to the Fire Department, calls to service include structure fires, hazardous materials mitigation, medical calls, traffic accidents, and confined space rescue among other things (City of Montclair 2019a). The Fire Department's staff includes 18 firefighters, three chief officers, a public safety director, and one fire investigator, one administrative technician, and one part-time receptionist (Zacile Rosette, pers. comm. 2019b). According to the Fire Department, Fire Station #151 (8901 Monte Vista Avenue) is equipped with a three-person engine, a Type 1 engine, and will soon have a quint with a 100-foot aerial ladder and platform (Zacile Rosette, pers. comm. 2019b). Fire Station #152 (10825 Monte Vista Avenue) is equipped with one chief officer (stationed at Fire Station 151), a crew of three fire suppression/public safety personnel, including a fire captain, fire engineer, and firefighter/paramedic. Station #152 currently operates with a 2014 KME Type 1 fire engine in service along with a 2000 KME Type 1 reserve engine. Station #152 also houses a lighting unit, which is used to carry urban search and rescue equipment (Zacile Rosette, pers. comm. 2019b). The Fire Department has an average response time of 6 minutes and 13 seconds for medical emergencies and a response time of 6 minutes and 53 seconds for structural fires. The average or anticipated emergency call response time to the Plan area is 3 minutes, and response goals are currently being met by the Montclair Fire Department (Zacile Rosette, pers. comm. 2019b).

The Fire Department participates in an "All Hazard" emergency aid system (through mutual aid agreements) with the fire departments from the surrounding communities of Chino, Upland, Ontario, Rancho Cucamonga, San Bernardino County, and Los Angeles County.

Police Protection

Police protection services in the City are provided by the Montclair Police Department, which is headquartered on the northwest corner of Arrow Highway and Monte Vista Avenue, at 4870 Arrow Highway. The Montclair Police Department serves an approximately 5.5 square-mile community with 40,402 residents as of 2018 (SCAG 2016). The Department employs 53 sworn officers, 32 full and part-time civilian support personnel, including 5 reserve officers and 2 chaplains (Captain Jason Reed, pers. comm. 2019). The Montclair Police Department treats all calls as priority calls; however, the response times vary based on the nature of the call, as shown in Table 3.11-1 below. The Montclair Police Department has a goal of 4-minute response times for Priority 1 calls, and 5-minute response times for Priority 2 calls. As of August 2019, Captain Jason Reed of the Montclair Police Department confirmed response time goals were being meet (Captain Jason Reed, pers. comm. 2019). In addition to patrolling, the Montclair Police Department also includes specialized assignments such as Detective Bureau, Narcotics Investigations Task Force, Motor Officer Program, Technical Services, Plaza Precinct Patrol, and School Resource Officer.

Table 3.11-1
Montclair Police Department's Response Times

Priority Call	Example	Average Response Time (July 2018 – July 2019)
Priority 1	In-progress crime and calls for medical emergencies.	5 minutes and 52 seconds
Priority 2	Calls for crime reports or medical service not in progress.	19 minutes and 12 seconds
Priority 3	Non-criminal calls and infractions e.g., illegal parking	38 minutes and 56 seconds

Source: Captain Jason Reed, pers. comm. 2019

Schools

The Plan area is served by the Ontario-Montclair School District and the Chaffey Joint Union High School District. Moreno Elementary School and Serrano Middle School, both Ontario-Montclair School District schools, are the closest elementary and middle school to the planning area. Moreno Elementary School is located on Moreno Street, approximately 350 feet west of the Plan area. Serrano Middle School is located on San Jose Street, approximately 750 feet west of the Plan area. Montclair High School of the Chaffey Joint Union High School District serves the entire City and is located on Benito Street, approximately 0.7-mile southwest of the Plan area.

According to the California Department of Education (CDE), Moreno Elementary School serves students from kindergarten through grade 6. The current total enrollment of the school is 545 students (CDE 2019a). The enrollment capacity of Moreno Elementary is 569 students (Craig Misso, pers. comm. 2019). Serrano Middle School serves grades 7 and 8 and the current total student population is 849 students (CDE 2019b). According to the Ontario-Montclair School District, Serrano Middle School has capacity for 746 students (Craig Misso, pers. comm. 2019). Montclair High School, which is part of the Chaffey Joint Union High School District, currently has 2,882 students enrolled in grades 9-12 (CDE 2019c). The Chaffey Joint Union High School District reports a slightly lower enrollment at Montclair High School of 2,856 students, and estimates the capacity of the high school to be approximately 3,483 students (Michael Harrison, pers. comm. 2019).

Parks

In addition to National and County Parks in proximity to the Plan area (see Section 3.12, Recreation, for details), the City owns and operates 13 parks. According to the *Montclair General Plan Update - Our Natural Environment Discovery Memo* (NEDM), the City's parks and recreation network is comprised of: 1) formally programmed public parks and gardens operated and maintained by the City; 2) undeveloped open space; 3) semi-recreational areas such as school yards and playgrounds; and,4) trails and streetscapes (City of Montclair 2019b).

The 13 parks in the City total approximately 46.27 acres, which equates to a parkland to resident ratio of approximately 1.15 acres per every 1,000 residents. This ratio is significantly below the national average of 10.1 acres of parkland per 1,000 residents, as well as below the City's goal of three acres per every 1,000 residents. As such, there is a prevailing deficiency in available parks and recreational amenities within the City (City of Montclair 2019b). Table 3.12-2 in Section 3.12, Recreation, briefly describes the size, location, and amenities offered at each City park and recreational facility, as well as the approximate distance and direction of each park from the proposed Plan area.

Libraries

Library services are provided by the San Bernardino County Library System (SBCL). The SBCL comprises 32 branch libraries and serves a County population of approximately 2,171,603 people (SBCL 2019; U.S. Census 2018a). Montclair Branch Library is located at 9955 Fremont Avenue, approximately 0.75-mile south of the Plan area. The Montclair Library is one of the largest facilities in the regional library system. It encompasses 20,200 square feet and 59,100 volumes. The Montclair Library serves the residents of the City (City of Montclair 2017; U.S. Census 2018b).

3.11.2 Regulatory Setting

Federal

There are no federal public services regulations applicable to the Proposed Project.

State

Fire Protection

California Fire Code

The California Fire Code is legislated in Title 24, Chapter 9 of the California Code of Regulations. The California Fire Code provides regulations for safeguarding life and property from fire and explosion hazards derived from the storage, handling, and use of hazardous substances, materials, and devices. The provisions of this code apply to construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenance connected or attached to such building structures throughout California.

California Health and Safety Code

State fire regulations are set forth in Division 12, Section 13000 et seq. of the California Health and Safety Code, including regulations for building standards (also set forth in the California Building Code), and fire protection and notification systems, standard equipment such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

California Occupational Safety and Health Administration

In accordance with California Code of Regulations, Title 8, Sections 1270, Fire Prevention, and 6773, Fire Protection and Fire Equipment, the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials; fire hose size requirements; restrictions on the use of compressed air; requirements for access roads; and guidelines for testing, maintaining, and using all firefighting and emergency medical equipment.

Mutual Aid Agreements

The California Disaster and Civil Defense Master Mutual Aid Agreement (Mutual Aid Agreement) is a cooperative agreement between jurisdictions that provides statewide mutual aid in the event of disaster, such as fire, earthquake, pestilence, and war. The Mutual Aid Agreement is legislated by the California Emergency Services Act, Article 11, Section 8615 et seq. of the Government Code. The Governor's Office of Emergency Services (Cal OES) is responsible for coordinating and overseeing the State's emergency preparedness, response, and recovery efforts (Cal OES 2015). The statewide mutual aid system exists to ensure that adequate resources, facilities, and other supports are provided to jurisdictions whenever resources prove to be inadequate for a given situation. Each jurisdiction controls its own personnel and facilities but can give and receive help when needed.

Uniform Fire Code

The Uniform Fire Code contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code include fire department access, fire hydrants, automatic storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The code contains specialized technical regulations related to fire and life safety.

Police Protection

There are no state regulations specific to police protection that would be applicable to the Proposed Project.

Schools

Proposition 1A/Senate Bill 50

SB 50, or the Leroy F. Greene School Facilities Act of 1998, establishes a program whereby the State Allocation Board is required to provide state per pupil funding for the construction and modernization of new school facilities. Section 17620 of the Education Code authorizes the governing board of any school district to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district. SB 50 amends Section 17620 of the Education Code to authorize school districts to levy statutory developer fees at levels that may be significantly higher than those previously permitted, but also provides new and stricter standards for school districts to follow when levying fees. School Districts would continue to be authorized to charge development fees (also known as Level 1 fees) of $3.79 per square foot on residential buildings and $0.61 per square foot on commercial or industrial buildings. However,

pursuant to Government Code Sections 65995.5 and 65995.7, SB 50 authorizes school districts to charge additional Level 2 development fees to match 50 percent of school construction costs of State funds, and Level 3 development fees to fund 100 percent of school construction costs if State funds are not available (Ontario-Montclair School District 2019).

Government Code Section 65996

Section 65996 legislates that development impact fees collected under Section 17620 of the Education Code (the mitigation fees authorized by SB 50) and Section 65970 of the Government Code be deemed, "to provide full and complete school facilities mitigation." Under Government Code 65996 a state or local agency may not deny or refuse to approve the development of real property on the basis that school facilities are inadequate.

Parks

Quimby Act

California Government Code Section 66477, referred to as the Quimby Act, permits local jurisdictions to require developers to dedicate land and/or pay in-lieu fees towards the conservation of parkland. The Quimby Act was legislated to encourage the pre-emptive mitigation of developments' impact to parks and open space with the overarching goal of achieving a jurisdictional standard of 3.5 acres of parkland per 1,000 residents (California Department of Parks and Recreation 2002). The land dedication and/or fees differ by project and are based upon the residential density, parkland cost, and other factors. Land dedication and fees collected pursuant to the Quimby Act may be used for acquisition, improvement, and expansion of park, playground, and recreational facilities or the development of public school grounds.

Assembly Bill 1359

Assembly Bill 1359 was signed into law in 2013. The bill removed the limitation that required the use of developer's fees for only those parks served by the developer's proposed subdivision. AB 1359 allows cities and counties to use developer paid Quimby Act fees to provide parks in neighborhoods other than the one in which the developer's subdivision is located, as long as the legislative body completes a public hearing before utilizing the applicable fees. Under AB 1359, the transferal of development fees to parks outside of the proposed developments service area is only possible if the following requirements are met:

1. The neighborhood where the city or county is proposing to use the fees to provide parks must have fewer than three acres of park area per 1,000 members.

2. The neighborhood where the proposed subdivision is located must have at least three acres of park area or more per 1,000 members.
3. The city or county must hold a public hearing before using the fees in another neighborhood.
4. The city or county must find it reasonably foreseeable that the new subdivision's residents will use the park facilities in the other neighborhood.
5. And, finally, the city or county must use the fees in areas consistent with the city or county's local Quimby Act ordinance and general plan.

AB 1359 makes one other addition to the Quimby Act. It now allows a city or county to enter into a joint or shared-use agreement with one or more public districts in order to provide additional park and recreational access.

Local

City of Montclair General Plan

Fire

The General Plan includes policies and programs to minimize potential damage and hazards resulting from fire, including, but not limited to, the following:

SE- 4.4.0 Require that all development plans be reviewed by local planning, fire, water, health, road, and flood control authorities.

SE- 4.5.0 Support plans which would provide for safe ingress and egress of emergency equipment.

Police

The Safety Element of the General Plan contains implementation policies and programs that encourage coordination between crime prevention and physical planning, while supporting the need for sufficient facilities. It includes policies which encourage consideration of design that would prevent criminal activity through security and surveillance:

SE- 3.1.2 Encourage design consideration that would prevent or discourage criminal activity by providing security and surveillance.

SE- 3.1.3 Advocate the design of proposed developments to facilitate their surveillance and neighborhood watch by the people who utilize or inhabit them.

SE- 3.1.4 Maximize the social deterrents to crime in street patterns and lot planning enhancing the neighborhood observation and recognition.

SE- 3.1.5 Encourage the clustering of houses into small neighborhoods removed from major thoroughfares, thereby enhancing neighborhood recognition and surveillance and making strangers in the neighborhood obvious.

SE- 3.1.9 Improve the visual security image as well as the intensity of use of streets and public spaces.

Parks

The Open Space Element of the General Plan addresses parks and supports the standards of three acres per every 1,000 residents. Under existing conditions, the City has a shortage of approximately 74.9 acres of parkland and recreational amenities within the City. The Open Space Element includes policies directing land acquisition for park areas where future population growth and higher density is anticipated, and encourages a balanced park system that is accessible to all ages. See Section 3.12, Recreation for more information.

City of Montclair Municipal Code

Section 11.38.080, Dedication of Land or Payment of Fees for Park and Recreational Facilities. The City incorporated the Quimby Act by reference in Section 11.38.080 of the Municipal Code, which essentially legislates an ordinance to fund parks and recreational facilities in accordance with Section 66477 of the State Government Code.

The City's Quimby Ordinance allows the City to require the payment of a fee or the dedication of an equivalent area of parkland when new residential subdivisions are proposed. The law states that:

> *"the dedication of land or the payment of fees, or both, shall not exceed the proportionate amount necessary to provide three acres of park area per 1,000 persons residing within a subdivision subject to this section, unless the amount of existing neighborhood and community park area, as calculated pursuant to this subdivision, exceeds that limit, in which case the legislative body may adopt the calculated amount as a higher standard not to exceed five acres per 1,000 persons residing in a subdivision subject to this section."*

In addition to Quimby fees, facilities can be provided by grants, donations, user fees, community fund raising events, joint ventures, and joint use agreements.

3.11.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criteria based on Appendix G of the State CEQA Guidelines (14 Cal. Code Regs. section 15000 et seq.). The following significance criteria are based on Appendix G of the State CEQA Guidelines (14 Cal. Code Regs. section 15000 et seq.), and will be used to determine the significance of potential impact to public services. Impacts related to public services would be significant if the Proposed Project would:

A. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

- Fire protection
- Police protection
- Schools
- Parks
- Libraries and other public facilities

3.11.4 Impacts Analysis

A Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services?

Fire Protection

Less Than Significant Impact With Mitigation Incorporated. As previously discussed, fire protection services and emergency medical services are provided by the Montclair Fire Department. The Fire Department's Station #151 is closest to the planning area and would be the first responder to any individual site within the Proposed Project's Plan area. In the event that Station #151 could not meet the immediate needs of a call for services independently or did not have capability to address the full extent of a larger incident, Station #152 would respond or provide support, as would those jurisdictions bound by the regional Mutual Aid Agreements.

Future development under the Proposed Project would be subject to the existing Fire Department requirements for fire sprinkler systems, fire alarm systems, fire flow, and equipment and firefighter access, as well as International Fire Code requirements. Additionally, all development proposed under the MPDSP would result in the payment of both developer's fees and property taxes, both of which would result in additional revenue available to the City and, indirectly, would result in increased revenue available to the Fire Department. Developer's fees cannot be used for personnel; however, assuming that the City routed increased property tax revenues to the Fire Department as development and population increases in the planning area, impacts to the Fire Department as a result of the Proposed Project would be partially alleviated. Additionally, the Proposed Project would be implemented in a phased manner over an approximately 20-year period, and any development proposed under the MPDSP would be subject to independent environmental review, per Public Resources Code (PRC) Section 21157.1 and State CEQA Guidelines 15152. Furthermore, the City and Montclair Fire Department would be required to review the MPDSP Fire Master Plan during design review.

Nonetheless, implementation of the Proposed Project would result in the development of 6,321 additional residential units supporting a residential population of approximately 18,331 persons in addition to commercial uses, which would result in changes to both the makeup and population in this portion of the fire service area. As previously analyzed in Chapter 3.10 of this EIR, using the Southern California Association of Government's (SCAG) population generation factor of 2.9 persons per household (SCAG 2019a), the Proposed Project could support a residential population of approximately 18,331 persons[1]. Given this population increase, the Fire Department estimates that buildout of the Proposed Project would result in the need for expanded facilities, new equipment and/or additional personnel in order to maintain existing fire department service ratios, response times, and other performance objectives (Zacile Rosette, pers. comm. 2019b). Therefore, impacts to fire protection services as a result of implementing the Proposed Project is potentially significant. However, with the implementation of mitigation measure **MM-PUB-1**, impacts would be **less than significant with mitigation incorporated**.

Police Protection

Less Than Significant Impact. As stated in Section 3.11.1, Existing Conditions, police protection services in the City are provided by the Montclair Police Department (Police Department), which is headquartered on the northwest corner of Arrow Highway and Monte Vista Avenue, at 4870 Arrow Highway. The Police Department serves an

[1] 18,331 persons represents a conservative estimate and assumes that all residents of the Proposed Project would be new transplants to the City. Under a more realistic scenario, it is probable that a portion of the Proposed Project's residential population will have already been living within the City prior to moving onto the Plan area.

approximately 5.5 square-mile community with approximately 40,402 residents as of 2018 (SCAG 2016). The Police Department employs 53 sworn officers and 32 full and part-time civilian support personnel, including 5 reserve officers and 2 chaplains (Captain Jason Reed, pers. comm. 2019).

As previously stated, implementation of the Proposed Project would result in the development of 6,321 additional residential units, supporting a residential population of approximately 18,331 persons, which would result in changes to both the makeup and population in this portion of the Police Department's service area. This anticipated population increase would result in an increase in activity in the planning area, which would potentially lead to an increase in the number of calls that the Police Department receives from the Plan area. With additional residents in the planning area, future development under the Proposed Project may adversely affect service levels or response times and may result in the need for additional or expanded police facilities to maintain existing police department service ratios, response times, or other performance objectives.

Only one officer is currently assigned to the Plan area under existing conditions; as such, the Police Department anticipates that an increase in sworn officers, dispatch personnel, and/or parking enforcement would be recommended under the Proposed Project. However, the Proposed Project would not result in a deviation from the average response times currently recorded as the Plan area is accessible via many thoroughfares and cross-streets (Captain Jason Reed, pers. comm. 2019). Additionally, all development proposed under the MPDSP would result in the payment of both developer's fees and property taxes, both of which would result in additional revenue available to the City and, indirectly, would result in increased revenue available to the Police Department. As the Proposed Project is not anticipated to impact the Department's average response times, the Proposed Project would not result in the need for new or physically altered police facilities, and impacts to police protection services would be **less than significant**. No mitigation is required.

Schools

Less Than Significant Impact. As stated above in Section 3.11.1, Existing Conditions, the Plan area is served by the Ontario-Montclair School District and the Chaffey Joint Union High School District. Ontario-Montclair School District is a K-8 school district in San Bernardino County that covers all of Montclair and a large portion of Ontario. It serves approximately 24,000 students, and the district feeds into Chaffey Joint Union High School District. Moreno Elementary School and Serrano Middle School of the Ontario-Montclair School District are the closest elementary and middle school to the planning area, located approximately 350 feet west and 750 feet west, respectively, of

the Plan area. Montclair High School of the Chaffey Joint Union High School District serves the entire City and is located approximately 0.7-mile southwest of the Plan area.

According to the California Department of Education (CDE), Moreno Elementary School serves students in kindergarten through grade 6. The current total enrollment of the school is 545 students (CDE 2019a). According to the Ontario-Montclair School District, the capacity of Moreno Elementary is 569 students (Craig Misso, pers. comm. 2019). Serrano Middle School serves grades 7 and 8 and the current total student population is 849 students (CDE 2019b). According to the Ontario-Montclair School District, Serrano Middle School has capacity for 746 students (Craig Misso, pers. comm. 2019). Montclair High School currently has 2,882 students enrolled in grades 9-12 (CDE 2019c). The Chaffey Joint Union High School District reports a slightly lower enrollment at Montclair High School of 2,856 students, and estimates the capacity of the high school to be approximately 3,483 students (Michael Harrison, pers. comm. 2019).

The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to warrant the improvement of existing, or the construction of new, school facilities.

Although the General Plan states that school facilities are sufficient to serve the future needs of the City, the growth projected under the Proposed Project was not included in this assessment. Future development under the Proposed Project would support an estimated 18,331 additional residents in the City, which would result in changes to both the makeup and population in the school districts.

The Chaffey Joint Union High School District uses a slightly different generation rate of 0.085 student per dwelling unit.[2] As such, the addition of 6,321 dwelling units (specifically, apartments) would result in an additional 537 students to the high school district.[3] According to the Chaffey Joint Union High School District, Montclair High School could accommodate the additional 537 students and the school district does not plan to expand and/or improve facilities in order to accommodate the increase in enrollment (Michael Harrison, pers. comm. 2019).

The Ontario-Montclair School District uses a generation rate of 0.14 students per dwelling unit for elementary students and a generation rate of 0.03 students per dwelling unit for middle school students (Craig Misso, pers. comm. 2019).[4] As such, the addition of 6,321 dwelling units would result in an additional 885 elementary school children and

[2] Generation rates for apartments (not condos) were used so as to be more conservative.
[3] 6,321 * 0.085 = 537
[4] Generation rates for apartments (not condos) were used so as to be more conservative.

190 middle school children into the Plan area.[5] According to the Ontario-Montclair School District, the District's existing facilities and staff are not sufficient to accommodate the addition of 1,075 new students to the Plan area. The existing enrollment, maximum capacity, and current availability of schools closest to the Plan area are outlined in Table 3.11-2 below.

Table 3.11-2
Availability of Schools Closest to the Plan Area

School	Enrollment (2019)	School Capacity	Availability (2019)	Students Generated by the Project
Moreno Elementary School	545 students	569 students	+24	885
Serrano Middle School	849 students	746 students	-103	190
Montclair High School	2,856 students	3,483 students	+627	537

Source: (CDE 2019a); (Craig Misso, pers. comm. 2019)

As shown in Table 3.11-2, of the three schools closest to the Plan area, Montclair High school is the only school with existing availability to serve the estimated students generated by the Project. However, estimated student generation as a result of the Project is considered conservative, as it assumes all students residing within the planning area would be new to the districts, which is unlikely. Additionally, elementary and middle school students residing within the Plan area would be able to attend other schools within Ontario-Montclair School District with availability.

Per SB 50, or the Leroy F. Greene School Facilities Act of 1998, and Section 17620 of the Education Code, the governing board of any school district may levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district. SB 50 amends Section 17620 of the Education Code to authorize school districts to levy statutory developer fees at levels that may be significantly higher than those previously permitted, but also provides new and stricter standards for school districts to follow when levying fees. The payment of school impacts fees under SB 50 is deemed full and complete mitigation for project-related impacts to school facilities.

In the event that a total of 1,612[6] students were to be added to the Ontario-Montclair School District and the Chaffey Joint Union High School District due to future development under the Proposed Project, this addition would occur over a phased 20-year period and could potentially result in the need for new schools in the area. However, as discussed above, developers proposing projects within the MPDSP area are required to

[5] 6,321 * 0.14 = 885 elementary students and 6,321 * 0.03 = 190 middle school students

[6] 537 + 885 + 190 = 1,612 total students generated.

pay applicable school impact fees. Pursuant to Government Code Section 65996, payment of school impact fees in accordance with Government Code Section 65995 is deemed full and complete mitigation for potential impacts to schools caused by development. Therefore, implementation of the Proposed Project would result in a **less than significant** impact to schools. No mitigation is required.

Parks

Significant and Unavoidable Impact. As stated in Section 3.12 Recreation, the City had an estimated population of 40,402 people in 2018 (SCAG 2019b). Assuming 46.27 acres of developed, operating parkland within the City, the current parkland ratio is approximately 1.15 acres for every 1000 residents. Based on the Citywide goal of three acres per every 1,000 residents, the City currently has a parkland deficiency of approximately 74.9 acres.[7]

The increased demand for neighborhood, regional, and state parks is most commonly associated with a substantial population increase such that existing parks and recreational amenities become over-utilized and deteriorate as a result. As stated in Section 3.10, Population and Housing, implementation of the MPDSP would include 6,321 new residential units. To determine the Proposed Project's population generation, the number of proposed units is multiplied by the average household size in the SCAG region. According to SCAG's 2020-2045 RTP/SCS, there was an increase in average household size in the SCAG region from 3.0 in 2010 to 3.1 in 2016, but it is anticipated the average household size will decline from 3.1 in 2016 to 2.9 in 2045 (SCAG 2016). Using this factor of 2.9 persons per household and a total of 6,321 dwelling units, the Proposed Project could support a residential population of approximately 18,331 persons. As stated in Section 3.10, Population and Housing, this localized population growth is not accounted for in the City's population projections. As such, the addition of approximately 18,331 people to the Plan area has the potential to further deteriorate City and Regional parks and recreational facilities, which are already over-utilized under existing conditions.

The Proposed Project would offset a portion of these impacts to parks and recreational facilities through the provision of eight neighborhood parks and amenities (plazas, and pedestrian paseos) surrounded by multi-family residences and/or offices, and lined with ground floor neighborhood-serving retail stores. These parks would accommodate a variety of amenities, such as playgrounds, dog parks, basketball courts, walking paths, and open lawns for informal picnics, family ball games, and sunbathing (City of

[7] 46.27 / 40, 402 = 0.0011452 acres per resident * 1000 residents = 1.15 acres per 1000 residents. 40,402 / 1000 people = 40.402 * 3 acres = 121.2 acres of parkland, which should be available within the City per City ratio. 121.2 acres – 46.27 acres (existing parkland) = 74.94 acres of parkland deficiency.

Montclair 2020). However, the total acreage of these proposed parks, approximately 8 acres combined, would not meet the City's parkland ratio requirements per Municipal Code, Section 11.38.080, under existing or proposed conditions. As per the Specific Plan, parks, plazas and open spaces shall remain open to the public year-round and in perpetuity, and shall be accessible to pedestrians. With the addition of approximately 18,331 people to the Plan area, the Proposed Project would be required to provide approximately 55 acres of parkland to adequately serve the proposed dwelling units, under the City's parkland ratio requirements of three (3) acres per 1,000 residents. As such, the Proposed Project would be required to further mitigate impacts to parks and recreational facilities.

Per California Government Code Section 66477, or, the Quimby Act (which is incorporated by reference into the City's Municipal Code, Section 11.38.080), developers are required to dedicate land and/or pay in lieu fees in order to mitigate anticipated impacts to parks and recreational facilities. As stated above, the Proposed Project's 6,321 housing units would provide for approximately 18,331 people. Based on the City's requirement to provide three acres of parkland and recreational facilities for every 1,000 residents, the applicant would be required to either provide approximately 55 acres of parkland or to mitigate impacts to parks and recreation through payment of a comparable in lieu fee.[8] Per the provisions listed above, and outlined in the City's Municipal Code, Section 11.38.080, prior to Project approval, the Applicant would coordinate with the City Planning Commission in order to determine the appropriate recourse for impacts to parks and recreation. All multi-family residential projects are subject to a parkland development impact fee that requires land dedication (431 square feet/unit) or payment of an in lieu fee ($2,800) on a per unit basis. In the past, projects in the City that include a required public open space or park area were able to use this collected fee to partially off-set the cost for completing their respective public park or open space improvements. With adherence to State and local law, and compliance with applicable fees as determined by the City Planning Commission, impacts to existing parks and recreational facilities as a result of Project implementation would be reduced. However, considering the existing deficiency of recreational facilities in the City, the limited availability of land for new park space, and the estimated increase in population as a result of the proposed dwelling units, implementation of the Proposed Project would exacerbate the City's existing park shortage. All 13 existing parks within the City are located approximately 0.02 to 2.3 miles from the Plan area and could experience a substantial increase in use such that substantial physical deterioration of the facility could occur as a result of the Project. Therefore, impacts to existing neighborhood and regional parks and/or recreational facilities is determined to be **significant and unavoidable.**

[8] 18,331 anticipated people / 1000 = 18.331 * 3 = 54.99 acres of parkland dedication.

Libraries and Other Public Facilities

Less Than Significant Impact. Other public facilities and services provided within the City include library services and City administrative services. Library services are provided at the Montclair Branch Library, which is located at 9955 Fremont Avenue. The library is a part of the San Bernardino County Library System (SBCL). Because the library is part of a greater network of other county library services, residents and registered borrowers have access to over three million titles (City of Montclair 1999; San Bernardino County Library 2016). Residents from future development under the Proposed Project could use library services. The Proposed Project would include 6,321 new dwelling units, which could result in approximately 18,331 new residents. However, since the overall residential growth associated with the Proposed Project would occur gradually over a roughly 20-year period, the impact on library and other administrative services would also be gradual and most likely commensurate with overall increased funding and staffing levels expected during that time frame. Therefore, it is anticipated that existing library and City administrative services would be sufficient or require a slight increase over time to accommodate the increased demand due to implementation of the Proposed Project, and no new or physically altered governmental facilities would be necessary. Accordingly, implementation of the Proposed Project would result in a **less than significant** impact to library services. No mitigation is required.

3.11.5 Cumulative Impacts

Cumulative impacts to public services consider whether impacts of the Proposed Project together with other related projects, when taken as a whole, substantially increase the provision of public services within the regional area. As discussed above, the MPDSP would introduce a maximum of 18,331 new residents in the planning area at buildout. As previously outlined in Chapter 3.10 Population and Housing of this EIR, according to SCAG's 2020-2045 RTP/SCS, the City's population is anticipated to increase from 38,700 persons in 2016 to 49,200 persons in 2045, an increase in 10,500 persons. This represents a 21.3% increase (approximately 0.7% per year) between 2016 and 2045. As shown on Tables 3.10-1, the City experienced a population increase of approximately 4.4% per year between 2016 to 2018. Assuming the City increased population growth at a consistent rate between 2016 and 2045, the City would add approximately 362 persons per year.

Cumulative development in the City will increase the structures, residents, and employees requiring fire and police protection. Assuming fees continue to be adjusted and assessed and improvements in facilities are made concurrent with, or in advance of, new development, cumulative impacts to police and fire are not considered significant. Additionally, mitigation measure **MM-PUB-1** would be implemented as part of the Proposed Project.

Cumulative development in the City will continue to increase the number of students attending local schools and other educational facilities. Assuming appropriate statutory fees continued to be paid, impacts are considered fully mitigated by the law, pursuant to Government Code Section 65996.

Based on the population and growth discussed in Chapter 3.10 of this EIR, the City is deficient in meeting the required acreage for parkland. As described in Section 3.12, Recreation, there is a deficit in parkland of approximately 62%. Continued growth in the City will increase the number of residents and consequently the demand for park space. If fees continue to be exacted and new park space is developed concurrent with, or in advance of new development in the City, impacts could be reduced. However, given the relative lack of remaining open land in and around Montclair, the Proposed Project's contribution to the cumulative parks impact is considered a cumulatively significant. As such, cumulative impacts to public serves are considered **significant and unavoidable**.

3.11.6 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. Implementation of mitigation measure **MM-PUB-1** below would ensure that development proposed under the MPDSP adheres to applicable regulations related to fire protection service.

MM-PUB-1 Future development within the MPDSP area shall adhere to State and local law, including the California Code of Regulations, Title 24 (fire Code) and PRC 21157.1. As such, applicants of all future development within the MPDSP area shall be required to pay fees consistent with the requirements of Resolution 11-2872 of the City Council of the City of Montclair Adopting Local Goals and Policies for Community Facilities Districts.

3.11.7 Significance After Mitigation

With the implementation of mitigation measure **MM-PUB-1**, impacts to fire protection services as a result of implementing the Proposed Project would be less than significant.

Impacts on existing park and recreational facilities as a result of implementing the Proposed Project would be **significant and unavoidable**.

3.11.8 References

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3.12 RECREATION

This section describes potential impacts on recreation as a result of implementing the proposed Montclair Place District Specific Plan Project (MPDSP or Proposed Project). The May 2019 Initial Study (Appendix A) prepared for the Proposed Project included an analysis on public services in the Plan area based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. The Initial Study concluded that impacts on recreation as a result of the Proposed Project would be potentially significant. Accordingly, the analysis within this section describes the existing recreational uses; identifies associated regulatory requirements; and evaluates potential adverse impacts to recreational facilities as a result of the Proposed Project.

3.12.1 Existing Conditions

The City of Montclair (City) is located in a transitional zone between the coastal plains and mountains west and north of the City, and the California's Inland Desert region to the east and south of the City. While the City is surrounded by natural features, the City itself is largely built-out with little undeveloped land (City of Montclair 2019a). The Plan area and surrounding area is characterized as an urban, developed commercial and residential area. The Plan area and all surrounding properties have undergone disturbance previously resulting from development of the existing Mall and the commercial and residential uses that surround it.

Parks Standards

The national average for parkland is approximately 10.1 acres of parkland per every 1,000 residents. According to the *San Bernardino Countywide Plan Draft PEIR*, the county operates a total of 8,515 acres of regional parks (San Bernardino County 2019a). The City of Montclair (City) General Plan sets a goal of three (3) acres of recreational area per 1,000 residents (City of Montclair 1999). The City is approximately 62% deficient in parkland under existing conditions. Existing designated parks, recreation areas, and trails are described below.

Parks

National Parks

The Angeles National Forest (ANF) lies approximately three miles north of the proposed Montclair Place District Specific Plan (Plan) area. The ANF covers approximately 700,000 acres and is managed by the United States Department of Agriculture's (USDA) Forest Service. Amenities and recreational activities within the ANF include campgrounds and picnic areas; swimming; fishing; and, skiing, while the forest's extensive trail network accommodates hikers, equestrians, mountain bikers, and off-highway vehicle enthusiasts (USDA 2019).

Regional Parks

Regional parks include the most extensive or more highly specialized of the recreational facilities. They provide spacious areas for those scenic and recreation opportunities that have area-wide significance. While the City has no designated regional parks within its own boundaries, it is in close proximity to three major regional recreational facilities (City of Montclair 1999). These regional recreational facilities include Cucamonga Guasti Regional Park, Prado regional Park, and Frank G. Bonelli Regional County Park. Table 3.12-1 below, briefly describes the size, location, and amenities offered at each Regional Park, as well as the approximate distance and direction of each park from the proposed Plan area.

Table 3.12-1
Regional/County Parks in Proximity to the MPDSP area

Facility Name	Address	Size (acres)	Available Amenities	Distance and Direction from Plan Area
Regional/County Parks				
Cucamonga Guasti Regional Park	800 N. Archibald Avenue, Ontario (San Bernardino County)	79	Fishing; swimming pools; water park; picnic tables; and, picnic shelters.	11.3 miles southeast
Prado Regional Park	16700 S. Euclid Avenue, Chino (San Bernardino County)	2,100	56-acre lake; fishing; camping; hiking; biking and nature trails; disc golf; picnic facilities; 80-seat meeting room; two 18-hole golf courses; an Olympic shooting range; horseback riding; and, archery.	20 miles south
Frank G. Bonelli Regional Park	120 E Vía Verde, San Dimas (Los Angeles County)	2,500	Hiking trails (14 miles); picnic areas; boat-launching areas; fishing; camping; hiking; RV Park; equestrian facilities; golf course; and, a raging waters theme park.	13 miles west

Source: San Bernardino County 2019; County of Los Angeles Department of Parks and Recreation 2019

Local Parks and Recreational Areas

According to the *Montclair General Plan Update - Our Natural Environment Discovery Memo* (NEDM), the City's parks and recreation network is comprised of: 1) formally programmed public parks and gardens operated and maintained by the City; 2) undeveloped open space; 3) semi-recreational areas such as school yards and playgrounds; and,4) trails and streetscapes (City of Montclair 2019a).

As shown in Table 3.12-2 below, there are 13 existing parks within the City. These parks total approximately 46.27 acres, which equates to a parkland to resident ratio of approximately 1.15 acres per every 1,000 residents. The anticipated expansion of Reeder Ranch into Reeder Ranch and Park would contribute an additional 1.57 acres of parkland. Table 3.12-2 below, briefly describes the size, location, and amenities offered at each designated City park and recreational facility, as well as the approximate distance and direction of each facility from the proposed Plan area.

At the time that the General Plan was adopted in 1999, there was an estimated parkland deficiency of approximately 35 acres (City of Montclair 1999). The population in Montclair has grown considerably since 1999; however, the correlated increase in parkland acreage has not kept abreast due to the rapidly expanding population, as well as a lack of available vacant land. As described in Chapter 3.10 of this EIR, the Southern California Association of Governments (SCAG) estimated the City's population to be 40,402 people in 2018 (SCAG 2019). Assuming approximately 46.27 acres of developed and operating parkland, the current parkland ratio is approximately 1.15 acres for every 1000 residents.[1] This ratio is significantly below both the City's goal of three (3) acres per 1,000 residents and the national average of 10.1 acres of parkland per 1,000 residents, and demonstrates the prevailing deficiency in available parks and recreational amenities within the City (City of Montclair 2019a). The City's existing parkland ratio represents an existing parkland deficiency of approximately 74.9 acres[1]. Although this deficiency is somewhat alleviated by the availability of semi-recreational amenities (such as trails, school playgrounds etc.), these additional amenities are not considered in this analysis because they are either undeveloped, proposed/anticipated, and/or have restricted public access (i.e., school facilities are not open to the public during school hours).

Undeveloped open spaces in the City are limited, consisting primarily of the series of detention basins that flank the San Antonio Creek and occupy approximately 57.6 acres of land. These detention basins are currently fenced off and inaccessible to the public. The primary function of these detention basins is stormwater management. Developing these spaces into useable recreation space would require coordination with the Chino Basin Water Conservation District, which controls these lands. The City and the Chino Basin Water Conservation District have indicated a willingness to open this land up for use as public open space, similar to Wilderness Basin Park. (City of Montclair 2019a).

Trails

The City has a limited trails network. The built network consists solely of a small segment of the Pacific Electric Inland Empire Trail (Pacific Electric Trail) in the northernmost portion of the City. This is a regional trail that extends west into Claremont, and east to Upland and provides access to the Claremont Colleges and Upland Memorial Park respectively, as well as access extending into Rialto and beyond. As described in the Montclair General Plan Update – Our Natural Environment Discovery Memo, there is the potential to expand the City's trail network to include a mixed-use trail along the San Antonio Creek Channel (City of Montclair 2019a).

[1] 46.27 / 40,402 = 0.0011452 acres per resident * 1000 residents = 1.15 acres per 1000 residents. 40,402 / 1000 people = 40.402 * 3 acres = 121.2 acres of parkland which should be available within the City per City ratio. 121.2 acres – 46.27 acres (existing parkland) = 74.94 acres of parkland deficiency.

Table 3.12-2
City Parks and Recreational Amenities

Facility Name	Address	Size (acres)	Available Amenities	Facility Condition	Distance and Direction from Plan area
City Parks					
Alma Hofman Park	5201 Benito Street	4.95	Playground; splash pad; two lighted tennis courts; lighted skate park; lighted basketball court; picnic benches; and, restrooms.	The park amenities are well utilized and in fair condition. The park is landscaped with grass and sparse ornamental trees.	0.8-mile south
Essex Park	4295 Howard Street	4.4	Unlighted baseball field and snack bar facility.	The park is in fair condition; however, opportunities to improve the park's amenities (i.e., by supplying walking paths, night lighting, fitness equipment etc.) have been identified. The park is landscaped with grass, a baseball diamond, and sparse ornamental trees.	2.3 miles southwest
Golden Girls Park	9762 Benson Avenue	1.87	Softball field; snack bar; and, restroom.	The park is in good condition and is landscaped with grass and a softball diamond.	0.85-mile southeast
Kingsley Park	5575 Kingsley Street	3.0	Baseball field and snack bar facility.	The park is in fair condition; however, opportunities to improve the park's amenities (i.e., by updating the baseball diamond and providing amenities) have been identified. The park is landscaped with grass, a baseball diamond, and sparse ornamental trees around the perimeter of the parcel.	1.36 miles southeast
MacArthur Park	5450 Deodar Street	2.64	Batting cage; playground; and, picnic tables.	The park is in fair condition; however, opportunities to improve the park's amenities (i.e., by supplying walking paths, shade trees, fitness equipment etc.) have been identified. The park is landscaped with grass and sparse ornamental trees.	0.1-mile east
"Mini Park" #1	9120 Monte Vista Avenue	0.28	Two picnic tables.	The park is in fair condition; however, opportunities to improve the park's amenities (i.e., by supplying additional shade trees and picnic tables) have been identified. The park is landscaped with grass and two shade trees.	Immediately adjacent to the northwest corner of the Plan area, across Monte Vista Avenue.

Table 3.12-2
City Parks and Recreational Amenities

Facility Name	Address	Size (acres)	Available Amenities	Facility Condition	Distance and Direction from Plan area
"Mini Park" #2	4682 Highland Street	0.07	None	The park is landscaped with grass and in fair condition.	0.28-mile northwest
Moreno Vista Park	4675 Moreno Street	3.4	None. Existing tennis courts are in poor condition and closed to the public.	The park is landscaped with grass and a few ornamental trees around the perimeter of the parcel. The amenities are currently in poor condition; however, opportunities to improve the park's condition (i.e., by supplying additional shade trees, renovating the tennis courts and providing picnic tables etc.) have been identified.	0.26-mile west
Saratoga Park	5397 Kingsley Street	11.7	Playground; four baseball fields; a snack bar; basketball court; and, picnic area.	The park is in good condition and is landscaped with four baseball diamonds, grass, and clusters of mature shade trees. Opportunities to improve the park's condition (i.e., addition of walking paths and more shade trees etc.) have been identified.	1.34 miles south
Sunrise Park	5616 Princeton Street	2.34	Playground and picnic table.	The park is in fair condition; however, suffers from visibility and access issues. Opportunities to improve the park's condition (i.e., by connecting it to an adjacent City-owned parcel and improving access) have been identified.	0.62-mile southeast
Sunset Park	4351 Orchard Street	7.3	Playground; pickle ball court; and, picnic benches.	The park is in fair condition; however, opportunities to improve the park's condition (i.e., by providing amenities) have been identified. The park is landscaped with grass and sparse ornamental tress dotted around the perimeter of the parcel.	1.08 miles southwest
Wilderness Basin Park	4594 San Bernardino Street	4.32	Demonstration garden and planting areas; walking path; fitness equipment; picnic areas; and, restrooms.	The park is scantily landscaped and includes some non-shade supplying trees around the parcel perimeter.	0.3-mile southwest
Paseos Park	4914 Olive Street	0.77	A linear park space with terraced landscape and seating areas, pedestrian scale lighting and educational signage.	This is the City's newest park and it is in good condition. This park doubles as a stormwater capture feature of the associated Paseos Park residential development.	0.13-mile north

Table 3.12-2
City Parks and Recreational Amenities

Facility Name	Address	Size (acres)	Available Amenities	Facility Condition	Distance and Direction from Plan area
Reeder Ranch and Park (anticipated)	4405 Holt Boulevard	1.57 (anticipated)	Historic orchard (existing); historical and cultural center (anticipated); outdoor amphitheater (anticipated).	The Reeder Ranch is planned to be adjoined to an adjacent City-owned parcel to develop the parcel into the Reeder Ranch and Park. The parcel is graded and scantily landscaped with ornamental trees under existing conditions.	1.5 miles southwest
Semi-Public Recreation Facilities					
Moreno Elementary School	4825 Moreno Street	N/A	Two playgrounds; basketball courts; blacktop (asphalt) courts; and, lawns.	N/A	0.13-mile west
Serrano Middle School	4725 San Jose Street	N/A	Soccer fields; basketball courts; and, tennis courts.	N/A	0.38-mile west
Montclair High School	4725 Benito Street	N/A	Two baseball diamonds; softball diamond; football field; basketball courts; soccer field; and, tennis courts.	N/A	1.30 miles southwest
Monte Vista Elementary School	4900 Orchid Street	N/A	Four playgrounds; open lawn; basketball court; and, blacktop court.	N/A	1.53 miles south
Lehigh Elementary School	10200 Lehigh Avenue	N/A	Playground; basketball courts; blacktop courts.	N/A	2.33 miles southwest
Ramona Elementary School	4225 Howard Street	N/A	Two playgrounds; basketball court; and, open lawn.	N/A	4.62 miles southwest
Howard Elementary School	4650 Howard Street	N/A	Open lawn; baseball/softball diamond; blacktop courts; and soccer field.	N/A	4.1 miles southwest
Kingsley Elementary School	1170 Washington Avenue	N/A	Basketball and blacktop courts; playground; and, open lawn.	N/A	4.0 miles southwest

Source: City of Montclair 2019a

Funding

The City of Montclair Park Development Fund "Quimby" (1131)

Government Code Section 66477 (described in detail under Section 3.12.2 below) provides that a city may, by ordinance, require the dedication of land or impose an in-lieu fee for park and/or recreational purposes as a condition for new residential development. Resolution No. 824, adopted in October 1982, established the current land dedication and in-lieu fees imposed upon new residential development in the City (City of Montclair 2017). Proposed development within the City would be subject to applicable in-lieu fees; or, the City can consider waiving Quimby fees in exchange for construction or improvement of parks and recreation facilities.

The City of Montclair Park Maintenance Fund (1130)

Money collected under the Park Development Fund described above cannot be used for maintenance of parks. However, additional revenues collected from cell tower rentals, etc. are not restricted. This fund accounts for these additional monies and their uses for maintenance of parks within the City (City of Montclair 2017).

Bicycle and Pedestrian Circulation

The City's transportation infrastructure lacks an extensive bicycle network under existing conditions; however, improved bicycle and pedestrian corridors are included in the City's current and proposed planning efforts. There is one dedicated bicycle facility in proximity to the Plan area- the Pacific Electric Trail, which runs in an east-west direction approximately 0.5-mile north of the Plan area. The Pacific Electric Trail is approximately 21 miles length and runs between the cities of Rialto and Claremont, with the possibility of connecting a network of pathways including the Santa Ana River Trail and San Jose Creek to the San Gabriel River Trail (City of Montclair 2019b).

Pedestrian facilities in the Plan area include the continuous sidewalks along Monte Vista Avenue, Moreno Street, and Central Avenue; however, the City's existing street network lacks complete and comprehensive pedestrian amenities.

3.12.2 Regulatory Setting

Federal

There are no federal regulations applicable to the proposed MPDSP.

State

Quimby Act

California Government Code Section 66477, referred to as the Quimby Act, permits local jurisdictions to require developers to dedicate land and/or pay in-lieu fees towards the conservation of parkland. The Quimby Act was legislated to encourage the pre-emptive mitigation of developments' impact to parks and open space with the overarching goal of achieving a jurisdictional standard of 3.5 acres of parkland per 1,000 residents (California Department of Parks and Recreation 2002). The land dedication and/or fees required under the Quimby Act differ by project and are based upon the residential density, parkland cost, and other factors. Land dedication and fees collected pursuant to the Quimby Act may be used for acquisition, improvement, and expansion of park, playground, and recreational facilities or the development of public school grounds.

Assembly Bill 1359

Assembly Bill was signed into law in 2013. The bill lifted the limitation that required the use of developer's fees for only those parks served by the developer's proposed subdivision. AB 1359 allows cities and counties to use developer paid Quimby Act fees to provide parks in neighborhoods other than the one in which the developer's subdivision is located, as long as the legislative body completes a public hearing before utilizing the applicable fees. Under AB 1359, the transferal of development fees to parks outside of the proposed developments service area is only possible if the following requirements are met:

1. The neighborhood where the city or county is proposing to use the fees to provide parks must have fewer than three acres of park area per 1,000 members (i.e., be below the goal acreage per capita).
2. The neighborhood where the proposed subdivision is located must have at least three acres of park area or more per 1,000 members.
3. The city or county must hold a public hearing before using the fees in another neighborhood.
4. The city or county must find it reasonably foreseeable that the new subdivision's residents will use the park facilities in the other neighborhood.
5. And, finally, the city or county must use the fees in areas consistent with the city or county's local Quimby Act ordinance and general plan.

AB 1359 makes one other addition to the Quimby Act. It now allows a city or county to enter into a joint or shared-use agreement with one or more public districts in order to provide additional park and recreational access.

Local

City of Montclair General Plan

The Open Space Element of the General Plan addresses parks and supports the City standard of three acres per 1,000 population. It includes policies directing land acquisition for park areas where future population growth and higher density is anticipated, and encourages a balanced park system that is accessible to all ages.

As stated above, at the time that the General Plan was adopted in 1999, there was an estimated parkland deficiency of approximately 35 acres (City of Montclair 1999). The population in Montclair has grown considerably since 1999; however, the correlated increase in parkland acreage has not kept abreast. Under existing conditions, the City has an estimated population of 40,402 people (SCAG 2019). Assuming 46.27 acres of developed, operating parkland; the current parkland ratio is approximately 1.15 acres for every 1,000 residents. As stated above in Section 3.12.1, Existing Conditions, this ratio represents an existing parkland deficiency of approximately 74.9 acres[2].

City of Montclair Municipal Code

Section 11.38.080, Dedication of Land or Payment of Fees for Park and Recreational Facilities. The City incorporated the Quimby Act by reference in Section 11.38.080 of the Municipal Code, which essentially legislates an ordinance to fund parks and recreational facilities in accordance with Section 66477 of the State Government Code.

The City's Quimby Ordinance allows the City to require the payment of a development impact fee or the dedication of an equivalent area of parkland when new residential subdivisions are proposed. The law states that:

> *"…the dedication of land or the payment of fees, or both, shall not exceed the proportionate amount necessary to provide three acres of park area per 1,000 persons residing within a subdivision subject to this section, unless the amount of existing neighborhood and community park area, as calculated pursuant to this subdivision, exceeds that limit, in which case the legislative body may adopt the calculated amount as a higher standard not to exceed five acres per 1,000 persons residing in a subdivision subject to this section."*

[2] 46.27 / 40,402 = 0.0011452 acres per resident * 1000 residents = 1.15 acres per 1000 residents. 40,402 / 1000 people = 40.402 * 3 acres = 121.2 acres of parkland which should be available within the City per City ratio. 121.2 acres – 46.27 acres (existing parkland) = 74.94 acres of parkland deficiency.

In addition to Quimby fees, facilities can be provided by grants, donations, user fees, community fund raising events, joint ventures, and joint use agreements.

San Bernardino County Department of Public Health Strategic Plan (2015-2020)

The Plan's vision statement includes four guiding statements, one of which is "We Envision a sustainable system of high-quality education, community health, public safety, housing, retail, recreation, arts and culture, and infrastructure in which development complements our natural resources and environment." It also identifies a series of priority focus areas, of which Community and Environment is ranked number one. Relevant goals of the Community and Environment Priority Area include Sub-goal 1.1: Support healthy communities through policy, systems, and environmental strategies; and Subgoal 3.1: Improve access to open space, parks, trails and recreation (City of Montclair 2019a).

3.12.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criteria based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.). The following significance criteria, included for analysis in this EIR, are based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.), and will be used to determine the significance of potential impacts to parks and recreational facilities. Impacts related to parks and recreational facilities would be significant if the Proposed Project would:

A. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

B. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

3.12.4 Impacts Analysis

A. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Significant and Unavoidable Impact. As stated in Section 3.12.1, the City had an estimated population of 40,402 people in 2018 (SCAG 2019). Assuming 46.27 acres of developed, operating parkland within the City and the estimated City population in 2018, the current parkland ratio is approximately 1.15 acres for every 1000 residents. Based on the Citywide goal of three (3) acres per every 1,000 residents, the City currently has a parkland deficiency of approximately 74.9 acres.

The increased demand for neighborhood, regional, and state parks is most commonly associated with a substantial population increase such that existing parks and recreational amenities become over-utilized and deteriorate as a result. As stated in Section 3.10, Population and Housing, implementation of the MPDSP would include 6,321 new residential units. To determine the Proposed Project's population generation, the number of proposed units is multiplied by the average household size in the SCAG region. According to SCAG's 2020-2045 RTP/SCS, there was an increase in average household size in the SCAG region from 3.0 in 2010 to 3.1 in 2016, but it is anticipated the average household size will decline from 3.1 in 2016 to 2.9 in 2045 (SCAG 2016). Using this factor of 2.9 persons per household and a total of 6,321 dwelling units, the Proposed Project could support a residential population of approximately 18,331 persons. As stated in Section 3.10, Population and Housing, this localized population growth is not accounted for in the City's population projections. As such, the addition of approximately 18,331 people to the Plan area has the potential to further deteriorate City and Regional parks and recreational facilities, which are already over-utilized under existing conditions.

The Proposed Project would offset a portion of these impacts to parks and recreational facilities through the provision of eight neighborhood parks and amenities (plazas, and pedestrian paseos) surrounded by multi-family residences and/or offices, and lined with ground floor neighborhood-serving retail stores (refer to Figure 3.12-1, Proposed Open Space Areas). These parks would accommodate a variety of amenities, such as playgrounds, dog parks, basketball courts, walking paths, and open lawns for informal picnics, family ball games, and sunbathing (City of Montclair 2020). However, the total acreage of these proposed parks, approximately 8 acres combined, would not meet the City's parkland ratio requirements per Municipal Code, Section 11.38.080, under existing or proposed conditions. As per the Specific Plan, parks, plazas and open spaces shall remain open to the public year-round and in perpetuity, and shall be accessible to pedestrians. With the addition of approximately 18,331 people to the Plan area, the Proposed Project would be required to provide approximately 55 acres of parkland to adequately serve the proposed dwelling units, under the City's parkland ratio requirements of three (3) acres per 1,000 residents. As such, the Proposed Project would be required to further mitigate impacts to parks and recreational facilities.

Per California Government Code Section 66477, or, the Quimby Act (which is incorporated by reference into the City's Municipal Code, Section 11.38.080), developers are required to dedicate land and/or pay in lieu fees in order to mitigate anticipated impacts to parks and recreational facilities. Per Section 11.38.080 of the City's Municipal Code, the parkland dedication or park fees shall be required in

accordance with one or more of the outlined provisions. The following provisions would apply to the Proposed Project:

1. The developer will be required to dedicate a site or sites for a neighborhood park, sufficient in size and topography to serve the immediate and future needs of the residents of the developed area, based on an adopted ratio of three acres of park per 1000 persons. The actual amount of land dedication required per development, per dwelling unit shall be as periodically set by resolution of the City Council. Such dedication shall be shown on the tentative and final maps or sub-parcel map submitted by the developer and the necessary lands will be offered for dedication to the City at the time of filing the final map(s).
2. If the proposed residential development is in close proximity to an already-existing neighborhood park, as determined by the Planning Commission through the General Plan, and if the already-existing park is outside of the proposed limits of the development, the developer will be required to make a cash payment, in lieu of dedication, equivalent to the cost of the park land as determined by the Planning Commission. Such determination shall be based on the adopted ratio of parkland per dwelling unit and corresponding fees, as periodically set by resolution of the City Council. Such moneys shall be used only for the acquisition and development of that community park serving that proposed development. The developer may develop land for park use within the residential development as an alternate to cash payment. The cash payment shall be made to the City with the filing of final map(s), and shall be deposited with the City Treasurer in a Park Development Fund to be used solely for acquisition and development of park facilities.
3. Land dedication figures per dwelling unit and in-lieu fees per dwelling unit shall be as periodically set by resolution of the City Council. Said figures and fees shall be based on the adopted ratio of three acres of parkland per 1000 persons. The amount of land dedication per dwelling unit shall reflect the most recent State or federal census figures for persons per household, per type of dwelling unit (e.g., single-family lot, R-3; two-bedroom, mobile home), The amount of the in-lieu fee shall be based on the current actual cost of acquiring and developing land sufficient to meet City recreation objectives. Both land dedication and in-lieu fee figures shall also reflect current federal, state and local legislation.

As stated above, the Proposed Project's 6,321 housing units would provide for approximately 18,331 people. Based on the City's requirement to provide three acres of parkland and recreational facilities for every 1,000 residents, the applicant would be required to either provide approximately 55 acres of parkland or to mitigate impacts to

parks and recreation through payment of a comparable in lieu fee.[3] Per the provisions listed above, and outlined in the City's Municipal Code, Section 11.38.080, prior to Project approval, the Applicant would coordinate with the City Planning Commission in order to determine the appropriate recourse for impacts to parks and recreation. All multi-family residential projects are subject to a parkland development impact fee that requires land dedication (431 square feet/unit) or payment of an in lieu fee ($2,800) on a per unit basis. In the past, projects in the City that include a required public open space or park area were able to use this collected fee to partially off-set the cost for completing their respective public park or open space improvements. With adherence to State and local law, and compliance with applicable fees as determined by the City Planning Commission, impacts to existing parks and recreational facilities as a result of Project implementation would be reduced. However, considering the existing deficiency of recreational facilities in the City, the limited availability of land for new park space, and the estimated increase in population as a result of the proposed dwelling units, implementation of the Proposed Project would exacerbate the City's existing park shortage. All 13 existing parks within the City are located approximately 0.02 to 2.3 miles from the Plan area and could experience a substantial increase in use such that substantial physical deterioration of the facility could occur as a result of the Project. Therefore, impacts to existing neighborhood and regional parks and/or recreational facilities is determined to be **significant and unavoidable**.

B. Does the Project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Significant and Unavoidable Impact. The MPDSP would provide for the demolition of all or a portion of the existing Montclair Place Mall, some or all appurtenant free-standing outbuildings, and portions of the existing surface parking lots, to construct a pedestrian-oriented, mixed-use downtown district, with structured parking facilities through a series of planned phases. As stated above, the Proposed Project would include the provision of eight neighborhood parks varying in size, surrounded by multi-family residences and/or offices lined with ground floor neighborhood-serving retail stores. These parks would accommodate a variety of amenities, such as playgrounds, dog parks, basketball courts, walking paths, and open lawns for informal picnics, family ball games, and sunbathing (City of Montclair 2020). However, as described above, the total acreage of these proposed parks (approximately 8 acres combined) would not meet the City's parkland ratio requirements of three (3) acres per 1,000 residents per Municipal Code, Section 11.38.080, under existing or proposed conditions. With the addition of approximately 18,331 people to the Plan area, the Proposed Project would be required to provide approximately 55 acres of parkland to adequately serve

[3] 18,331 anticipated people / 1000 = 18.331 * 3 = 54.99 acres of parkland dedication.

this estimated increase in population as a result of the Project. The construction of these parks and associated recreational amenities is analyzed throughout this EIR. Although construction of the proposed neighborhood park facilities is not anticipated to result in any adverse effects on the environment, the Proposed Project would not meet the City's 3 acres of parkland for every 1,000 citizens standard and would therefore exacerbate the City's existing park shortage; resulting in the need for the construction or expansion of recreational facilities.

As stated above, the Proposed Project would be required to coordinate with the City Planning Commission in order to determine the appropriate recourse for impacts to parks and recreation. Compliance with applicable fees as determined by the City Planning Commission would reduce potential impacts to parks and recreational facilities. However, even with payment of applicable fees, the required construction or expansion of recreational facilities due to existing park deficiencies exacerbated by the Proposed Project could result in an adverse physical effect on the environment. Therefore, impacts are determined to be **significant and unavoidable**.

3.12.5 Cumulative Impacts

Based on the population and growth factors (see Section 3.10, Population and Housing), the City is deficient in meeting the required acreage for parkland. There is an existing deficit in parkland of approximately 62%. Continued growth in the City caused by other cumulative projects would further increase the number of residents and consequently increase the demand for park space. If fees continue to be exacted and new park space is developed concurrent with, or in advance of new development in the City, impacts could be reduced. Additionally, all projects under the cumulative scenario (see Section 3.13, Transportation) would be required to mitigate impacts to parks through either the dedication of parkland, or more likely, the payment of a development impact/in lieu fee. However, considering the existing deficiency of recreational facilities in the City, the shortage in remaining open space to develop parkland in the City, and the City's exceedance of SCAG's population growth projections (see Section 3.10, Population and Housing), implementation of the Proposed Project in addition to cumulative projects would exacerbate the City's existing park shortage. Therefore, the Proposed Project's impacts on recreational facilities when combined with other future projects would be cumulatively considerable. Cumulative impacts are, therefore, considered **significant and unavoidable**.

3.12.6 Mitigation Measures

Although the applicant would comply with the City's required payment of applicable in-lieu fee(s), no additional feasible mitigation is available to reduce significant impacts to recreational facilities.

3.12.7 Significance After Mitigation

Impacts on existing recreational facilities as a result of implementing the Proposed Project would be **significant and unavoidable**.

3.12.8 References

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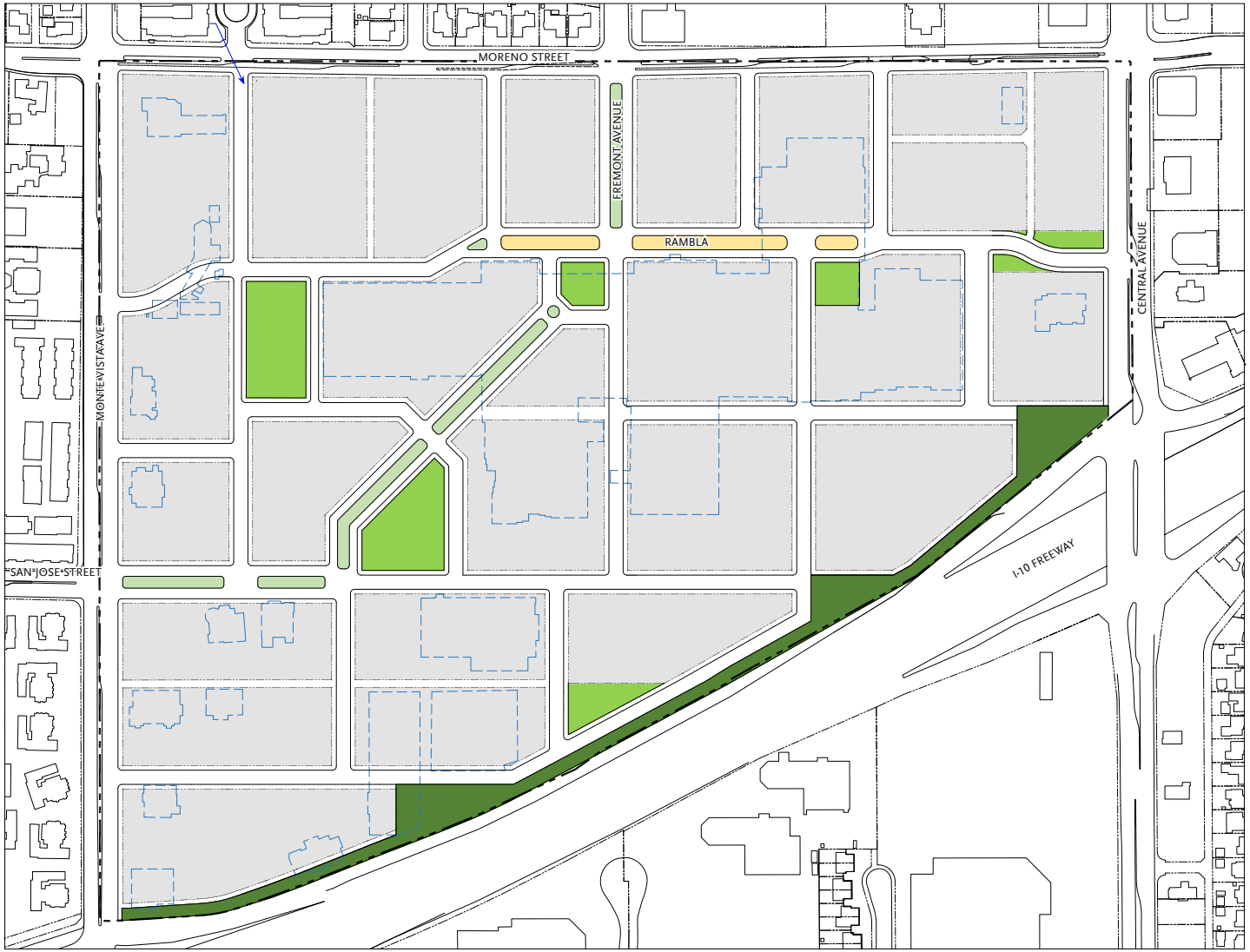

OPEN SPACE AREA

Open Space Type	Area	
	sf	acres
Park/Plaza	138,417	3.18
Plaza (Rambla)	26,552	0.61
Median	39,071	0.9
Green Buffer	145,188	3.33
TOTAL	**349,228**	**8.02**

Specific Plan Boundary

Existing On-Site Buildings

SOURCE: Moule & Polyzoids 2020

Figure 3.12-1

Proposed Open Space Areas

Montclair Place District Specific Plan EIR

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3.13 TRANSPORTATION

This section describes the existing transportation facilities on the proposed Montclair Place District Specific Plan Project (MPDSP or Proposed Project) site and within the Proposed Project's general vicinity (study area). Analysis within this section identifies associated regulatory requirements and potential impacts related to implementation of the Proposed Project. This section is based on the analysis presented in the *Traffic Impact Analysis for the Montclair Place District Specific Plan* (TIA) prepared for Proposed Project (Appendix F).

An Initial Study (Appendix A) was completed for the Proposed Project in May 2019 that included an analysis of the significance criteria based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.). The Initial Study concluded that there were potentially significant impacts related to whether the Proposed Project conflicts with applicable plans, ordinances or policies addressing the circulation system, whether the Proposed Project conflicts or is inconsistent with State CEQA Guidelines section 15064.3, subdivision (b), whether the Proposed Project would substantially increase hazards due to a geometric design feature or incompatible uses, and whether the Proposed Project would result in inadequate emergency access.

3.13.1 Existing Conditions

This section describes key roadway segments, as well as transit, pedestrian, and biking facilities within the vicinity of the Proposed Project.

Roadways

Roadway characteristics for key vicinity roads are described below, and roadway classifications within the City of Montclair are shown in Figure 3.13-1, Recommended General Plan Circulation Element Roadway Classifications.

Interstate 10 (I-10) is an east-west divided interstate freeway, that is generally 8 to 10 lanes, and extends across the length of the United States from California to Florida. Within the study area, I-10 serves as a critical connection for many other regional roadways, freeways, and highways. The posted speed limit is 65 miles per hour (MPH), and interchanges near the study area are located at Monte Vista Avenue, Palo Verde Street, and Central Avenue.

State Route 210 (SR-210) is an east-west divided state highway that is generally 8 lanes, and is located northward and parallel to I-10. SR-210 connects the foothill communities within Los Angeles County and San Bernardino County, as well as other regional roadways, highways, and freeways. The posted speed limit is 65 MPH and the nearest interchange to the study area is at Baseline Road near the border between the cities of Claremont and Upland.

Central Avenue is a north-south, generally 4 to 6 lane, divided roadway within the study area, however near the Plan area has portions that are undivided and a two-way left-turn lane (TWLTL) north of the Pacific Electric Bike Trail. Central Avenue spans three cities within the study area and is classified distinctly in each as follows: Upland (Major Arterial), Montclair (Major Street), Chino (Major). Parking is generally not permitted along either side of the roadway, and the posted speed limit ranges from 40 to 45 MPH within the study area. Central Avenue is located along the eastern edge of the Plan area and connects the Plan area northward to major corridors such as Foothill Boulevard, and southward to I-10 and SR-60, as well as the City of Chino.

Monte Vista Avenue is a north-south, generally 4 to 6 lane, divided roadway in the study area, however possess a TWLTL along portions near the Plan area. Monte Vista Avenue is designated as a Major Arterial in Claremont and as a Major Street in Montclair. Parking is generally not permitted along either side of the roadway, however there are portions where parking is permitted. The posted speed limit ranges from 35 to 45 MPH within the study area. Monte Vista Avenue is located along the western edge of the Plan area and connects the Plan area to major corridors such as Foothill Boulevard and SR-210 northward, as well as Mission Boulevard and I-10 southward.

Moreno Street is an east-west, generally 2 to 4 lane, divided roadway in the study area, however possess undivided portions as well as TWLTL lane east of Central Avenue. Moreno Street is designated as a Major Street by the City of Montclair. Parking is generally not permitted along either side of the roadway, except for portions along the northern edge of the roadway. The posted speed limit ranges from 35-40 MPH. Moreno Street fronts the northern edge of the Plan area and serves as vital connection to north-south roadways that connect to the larger regional network.

Fremont Avenue is a north-south, 4 lane, undivided roadway in the study area and is designated as a Collector Street in the City of Montclair. Parking is permitted along the western edge of the roadway, and the posted speed limit is 40 MPH. Fremont Avenue bisects Moreno Street and serves to connect the Plan area to Arrow Highway as well as the Montclair Metrolink Station and Montclair Transcenter transit station. No direct connections to the Montclair Transcenter currently exist via Fremont Avenue; however, a connection to the existing pedestrian tunnel (not accessible from the south) would be completed in conjunction with development of the (proposed) Village at Montclair project, located northwest of the Fremont Avenue/Arrow Highway intersection and immediately south of the railroad tracks and Transcenter. Additionally, the North Montclair Downtown Street Improvements Project is currently in the process of design review with the City, and proposes to convert Fremont Avenue from a 4-lane road to a 2-lane, undivided roadway, with plans to extend curb lengths for shorter pedestrian crossings, improve sidewalk conditions, modify intersection controls and lane geometrics, and provide designated parking spaces along Fremont Avenue.

Arrow Highway is an east-west, generally 4 to 6 lane, divided roadway that is classified distinctly in each city that it spans. Arrow Highway spans three cities within the study area and is classified distinctly in each as follows: Pomona and Claremont (Major Arterial), Montclair (Major Street), and Upland (Secondary Arterial). Parking is permitted along either side of the roadway in most areas, and the posted speed limit ranges from 35 to 45 MPH. Near the Plan area, a TWLTL divides Arrow Highway east of Mills Avenue, and a raised median separates the roadways west of Indian Hill Boulevard. In addition to modifications to Fremont Avenue, the North Montclair Downtown Street Improvements Project proposes to convert the existing TWLTL to a raised median with left-turn pockets along Arrow Highway, from the City's western limit to Central Avenue. As with Fremont Avenue, the Street Improvements Project includes plans to extend curb lengths for shorter pedestrian crossings, improve sidewalk conditions, modify intersection controls and lane geometrics, and provide designated parking spaces along Arrow Highway.

Mills Avenue is a north-south, generally 2 to 4 lane divided roadway; however portions in the study area possess undivided portions. Mills Avenue is a continuation of Claremont Boulevard, south of Arrow Highway. It is designated as a Collector Roadway within Claremont and is unclassified within Montclair. Parking is generally permitted along either side of the roadway, and the posted speed limit ranges from 40 to 45 MPH within the study area.

Claremont Boulevard is a north-south, generally 4 lane divided roadway. Claremont Boulevard is a continuation of Mills Avenue, north of Arrow Highway. It is designated as a Secondary Arterial within Claremont and parking is generally not permitted along either side of the roadway. The posted speed limit is 40 MPH within the study area.

Benson Avenue is a north-south, generally 4 lane, divided roadway in the study area, however also has portions that are undivided and with a TWLTL. Benson Avenue is designated as a Secondary Arterial in the City of Upland, and as a Secondary Street in the City of Montclair. Parking is generally permitted along the east side of the roadway, however it is also permitted on both sides along certain sections. The posted speed limit ranges from 25-40 MPH.

Foothill Boulevard is an east-west, generally 4 lane divided roadway, however contains a TWLTL east of Central Avenue. Foothill Boulevard is also co-identified as US Highway 66. It is designated as a Major Arterial within both the City of Claremont and the City of Upland. Parking is generally not permitted along either side of the roadway and the speed limit is generally 45 MPH within the study area.

Palo Verde Street is an east-west, generally 4 lane, divided roadway west of Central Avenue, and a 2-lane undivided roadway east of Central Area. Palo Verde Street is designated as a Major

Street within the City of Montclair. Parking is permitted along either side of the roadway, except for west of the I-10 eastbound ramps. The posted speed limit ranges from 35 to 40 MPH.

Transit

The Plan area is served by a regional rail transit station and multiple bus stops. The Southern California Regional Rail Authority (SCRRA) Metrolink commuter rail system has a connection at Montclair Station located at 5091 Richton Street, less than one mile north of the Plan area via Richton Street. The North Montclair Downtown Street Improvements Project has a planned connection to the existing pedestrian tunnel at the Montclair Transcenter connecting directly to Fremont Avenue, north of the Plan area. This connection would be completed in conjunction with development of the (proposed) Village at Montclair project, located northwest of the Fremont Avenue/Arrow Highway intersection and immediately south of the railroad tracks and Transcenter. Development of this connection to the tunnel would reduce the travel distance for pedestrians commuting from the Plan area to the Transcenter via Fremont Avenue.

The study area is served by two public bus transit services; Omnitrans and Foothill Transit. Bus routes that serve the Proposed Project include Routes 66, 85, and 88 from Omnitrans, and Routes 480 and 492 from Foothill Transit. Existing transit facilities are shown in Figure 3.13-2, Existing Transit Facilities.

Metrolink

Metrolink is a commuter rail system that offers services in six counties, including San Diego, Orange, Riverside, San Bernardino, Los Angeles, and Ventura. Metrolink operates seven routes, which include the following:

- Antelope Valley Line in Los Angeles County
- Inland Empire-Orange County Line from San Diego, Orange, Riverside, and San Bernardino counties
- Orange County Line from Orange County to Los Angeles County
- Riverside County Line from Riverside, San Bernardino, and Los Angeles counties
- San Bernardino Line from Los Angeles County to San Bernardino County
- Ventura County Line from Los Angeles County to Ventura County
- 91/Perris Valley Line from Riverside, Orange, and Los Angeles counties

The Proposed Project would be most directly served by Metrolink's San Bernardino Line which runs west to east from Los Angeles County to San Bernardino County with its terminus at Los Angeles Union Station and San Bernardino – Downtown Station. The San Bernardino Line has

14 stations, 57.6 route miles, an average of 9,736 weekday riders, and an average of 6,126 weekend riders. The Montclair Metrolink headway is an average of 45 to 60 minutes on weekdays and an average of one hour and 45 minutes on weekends.

Omnitrans

Public transit bus services from Omnitrans have routes serving the City of Chino Hills, Pomona, Chino, Ontario, Montclair, Upland, Rancho Cucamonga, Fontana, Rialto, San Bernardino, Colton, Grand Terrace, Loma Linda, Riverside, Highland, Redlands, and Yucaipa (Omnitrans 2019). The routes that serve the study area are Route 66, 85, and 88.

Route 66

Route 66 serves Fontana and Montclair. It runs along Monte Vista Avenue, Moreno Street/7th Street, Richton Street, Central Avenue, Foothill Boulevard, and Juniper Avenue. The buses arrive approximately every 15 to 30 minutes on the weekdays, and every 30 minutes on the weekend.

There are three bus stops serving Route 66 within the Plan Area. The Moreno Street and Lindero Avenue bus stop is located in the northwestern half of the Plan Area. The Central Avenue and Moreno Street bus stop is located in the northeast corner of the Plan Area. The Moreno Street and Fremont Avenue bus stop is located in the center northern boundary of the Plan Area. Headway data for these three stops is not available.

Route 85

Route 85 serves the Chino Transit Center, Montclair, Chino Civic Center, and Chaffey College. It runs along Chino Avenue, Central Avenue, San Bernardino Avenue, Monte Vista Avenue, Arrow highway, San Bernardino Road, Grove Avenue, Red Oak Street, Aspen Avenue, Foothill Boulevard, Milliken Avenue, Banyan Street, Haven Avenue, and College Drive. The buses arrive approximately every 30 minutes on the weekdays and every 60 minutes on the weekend.

There are three bus stops serving Route 85 within the study area. The Monte Vista Avenue and San Jose Street bus stop, the Monte Vista Avenue and Plaza Lane bus stop, and the Monte Vista Avenue and Moreno Street bus stop all are located along the western boundary of the Plan area.

Route 88

Route 88 serves Chino Hill to Montclair via Ramona Avenue. It runs along Peyton Drive, Grand Avenue, Pipeline Avenue, Chino Avenue, Central Avenue, Riverside Drive, Ramona Avenue, San Bernardino Avenue, Monte Vista Avenue, and Richton Street. The buses arrive approximately every hour on weekdays and weekends.

There are three bus stops serving Route 88 within the Plan Area. The Monte Vista Avenue and San Jose Avenue bus stop, the Monte Vista Avenue and Plaza Lane bus stop, and the Monte Vista Avenue and Moreno Street bus stop all are located along the western boundary of the Plan area.

Foothill Transit

The routes that serve the study area are Route 480 and Route 492 (Foothill Transit, 2019).

Route 480

Route 480 serves Montclair, Pomona, and West Covina via Mission Boulevard. It runs along Covina Parkway, Vincent Avenue, Interstate 10, Barranca Street, Workman Street, Citrus Street, Cameron Avenue, Grande Avenue, Temple Avenue, Valley Boulevard, Humane Way, Mission Boulevard, South Garey Avenue, Monterey Avenue, North Main Street, South East End Avenue, Holt Avenue, Indian Hill Boulevard, 1st Street, Claremont Boulevard, Arrow Highway, Monte Vista Avenue, Moreno Street, Central Avenue, and Richton Street. The buses arrive approximately every 20 to 30 minutes on weekdays and every 30 to 60 minutes on weekends.

There are two bus stops serving Route 480 near the Plan area. The Moreno Street and Fremont Avenue bus stop and the Moreno Street and Target Drive bus stop are located in the center northern boundary of the Plan area.

Route 492

Route 492 serves Montclair, Arcadia, and El Monte via Arrow Highway. It runs along Santa Anita Avenue, Live Oak Avenue, Arrow Highway, Bonita Avenue, Indian Hill Boulevard, 1st Street, Claremont Boulevard, Monte Vista Avenue, Moreno Street, Central Avenue, and Richton Street. The buses arrive approximately every 20 to 30 minutes on weekdays and every 30 minutes on weekends.

There are two bus stops serving Route 492 near the Plan area. The Moreno Street and Fremont Avenue bus stop and the Moreno Street and Target Drive bus stop are located in the center northern boundary of the Plan area.

Bicycle and Pedestrian Facilities

Bicycle Facilities

As stated in the City of Montclair General Plan, the City has connecting bike routes to surrounding communities like Claremont, Upland, and Ontario. Monte Vista Avenue and Central Avenue are designated as on-street bicycle lanes (City of Montclair 1999). The City's

recommended bicycle facilities identified in the General Plan Circulation Element are shown on Figure 3.13-3, Existing Bicycle Facilities.

As identified by Caltrans, the following classes are used to identify bicycle facilities within the study area:

> **Class I Bike Paths** are hard-surface routes within an exclusive right-of-way physically separated from vehicular roadways and intended specifically for non-motorized use.
>
> **Class II Bike Lanes** are marked bicycle lanes within roadways adjacent to the curb lane, delineated by appropriate striping and signage.
>
> **Class III Bike Routes** are marked by a series of signs designating a preferred route between destinations such as residential neighborhoods and shopping areas. These routes share the right-of-way with on-road vehicles.
>
> **Class IV Bikeways (Cycle Track)** are on-street facilities reserved for the exclusive use of bicycles and include a separation between the bikeway and through vehicular traffic.

There are no existing designated bicycle facilities adjacent to the Plan area along Central Avenue, Moreno Street, or Monte Vista Avenue, aside from the on-street bicycle lanes recommended in the City's General Plan. The closest bicycle facilities to the Plan area include a Class II bike lane that begins at Monte Vista Avenue, north of Arrow Highway, and the Pacific Electric Bike Trail (Class I bike path) that begins at Claremont Boulevard and extends approximately 18 miles east into the City of Rialto.

The Proposed Project would construct the following bicycle facilities:

- Class IV Bikeway (Cycle Track) – Monte Vista Avenue, from I-10 westbound ramps to Moreno Street.
- Class II Bike Lane – Moreno Street, Monte Vista Avenue to Central Avenue.
- Class I Bike Path – Rambla (within the Plan area).
- Class II Bike Lane – Fremont Avenue, Moreno Street to Monte Vista Avenue (within the Plan area).

Pedestrian Facilities

The Plan area serves active transportation users due its nature as a commercial center. Moreno Street, Monte Vista Avenue, and Central Avenue all have been constructed with curbs, gutters, and sidewalks on both sides of the street.

Several other roadways intersect with the Plan area boundary, including Fremont Avenue, San Jose Street, and Lindero Avenue. Fremont Avenue has complete curbs, gutters, and sidewalks on both sides of the street, except for the eastern section of the roadway, north of Olive Street that is currently occupied by an unimproved parcel. Fremont Avenue has pedestrian crossings on both eastern and western legs of its intersection with Moreno Street. San Jose Street possesses complete curbs, gutters, and sidewalks on both sides of the street and has a pedestrian crossing on the northern leg of its intersection with Monte Vista Avenue. As previously discussed, the North Montclair Downtown Street Improvements Project is currently in the process of design review with the City, and proposes to convert Fremont Avenue from a 4-lane road to a 2-lane, undivided roadway, with plans to extend curb lengths for shorter pedestrian crossings at intersections and extend sidewalks along the full extent of Fremont Avenue, from Moreno Street to Arrow Highway. Lindero Avenue possesses complete curbs, gutters, and sidewalks on both sides of the street, and has pedestrian crossings on both the eastern and western legs of its intersection with Moreno Street.

3.13.2 Regulatory Setting

The following is a summary of regulations regarding transportation that apply to the City of Montclair.

Federal

No federal transportation regulations apply to the Proposed Project.

State

California Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law, which creates a process to change the way that transportation impacts are analyzed under California Environmental Quality Act (CEQA). SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. Under the new transportation guidelines, LOS, or vehicle delay, will no longer be considered an environmental impact under CEQA. The updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018. Under the new guidelines, VMT has been adopted as the most appropriate measure of transportation impacts under CEQA. The OPR's regulatory text indicates that a public agency may immediately

commence implementation of the new transportation impact guidelines, and that the guidelines must be implemented statewide by July 1, 2020.

State of California Department of Transportation (Caltrans)

As the owner and operator of the State Highway System, the State of California Department of Transportation (Caltrans) implements established state planning priorities in all functional plans, programs, and activities. Caltrans has the responsibility to coordinate and consult with local jurisdictions when proposed local land use planning and development may impact state highway facilities. Pursuant to Section 21092.4 of the Public Resources Code (PRC), for projects of statewide, regional, or area-wide significance, the lead agency shall consult with transportation planning agencies and public agencies that have transportation facilities which could be affected by the project.

In anticipation of SB 743 implementation, Caltrans released the Draft Transportation Impact Study Guide (TISG) in February 2020, replacing the 2002 Guide for the Preparation of Traffic Impact Studies. Under the 2002 guidance, a traffic impact study was required by Caltrans when a project generates and assigns over 100 peak hour trips to a state highway facility; or if the project generates and assigns 50 to 100 peak hours trips to a state highway facility causing the facility to approach LOS C or D; or 1 to 49 peak hour trips are generated and assigned to a state highway facility causing it to experience significant congestion (LOS E or F), increased risk for traffic collisions, or affect access to the facility (Caltrans 2002). Per the 2020 TISG, Caltrans' primary review focus is now VMT, replacing LOS as the metric used in CEQA transportation analyses. Caltrans recommends use of OPR's recommended thresholds for land use projects and recommends following the guidance on methods of VMT assessment found in OPR's Technical Advisory (OPR 2018). The following thresholds from the Advisory for residential, office, and retail projects are provided below:

> **Residential:** A proposed project exceeding a level of 15 percent below existing VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita. Proposed development referencing a threshold based on city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the number of units specified in the SCS for that city, and should be consistent with the SCS.
>
> **Office:** A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.
>
> **Retail:** A net increase in total VMT may indicate a significant transportation impact.

> **Mixed-Use:** Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential, office and retail). Alternatively, a lead agency may consider only the project's dominant use. In the analysis of each use, a project should take credit for internal capture. Combining different land uses and applying one threshold to those land uses may result in an inaccurate impact assessment.

In addition to VMT, the 2020 TISG states that it may request a targeted operational and safety analysis to address a specific geometric or operational issue related to the State Highway System and connections with the State Highway System. Caltrans also notes that a future update of the TISG will include the basis for requesting transportation impact analysis not based on VMT and define elements to be included in non-VMT analysis. At the time of this study, this update has not been released; however, the TIA provided in Appendix F includes a mainline and facility analysis along I-10 near the Plan area, as well as a queuing analysis at Caltrans off-ramps.

Regional

Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) develops the Regional Transportation Plan (RTP), which presents the transportation vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura Counties. Senate Bill 375 (SB 375) was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning. Under the law, SCAG is tasked with developing a Sustainable Communities Strategy (SCS), a newly required element of the Regional Transportation Plan (RTP) that provides a plan for meeting emissions reduction targets set forth by the California Air Resources Board.

The 2020-2045 RTP/SCS (also known as the Connect SoCal Plan) was made available in March 2020, and presents the land use and transportation vision for the region through the year 2045, providing a long-term investment framework for addressing the region's challenges. The Proposed Final Connect SoCal Plan has not yet been adopted by SCAG's Regional Council; however, in May 2020 the Regional Council approved Connect SoCal for the limited purpose of submitting the plan to the Federal Highway Administration and Federal Transit Administration for review prior to the June 1, 2020 deadline, as required by the Clean Air Act.

The 2016 RTP/SCS identifies priorities for transportation planning within the Southern California region, sets goals and policies, and identifies performance measures for transportation improvements to ensure that future projects are consistent with other planning goals for the area. The RTIP, also prepared by SCAG based on the RTP, lists all of the regional funded/programmed improvements

within the next seven years. In order to qualify for CEQA streamlining benefits under SB 375, a project must be consistent with the RTP/SCS.

County of San Bernardino Congestion Management Program (CMP)

To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California, Proposition 111 created the Congestion Management Program (CMP) in 1990. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. Included with the provision for additional transportation funding was a requirement to undertake a Congestion Management Program (CMP) within each county with an urbanized area having a population of 50,000 or more, to be developed and adopted by a designated Congestion Management Agency (CMA). In 1990 the San Bernardino Associated Governments (SANBAG) was designated the CMA for San Bernardino County.

Although implementation of the CMP was made voluntary by the passage of AB 2419 (Bowler, 1996), the CMP requirement has been retained in all five urban counties within the SCAG region. In addition to its value as a transportation management tool, CMPs have been retained in these counties because of the Federal Congestion Management Process requirement that applies to all large urban areas that are not in attainment of federal air quality standards. These counties recognize that the CMP provides a mechanism through which locally implemented programs can fulfill most aspects of a regional requirement that would otherwise have to be addressed by the Regional Agency (SCAG).

The LOS at each CMP location is monitored by local jurisdictions in order to implement the statutory requirements of the CMP. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to meet conformance standards outlined by the countywide plan. The local CMP requires that a TIA report be prepared when a project's trip generation exceeds 250 two-way peak hour trips. For the CMP roadway system, the LOS standard shall be E for all segments and intersections except those designated LOS F, as listed in Table 2-1 of the CMP (SANBAG 2016). However, per SB 743, LOS is no longer considered an environmental impact under CEQA. As the County of San Bernardino has not adopted significance thresholds regarding a VMT impact, the significance thresholds provided in the OPR's Technical Advisory, as described above, have been used for this Proposed Project.

County of Los Angeles Congestion Management Program

In Los Angeles County, the Los Angeles County Metropolitan Transportation Authority (Metro) is the designated CMA and is responsible for implementing the CMP. In 2018, Metro's Board approved to opt out of the state's CMP program due to its framework that is grounded to the idea that congestion can be mitigated by continuing to add capacity to roadways. This is evidenced by

the primary metric that drives the CMP program, which is LOS. Recent state laws and rulemaking, namely AB 32 (California Global Warming Solutions Act of 2006), SB 375 (Sustainable Communities and Climate Protection Act of 2008), SB 743 (Environmental quality: transit oriented infill projects, judicial review streamlining for environmental leadership development projects) and SB 32 (California Global Warming Solutions Act of 2006), all move away from LOS directly or indirectly. Therefore, as the CMP primarily uses the LOS performance metric and these key state policies move towards other metrics such as VMT, the CMP contradicts these key state policies and Metro's own efforts to promote a more sustainable and equitable region. As stated in the June 25, 2019, Congestion Management Program Opt-Out Status Report, the decision to opt out of the CMP is not a unilateral decision made by Metro but a collective, majority decision of Metro and all 89 local jurisdictions in Los Angeles County (METRO 2019). The opt out of the CMP applies to Metro and all Los Angeles County local jurisdictions.

County of Los Angeles Public Works Department

Additionally, the County of Los Angeles Department of Public Works Board of Supervisors elected to be exempt from the CMP, pursuant to the California Code Section 65088.3. The resolution was adopted on July 16, 2019 and allows "the region to use different performance measures consistent with State-mandates to determine roadway deficiencies and ensure adequate planning" (County of Los Angeles 2019). As the County of Los Angeles has not adopted significance thresholds regarding a VMT impact, the significance thresholds provided in the OPR's Technical Advisory, as described above, have been used for this Proposed Project.

Local

City of Montclair

The City of Montclair Circulation Element objective is to promote a circulation and transportation system that accommodates all modes efficiently and safely as well as be attractive in appearance (Montclair 1999). The City has a LOS standard of D for all intersections under its jurisdiction; however, as the City of Montclair has not adopted significance thresholds regarding a VMT impact, the significance thresholds provided in the OPR's Technical Advisory, as described above, have been used for this Proposed Project.

3.11.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criteria based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.). The following significance criteria, included for analysis in this EIR, are based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.), and will be used to

determine the significance of potential transportation impacts. Impacts to transportation would be significant if the Proposed Project would:

A. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

B. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

C. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

D. Result in inadequate emergency access.

3.13.4 Methodology

This section describes the methodology used to analyze the potential impacts of the Proposed Project. Circulation elements that could potentially be affected by development of the Proposed Project were identified and analyzed under two scenarios: existing conditions and future long-range conditions. The study area and study scenarios are described in more detail below.

Vehicle Miles Traveled

As described in Section 3.13.2, OPR has approved the addition of new Section 15064.3, "Determining the Significance of Transportation Impacts" to the State's CEQA Guidelines, compliance with which will be required beginning July 1, 2020. The Updated CEQA Guidelines state that "…*generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts…*" and define VMT as "…*the amount and distance of automobile travel attributable to a project…*". It should be noted that "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck VMT). Other relevant considerations may include the effects of the project on transit and non-motorized traveled.

Screening for Land use Projects

The Technical Advisory suggests that agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing.

- Screening Threshold for Small Projects (110 daily trips or less): Since the Proposed Project generates more than 110 trips per day it cannot be assumed to cause a less-than-significant transportation impact.
- Map Based Screening for Residential and Office Projects: Currently, the City does not have VMT maps that can be utilized to identify areas with low VMT for projects.

- Presumption of Less Than Significant Impact Near Transit Stations: The Plan area is not located within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor. Per Public Resources Code Section 21155, a project shall be considered to be within ½ mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area farther than ½ mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than ½ mile from the stop or corridor. The Proposed Project would not meet these criteria, as less than half of the Plan area is within 1/2-half mile of the Montclair Transcenter, a major transit stop. Additionally, no high-quality transit corridors exist along any of the adjacent streets bordering the Plan area, as no bus routes operate at consistent 15-minute headways during peak hours. However, it must be noted that the northwest portion of the Plan area is located within a Transit Priority Area in the year 2045 (see Figure 3.13-2).
- Presumption of Less Than Significant Impact for Affordable Residential Development: The Proposed Project includes a 15 percent affordable and senior housing density bonus; however, this would not meet the Technical Advisory's recommended screening criteria of 100 percent affordable housing.

Section 15064.3 (b)(1) *Criteria for Analyzing Transportation Impacts* includes presumptions that certain projects (including residential, retail, office, and mixed-use projects) proposed within ½ mile of an existing major transit stop or along a high-quality transit corridor will have a less-than-significant impact on VMT.

However, this presumption would not apply if the project:

- Has a Floor Area Ratio (FAR) of less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking)
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization)
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units

The Proposed Project would not be located within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor per Public Resources Code Section 21155. Therefore, the exceptions listed above are not applicable to the Proposed Project.

As outlined above, the Proposed Project does not meet the screening criteria identified in the Technical Advisory. Therefore, an assessment of the Proposed Project's VMT impact under base

year conditions has been provided in this chapter using available significance thresholds and guidance from OPR and Technical Advisory.

Methodology for VMT Estimation

For mixed use projects such as the Proposed Project, model-based approach (tour- or trip- based travel demand models) offer the best methods for assessing VMT from residential/office projects and for comparing those assessments to VMT thresholds.

Per OPR's Technical Advisory, when a trip-based model is used to analyze a residential project, the focus can be on home-based trips and similarly for an office project, the focus can be on home-based work trips. Therefore, the analysis for the project is based on home-based VMT for service population i.e., sum of population and employees. For retail projects, the effects of a retail project by assessing the change in total VMT because retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns. However, there are existing retail uses on the site, and the net new retail trip generation of the project was estimated to be negative. The retail component of the project was included in the non-residential use using employee data. Therefore, the retail component of the project has not been analyzed separately.

The San Bernardino Transportation Analysis Model (SBTAM) 2012 base year version was utilized for VMT analysis of the proposed project. The SBTAM is a trip-based model that has been developed using Southern California Association of Governments (SCAG) Sub-Regional Model Development Tool. This tool converts the SCAG Regional Model based on its 2016 Regional Transportation Plan into a prototype focused model for a sub-region within the SCAG region. Further, SBTAM combines local demographics and highway network data maintained by SBCTA to generate a locally relevant travel demand model. Data sources of the model include household travel surveys, traffic count data, transit ridership data, and on-board transit surveys representative of travel in San Bernardino County.

VMT Impact Thresholds

The updated State CEQA Guidelines themselves do not establish a significance threshold, the OPR's Technical Advisory recommends a threshold of significance for residential, office and other land uses. While the recommended threshold for per capita or per employee for residential or office projects, respectively, is 15 percent below that of existing development, lead agencies can use more location-specific information to develop their own specific threshold for other project/land use types. The Proposed Project would be considered a mix of residential, office and retail land use and as such City of Montclair could develop their own threshold per OPR guidance. Further, consistency with regional transportation plan is required for all land use projects.

Since the City of Montclair has not yet adopted significance threshold regarding a VMT impact, the following significance thresholds provided in the OPR's Technical Advisory, December 2018 have been used for the Proposed Project:

> **Residential:** A proposed project exceeding a level of 15 percent below existing VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita. Proposed development referencing a threshold based on city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the number of units specified in the SCS for that city, and should be consistent with the SCS.
>
> **Office:** A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.
>
> **Retail:** A net increase in total VMT may indicate a significant transportation impact.
>
> **Mixed-Use:** Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential, office and retail). Alternatively, a lead agency may consider only the project's dominant use. In the analysis of each use, a project should take credit for internal capture. Combining different land uses and applying one threshold to those land uses may result in an inaccurate impact assessment.

3.13.5 Impacts Analysis

A. Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. As discussed below, the Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

2020-2045 RTP/SCS Consistency Analysis

The Proposed Project's consistency with the 2020-2045 RTP/SCS is discussed in Section 3.8.4, Land Use and Planning, and consistency findings are summarized in Table 3.8-1. The Proposed Project would not conflict with the applicable goals in the RTP/SCS.

City of Montclair General Plan Circulation Element

The Proposed Project's consistency with the City of Montclair General Plan Circulation Element is also discussed in Section 3.8.4, and consistency findings are summarized in

Table 3.8-2. The Proposed Project is determined to be consistent with the applicable goal (CE-1.0.0) and policies (except CE-1.1.6 – LOS) of the City of Montclair General Plan Circulation Element. Under Policy CE-1.1.6, the City of Montclair strives to:

> *"Keep traffic on all streets in balance with the capacity of the circulation system by regulating the intensity and density of land use in conformity with Level of Service "D" or better performance during typical weekday peak hours."*

Although the City's LOS policy was determined to no longer be applicable as a transportation impact under CEQA per SB 743, the following intersections would not comport with Policy CE-1.1.6 of the City's General Plan, as they would operate or are forecast to operate at unsatisfactory (LOS E or F) conditions during either the AM or PM peak hours:

Existing

- Mills Avenue/San Jose Avenue (LOS F in AM peak hour)

Existing plus Project

- Monte Vista Avenue/San Jose Street (LOS E in PM peak hour)
- Benson Avenue/Palo Verde Street – 5th Street (LOS E in PM peak hour)
- Mills Avenue/San Jose Avenue (LOS F in AM peak hour; LOS E in the PM peak hour)
- Benson Avenue/San Bernardino Street (LOS E in PM peak hour)
- Mills Avenue/Orchard Street (LOS F in AM peak hour)

General Plan Year 2040

- Mills Avenue/Moreno Street (LOS E in PM peak hour)
- Mills Avenue/San Jose Avenue (LOS F in both peak hours)
- Benson Avenue/ Palo Verde Street – 5th Street (LOS F in PM peak hour)
- Mills Avenue/San Jose Avenue (LOS F in both peak hours)
- Benson Avenue/San Bernardino Street (LOS E in AM peak hour; LOS F in PM peak hour)
- Mills Avenue/Orchard Street – Lincoln Street (LOS F in both peak hours)

General Plan Year (2040) plus Project

- Mills Avenue/Moreno Street (LOS E in PM peak hour)
- Fremont Avenue/Moreno Street (LOS E in PM peak hour)
- Mills Avenue/San Jose Avenue (LOS F in both peak hours)
- Benson Avenue/ Palo Verde Street – 5th Street (LOS F in PM peak hour)
- Monte Vista Avenue/Baseline Road (LOS E in PM peak hour)
- Mills Avenue/San Jose Avenue (LOS F in both peak hours)
- Benson Avenue/San Bernardino Street (LOS F in both peak hours)
- Mills Avenue/Orchard Street – Lincoln Street (LOS F in both peak hours)

Improvements were recommended in the TIA (Appendix F) for the intersections listed above, and the Proposed Project would be required to pay their fair-share costs to the City. This City does not currently have a fair-share program (or similar fee program) but will establish one for the Proposed Project upon approval of the MPDSP. However, the following intersections were determined to remain inconsistent with the City's LOS Policy CE-1.1.6 due to the proposed MPDSP improvements designed to comport with other General Plan Circulation Element policies and/or unavailable right of way to implement the recommended improvements:

- Monte Vista Avenue/San Jose Street
- Moreno Street/Fremont Avenue

Although development of the MPDSP would exceed the LOS goals stated in Policy CE-1.1.6, LOS can no longer be used to determine significant transportation impacts under CEQA and SB 743. Furthermore, as determined in Section 3.8, Land Use and Planning, in Table 3.8-2, Consistency with City of Montclair General Plan, the Proposed Project would be consistent with all other policies of the City's Circulation Element (Policies CE-1.1.0 to CE-1.1.16) related to commercial and recreational vehicle parking, bicycle and pedestrian circulation, truck routes, and improved freeway service. Therefore, impacts related to the City's General Plan Circulation Element policies would be **less than significant.**

Modifications to the surrounding roadway, bicycle, and pedestrian network proposed in the MPDSP are discussed below to determine consistency with applicable plans and policies. The proposed street and block network plan is provided in Figure 3.13-4, Street

and Block Network Plan, and individual street types proposed in the MPDSP are compiled in Figure 3.13-5, Street Types.

Roadway Network

The MPDSP includes modifications to the three existing arterial and collector streets surrounding the Proposed Project (Central Avenue, Moreno Street, and Monte Vista Street). All lane modifications to the surrounding streets, and all new street types added within the Plan area are detailed in Chapter 3.2 of the MPDSP and are shown in Figures 3.13-4 and 3.13-5. The following modifications are summarized and potential effects of these modifications to the surrounding intersections and roadway network are discussed below.

Central Avenue

- Decrease right of way from 115 feet to 110 feet
- Increase sidewalk widths on both sides of the street from 7-8 feet to 14 feet
- Decrease lane widths varying from 11-13.5 feet to 11 feet across all six lanes
- Decrease median width from 25.5 feet to 16 feet, and remove one left-turn storage lane where applicable

A decreased median width and subsequent removal of one left-turn lane along Central Avenue would result in the removal of one northbound left-turn lane at both the Central Avenue/Montclair Place and Central Avenue/Moreno Street intersections. It must be noted that removing one lane at each of these intersections would decrease the available northbound left-turning capacity; however, this loss in capacity would not conflict with applicable plans or policies. Both intersections would continue to operate at LOS D or better in accordance with the City's Policy CE-1.1.6 in both existing and long-term buildout conditions, and the increased sidewalk widths would promote Policies CE-1.1.7 and CE-1.1.9 regarding pedestrian circulation and walkability between major pedestrian generators.

Moreno Street

- Decrease right of way from 105 feet to 84 feet
- Decrease sidewalk widths from 8-9 feet to 6-feet, with allocated space for a 4-foot parkway between the sidewalk area and roadway.
- Add 8 feet Class II bike lanes along both sides of the street
- Remove one travel lane from each direction, converting Moreno Street from a 4-lane road to a 2-lane road.

- Decrease median width from 15+ feet to 10 feet, removing multiple left-turn lanes and incorporating left-turn pockets into the 10-feet median where applicable

As the median and right of way widths would decrease, and Class II bike lanes would be added to Moreno Street under these modifications, removal of one eastbound left-turn lane and one eastbound through lane at the Central Avenue/Moreno Street intersection would be necessary, along with the removal of one westbound left-turn lane at the Fremont Avenue/Moreno Street and Monte Vista Avenue/Moreno Street intersections. One westbound and one eastbound through lane would also need to be removed at each intersection to accommodate the proposed modifications. As noted for the removal of left-turn lanes at the two intersections along Central Avenue, reduction in capacity along Moreno Street and at corresponding intersections noted here would also occur. This loss in capacity would conflict with the City's Policy CE-1.1.6 at the intersection of Moreno Street and Fremont Avenue in long-term buildout conditions. However, the increased sidewalk widths would promote Policies CE-1.1.7 and CE-1.1.9 regarding pedestrian circulation and walkability between major pedestrian generators.

Monte Vista Avenue

- Maintain 96-foot right of way
- Convert 12-foot two-way left-turn lane (TWLT) to a 12-foot raised median
- Remove one travel lane from each direction, converting Monte Vista Avenue from a 6-lane road to a 4-lane road
- Add a 12-foot Class IV bikeway along the east side of Monte Vista Avenue
- Add an 8-foot parking lane along the east side of Monte Vista Avenue

With the addition of a Class IV bikeway and parking along Monte Vista Avenue, and reduction of one travel lane in each direction, it is assumed that one southbound through lane would be removed at the Monte Vista Avenue/San Jose Street intersection. As noted above, reduction in capacity from removal of lane(s) would occur. This loss in capacity would conflict with the City's Policy CE-1.1.6 at the intersection of Monte Vista Avenue and San Jose Street in both existing and long-term buildout conditions. However, the increased sidewalk widths would promote Policies CE-1.1.7 and CE-1.1.9 regarding pedestrian circulation and walkability between major pedestrian generators.

These roadway capacity reductions on Central Avenue, Moreno Street, and Monte Vista Avenue are components of the MPDSP and are proposed to enhance non-motorized, pedestrian, and bicycle circulation within, and around, the Specific Plan area. Further

analysis of this capacity reduction at corresponding intersections with the addition of Proposed Project traffic is provided in the TIA in Appendix F.

Monte Vista Avenue north of the I-10 freeway, Arrow Highway, and Central Avenue are designated as part of the San Bernardino County CMP Network. All intersections along Monte Vista Avenue, Arrow Highway, and Central Avenue operate at, or are forecast to operate at, LOS E or better, per San Bernardino CMP criteria in existing and long-term conditions.

Bicycle Network

The Rambla and Fremont Avenue roadways within the Plan area are designed to accommodate bicyclists, electric scooter riders, and other alternative forms of micro transportation. Although all other internal streets within the Plan area do not include specific bicycle facilities, the MPDSP identifies built-in traffic calming strategies, including narrow lanes, on-street parking, and street trees that would be more conducive to bicycle and micro transportation modes.

Additionally, improvements to the infrastructure of the adjacent collectors and arterials would connect the MPDSP with the City's bicycle network. A Cycle Track (Class IV bikeway) is proposed along Monte Vista Avenue to connect the Plan area with the Transcenter and Pacific Electric Trail to the north, as well as with residential areas south of I-10. Along with the Monte Vista Avenue Cycle Track proposed within the MPDSP, the City's planned bicycle network includes the addition of a Class II bike lane along the following corridors adjacent to the Plan area:

- Monte Vista Avenue, north of Moreno Street
- Moreno Street, east of Monte Vista Avenue

Pedestrian Network

As discussed in Chapter 5.3, Urban Standards of the MPDSP, the intent of the specific plan is to provide a framework for redeveloping and infilling the specific plan area over time with:

- A network of pedestrian-friendly blocks and streets that promote walking and bicycling;
- A continuous network of publicly accessible open spaces;

- Buildings that accommodate a variety of uses and are designed with massing configurations and architectural styles consistent with the spirit of a downtown setting.
- Active building frontages that enhance the pedestrian activity of the streets.
- Parking that is seamlessly integrated through on-street and subterranean parking, and lined parking garages.

These points indicate that the MPDSP prioritizes development with a pedestrian-oriented focus. Although the majority of the existing Montclair Plaza and surrounding roadways have basic sidewalk, curb, and gutter facilities, the overall layout of the site is currently designed to prioritize vehicle, not pedestrian, accessibility and travel. All street types (with exception to the alley) proposed in the MPDSP and shown in Figure 3.13-5, include at least sidewalks or some form of pedestrian accessibility. The majority of internal street types include 12-foot sidewalks along both sides of the street, and Fremont Avenue and the Rambla, the two major streets within the Plan area, are also designed with 14-foot- and 36-foot-wide pathways within their medians, respectively.

Additionally, open spaces and greenways are proposed throughout the Plan area. These open spaces are connected to retail areas and residential neighborhoods through the MPDSP street network, and the proposed streetscape would be designed to provide a pedestrian-friendly experience, encouraging foot traffic throughout the Plan area.

Furthermore, Fremont Avenue, north of the Plan area, would provide direct pedestrian access, via a new connection to the existing tunnel at the Montclair Transcenter in conjunction with buildout of the North Montclair Downtown Specific Plan (NMDSP). The proposed Village at Montclair project would be built with the connection to the existing tunnel as described in Section 4.2.010 of the NMDSP. Development of this connection to the existing tunnel would reduce the travel distance for pedestrians commuting from the Plan area to the Transcenter. Additionally, Fremont Avenue, north of the Plan area, would the North Montclair Downtown Street Improvements Project (currently under City review)

Based on review of the plans and programs above, although development of the MPDSP would result two intersections no longer able to satisfy the LOS stated in Policy CE-1.1.6 of the Circulation Element, CEQA can no longer determine significant transportation impacts under SB 743. Additionally, development of the MPDSP would be consistent with the other Circulation Element policies, particularly promoting Policies CE-1.1.7 and CE-1.1.9 regarding pedestrian circulation and walkability between major pedestrian generators. Therefore, the Proposed Project would not conflict with a program, plan,

ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and its impact to transportation plans and programs would be **less than significant**. No mitigation is required.

B. Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. The following discusses the Proposed Project's VMT impacts and its consistency with CEQA Guidelines section 15064.3, subdivision (b).

Project Trip Generation

Trip generation estimates for the MPDSP are based on daily and AM and PM peak hour trip generation rates obtained from the Institute of Transportation Engineers (ITE) *Trip Generation Handbook, 10th Edition* (2017). As discussed in Chapter 2, Project Description, the MPDSP would result in the demolition of all or a portion of the existing mall, some or all appurtenant free-standing outbuildings, and portions of the existing surface parking lots, to construct a pedestrian-oriented, mixed-use downtown district, with structured parking facilities through a series of planned phases. Therefore, the trip generation estimates for the existing mall, referred to as the Former Land Use in Table 3.13-1 below, were determined by applying trip generation rates to all entitled land uses. As the existing mall includes only retail land uses, the Former Land Use trip generation estimates were then deducted from the trip generation estimates for all proposed retail (non-residential or office) land uses in the MPDSP to determine the net new trips added to the transportation network. Trip generation rates and resulting trip generation estimates are summarized in Table 3.13-1.

As shown in Table 3.13-1, the Former Land Use generates 58,327 daily trips, 1,958 AM peak hour trips (1,147 inbound and 811 outbound), and 5,635 PM peak hour trips (3,133 inbound and 2,502 outbound). The Proposed Land Use would generate 93,050 daily trips, 4,440 AM peak hour trips (2,141 inbound and 2,299 outbound), and 8,496 trips during the PM peak hour (4,464 inbound and 4,032 outbound).

Additionally, trip reductions for pass-by trips, internal trip capture, and estimated transit trips were applied to both Former and Proposed land uses.

Pass-by Trips

Trip reductions for pass-by trips pursuant to the *ITE Trip Generation Handbook, 3rd Edition* were applied to both former and proposed land uses. Some of the trips generated by retail and restaurant uses within the Proposed Project would be pass-by trips, or trips whose primary destination are not those uses. These would include trips such as a work-to-home trip that stops at a restaurant or retail business on the way home from work.

These trips would not be new trips generated by the Proposed Project; rather, they are trips that are already on the roadway network that would make a stop at the Plan area.

Internal Trip Capture

Trip reductions for internal trip capture pursuant to the NCHRP 8-52 *Internal Trip Capture Estimate Tool* were applied to both former and proposed land uses. Internal trip capture is the potential for walking or vehicle trips to take place between the land uses within the Plan area. These would be trips generated by the Proposed Project land uses that do not result in additional traffic through study intersections.

Transit Trips

The Plan Area is served by a regional rail transit station and multiple bus stops. The Southern California Regional Rail Authority (SCRRA) Metrolink commuter rail system has a connection at Montclair Transcenter Station located at 5091 Richton Street, approximately ½ to ¾ mile north of the Plan area via the only existing access on Richton Street. The study area is served by two public bus transit services; Omnitrans and Foothill Transit. Bus routes that serve the Plan area include Routes 66, 85, and 88 from Omnitrans, and Routes 480 and 492 from Foothill Transit. A 1% transit trip reduction was applied for the existing (Former) uses, and a 5% transit trip reduction was applied for the Proposed Project, assuming residential land uses would result in more commute trips via public transportation.

Based on these trip reductions, the Former Land Use generates approximately 48,837 net daily trips, 1,600 net AM peak hour (938 inbound and 662 outbound), and 3,887 net PM peak hour trips (2,247 inbound and 1,640 outbound); and the Proposed Land Use would generate approximately 75,879 net daily trips, 3,718 AM peak hour trips (837 inbound and 1,281 outbound), and 5,713 net PM peak hour trips (3,001 inbound and 2,712 outbound).

Therefore, as shown in Table 3.13-1, 27,042 net new daily trips, 2,118 net new AM peak hour trips (837 inbound and 1,281 outbound), and 1,826 PM peak hour trips (754 inbound and 1,072 outbound trips) would be generated with implementation of the MPDSP.

Project Trip Distribution and Assignment

Project trip distribution percentages were derived from the 2040 San Bernardino County Transportation Analysis Model (SBTAM) select zone assignments residential, office, and retail land uses in the MPDSP Transportation Analysis Zone (TAZ). Select zone model plots for each land use type include trip distribution patterns throughout the transportation network and were provided. The select zone plots are provided in the TIA (Appendix F). Further discussion of trip distribution is provided in the following section on VMT impacts.

Table 3.13-1
Project Trip Generation for Montclair Place District Specific Plan Mixed-Use Project

Land Use	ITE Code	Size/Units		Daily	AM Peak Hour			PM Peak Hour		
					In	*Out*	*Total*	*In*	*Out*	*Total*
Trip Rates[1]										
Multifamily Housing (Mid-Rise)	221	DU		5.44	0.09	0.27	0.36	0.27	0.17	0.44
Multifamily Housing (High-Rise)	222	DU		4.45	0.07	0.24	0.31	0.22	0.14	0.36
General Office	710	TSF		*Fitted Curve Equations Used*[2]						
Medical-Dental Office Building	720	TSF		34.80	2.17	0.61	2.78	0.97	2.49	3.46
Hotel	310	Rooms		8.36	0.28	0.19	0.47	0.31	0.29	0.60
Shopping Center	820	TSF		*Fitted Curve Equations Used*[3]						
Movie Theatre[4]	444	TSF		78.09	0.11	0.11	0.22	5.80	0.37	6.17
High-Turnover (Sit-Down) Restaurant	932	TSF		112.18	5.47	4.47	9.94	6.06	3.71	9.77
Health/Fitness Club[5]	492	TSF		30.00	0.67	0.64	1.31	1.97	1.48	3.45
Tire Store	848	TSF		28.52	1.71	2.27	3.98	1.94	1.79	3.73
Church	560	TSF		6.95	0.20	0.13	0.33	0.22	0.27	0.49
Government Office Building	730	TSF		22.59	2.51	0.84	3.34	0.43	1.28	1.71
Trip Generation										
Former Land Use										
Shopping Center Retail	820	1180.009	TSF	32,203	460	282	742	1,620	1,755	3,375
Pass-by & Diverted Trips for Shopping Centers >1,000 TSF (Daily & AM 13.0%/PM 26.0%)[6]				*-4,186*	*-60*	*-37*	*-96*	*-421*	*-456*	*-878*
Subtotal (Shopping Center Retail)				*28,017*	*400*	*245*	*645*	*1,199*	*1,299*	*2,498*
Strip Center Retail (Moreno/Monte Vista)	820	13.913	TSF	1,572	98	60	159	61	66	126
Pass-by & Diverted Trips for Shopping Centers <100 TSF (Daily & AM 23.0%/PM 46.0%)[7]				*-362*	*-23*	*-14*	*-37*	*-28*	*-30*	*-58*
Subtotal (Strip Center Retail & Outbuilding Retail)				*1,211*	*76*	*46*	*122*	*33*	*35*	*68*
Outbuilding Retail	820	98.168	TSF	5,937	125	76	201	257	279	536
Pass-by & Diverted Trips for Shopping Centers <100 TSF (Daily & AM 23.0%/PM 46.0%)[7]				*-1,365*	*-29*	*-18*	*-46*	*-118*	*-128*	*-247*
Subtotal (Strip Center Retail & Outbuilding Retail)				*4,571*	*96*	*59*	*155*	*139*	*151*	*289*
Outbuilding - Restaurant	932	74.21	TSF	8,325	406	332	738	450	276	725
Pass-by & Diverted Trips for Restaurants (Daily & AM 21.5%/PM 43.0%)[8]				*-1,790*	*-87*	*-71*	*-159*	*-193*	*-118*	*-312*
Subtotal (Outbuilding - Restaurant)				*6,535*	*318*	*261*	*579*	*256*	*157*	*413*

Table 3.13-1
Project Trip Generation for Montclair Place District Specific Plan Mixed-Use Project

Land Use	ITE Code	Size/Units		Daily	AM Peak Hour			PM Peak Hour		
					In	*Out*	*Total*	*In*	*Out*	*Total*
Outbuilding - Fitness	492	46.536	TSF	1,396	31	30	61	92	69	161
Outbuilding - Auto Repair	848	7.055	TSF	201	12	16	28	14	13	26
Pass-by & Diverted Trips for Tire Store (Daily & AM 14.0%/PM 28.0%)[9]				*-28*	*-2*	*-2*	*-4*	*-4*	*-4*	*-7*
Subtotal (Outbuilding - Auto Repair)				*173*	*10*	*14*	*24*	*10*	*9*	*19*
Movie Theater	444	109.836	TSF	8,577	12	12	24	637	41	678
Church	560	16.546	TSF	115	3	2	5	4	4	8
Subtotal Former Land Use				*58,327*	*1,147*	*811*	*1,958*	*3,133*	*2,502*	*5,635*
All Pass-by Trips (50% of total Pass-by & Diverted Trips)				-3,866	-100	-71	-171	-382	-368	-751
All Diverted Trips (50% of total Pass-by & Diverted Trips)				-3,866	-100	-71	-171	-382	-368	-751
Pass-by + Diverted Trips				-7,732	-200	-142	-342	-765	-737	-1,501
Subtotal w/ Pass-by & Diverted Trips				*50,595*	*947*	*669*	*1,616*	*2,369*	*1,765*	*4,134*
Transit Trip Reduction[10]				-506	-9	-7	-16	-24	-18	-42
Subtotal w/ Transit Trip Reduction				*50,089*	*938*	*662*	*1,600*	*2,345*	*1,747*	*4,092*
Internal Trip Capture[11]				-1,252	0	0	0	-98	-107	-205
Total NET Former Land Use				**48,837**	**938**	**662**	**1,600**	**2,247**	**1,640**	**3,887**
Proposed Land Use										
Mid-Rise (3-10 stories)	221	5,366	DU	29,190	502	1,429	1,932	1,440	921	2,361
High-Rise (11+ stories)	222	955	DU	4,248	71	225	296	210	134	344
General Office	710	331.056	TSF	3,389	290	47	338	57	298	355
Medical Office	720	201.452	TSF	7,011	437	123	560	195	502	697
Hotel	310	250[12]	Rooms	2,090	69	48	118	77	74	150
Shopping Center Retail	820	1,170.853	TSF	32,033	457	280	737	1,611	1,745	3,356
Pass-by & Diverted Trips for Shopping Centers >1,000 TSF (Daily & AM 13.0%/PM 26.0%)[6]				-4,164	-59	-36	-96	-419	-454	-873
Subtotal (Shopping Center Retail)				*27,869*	*398*	*244*	*641*	*1,192*	*1,291*	*2,483*
Strip Center Retail (Monte Vista)	820	72.682	TSF	4,839	117	71	188	206	223	429
Pass-by & Diverted Trips for Shopping Centers <100 TSF (Daily & AM 23.0%/PM 46.0%)[7]				-1,113	-27	-16	-43	-95	-103	-197
Subtotal (Strip Center Retail)				*3,726*	*90*	*55*	*145*	*111*	*120*	*232*

Table 3.13-1
Project Trip Generation for Montclair Place District Specific Plan Mixed-Use Project

Land Use	ITE Code	Size/Units		Daily	AM Peak Hour			PM Peak Hour		
					In	*Out*	*Total*	*In*	*Out*	*Total*
Civic	730	74.030	TSF	1,672	185	62	247	32	95	127
Movie Theatre	444	109.836	TSF	8,577	12	12	24	637	41	678
Subtotal Proposed Land Use				93,050	2,141	2,299	4,440	4,464	4,032	8,496
All Pass-by Trips (50% of total Pass-by & Diverted Trips)				-2,639	-43	-26	-70	-257	-278	-535
All Diverted Trips (50% of total Pass-by & Diverted Trips)				-2,639	-43	-26	-70	-257	-278	-535
Pass-by + Diverted Trips				-5,277	-86	-53	-139	-514	-556	-1,070
Subtotal w/ Pass-by & Diverted Trips				*87,772*	*2,055*	*2,246*	*4,301*	*3,950*	*3,476*	*7,426*
Transit Trip Reduction[10]				-4,389	-103	-112	-215	-198	-174	-372
Subtotal w/ Transit Trip Reduction				*83,384*	*1,952*	*2,134*	*4,086*	*3,752*	*3,302*	*7,054*
Internal Trip Capture[11]				-7,505	-177	-191	-368	-751	-590	-1,341
Total NET Proposed Land Use				**75,879**	**1,775**	**1,943**	**3,718**	**3,001**	**2,712**	**5,713**
NET Trip Generation (Proposed - Former Uses)				**27,042**	**837**	**1,281**	**2,118**	**754**	**1,072**	**1,826**

Notes: DU = dwelling unit; TSF = Thousand Square Feet

1 Trip rates from Trip Generation, 10th Edition, Institute of Transportation Engineers, 2017.

2 Fitted Curve Equations used. Daily: Ln(T) = 0.97Ln(X) + 2.50; AM Peak Hour: T = 0.94(X) + 26.49; PM Peak Hour: Ln(T) = 0.95Ln(X) + 0.36.

3 Fitted Curve Equations used. Daily: Ln(T) = 0.68Ln(X) + 5.57; AM Peak Hour: T = 0.50(X) + 151.78; PM Peak Hour: Ln(T) = 0.74Ln(X) + 2.89.

4 No AM Peak Hour distribution split is given; percent distribution is assumed to be 50% of total AM trips.

5 No Daily ITE rate is available; SANDAG daily rate used.

6 Pass-by trip rates derived from the average of pass-by trip percentages provided for all shopping centers greater than 1,000 TSF in size, from the ITE Trip Generation Handbook, 3rd Edition - Table E.9, Pass-by Trips (Weekday, PM Peak Hour), ITE 820 - Shopping Center.

7 Pass-by trip rates derived from the average of pass-by trip percentages provided for all shopping centers less than 100 TSF in size, from the ITE Trip Generation Handbook, 3rd Edition - Table E.9, Pass-by Trips (Weekday, PM Peak Hour), ITE 820 - Shopping Center.

8 Pass-by trip rates provided by the ITE Trip Generation Handbook, 3rd Edition - Table E.30, Pass-by Trips (Weekday, PM Peak Hour), ITE 932 - High-Turnover (Sit-Down) Restaurant.

9 Pass-by trip rates provided by the ITE Trip Generation Handbook, 3rd Edition - Table E.12, Pass-by Trips (Weekday, PM Peak Hour), ITE 848 - Tire Store.

10 A 1% transit trip reduction is taken for the existing (former) project; a 5% transit trip reduction is taken for the Proposed Project, assuming residential land uses would result in more commute trips via public transportation.

11 Internal trip capture estimated using the NCHRP 8-51 Internal Trip Capture Estimate Tool, developed by the Texas Transportation Institute. Note: No internal trip capture in the AM Peak Hour is estimated under existing conditions; no Daily internal trip capture rates are available - the Daily internal trip capture rate is assumed to be one-half of the PM Peak Hour under existing conditions, and equal to the AM Peak Hour rate under proposed conditions.

12 The Project Description of the Proposed Project indicates that a 100-200 room hotel would be built. The traffic analysis conservatively assumed that a 250-room hotel may be built.

VMT Analysis

As mentioned above, the Proposed Project's VMT analysis was based on the SBTAM (Year 2012). Consistent with standard modeling practice, to identify VMT from the project, a TAZ for the Proposed Project was included in the model and select zone runs were conducted. Since the primary purpose of SB-743 is to reduce home-based automobile travel, only the VMT related to home-based passenger vehicle travel are reported for the Proposed Project and the City of Montclair. This is an "apples-to-apples" comparison as contemplated in OPR's Technical Advisory. The findings of the Proposed Project's VMT analysis for the base year are shown in Table 3.13-2 below.

- **Residential VMT**: VMT per capita for the Proposed Project is 5.97 and for the City of Montclair is 20.43. Therefore, the Proposed Project's VMT/capita is 70.8% lower than the City's VMT per capita.
- **Non-Residential VMT**: VMT per employee for the Proposed Project is 13.9 and the City of Montclair is 16.16. Therefore, the Proposed Project's VMT/employee is 14.0% lower than the City's VMT per employee.
- **Total VMT**: VMT per service population (i.e., sum of population and employees) for the Proposed Project is 8.37 and for the City of Montclair is 19.27. Therefore, the Proposed Project's VMT/service population is 56.5% lower than the City's VMT per service population.

As shown in Table 3.13-2 and summarized above, the Proposed Project's residential VMT and total VMT per service population exceed a level of 15% below existing/base year (2012 per the SBTAM validation year) VMT per capita and VMT per service population. The Proposed Project's VMT per employee is 14.0% lower than the existing City VMT per employee. Since the Proposed Project is a mixed-use development, the total VMT per service population is the appropriate indicator of the Proposed Project's travel characteristics. Therefore, since the Proposed Project's VMT per service population (8.37) would be less than 15% of the City's existing/base year VMT (15% of 19.27 = 16.38), the Proposed Project's impact to VMT would be **less than significant**.

Furthermore, the Proposed Project would be most directly served by Metrolink's San Bernardino Line which runs west to east from Los Angeles County to San Bernardino County with its terminus at Los Angeles Union Station and San Bernardino – Downtown Station. The closest station is the City's Transcenter located north of the Plan area. The propoosed Village Montclair project, in conjunction with buildout of the NMDSP, would construct access to the existing tunnel at the Transcenter which would provide a more direct

access between the Plan area and Transcenter. Also, as shown on Figure 3.13-2, the northwest portion of the Plan area is located within a Transit Priority Area in the year 2045.

Table 3.13-2
Summary of Project's Vehicle Miles Traveled (VMT)

Base Year	Total Homebased VMT	Total Population	VMT/ Capita or Employee or Service Population	% Reduction
Residential (per capita)				
Project (Montclair District Specific Plan Population)	84,931	14,222	5.97	70.8%
City of Montclair	1,106,140	54,134	20.43	
Non-Residential - Retail and Office (per employee)				
Project (Montclair District Specific Plan Employment)	85,853	6,177	13.90	14.0%
City of Montclair	329,384	20,380	16.16	
All (per service population)				
Project (Montclair District Specific Plan Population and Employment)	170,784	20,399	8.37	56.5%
City of Montclair	1,435,524	74,514	19.27	

Source: San Bernardino Traffic Analysis Model

C. Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Significant and Unavoidable Impact. The following discussion describes the potential for increased hazards as a result of geometric design features of the Proposed Project, and/or as a result of the addition of Proposed Project traffic to adjacent roadway facilities.

Project Site Access

As shown in Figure 3.13-4, the MPDSP identifies 10 intersections that would provide access to and/or access from the Plan area. Four driveways are identified along Monte Vista Avenue, five driveways are identified along Moreno Street, and one driveway is identified along Central Avenue. Primary site access is located along the western, northern, and eastern boundaries of the Plan area, at the intersections of Monte Vista Avenue/San Jose Street, Fremont Avenue/Moreno Street, and Central Avenue/Montclair Plaza, respectively. All access intersections would be assumed to be full access driveways, with exception of the following:

- Monte Vista Avenue Driveway, north of San Jose Street: right turn in/out only
- Moreno Street Driveway, west of Fremont Avenue: right turn in/out only

- Central Avenue/Montclair Plaza: limited access (eastbound left-turn is restricted)

Additionally, it should be noted that the MPDSP would propose to remove the southern legs (existing Montclair Plaza driveways) of the Lindero Avenue and Target Lane signalized intersections with Moreno Street. Reconfiguration of these intersections as three leg intersections (either maintained as signalized intersections or converted to unsignalized intersections) would be required. Since all Plan area access driveways and intersections will be required to be constructed consistent with City of Montclair driveway and intersection standards and specifications, impacts to Plan area access would be less than significant.

Freeway Ramp Queuing

As the Proposed Project has the potential to add traffic to nearby freeway facilities, a queuing analysis was conducted at the following 7 freeway off-ramp intersections within the study area to determine the potential for queuing onto the freeway mainline:

- Central Avenue/Interstate 10 (I-10) westbound ramps
- Central Avenue/I-10 eastbound ramps
- Monte Vista Avenue/I-10 westbound ramps
- Monte Vista Avenue/I-10 eastbound off-ramp
- State Route 210 (SR-210) ramps/Baseline Road
- Central Avenue/State Route 60 (SR-60) westbound ramps
- Central Avenue/SR-60 eastbound ramps

Queuing was analyzed utilizing the SimTraffic software, which calculates the 95th percentile (design) queue. A discussion of the queuing conditions at each off-ramp is provided in the following discussion, and SimTraffic queueing worksheets are provided in the TIA (Appendix F).

Existing Conditions

As shown in Table 3.13-3, peak 95th percentile queues are forecast to exceed some of the storage pocket lengths at the freeway off-ramps of the following intersections:

- Central Avenue/I-10 westbound ramps
- Monte Vista Avenue/I-10 westbound ramps
- Central Avenue/SR-60 westbound ramps

- Central Avenue/SR-60 eastbound ramps

While off-ramp queues during the AM peak hour exceed some of the storage pocket lengths, the total lengths of the off-ramps (stop bar at intersection to gore point at mainline lane) provide adequate storage, and queues would not extend into the mainline freeway lanes. However, during the PM peak hour, the westbound off-ramp queues at Central Avenue/I-10 westbound ramps exceed the total ramp length by approximately 187 feet. As PM peak hour 95th percentile queue extends into the I-10 mainline lanes at Central Avenue/I-10 westbound ramps in the Existing condition, queueing along this off-ramp has the potential to impact mainline operations.

Existing plus Project Conditions

As shown in Table 3.13-3, peak 95th percentile queues are forecast to exceed some of the storage pocket lengths at the freeway off-ramps of the following intersections with the addition of Proposed Project traffic:

- Central Avenue/I-10 westbound ramps
- Central Avenue/I-10 eastbound ramps
- Monte Vista Avenue/I-10 westbound ramps
- Central Avenue/SR-60 westbound ramps
- Central Avenue/SR-60 eastbound ramps

In the Existing plus Project condition, AM peak hour 95th percentile queues exceed the total ramp lengths at the Central Avenue/I-10 westbound and I-10 eastbound ramps by approximately 180 feet and 132 feet, respectively. During the PM peak hour, the westbound off-ramp queues at Central Avenue continue to exceed the total ramp length; however, the total queue length is forecast to decrease by approximately 84 feet between the Existing and plus Project conditions. The Central Avenue/eastbound off-ramp queues are also forecast to exceed the total ramp length, extending approximately 159 feet into the mainline lanes.

As both AM and PM peak hour 95th percentile queues are forecast to extend into the I-10 mainline lanes at the Central Avenue/I-10 westbound and eastbound ramps in the Existing plus Project condition, queueing along these off-ramps has the potential to impact mainline operations. Improvements to accommodate the Existing plus Project queues at these off-ramps would require extensive coordination and further study under Caltrans direction to determine the appropriate designs to accommodate off-ramp queues. Since there are no current programs administered by the City for ramp improvements at

the I-10/Central Avenue interchange, and since the City does not have jurisdiction over these facilities, there are no feasible mitigation measures to mitigate the Proposed Project's off-ramp queuing impacts. Therefore, the Proposed Project may increase a hazardous condition at the I-10/Central Avenue eastbound and westbound off-ramps, and its impacts would be **significant and unavoidable**.

Table 3.13-3
Queuing Summary - Existing plus Project

Intersection	Movement	Pocket Length[1]	Existing				Existing plus Project			
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
			95th Percentile Queue[2]	Exceeds Turn Pocket Length?	95th Percentile Queue[2]	Exceeds Turn Pocket Length?	95th Percentile Queue[2]	Exceeds Turn Pocket Length?	95th Percentile Queue[2]	Exceeds Turn Pocket Length?
Central Avenue/I-10 westbound ramps	WBL	160	210	**Yes[4]**	249	**Yes**	240	**Yes**	249	**Yes**
	WBLTR[3]	765	477	No	761	No	772	**Yes**	660	No
	WBR	290	358	**Yes[4]**	392	**Yes**	383	**Yes**	409	**Yes**
Central Avenue/I-10 eastbound ramps	EBL	260	250	No	83	No	350	**Yes**	338	**Yes**
	EBLT[3]	940	623	No	734	No	838	No	827	No
	EBR	440	172	No	118	No	584	**Yes**	634	**Yes**
Monte Vista Avenue/I-10 westbound ramps	WBL	140	188	**Yes[4]**	188	**Yes[4]**	189	**Yes[4]**	191	**Yes[4]**
	WBR1[3]	965	289	No	335	No	368	No	406	No
	WBR2	170	161	No	199	**Yes[4]**	196	**Yes[4]**	213	**Yes[4]**
Monte Vista Avenue/I-10 eastbound off-ramp - Palo Verde Street	EBL	700	177	No	309	No	236	No	457	No
	EBTR[3]	1530	150	No	417	No	243	No	542	No
SR-210 ramps/Baseline Road	NBL	1000	475	No	141	No	310	No	519	No
	NBR1[3]	1680	188	No	247	No	186	No	587	No
	NBR2	530	160	No	225	No	159	No	282	No
	SBL	1000	99	No	107	No	96	No	97	No
	SBR[3]	1825	324	No	140	No	393	No	312	No
Central Avenue/SR-60 westbound ramps	WBL	240	302	**Yes[4]**	266	**Yes[4]**	302	**Yes[4]**	263	**Yes[4]**
	WBLTR[3]	1350	391	No	356	No	849	No	301	No
	WBR	340	307	No	278	No	347	**Yes[4]**	242	No

Table 3.13-3
Queuing Summary - Existing plus Project

Intersection	Movement	Pocket Length[1]	Existing				Existing plus Project			
			AM Peak Hour		*PM Peak Hour*		*AM Peak Hour*		*PM Peak Hour*	
			95th Percentile Queue[2]	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*
Central Avenue/SR-60 eastbound ramps	EBL	225	252	**Yes[4]**	257	**Yes[4]**	269	**Yes[4]**	271	**Yes[4]**
	EBLTR[3]	1325	586	No	947	No	947	No	861	No
	EBR	225	263	**Yes[4]**	192	No	233	**Yes[4]**	225	No

Source: Dudek 2020

Notes:

1 Measured in feet.

2 Based on 95th percentile (design) queue length in SimTraffic 10.

3 Primary offramp lane; approximate length measured from freeway mainline.

4 While queue exceeds storage lane, the total length of the off-ramp is greater than the queue, therefore queue would not impact the mainline lanes.

XX – Queue exceeds storage length; **XX** - Queue exceeds storage length and impacts the freeway mainline.

General Plan Year 2040 Conditions

As shown in Table 3.13-4, peak 95th percentile queues are forecast to continue to exceed some of the storage pocket lengths at the freeway off-ramps of the following intersections:

- Central Avenue/I-10 westbound ramps
- Monte Vista Avenue/I-10 westbound ramps
- Central Avenue/SR-60 westbound ramps
- Central Avenue/SR-60 eastbound ramps

While off-ramp queues during the AM peak hour are forecast to exceed some of the storage pocket lengths during the General Plan Year 2040 conditions, the total lengths of the off-ramps provide adequate storage and queues would not extend to the mainline freeway lanes. However, during the PM peak hour, the westbound off-ramp queues at Central Avenue are forecast to exceed the total ramp length by approximately 147 feet. As the PM peak hour 95th percentile queue extends into the I-10 mainline lanes at Central Avenue/I-10 westbound ramps in the General Plan Year 2040 condition, queueing along this off-ramp has the potential to impact mainline operations.

General Plan Year 2040 plus Project Conditions

As shown in Table 3.13-4, peak 95th percentile queues are forecast to continue to exceed some of the storage pocket lengths at the freeway off-ramps at all study ramp intersections with the addition of Proposed Project traffic:

- Central Avenue/I-10 westbound ramps
- Central Avenue/I-10 eastbound ramps
- Monte Vista Avenue/I-10 westbound ramps
- Monte Vista Avenue/I-10 eastbound ramps
- SR-210 ramps/Baseline Road
- Central Avenue/SR-60 westbound ramps
- Central Avenue/SR-60 eastbound ramps

However, in the General Plan Year (2040) plus Project condition, the 95th percentile queues are forecast to exceed the total ramp storage length at the Central Avenue/I-10 westbound ramps, and I-10/Central Avenue eastbound ramps. The AM peak hour 95th percentile queues exceed the total ramp lengths at the Central Avenue/I-10 westbound

ramps by approximately 150 feet. During the PM peak hour, the westbound off-ramp queues at Central Avenue continue to exceed the total ramp length; however, the total queue length is forecast to decrease by approximately 49 feet between the General Plan Year 2040 and plus Project conditions.

As both AM and PM peak hour 95th percentile queues are forecast to extend into the I-10 mainline lanes at the Central Avenue/I-10 westbound ramps in the General Plan Year (2040) plus Project condition, queueing along these off-ramps has the potential to impact mainline operations. Improvements to accommodate the General Plan Year (2040) plus Project queues at these off-ramps would require extensive coordination and further study under Caltrans direction to determine the appropriate designs to accommodate off-ramp queues. Since there are no current or planned programs administered by the City for ramp improvements at the I-10/Central Avenue interchange, and since the City does not have jurisdiction over these facilities, there are no feasible mitigation measures to mitigate the Proposed Project's off-ramp queuing impacts. Therefore, the Proposed Project may increase a hazardous condition at the I-10/Central Avenue eastbound and westbound off-ramps, and its impacts would be **significant and unavoidable**.

Table 3.13-4.
Queuing Summary – General Plan Year (2040) plus Project

Intersection	Movement	Pocket Length[1]	General Plan Year 2040				General Plan Year (2040) plus Project			
			AM Peak Hour		*PM Peak Hour*		*AM Peak Hour*		*PM Peak Hour*	
			95th Percentile Queue[2]	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*
Central Avenue/I-10 westbound ramps	WBL	160	243	**Yes[4]**	255	**Yes**	246	**Yes**	259	**Yes**
	WBLTR[3]	765	561	No	665	No	727	No	660	No
	WBR	290	378	**Yes[4]**	442	**Yes**	392	**Yes**	394	**Yes**
Central Avenue/I-10 eastbound ramps	EBL	260	172	No	225	No	193	No	338	**Yes[4]**
	EBLT[3]	940	168	No	424	No	187	No	727	No
	EBR	440	115	No	312	No	136	No	502	**Yes[4]**
Monte Vista Avenue/I-10 westbound ramps	WBL	195	96	No	122	No	122	No	135	No
	WBTL[3]	965	537	No	204	No	189	No	544	No
	WBR1[3]	965	183	No	315	No	193	No	555	No
	WBR2	105	80	No	168	**Yes[4]**	130	**Yes[4]**	161	**Yes[4]**
Monte Vista Avenue/I-10 eastbound off-ramp - Palo Verde Street	EBL	400	205	No	261	No	206	No	468	**Yes[4]**
	EBLTR[3]	1530	272	No	357	No	295	No	917	No
	EBR	700	215	No	286	No	240	No	799	**Yes[4]**
SR-210 ramps/Baseline Road	NBL	1000	995	No	116	No	1113	**Yes[4]**	138	No
	NBR1[3]	1680	946	No	131	No	1161	No	350	No
	NBR2	530	426	No	342	No	489	No	314	No
	SBL	1000	183	No	309	No	502	No	193	No
	SBR[3]	1825	542	No	214	No	1017	No	249	No
Central Avenue/SR-60 westbound ramps	WBL	240	300	**Yes[4]**	207	No	292	**Yes[4]**	288	**Yes[4]**
	WBLTR[3]	1350	883	No	366	No	670	No	333	No
	WBR	340	423	**Yes[4]**	298	No	408	**Yes[4]**	280	No

Table 3.13-4.
Queuing Summary – General Plan Year (2040) plus Project

Intersection	Movement	Pocket Length[1]	General Plan Year 2040				General Plan Year (2040) plus Project			
			AM Peak Hour		*PM Peak Hour*		*AM Peak Hour*		*PM Peak Hour*	
			95th Percentile Queue[2]	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*
Central Avenue/SR-60 eastbound ramps	EBL	225	275	**Yes[4]**	261	**Yes[4]**	277	**Yes[4]**	258	**Yes[4]**
	EBLTR[3]	1325	749	No	541	No	846	No	746	No
	EBR	225	261	**Yes[4]**	269	**Yes[4]**	264	**Yes[4]**	254	**Yes[4]**

Source: Dudek 2020

Notes:

1 Measured in feet.

2 Based on 95th percentile (design) queue length in SimTraffic 10.

3 Primary offramp lane; approximate length measured from freeway mainline.

4 While queue exceeds storage lane, the total length of the off-ramp is greater than the queue, therefore queue would not impact the mainline lanes.

XX – Queue exceeds storage length; **XX** - Queue exceeds storage length and impacts the freeway mainline.

D. Would the Project result in inadequate emergency access?

Less Than Significant Impact. Section 3.11.4, Public Services, indicates that the Proposed Project could support a residential population of approximately 18,331 persons with the addition of 6,321 residential units. Given this population increase, the Fire Department estimates that buildout of the Proposed Project would result in the need for additional physical facilities, expanded facilities, equipment and/or personnel in order to maintain existing fire department service ratios, response times, and other performance objectives. Therefore, impacts to fire protection services as a result of the Proposed Project is determined to be potentially significant (and is further discussed in Section 3.11.4).

However, in terms of emergency access, the structure of the downtown center proposed in the MPDSP would be built across individual blocks, creating a "network of thoroughfares." As stated in the MPDSP, the "interconnected block and thoroughfare pattern provides multiple routes that diffuse vehicular traffic, while providing more options for emergency personnel to reach a distressed location." The MPDSP also indicates that street intersections would be designed with minimal curb radii as a traffic calming measure and as a method to reduce crossing distances for pedestrians. Prior to construction of street intersections, consultation with emergency departments would be required during City and Montclair Fire Department design review to ensure fire trucks and other emergency equipment would be able to navigate the proposed minimal curb radii, and that the radii are consistent with the applicable City of Montclair standards and specifications. Additionally, during construction of the MPDSP, lane closures along sections of the adjacent roadways (Monte Vista Avenue, Moreno Street, and Central Avenue) may occur and will be reviewed by the Public Works and Fire Departments. Traffic control plans may be required upon review. Therefore, impacts related to inadequate emergency access would be **less than significant**. No mitigation is required.

3.13.6 Cumulative Impacts

VMT Impacts

Per the OPR Technical Advisory: "…a project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa…" Based on the VMT analysis above, since the Proposed Project would have a per service population VMT below OPR's 15% below existing/base year VMT, it would have a less than significant cumulative impact to VMT. Furthermore, the Plan area is within the 2045 SCAG High Quality

Transit Area (HQTA) which would also result in the Proposed Project having a **less than significant** cumulative impact to VMT.

Off-Ramp Queuing Impacts

As shown in Table 3.13-3, in the General Plan Year (2040) plus Project condition, the 95th percentile queues are forecast to exceed the total ramp storage length at the Central Avenue/I-10 westbound ramps. The AM peak hour 95th percentile queues exceed the total ramp lengths at the Central Avenue/I-10 westbound ramps by approximately 150 feet. During the PM peak hour, the westbound off-ramp queues at Central Avenue continue to exceed the total ramp length; however, the total queue length is forecast to decrease by approximately 49 feet between the General Plan Year 2040 and plus Project conditions.

As both AM and PM peak hour 95th percentile queues are forecast to extend into the I-10 mainline lanes at the Central Avenue/I-10 westbound ramps in the General Plan Year (2040) plus Project condition, queueing along these off-ramps has the potential to impact mainline operations. Improvements to accommodate the General Plan Year (2040) plus Project queues at these off-ramps would require extensive coordination and further study under Caltrans direction to determine the appropriate designs to accommodate off-ramp queues. The Caltrans and SBCTA I-10 Corridor Project (EA 0C2500) was approved in May 2017 and proposes to add Express Lanes in either direction along 33 miles of the I-10 freeway, which includes widening of the I-10 freeway bridge over Monte Vista Avenue and intersection improvements at the Monte Vista Avenue/I-10 freeway ramps. These improvements were incorporated into the General Plan Year 2040 queuing analysis at the Monte Vista interchange; however, there are no current or planned programs administered by the City for ramp improvements at the I-10 freeway/Central Avenue interchange, and since the City does not have jurisdiction over these facilities, there are no feasible mitigation measures to mitigate the Proposed Project's off-ramp queuing impacts. Therefore, the Proposed Project may increase a hazardous condition at the I-10 freeway/Central Avenue eastbound and westbound off-ramps, and its impacts would be **significant and unavoidable**.

3.13.7 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. Based on the analyses presented above, the Proposed Project would have significant transportation impacts related to vehicle queuing hazards at the Central Avenue/I-10 westbound ramps in AM and PM peak hours of the Existing plus Project and General Plan Year (2040) plus Project conditions; and, at the Central Avenue/I-10 eastbound ramps in AM and PM peak hours of the Existing plus Project condition.

Since there are no current or planned programs administered by the City for ramp improvements at the I-10/Central Avenue interchange, and since the City does not have jurisdiction over these

facilities, there are no feasible mitigation measures to mitigate the Proposed Project's off-ramp queuing impacts. Therefore, the Proposed Project may increase a hazardous condition at the I-10 freeway/Central Avenue eastbound and westbound off-ramps.

3.13.8 Significance After Mitigation

As noted above, there are no current or planned programs administered by the City for ramp improvements at the I-10 freeway/Central Avenue interchange, and since the City does not have jurisdiction over these facilities, there are no feasible mitigation measures to mitigate the Proposed Project's off-ramp queuing impacts. Therefore, the Proposed Project may increase a hazardous condition at the I-10 freeway/Central Avenue eastbound and westbound off-ramps, and impacts would be **significant and unavoidable**.

3.13.9 References

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Source: City of Montclair General Plan Circulation Element 1999

FIGURE 3.13-1

Recommended General Plan Circulation Element Roadway Classifications

Montclair Plaza District Specific Plan

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May 11, 2020 - 1:38pm ameroux P:\300.Environmental\10655 Montclair Place District SP EIR\Project Information\Transportation\Graphics\Autocad Files\Montclair Place EIR.dwg Layout: 3.13-1_RoadwayGP

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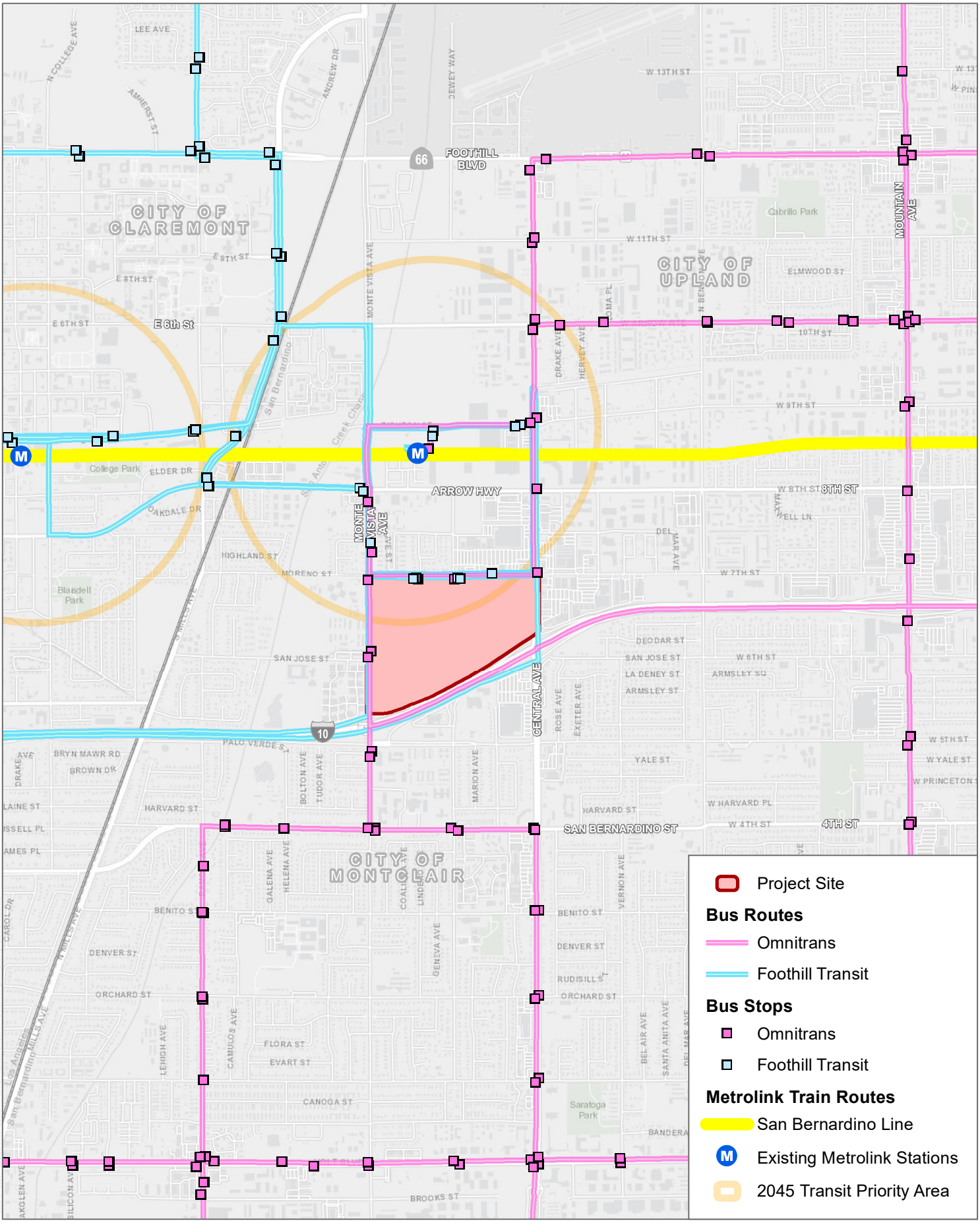

SOURCE: County of San Bernardino, SCAG

DUDEK

0 1,000 2,000 Feet

FIGURE 3.13-2

Existing Transit Facilities

Montclair Place District Specific Plan

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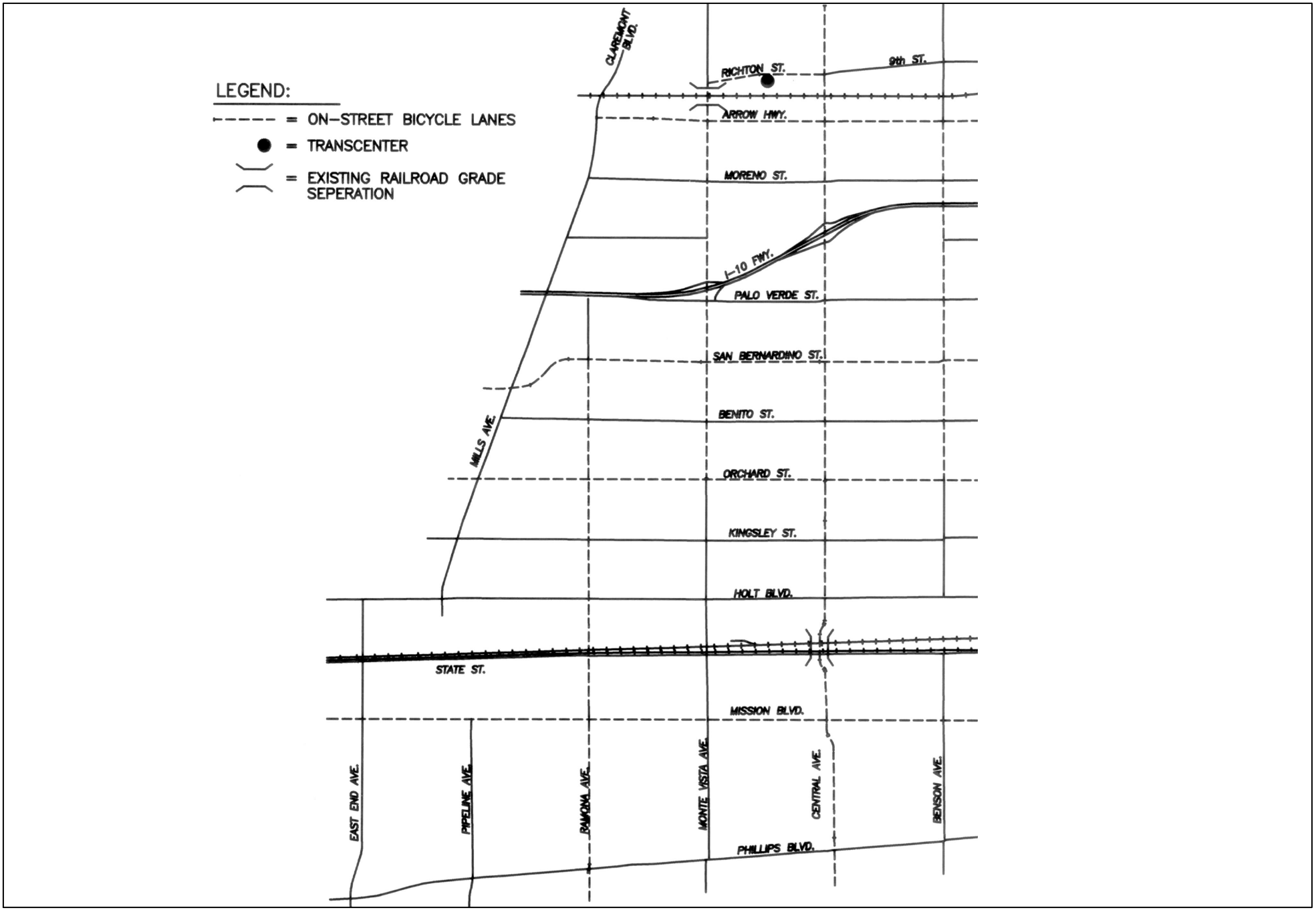

Source: Figure II-12 - City of Montclair General Plan Circulation Element

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FIGURE 3.13-3

Existing Bicycle Facilities

Montclair Place District Specific Plan

Jun 17, 2020 - 6:01pm ameroux P:\300.Environmental\10665 Montclair Place District SP EIR\Project Information\Transportation\Graphics\Autocad Files\Montclair Place_061620.dwg Layout: Fig6_ BicycleFacilities

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Source: DRAFT Montclair Place District Specific Plan 2020

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FIGURE 3.13-4

Street and Block Network Plan

Montclair Plaza District Specific Plan

May 12, 2020 - 3:07pm ameroux P:\300.Environmental\10865 Montclair Place District SP EIR\Project Information\Transportation\Graphics\Autocad Files\Montclair Place EIR.dwg Layout: 3.13-4_StreetNetworkPlan

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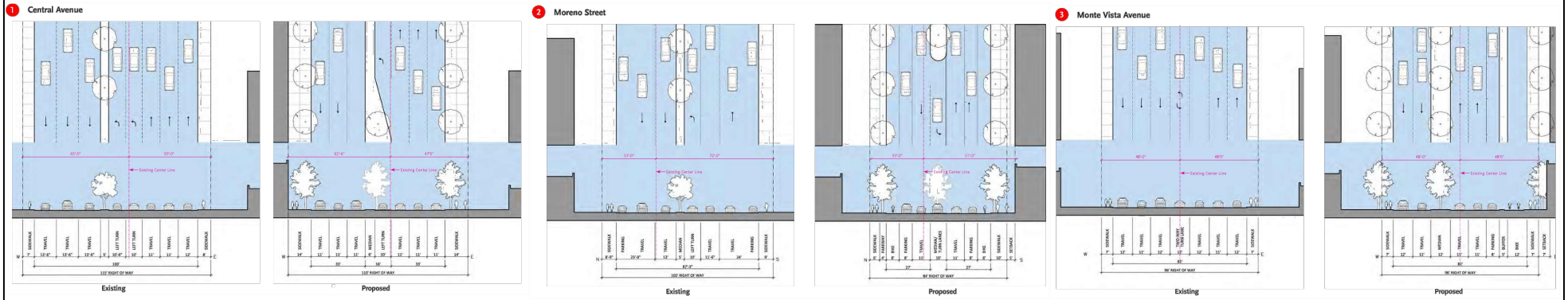
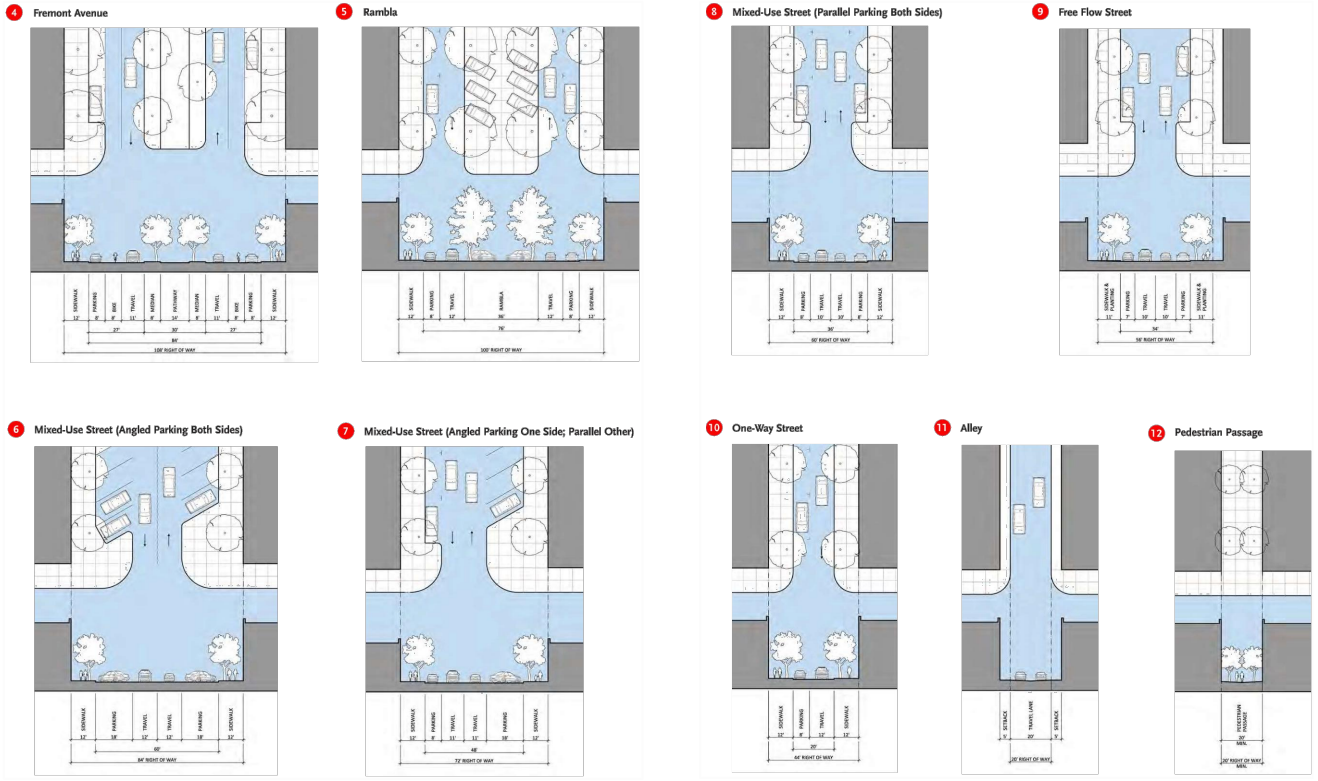
Surrounding Arterial and Collector Streets



Internal Streets



Source: DRAFT Montclair Place District Specific Plan 2018

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FIGURE 3.13-5

Street Types

Montclair Plaza District Specific Plan

Feb 13, 2020 - 3:53pm ameraux P:\300.Environmental\10665 Montclair Place District SP EIR\Project Information\Transportation\Graphics\Autocad Files\Montclair Place_Streets.dwg Layout: Fig20_StreetTypes

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3.14 TRIBAL CULTURAL RESOURCES

This section describes tribal cultural resources that could be impacted by the proposed Montclair Place District Specific Plan Project (MPDSP or Proposed Project) site. The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following issue areas as they relate to tribal cultural resources: whether the Proposed Project may cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, a local register for historical resources, or a resource determined by a lead agency to be significant. It was concluded in the Initial Study, that there may be impacts for these issue areas. As such, analysis within this section identifies associated regulatory requirements, evaluates potential impacts to tribal cultural resources, and identifies mitigation measures related to implementation of the Proposed Project.

3.14.1 Existing Conditions

The Proposed Project would assign and create land use zones for parcels within the an approximately 104.35-acre site ("Plan area") located in downtown Montclair, just north of the Interstate 10 (I-10) freeway and just south of the City's North Montclair Downtown Specific Plan Area. The MPDSP would provide development standards and architectural guidelines to guide development in the Plan area through 2040. The majority of the Plan area (approximately 75 acres) is currently occupied by the existing Montclair Place Mall properties. A key feature of the MPDSP would provide for the demolition of all or a portion of the existing Mall, some or all appurtenant free-standing outbuildings, and portions of the existing surface parking lots, to construct a pedestrian-oriented, mixed-use downtown district, with structured parking facilities through a series of planned phases. The maximum number of dwelling units for the Plan area envisioned under the MPDSP is approximately 5 million square feet of residential uses (or 6,321 dwelling units) and the total additional commercial square footage envisioned under the MPDSP is approximately 512,635 square feet. Additionally, the MPDSP includes provisions for the construction of a hotel with approximately 100–200 rooms. The MPDSP would replace the existing C-3 zoning assigned to it by the North Montclair Specific Plan with the MPDSP and its new mixed-use zones, thereby enabling the future development of commercial, office, multi-family residential, hotel, and mixed-use projects within walking and biking distance of the nearby Montclair Transcenter.

This section documents the results of the California Historical Research Information System (CHRIS) search conducted at the South Central Coastal Information Center (SCCIC), a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF), and tribal consultation completed by the lead agency, the City, pursuant to California Assembly Bill (AB) 52 and Senate Bill (SB) 18.

3.14.2 Regulatory Setting

Federal

No federal requirements related to tribal cultural resources (TCRs) are applicable to the Proposed Project.

State

California Register of Historical Resources

In California, the term "historical resource" includes "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California PRC Section 5020.1(j)). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1(a)). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

(2) Is associated with the lives of persons important in our past.

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

(4) Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CC) 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in

the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

The following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and tribal cultural resources (TCRs):

- PRC Section 21083.2(g) defines "unique archaeological resource."
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines "historical resources." In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource"; it also defines the circumstances when a project would materially impair the significance of a historical resource.
- PRC Section 21074(a) defines "tribal cultural resources."
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC Section 21084.1; 14 CCR 15064.5(b)).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (14 CCR 15064.5(b)(1); PRC Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project does any of the following (14 CCR 15064.5(b)(2)):

(1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

(2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any "historical resources," then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance would be materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2(a)–(c)).

Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria (PRC Section 21083.2(g)):

(1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

(2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.

(3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts on non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2(a); 14 CCR 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as a TCR (PRC Sections 21074(c) and 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in PRC Section 5097.98.

California State Assembly Bill 52

AB 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a TCR has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a TCR or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to TCRs, the consultation shall include those topics (PRC Section 21080.3.2(a)). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted pursuant to the consultation (PRC Section 21082.3(a)).

Senate Bill 18

The Local and Tribal Intergovernmental Consultation process, commonly known as SB 18 was signed into law September of 2004 and took effect March 1, 2005. SB 18 refers to PRC Section 5097.9 and 5097.995, which defines cultural places as:

- Native American sanctified cemetery place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9).
- Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1,

including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.993).

SB 18 established responsibilities for local governments to contact, provide notice to, refer plans to, and consult with California Native American tribes that have been identified by the NAHC and if that tribe requests consultation after local government outreach as stipulated in Government Code Section 65352.3. The purpose of this consultation process is to protect the identity of the cultural place and to develop appropriate and dignified treatment of the cultural place in any subsequent project. The consultation is required whenever a general plan, specific plan, or open space designation is proposed for adoption or to be amended. Once local governments have sent notification, tribes are responsible for requesting consultation. Pursuant to Government Code Section 65352.3(a)(2), each tribe has 90 days from the date on which they receive notification to respond and request consultation.

In addition to the requirements stipulated previously, SB 18 amended Government Code Section 65560 to "allow the protection of cultural places in open space element of the general plan" and amended Civil Code Section 815.3 to add "California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places."

California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains can occur until the county coroner has examined the remains (Health and Safety Code Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (Health and Safety Code Section 7050.5(c)). The NAHC will notify the "most likely descendant." With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of being granted access to the site. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

Background Research

CHRIS Records Search

On August 2, 2018, Dudek completed a CHRIS records search at the SCCIC for the Proposed Project site and surrounding 0.5-miles. This search included mapped prehistoric, historical, and

built-environment resources; Department of Parks and Recreation site records; technical reports; archival resources; and ethnographic references. Additional consulted sources included historical maps of the Proposed Project site, the NRHP, the CRHR, the California Historic Property Data File, the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. The confidential records search results are on file at the City of Montclair.

Previously Conducted Cultural Resource Studies

The SCCIC records indicate that 20 previous cultural resources technical investigations have been conducted within 0.5-mile of the Proposed Project site between 1977 and 2016. Of these, two overlap the Proposed Project site and five are adjacent. Less than 10% of the Proposed Project site has been previously investigated. Table 3.14-1, below, summarizes the seven previous cultural resource studies that were conducted within the 0.5-mile records search radius followed by a brief summary of the two studies (SB-04098 and SB-05229) that overlap the Proposed Project site.

Table 3.14-1
Previously Conducted Cultural Resource Studies Within 0.5-Mile of the Proposed Project Site

Report Number	Author	Year	Report Title	Proximity to Proposed Project Site
SB-00525	Hearn, Joseph E.	1977	Archaeological - Historical Resources Assessment Of Two Proposed Water-Well Drilling Sites	Outside
SB-01639	Hammond, Stephen R.	1987	Negative Archaeological Survey Report: Off-Ramp Addition On Interstate Route 10 At Monte Vista Ave., City Of Montclair	Adjacent
SB-02851	Landis, Daniel G.	1993	A Cultural Resources Survey For The Chino Basin Groundwater Storage Program, San Bernardino County, Ca	Outside
SB-02863	Wlodarski, Robert J.	1993	Provide High Occupancy Vehicle (HOV) Lanes On I-10 Between Mills And I-15	Adjacent
SB-03248	Smith, Francesca and Robert Wlodarski	1994	Historic Property Survey Report: Provide High Occupancy Vehicle Lanes On I-10 Between The Los Angeles/San Bernardino County Line & I-15 In San Bernardino County, Ca. 88pp	Adjacent
SB-03559	Lapin, Phillipe	2000	Cultural Resource Assessment For PBW Facility Cm 236-01, County Of San Bernardino, Ca. 5pp	Outside
SB-03564	Lapin, Phillipe	2000	Cultural Resources Assessment For PBMS Facility Cm 199-01 In The County Of San Bernardino, Ca. 5pp	Outside
SB-04098	Dice, Michael	2003	Cultural Records Search & Site Visit For Sprint Telecommunication Facility La35xc935h (Tree Top), 9185 Monte Vista Ave, Montclair, San Bernardino County, Ca. 7pp	Within
SB-04197	Budinger, Fred E.	2001	Verizon Site: Claremont. 16pp	Outside

Table 3.14-1
Previously Conducted Cultural Resource Studies Within 0.5-Mile of the Proposed Project Site

Report Number	Author	Year	Report Title	Proximity to Proposed Project Site
SB-04678	Encarnacion, Deirdre	2005	Historical/Archaeological Resources Survey Report: San Antonio Channel (West Edison) Recycled Water Pipeline Project in the Cities of Montclair and Ontario, San Bernardino County, California.	Outside
SB-05229	Billat, Lorna	2006	Cingular Montclair Plaza LA-0700C.	Within
SB-05726	Bonner, Wayne H. and Marnie Aislin-Kay	2006	Cultural Resource Records Search Results and Site Visit for T-Mobile Telecommunications Facility Candidate IE04920C (Laird Properties), 4701 Arrow Highway, Montclair, San Bernardino County, California.	Outside
SB-05876	Bodmer, Clarence, Daniel Ballester, and Melissa Hernandez	2007	Identification and Evaluation of Historic Properties: San Antonio Channel (West Edison) Recycled Water Pipeline Project Addiction in the Cities of Ontario and Montclair, San Bernardino County, California.	Adjacent
SB-05877	Tang, Bai "Tom"	2007	Historical/Archaeological Resources Survey: San Antonio Channel Recycled Water Pipeline Project Alternatives/Extensions, Cities of Ontario and Montclair, San Bernardino County, California.	Outside
SB-06787	Tang, Bai "Tom", Dierdre Encarnacion, and Daniel Ballester	2008	Historical/Archaeological Resources Survey Report: Chino Groundwater Basin Dry-Year Yield Program Expansion, Los Angeles, Riverside and San Bernardino Counties, California	Adjacent
SB-07084	Tang, Bai "Tom"	2010	Preliminary Historical/Archaeological Resources Study, San Bernardino Line Positive Train Control Project, Southern California Regional Rail Authority, Counties of Los Angeles and San Bernardino.	Outside
SB-07419	Frank, Myra L., Jones & Stokes, and Applied Earthworks	2004	(Draft) Historic Property Survey and Effects Report for the Gold Line Phase II Project (Pasadena to Montclair), Los Angeles and San Bernardino Counties, California.	Outside
SB-07707	Applied Earthworks and Far Western Anthropological Research Group	2011	Cultural Resource Constraints Analysis for Gas Hydrotesting at T-52 on Gas Transmission Line 300 A.	Outside
SB-07880	Wills, Carrie D.	2014	Cultural Resource Records Search and Site Visit Results for Verizon Wireless Candidate 'Centrow', 5280 Arrow Highway, Montclair, San Bernardino County, California.	Outside
SB-08257	Tang, Bai "Tom"	2016	Due-Diligence Historical/Archaeological Resources Study Inland Empire Utilities Agency Recharge Basin Maintenance Plan Chino Basin Area, San Bernardino and Riverside Counties, California CRM TECH Contract No. 2989	Outside

SB-04098

Cultural Records Search & Site Visit For Sprint Telecommunication Facility La35xc935h (Tree Top), 9185 Monte Vista Ave, Montclair, San Bernardino County, California (Dice 2003) reports the results of a cultural resource assessment for a proposed 0.25-acre Sprint telecommunications facility in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulations, 36 CFR Part 800. This study overlaps the northwest corner of the current Proposed Project site. The study included a CHRIS records search and pedestrian survey. As a result of the 2003 study, one cultural resource was identified within a 0.25-mile radius of the Proposed Project's Area of Potential Effect (APE). The identified resource consists of the Unitarian Universalist Congregational Church, which was constructed in 1956. The building was determined ineligible for the NR (status code 6Z). Additionally, the study determined that the sensitivity of the Proposed Project APE to be low and that there were no effects to cultural resources as a result of the construction of the proposed telecommunications facility.

SB-05229

Cingular Montclair Plaza LA-0700C (Billat 2006) reports the results of a cultural resource assessment for a proposed 0.25-acre Cingular wireless facility in compliance with Section 106 of the NHPA of 1966. This study overlaps the northwest corner of the current Proposed Project site. The study included a CHRIS records search and pedestrian survey. Additionally, a NAHC SLF records search was completed with negative results. The NAHC also provided a list of Native American groups and/or individuals who may have knowledge of cultural resources in the Proposed Project's APE. As a result of the 2006 study, no newly or previously recorded cultural resources or historic properties were identified and as such, the author determined that no archaeological or historic resources would be impacted by the Proposed Project.

Previously Recorded Cultural Resources

No cultural resources have been previously recorded within the Proposed Project site. However, the SCCIC records indicate that three resources have been previously recorded within 0.5-mile of the Proposed Project site (Table 3.14-2).

Table 3.14-2
Previously Recorded Cultural Resources Within 0.5-Mile of the Proposed Project Site

Primary Number P-36-	NRHP Listing	Period	Description	Year/Recorder	NRHP/CRHR Status
024458	—	Prehistoric	Isolated mortar	2012 (Tang, Bai and John D. Goodman II.)	Ineligible

Table 3.14-2
Previously Recorded Cultural Resources Within 0.5-Mile of the Proposed Project Site

Primary Number P-36-	NRHP Listing	Period	Description	Year/Recorder	NRHP/CRHR Status
024507	—	Historic	Island Pacific Ballet	2004 (Unknown, Myra L Frank & Associates/Jones & Stokes)	Not Evaluated
—	NRHP-7-8-860	Historic	Russian Village District	1979 (Snowis, Leo M.)	Listed on NRHP

Native American Coordination

Sacred Lands File Search and Tribal Outreach

On September 11, 2018, Dudek requested a search of the SLF from the California NAHC. The NAHC responded via email on September 19, 2018, with an attached letter stating that the results of the SLF search were negative for the presence of Native American cultural resources for the Proposed Project site. The NAHC also provided a list of seven Native American groups and/or individuals who may have knowledge of cultural resources in the Proposed Project site (see Appendix G). No informal tribal consultation was initiated by Dudek for the Proposed Project.

Assembly Bill 52

A project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment (PRC Section 21084.2). Under AB 52, a TCR must have tangible, geographically defined properties that can be impacted by project implementation. The Proposed Project is subject to compliance with AB 52.

The City sent notification of the Proposed Project to all California Native American tribal representatives that have requested project notifications from the City pursuant to AB 52 on September 27, 2018. These notification letters included a Proposed Project map, a Proposed Project description, a brief summary of the CHRIS and SLF records searches, and inquiring if the tribe would like to consult to discuss the Proposed Project and the potential to impact any TCRs. AB 52 allows tribes 30 days after receiving notification to request consultation. If a response is not received within the allotted 30 days, it is assumed that consultation is declined. To date, government-to-government consultation initiated by the City has not resulted in the identification of a TCR within or near the Proposed Project site. To date, two responses have been received as a result of the City's AB 52 consultation notification:

- **Gabrieleño Band of Mission Indians-Kizh Nation** – A response to the September 27, 2018 notification letter was received on October 1, 2018 via a letter from Chairman Salas

requesting consulting party status and included a map of tribal territories, county boundaries, and suggested mitigation measures. A consultation meeting between the City and the Tribe occurred on November 14, 2018; the Tribe provided documentation regarding their ancestral territories and suggested mitigation measures. On November 15, 2018 the City provided mitigation measures to Mr. Salas for review and consideration for the MPDSP project. The mitigation measures were previously authorized by the Tribe for use on another City project, and based on consultation discussions between the City and Mr. Salas for the Proposed Project, the email requested Mr. Salas to review and provide concurrence. On November 28, 2019, the City provided a follow-up email with some revisions to the mitigation measures previously given and requested that the Tribe review and provide concurrence. On January 3, 2019, the City provided a follow-up email and the Tribe responded on January 7, 2019 confirming that they agree with the mitigation measures and consider the consultation process complete.

- **San Manuel Band of Mission Indians (SMBMI)** – On May 30, 2019, Mary Vizcaino, Senior Administrative Assistant for the SMBMI, emailed the City stating that the Band appreciates the opportunity to review the Proposed Project, but since the Proposed Project is located outside of Serrano ancestral territory, the SMBMI does not desire consulting party status with the City regarding the Proposed Project.

Table 3.14-3 summarizes the results of the AB 52 process for the Proposed Project. The confidential AB 52 consultation results are on file with the City.

Table 3.14-3
Assembly Bill 52 Native American Tribal Outreach Results

Native American Tribal Representatives	Method and Date of Notification	Response to City Notification Letters	Consultation Date
Lee Clauss, Director of Cultural Resources San Manuel Band of Mission Indians	Certified mail; September 27, 2018	On May 30, 2019, Mary Vizcaino, Senior Administrative Assistant for the SMBMI, emailed the City stating that the Band appreciates the opportunity to review the Proposed Project, but since the Proposed Project is located outside of Serrano ancestral territory, the SMBMI did not desire consulting party status with the City regarding the Proposed Project.	Consultation declined on May 30, 2019.
Joseph Ontiveros, Cultural Resources Director Soboba Band of Luiseno Indians	Certified mail; September 27, 2018	No Response	As no response was received, consultation was concluded.
Andrew Salas, Chairperson	Certified mail;	Response received October 1,	Consultation concluded

Table 3.14-3
Assembly Bill 52 Native American Tribal Outreach Results

Native American Tribal Representatives	Method and Date of Notification	Response to City Notification Letters	Consultation Date
Gabrieleno Band of Mission Indians – Kizh Nation	September 27, 2018	2018 via letter from Chairman Salas requesting consulting party status and included a map of tribal territories, county boundaries, and suggested mitigation measures. A consultation meeting between the City and the Tribe occurred on November 14, 2018; the Tribe provided documentation regarding their ancestral territories and suggested mitigation measures. On November 15, 2018, the City provided mitigation measures to the Tribe for review and concurrence. The City received concurrence on the mitigation measures from the Tribe, along with agreement that consultation was concluded on January 7, 2019.	on January 7, 2019.

Senate Bill 18

The City sent notification of the Proposed Project to all California Native American tribal representatives that have requested project notifications pursuant to SB 18 on September 27, 2018. Tribes had 90 days from receipt of the letter to request consultation. The City must also send a notice to all contacts 45 days prior to adopting the amended General Plan, as well as a third notice 10 days prior to any public hearing regarding the General Plan amendment. These notification letters included a Proposed Project map and description inquiring if the tribe would like to consult on the Proposed Project. To date, government-to-government consultation initiated by the City has not resulted in the identification of a TCR within or near the Proposed Project site and two responses have been received as a result of the City's SB 18 consultation notification:

- **Gabrieleño Band of Mission Indians-Kizh Nation** - A response to the September 27, 2018 notification letter was received on October 1, 2018 via a letter from Chairman Salas requesting consulting party status and included a map of tribal territories, county boundaries, and suggested mitigation measures. A consultation meeting between the City and the Tribe occurred on November 14, 2018; the Tribe provided documentation regarding their ancestral territories and suggested mitigation measures. On November 15,

2018 the City provided mitigation measures to Mr. Salas for review and consideration for the MPDSP project. The mitigation measures were previously authorized by the Tribe for use on another City project, and based on consultation discussions between the City and Mr. Salas for the Proposed Project, the email requested Mr. Salas to review and provide concurrence. On November 28, 2019, the City provided a follow-up email with some revisions to the mitigation measures previously given and requested that the Tribe review and provide concurrence. On January 3, 2019, the City provided a follow-up email and the Tribe responded on January 7, 2019 confirming that they agree with the mitigation measures and consider the consultation process complete.

- **San Manuel Band of Mission Indians (SMBMI)** – On May 30, 2019, Mary Vizcaino, Senior Administrative Assistant for the SMBMI, emailed the City stating that the Band appreciates the opportunity to review the Proposed Project, but since the Proposed Project is located outside of Serrano ancestral territory, the SMBMI does not desire consulting party status with the City regarding the Proposed Project.

Table 3.14-4 summarizes the results of the SB 18 process for the Proposed Project. The confidential SB 18 consultation results are on file with the City.

Table 3.14-4
Senate Bill 18 Native American Tribal Outreach Results

Native American Tribal Representatives	Method and Date of Notification	Response to City Notification Letters	Consultation Date
Lee Clauss, Director of Cultural Resources San Manuel Band of Mission Indians	Certified mail; September 27, 2018	On May 30, 2019, Mary Vizcaino, Senior Administrative Assistant for the SMBMI, emailed the City stating that the Band appreciates the opportunity to review the Proposed Project, but since the Proposed Project is located outside of Serrano ancestral territory, the SMBMI did not desire consulting party status with the City regarding the Proposed Project.	Consultation declined on May 30, 2019.
Joseph Ontiveros, Cultural Resources Director Soboba Band of Luiseno Indians	Certified mail; September 27, 2018	No Response	As no response was received, consultation was concluded.
Andrew Salas, Chairperson Gabrieleno Band of Mission Indians – Kizh Nation	Certified mail; September 27, 2018	Response received October 1, 2018 via letter from Chairman Salas requesting consulting party status and included a map of tribal	Consultation concluded on January 7, 2019.

Table 3.14-4
Senate Bill 18 Native American Tribal Outreach Results

Native American Tribal Representatives	Method and Date of Notification	Response to City Notification Letters	Consultation Date
		territories, county boundaries, and suggested mitigation measures. A consultation meeting between the City and the Tribe occurred on November 14, 2018; the Tribe provided documentation regarding their ancestral territories and suggested mitigation measures. On November 15, 2018, the City provided mitigation measures to the Tribe for review and concurrence. The City received concurrence on the mitigation measures from the Tribe, along with agreement that consultation was concluded on January 7, 2019.	

3.14.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criteria based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.). The following significance criteria, included for analysis in this EIR, are based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.), and will be used to determine the significance of potential impacts to tribal cultural resources. Impacts to tribal cultural resources would be significant if the Proposed Project would:

A. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

   i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

i. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.14.4 Impacts Analysis

A. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Less Than Significant Impact. A records search of the CHRIS at the SCCIC was conducted on August 2, 2018 and April 3, 2019. The CHRIS search included a review mapped prehistoric, historical, and built-environment resources; Department of Parks and Recreation site records; technical reports; archival resources; and ethnographic references. Additional consulted sources include historical maps of the Proposed Project site, the NRHP, the CRHR, the California Historic Property Data File, the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. No previously recorded TCRs listed in the CRHR or a local register were identified within the Proposed Project site. Further, no TCRs have been identified by California Native American tribes as part of the City's AB 52 and SB 18 notification and consultation process. Impacts are considered **less than significant**. No mitigation is required.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact With Mitigation Incorporated. There are no resources on the Proposed Project site that have been determined by the City to be significant pursuant to the criteria set forth in PRC Section 5024.1. Further, no TCRs were identified in the

Proposed Project site by California Native American tribes as part of the City's AB 52 and SB 18 notification and consultation process.

One response to AB 52 outreach letters to tribal contacts was received by the City requesting consulting party status. On October 1, 2018, Chairman Andrew Salas of the Gabrieleno Band of Mission Indians – Kizh Nation, responded via email. In the response letter, Chairman Salas requests consulting party status. Additionally, Chairman Salas provided a map of tribal territories and county boundaries, including mitigation measures for tribal cultural resources within the Kizh Nation Tribal Territory, though the letter did not identify any TCRs or other known cultural resources that could be directly impacted by the Proposed Project.

As no information regarding TCRs has been received by the City, the City has determined that no TCRs are present in the Proposed Project site. However, there is still a low potential for unknown subsurface TCRs to be impacted by the Proposed Project, which could result in a significant impact. Therefore, protocols for the inadvertent discovery of TCRs is included as mitigation measure **MM-TCR-1,** and treatment of TCRs during unanticipated find is included as **MM-TRC-2**, which would reduce the potential impact to a less-than-significant level. As such, impacts would be **less than significant with mitigation incorporated**.

3.14.5 Cumulative Impacts

The geographic scope of the cumulative cultural resources analysis is the region surrounding the Proposed Project site. The Proposed Project site is located in urban, developed commercial and residential area. The Proposed Project site and all surrounding properties have undergone disturbance previously resulting from development of the existing Montclair Place Mall (Mall) and the commercial and residential uses that surround it. Ongoing development and growth in the broader Plan area may result in cumulatively significant impacts to tribal cultural resources due to the continuing disturbance of undeveloped areas, which could potentially contain significant, buried tribal cultural resources. The majority of the Proposed Project site (approximately 75 acres) is currently occupied by the existing Mall properties. Moreover, the Proposed Project would be constructed on a developed and disturbed site that has been subject to previous ground-disturbing actives, which greatly limits the potential for buried, unrecorded cultural resources to underlay the Proposed Project site. Nonetheless, mitigation measures **MM-TCR-1** and **TCR-2** are required to help ensure that unknown Tribal Cultural Resources, in the event of an unanticipated find, will be protected, researched, and potentially preserved (if subsequently deemed warranted) to maintain integrity and significance.

The cumulative impacts analysis on tribal cultural resources considers whether the impacts of the Proposed Project and other related cumulative projects, when taken as a whole, substantially

diminish the number of tribal resources within the same or similar context or property type. As discussed throughout this section, the Proposed Project could have significant impacts to unknown tribal cultural resources, and mitigation would be required to reduce adverse impacts to levels less than significant. It is anticipated that tribal cultural resources that are potentially affected by related projects would also be subject to the same requirements of CEQA as the Proposed Project and mitigate for their impacts, if applicable. The determinations of significance would be made on a case-by-case basis, and the effects of cumulative development on cultural resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Therefore, the Proposed Project would not contribute to a cumulatively considerable impact associated with tribal cultural resources due to the fact that impacts to tribal cultural resources would be mitigated to a less than significant level. Cumulative impacts would be **less than significant with mitigation incorporated**.

3.14.6 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. The following mitigation measures are required for the Proposed Project:

MM-TCR-1 Prior to the issuance of any grading permit for the Proposed Project, the City of Montclair (City) shall ensure that the Project applicant retain the services of a Tribal monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation for Native American monitoring during ground-disturbing activities. This provision shall be included on Proposed Project plans and specifications. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or augering, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Plan area. The Project site shall be made accessible to the monitor(s), provided adequate notice is given to the construction contractor and that a construction safety hazard does not occur. The monitor(s) shall be approved by the Gabrieleño Band of Mission Indians-Kizh Nation and shall be present on site during the construction phases that involve any ground-disturbing activities. The monitor(s) shall possess Hazardous Waste Operations and Emergency Response (HAZWOPER) certification. In addition, the monitor(s) shall be required to provide insurance certificates, including liability insurance, for any tribal cultural resources and/or archaeological resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act (CEQA), California Public Resources Code (PRC) Division 13, Section 21083.2 (a) through (k).

If evidence of any tribal cultural resources is found during ground-disturbing activities, the monitor(s) shall have the capacity to halt construction in the immediate vicinity of the find to recover and/or determine the appropriate plan of recovery for the resource. The recovery process shall not unreasonably delay the construction process.

Construction activity shall not be contingent on the presence or availability of a monitor, and construction may proceed regardless of whether or not a monitor is present on site. The monitor shall complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed or when the monitor has indicated that the site has a low potential for tribal cultural resources and/or archaeological resources.

MM-TCR-2 All tribal cultural resources and/or archaeological resources unearthed by Proposed Project construction activities shall be evaluated by the qualified archaeologist and Native American monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation. Upon discovery of any archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. Construction work shall be permitted to continue on other parts of the Project site while evaluation and, if necessary, preservation measures take place (State CEQA Guidelines Section15064.5 [f]). If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation tribe shall coordinate with the landowner regarding treatment and curation of these resources. If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures shall be made available through coordination between the Gabrieleño Band of Mission Indians-Kizh Nation and the Project applicant. The treatment plan established for the resources shall be in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5(f) for historical resources and Public Resources Code (PRC) Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler

Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

3.14.7 Significance After Mitigation

Implementation of mitigation measures **MM-TCR-1** and **MM-TCR-2** would ensure impacts to tribal cultural resources are **less than significant**.

3.14.8 References

None.

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3.15 UTILITIES AND SERVICE SYSTEMS

This section describes the existing utilities setting of the Montclair Place District Specific Plan Project (MPDSP or Proposed Project) area, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to the implementation of the proposed MPDSP. The analysis is based on a review of existing infrastructure and applicable laws, regulations, and guidelines. The analysis of the Project impacts related to utilities and service systems is partly based on information provided in the following reports (Appendix H):

- *Water Supply Assessment for the Montclair Place District Specific Plan*, prepared by Dudek, dated April 2019 (Appendix H-1);
- *Utility Capacity Study for Montclair Place*, prepared by DRC, dated January 22, 2020 (Appendix H-2);
- *Water Capacity Study Exhibits*, prepared by DRC, dated April 30, 2020 (updated drawings to January 22 report) (Appendix H-3);
- *Sewer Capacity Study Exhibits*, prepared by DRC, dated April 30, 2020 (updated drawings to January 22 report) (Appendix H-4);
- *Storm Drain Capacity Study Exhibits*, prepared by DRC, dated April 30, 2020 (updated drawings to January 22 report) (Appendix H-5); and
- *Electric Power Capacity Study Exhibits*, prepared by DRC, dated April 30, 2020 (updated drawings to January 22 report) (Appendix H-6).

In addition, existing conditions information was derived from older conceptual utility reports pertaining to the Plan area (DRC 2017, 2018).

3.15.1 Existing Conditions

Water Infrastructure

The MPDSP area currently has four main points of connection to the public MVWD supply system. Service is connected on the northern Plan area boundary by an existing 30-inch line in Moreno Street; on the east by a 12-inch line in Central Avenue; and on the west by a 12-inch line at the intersection of San Jose Street and Moreno Avenue. On-site water service is maintained through a 12-inch ductile iron system that is situated in a loop around the Plan area. Individual tenant meters and fire services are supplied from this system. Over time, as the mall has been re-configured and additions added, portions of the 12-inch system have been re-routed, and sub-loops have been added (DRC 2017, 2018; Appendix H).

Sewer System

The IEUA contracts with the City of Montclair for wastewater services. The IEUA manages the Regional Sewage Service System within its 242 square-mile service area to collect, treat, and dispose of wastewater delivered by the City. IEUA's facilities serve seven contracting agencies, including the cities of Chino, Chino Hills, Fontana, Montclair, Ontario, and Upland, as well as the Cucamonga Valley Water District. A system of trunklines and interceptor sewers convey sewage to regional wastewater treatment plants, which are all owned and operated by the IEUA. However, the mainline sewer facilities within the City of Montclair are owned and maintained by the City (MVWD 2016; IEUA 2020).

According to the City of Montclair General Plan Housing Element, IEUA's Westside Interceptor collects all of the reclaimable wastewater generated within the City (City of Montclair 2014). Sewage from Montclair is treated at two locations, including the Carbon Canyon Wastewater Reclamation Facility (CCWRF) and Regional Plant No. 1 (RP-1). The CCWRF has a design flow capacity of 11.4 million gallons per day (mgd) and treats approximately 7.0 mgd, and the RP-1 has a design flow capacity of 44.0 mgd and treats on average 28.0 mgd (IEUA 2020).

Approximate existing on-site wastewater output in the MPDSP area is summarized in Table 3.15-1.

Table 3.15-1
Existing On-Site Wastewater Output

Land Use	Water and Wastewater – Indoor (gallons/year)	Water and Wastewater - Outdoor (gallons/year)
Shopping center retail	87,406,300	53,571,600
Strip center retail (Monte Vista Ave)	1,030,350	631,504
Outbuilding - retail	7,271,560	4,456,760
Outbuilding - restaurant	22,525,200	1,437,780
Outbuilding - fitness	2,752,520	1,687,030
Outbuilding - auto repair	663,272	406,521
Movie theater	44,111,900	2,815,650
Church	517,831	809,941
Total: gallons/year	**232,095,719**	
Total: gallons/day	**635,879**	

Source: California Emissions Estimator Model (CalEEMod) (see Section 3.5, Greenhouse Gas Emissions, Table 3.5-4, Estimated Annual Operational GHG Emissions)

On-site Infrastructure

Currently, wastewater flows from the Plan area is divided into northern and southern systems. Flows from the northern half of the Plan area converge into an 8-inch vitrified clay pipe (VCP)

sanitary sewer line, located to the northeast of the mall. Flows are then conveyed under the mall, where the 8-inch VCP transitions to a 10-inch ductile iron pipe before transitioning back to an 8-inch VCP. From there, wastewater flows west along Moreno Street, before turning and flowing south, parallel to Monte Vista Avenue. Flows continue south before converging with the southern flow system, approximately 350 feet east of the intersection of San Jose Street and Monte Vista Avenue (DRC 2017, 2018; Appendix H).

The southern sanitary sewer system converges in an 8-inch VCP at the southeast corner of the Plan area. From there, wastewater flows south, before converging with the northern system flows near San Jose Street and Monte Vista Avenue. The combined flows are then conveyed east via an 8-inch VCP main, before discharging into the existing 10-inch public sanitary sewer system (DRC 2017, 2018; Appendix H).

Stormwater

The City receives stormwater in two main forms: in concentrated flows emerging from the San Gabriel Mountains, and in generalized flows resulting from direct rainfall to the area. The southwesterly-flowing San Antonio Wash, which originates in the San Gabriel Mountains to the north, is located approximately 1,200 feet west of the Proposed Project, at the closest point. The San Antonio Wash is a formerly natural channel that is now a concrete-lined drainage, which empties into the Santa Ana River and eventually into the Pacific Ocean (City of Montclair 1999).

The MPDSP area and surrounding area are characterized as an urban, developed commercial and residential area, with limited pervious surfaces. Vegetation within the Proposed Project is limited to ornamental landscaping associated with the existing development and several ornamental trees that currently buffer the Proposed Project from adjacent residential uses to the west. Planters with ornamental trees, shrubs, and grasses are scattered sparsely throughout the numerous surface parking lots within the Plan area. Two vacant lots are present within the area, both of which are highly disturbed and support only minimal amounts of low-growing vegetation (mostly annual weeds). The predominance of impervious surfaces prevents water from percolating into the ground, increasing the amount of runoff reaching the storm drain infrastructure. Stormwater runoff in the Plan area occurs primarily as sheetflow across paved parking areas, with internal storm drains collecting and transmitting the runoff to off-site storm drains.

Stormwater planning and management within the City and its sphere of influence are under the jurisdiction of the San Bernardino County Flood Control District (SBCFCD). As the regional flood control agency, SBCFD is responsible for the protection of life and property from uncontrolled storm waters and also captures and recharges some stormwater runoff (City of Montclair 1999).

Existing Stormwater Infrastructure

Based on Appendix H, the existing storm drain systems around the Plan area include:

1) A 72-inch reinforced concrete pipe (RCP), which transitions into an open channel and then into an 8- by 4-foot reinforced concrete box (RCB) culvert along the north side of the I-10 freeway;
2) A 39-inch RCP under Central Avenue that drains into the 72-inch RCP along the north side of the I-10 freeway;
3) A 48-inch RCP under Monte Vista Avenue that drains into the 8- by 4-foot RCB along the north side of the I-10 freeway;
4) An 18-inch RCP, which transitions into a 24-inch RCP connecting to the 48-inch RCP under Monte Vista Avenue; and
5) A 42-inch/45-inch/48-inch RCP under Moreno Avenue.

The municipal storm drain is owned by the City of Montclair and discharges to the groundwater recharge basins located approximately ¼ mile west of the Plan area. Currently, the storm water in the Plan area drains to the public system at the following locations:

1) A 30-inch RCP connects to the 72-inch RCP along the north side of the I-10 freeway;
2) An 18-inch RCP connects to the 72-inch RCP along the north side of the I-10 freeway;
3) A 24-inch RCP connects to the 48-inch RCP under Monte Vista Avenue; and
4) A 42-inch RCP connects to the 48-inch RCP under Monte Vista Avenue.

The northwest corner of the Plan area drains to a depression and into the 18-inch RCP that transitions into the 24-inch RCP, connecting to the 48-inch RCP under Monte Vista Avenue. In the southwest corner of the Plan area, stormwater flows off-site at two locations, including: 1) the ¼-acre Black Angus restaurant parking lot discharges via a parkway drain into Monte Vista Avenue, and 2) the retail center parking area discharges to curb and gutter along the southern property boundary, which in turn appears to connect to the 8- by 4-foot RCB along the north side of the I-10 freeway.

Electric Power

Underground and overhead electrical facilities, owned and operated by Southern California Edison (SCE), are located to the north, east, and west of the Plan area. Underground primary distribution voltage (16 kilovolts [kv] or less) electric lines are located in Central Avenue (to the east) and Moreno Street (to the north). In addition, underground facilities are located on the east

side of Monte Vista Avenue, while overhead facilities are located on the west side of Monte Vista Avenue. Other supporting electrical infrastructure includes five underground vaults, 13 transformers, and several smaller auxiliary structures. The on-site electrical system is a looped system that appears to connect in a circular direction from vault to vault, with primary and secondary runs branching off to several transformers, tieing-in the off-site systems to the north, east, and west. There does not appear to be any transmission voltage lines (33 kv+) on site or on any of the surrounding off-site streets (DRC 2017, 2018; Appendix H).

Natural Gas

Southern California Gas Company (SoCalGas) currently provides natural gas to the Plan area, with facilities to the north, east, and west. An existing 8-inch SoCalGas mainline located in Central Avenue provides natural gas service to the multiple points of service in the adjacent shopping center to the east. To the north of the Plan area, SoCalGas currently operates a 2-inch gas mainline in Central Avenue and a 2-inch gas main in Monte Vista Avenue. The gas main in Monte Vista Avenue serves existing units located on the west side of the Plan area, as well as adjacent properties on the west side of Monte Vista Avenue. Gas pipeline branches are also located in Plaza Lane (west side of Plan area), Lindero Avenue (north side), and East Montclair Plaza Lane (from Lindero Avenue). These main/service branches feed multiple meters throughout the Plan area (DRC 2017, 2018; Appendix H).

Telecommunication

Copper and fiber telephone facilities owned and operated by Frontier Communication (formerly Verizon) are located adjacent to the Plan area on the north and west sides. Based on the information provided in Frontier facility inventory maps, there do not appear to be existing telephone facilities located in Central Avenue adjacent to the Plan area. Existing fiber and copper facilities are located within the Plan area, with services feeding multiple units. The main source for the on-site telephone system appears to be derived from the north off of Moreno Street. At least two existing telephone maintenance manholes, which are the primary points of the telephone underground system (DRC 2017, 2018; Appendix H).

Currently, cable television (CATV) facilities owned and operated by Spectrum (formerly Time Warner Cable) are located immediately to the north and west of the Plan area. Based on Spectrum facility inventory maps, existing CATV facilities are located within the Plan area, with services feeding multiple units. The main feed for the on-site telephone system appears to be derived from a source to the north, off of Moreno Street. Several existing CATV pedestals are located within the Plan area. These pedestals are the main points of the CATV underground system. CATV facilities are not present in Central Avenue adjacent to the Plan area (DRC 2017, 2018; Appendix H).

Water Supply

Potable and recycled water supplied to the MPDSP is provided by the Monte Vista Water District (MVWD). Water supplies for the MVWD are derived from four principal sources: local groundwater, imported water, entitlement water deliveries, and recycled water. In 2018, MVWD received approximately 45.3% of its water supply from groundwater pumped from the Chino Groundwater Basin; 42.4% from imported water from the Metropolitan Water District of Southern California (MWD), which receives local water from the Inland Empire Utility Agency (IEUA) and Water Facilities Authority (WFA); 2.3% from entitlement water deliveries from the San Antonio Water Company; and 10% from recycled water from the IEUA (Appendix H).

In accordance with the Sustainable Groundwater Management Act (SGMA), the California Department of Water Resources (DWR) has classified the Chino Groundwater Basin as having a very low priority in regards to prioritizing the completion of a Groundwater Sustainability Plan (GSP) (California DWR 2019). In addition, the Chino Groundwater Basin is adjudicated through the Chino Basin Judgment and thus has a managed groundwater extraction rate, reducing the potential for over-extraction. The Judgment designated a safe yield for the basin of 140,000 acre-feet-per year (AFY). In the event that groundwater pumping rates exceed the safe yield, water is generally purchased from the MWD, through the IEUA and WFA, for basin recharge. However, supplemental water may also be obtained from any available source, including recycled water and imported water. The Chino Basin Judgment also allows for the transfer and storage of excess rights and supplemental supplies (MVWD 2016).

Solid Waste

Solid Waste Collection and Disposal Systems

Burrtec Waste Industries provides the collection, transport, and disposal of solid waste and recyclables from businesses and residences within the MPDSP area. Waste collected by Burrtec Waste Industries is taken to one of five local transfer stations for sorting; the closest of which is the West Valley Transfer Station, located at 13373 Napa Street, Fontana (Burrtec 2019). From there, the waste is transferred to a nearby landfill with sufficient permitted capacity to accommodate the solid waste disposal needs of the MPDSP area. The closest landfills to the MPDSP area include the Mid-Valley Sanitary Landfill and San Timoteo Sanitary Landfill (CalRecycle 2020). The location, relative distance, and capacity of each landfill are described below.

- The Mid-Valley Sanitary Landfill is located at 2390 North Alder Avenue in Rialto, approximately 16 miles northeast of the MPDSP area. As of 2009, the Mid-Valley Landfill had an estimated remaining capacity of 67,520,000 cubic yards; had a maximum permitted throughput of 7,500 tons/day; and had an approximate cease operation date of April 2033.

- The San Timoteo Sanitary Landfill is located at San Timoteo Canyon Road in Redlands, approximately 31 miles due east of the MPDSP area. As of 2017, the San Timoteo Sanitary Landfill had an estimated capacity of 11,402,000 cubic yards; had a maximum permitted throughput of 2,000 tons/day; and had an approximate cease operation date of January 2043.

Construction waste is typically disposed of at inert landfills, which are facilities that accept materials such as soil, concrete, asphalt, and other construction and demolition debris. The San Timoteo Landfill is the only landfill in San Bernardino County that accepts inert waste.

As summarized in Table 3.15-2, Existing On-Site Solid Waste Output, current on-site solid waste production is approximately 4.46 tons/day.

Table 3.15-2
Existing On-Site Solid Waste Output

Land Use	Solid Waste (tons/year)
Shopping center retail	619.51
Strip center retail (Monte Vista Ave)	7.31
Outbuilding - retail	51.54
Outbuilding - restaurant	441.55
Outbuilding - fitness	132.64
Outbuilding - auto repair	13.47
Movie theater	313.05
Church	47.17
Total: tons/year	**1626.24**
Total: tons/day	**4.46**

Source: California Emissions Estimator Model (CalEEMod), see Section 3.5, Greenhouse Gas Emissions, Table 3.5-4, Estimated Annual Operational GHG Emissions

3.15.2 Regulatory Setting

Federal

Federal Clean Water Act of 1972, 33 U.S.C., Section 1251 et seq.

The 1972 Federal Water Pollution Control Act and its 1977 amendments, collectively known as the Clean Water Act (CWA), established national water quality goals and the basic structure for regulating discharges of pollutants into the waters of the United States. The CWA also created a National Pollutant Discharge Elimination System (NPDES) of permits that specified minimum standards for the quality of discharged waters. The CWA required states to establish standards specific to water bodies and designated the types of pollutants to be regulated, including total

suspended solids and oil. The CWA authorized the U.S Environmental Protection Agency (USEPA) to issue the NPDES permits.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (Code Fed. Regs., Title 40, Section 268, Subpart D), contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs that include federal landfill criteria. The federal regulations address the location, operation, design, and closure of landfills, as well as groundwater monitoring requirements.

State

Porter-Cologne Water Quality Control Act

In the State of California, the State Water Resource Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) are responsible for implementing the CWA and the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act). The Porter-Cologne Act authorizes the SWRCB to implement programs to control polluted discharges into state waters. In compliance with the Porter-Cologne Act, the nine RWQCBs establish the wastewater concentrations of a number of specific hazardous substances in treated wastewater discharge.

Sanitary Sewer General Waste Discharge Requirements

On May 2, 2006, the SWRCB adopted a General Waste Discharge Requirement (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than 1 mile of sewer pipe. The Order provides a consistent statewide approach to reducing sanitary sewer overflows by requiring public sewer system operators to take all feasible steps to control the volume of waste discharged into the system. In order to prevent sanitary sewer waste from entering the storm sewer system, operators must develop a Sewer System Management Plan. The General Waste Discharge Requirement also requires that storm sewer overflows must be reported to the SWRCB, using an online reporting system.

California Code of Regulations Title 24, Part 11

In 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code, Part 11 of Title 24, commonly referred to as CALGreen, establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental

performance standards for all new construction of residential and non-residential buildings. CALGreen standards are updated periodically. The latest version (CALGreen 2019) became effective on January 1, 2020.

Mandatory CALGreen standards pertaining to water, wastewater, and solid waste include the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings.
- Mandatory reduction in outdoor water use through compliance with a local water-efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance.
- Diversion of 65% of construction and demolition waste from landfills.

California Code of Regulations Title 20

Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. The performance of appliances must be certified through the California Energy Commission (CEC) to demonstrate compliance with standards. New appliances regulated under Title 20 include, but are not limited to, refrigerators, freezers, air conditioners, dishwashers, clothes washers and dryers, cooking products, televisions, and consumer audio and video equipment. Title 20 presents protocols for testing for each type of appliance covered under regulations, and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Executive Order B-29-15

In response to the recent drought in California, Executive Order (EO) B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives became permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the DWR modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

Assembly Bills 939 and 341: Solid Waste Reduction

The California Integrated Waste Management (CIWM) Act of 1989 (Assembly Bill [AB] 939) was enacted as a result of a national crisis in landfill capacity, as well as a broad acceptance of the desired approach to solid waste management of reducing, reusing, and recycling. AB 939 mandated local jurisdictions to meet waste diversion goals of 25% by 1995 and 50% by 2000 and established an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. AB 939 requires cities and counties to prepare, adopt, and submit to CalRecycle a source reduction and recycling element to demonstrate how the jurisdiction would meet the diversion goals. Other elements included encouraging resource conservation and considering the effects of waste management operations. The diversion goals and program requirements are implemented through a disposal-based reporting system by local jurisdictions, under the California Integrated Waste Management Board (CIWMB) regulatory oversight. Since the adoption of AB 939, landfill capacity is no longer considered a statewide crisis. AB 939 has achieved substantial progress in waste diversion, program implementation, solid waste planning, and protection of public health, safety, and the environment, from landfills operations and solid waste facilities.

In 2011, AB 341 was passed, making a legislative declaration that it is the policy goal of the state that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. AB-341 requires that local agencies adopt strategies that will enable 75% diversion of all solid waste by 2020. This bill requires all commercial businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place. In addition, multifamily apartments with five or more units are also required to form a recycling program.

Assembly Bill 1327: California Solid Waste Reuse and Recycling Access Act of 1991

AB 1327, which was established in 1991, required CalRecycle to develop a model ordinance for the use of recyclable materials in development projects. Local agencies were then required to adopt the model ordinance, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects.

Senate Bill 1374: Construction and Demolition Waste Reduction

SB 1374 requires that annual reports submitted by local jurisdictions to the CIWMB include a summary of the progress made in the diversion of construction and demolition waste materials. In addition, SB 1374 requires the CIWMB to adopt a model ordinance suitable for adoption by any local agency that required 50% to 75% diversion of construction and demolition waste materials from landfills by March 1, 2004. Local jurisdictions are not required to adopt their own construction and demolition ordinances, nor are they required to adopt CIWMB's model by default.

Assembly Bill 1826: Mandatory Commercial Organics Recycling

In October 2014, Governor Brown signed AB 1826 Chesbro (Chapter 727, Statutes of 2014), requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. (Organic waste is defined as food waste, green waste, landscape, and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.) This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. This law phases in the mandatory recycling of commercial organics over time. In particular, the minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector would be required to recycle organic waste.

California Code of Regulations, Titles 14 and 27

Title 14 (Natural Resources, Division 7) and Title 27 (Environmental Protection, Division 2 [Solid Waste]) of the California Code of Regulations govern the handling and disposal of solid waste and operation of landfills, transfer stations, and recycling facilities.

Sustainable Groundwater Management Act

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package—AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley)—collectively known as SGMA. SGMA requires governments and water agencies of high- and medium-priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, sustainability should be achieved by 2040. For the remaining high- and medium-priority basins, 2042 is the deadline. Through SGMA, the DWR provides ongoing support to local agencies through guidance, financial assistance, and technical assistance. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably, and requires those GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California.

SGMA exempts adjudicated groundwater basins from the requirements of designating a GSA and developing a GSP. The Chino Basin is an adjudicated basin, managed according to the physical solution included within the 1978 Judgment adjudicating the rights to pump from the basin, and is expressly included in SGMA's list of exempt basins.

Urban Water Management Plans

Pursuant to the California Urban Water Management Act (California Water Code Sections 10610-10656), urban water purveyors are required to prepare and update a UWMP every 5 years. UWMPs are prepared by California's urban water suppliers to support long-term resource planning and ensure adequate water supplies. Every urban water supplier that either delivers more than 3,000 AFY of water annually or serves more than 3,000 connections are required to assess the reliability of its water sources over a 20-year period under normal-year, dry-year, and multiple-dry-year scenarios in a UWMP. UWMPs must be updated and submitted to the DWR every five years for review and approval. The Plan area is within the area addressed by the MVWD UWMP. The site is also located within the areas covered by other relevant water planning documents, including the IEUA 2015 UWMP and the MWD 2015 UWMP. The MVWD UWMP takes into account the projections and findings of the IEUA UWMP and the MWD UWMP.

Senate Bill 610 and Senate Bill 221: Water Supply Assessments

SB 610 and SB 221, amended into state law effective January 1, 2002, improve the linkage between certain land-use decisions made by cities and counties and water supply availability. The statutes require detailed information regarding water availability and reliability with respect to certain developments to be included in the administrative record to serve as the evidentiary basis for an approval action by the City or County on such projects. Under Water Code Section 10912 [a], projects subject to the California Environmental Quality Act (CEQA) that would require a Water Supply Assessment (WSA) include: (1) residential development of more than 500 dwelling units; (2) shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space; (3) commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space; (4) hotel, motel or both, having more than 500 rooms; (5) industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land or having more than 650,000 square feet of floor area; (6) mixed-use projects that include one or more of the projects specified; or (7) a project that would demand an amount of water equivalent to or greater than the amount required by a 500 dwelling unit project. A fundamental source document for compliance with SB 610 is the UWMP, which can be used by the water supplier to meet the standard for SB 610. SB 221 applies to the Subdivision Map Act, conditioning a tentative map on the applicant to verify that the public water supplier has sufficient water available to serve the proposed development.

Distribution and Water Rights

California Water Code Section 10910 (d)(2) requires the identification of existing water supply entitlements, water rights, or water service contracts; federal, state, and local permits for construction of necessary infrastructure, and any regulatory approvals required in order to be

able to deliver the water supply. Extraction and distribution of groundwater resources are governed by common law and the California constitution rather than a particular agency, such as the SWRCB, which exercises control over surface waters. However, as the Chino groundwater basin has been adjudicated, specific rights to groundwater resources are dictated under the jurisdiction of a Watermaster.

Local

Montclair General Plan

The Housing Element of the Montclair General Plan, Appendix B, Section 7, *On- and Off-site Improvements*, require developers to dedicate lands within the property that is needed for streets and alleys, including access rights and abutters' rights, drainage, public utility easements, and other public easements. The applicant is required to provide improvements, including storm drains, adequate domestic water supply, and sanitary sewers for each lot. Improvements include the relocation or replacement of existing relevant infrastructure, as appropriate.

Montclair Municipal Code

The Uniform Building Code (UBC)/Uniform Plumbing Code (UPC) establishes requirements for sanitary sewage facilities in structures, including pipe size. The City of Montclair has adopted these codes in its Unified Development Code. In order to obtain final occupancy approval, a project must be deemed compliant with the UBC by City building inspectors. In addition to the UBC and UPC, the City utilizes the California Plumbing Code.

Montclair Code of Ordinances, Article I, Section 9.20, Sewer System, apply to the design, construction, alteration, use, and maintenance of the City sewer system, including but not limited to, mainline sewers, building sewers, building laterals, wastewater pretreatment systems, regional wastewater treatment plants, gravity separation interceptors, and other appurtenances. The purpose of this ordinance is to provide for the maximum beneficial use of the City sewer system, groundwater resources, and effluent-receiving waterways, through regulation of wastewater discharges, by establishing terms, limits, and conditions of discharge.

Montclair Code of Ordinances, Article I, Section 9.24.080, Installation of Drainage Facility, requires the owner of the land to install drainage facilities for the removal of surface and storm waters, in lieu of construction of these facilities.

3.15.3 Thresholds of Significance

The May 2019 Initial Study (Appendix A) for the Proposed Project included an analysis of the following significance criteria based on Appendix G of the State CEQA Guidelines (14 CCR

15000 et seq.) and shall be used to determine the significance of potential impacts to utilities and service systems. Impacts to utilities and service systems would be significant if the Proposed Project would:

A. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

B. Not have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.

C. Result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

D. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

E. Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

3.15.4 Impacts Analysis

A. Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water Facilities

Less Than Significant Impact. The Proposed Project would involve the construction of water distribution infrastructure (i.e., pipes, valves, meters) to provide domestic water, firewater, and irrigation water to the Plan area. Based on a conceptual utility study (Appendix H-2), Project construction would occur over seven phases (Phases A through G). As illustrated in Appendix H-3, Water Capacity Study Exhibits, each phase would incrementally add new 12-inch water lines within the Plan area. In total, approximately 12,675 feet of new 12-inch water lines would be added as a result of Project development. Most of the existing 12-inch water lines would remain intact and these new lines would supplement and connect the existing water line system. These water lines would connect to off-site water mains within Monte Vista Avenue, Moreno Street, and Central Avenue. All construction work, including construction-related traffic control within the City public right-of-way (see Section 3.13, Transportation), would be subject to City municipal code requirements. Other than the lateral connections from the Plan

area to existing water mains, the Proposed Project is not expected to require or result in construction or expansion of off-site infrastructure.

Installation of new 12-inch water lines and associated laterals would consist of either trenching to the depth of pipe placement or using a variety of different trenchless technology, which causes substantially less ground disturbance. Utility construction would primarily occur within the Plan area, but would also occur within adjacent City streets, as new water lines would tie into existing water mains within the street. Staging areas would be confined to the Plan area.

Trenching results in a temporary stockpiling of soil along the length of the trench, pending backfilling, which could result in potential short-term erosion induced siltation of nearby waterways. Trenchless technology only requires temporary stockpiling of soil adjacent to excavations on both ends of long sections of pipe. Standard best management practices (BMPs), installed as part of an NPDES-mandated Stormwater Pollution Prevention Plan (SWPPP) (see Section 3.7 Hydrology and Water Quality), would reduce potential water quality impacts to less-than-significant levels. As such, impacts associated with construction of new water infrastructure would be **less than significant** and no mitigation is required.

Wastewater Conveyance and Treatment Facilities

Wastewater Conveyance

Less Than Significant Impact. The Proposed Project would be served by existing sewer mains located within Monte Vista Avenue and San Jose Street, to the east and south of the Plan area, respectively. As illustrated in Appendix H-4, Sewer Capacity Study Exhibits, each phase would incrementally add new sewer lines within the Plan area. In total, approximately 1,450 feet of 8-inch, 810 feet of 10-inch, 430 feet of 12-inch, 3,900 feet of 15-inch, and 360 feet of 18-inch of new sewer lines would be added as a result of Project development. Most of the existing sewer lines would remain intact and these new 8-inch to 18-inch lines would supplement and connect the existing wastewater system. These sewer lines would connect to an off-site 10-inch sewer main within Monte Vista Avenue. This existing 10-inch sewer main has been identified within the City Sewer Master Plan as sufficient in the current condition. However, due to the age of the line, the primary point of connection for the site, at the intersection of Monte Vista Avenue and San Jose Street, has been recommended in the Master Plan to be relined.

Off-site wastewater flow would substantially increase following completion of the Proposed Project. As a result, the sewer line connecting the existing 10-inch VCP at the intersection of Monte Vista Avenue and San Jose Street would need to upsize to

accommodate flows from the proposed 8-inch to 18-inch pipes. In addition, the increase in wastewater flow would require the existing 10-inch VCP under Monte Vista Avenue, south of San Jose Street, to be upsized. These sewer line upgrades are based on comparisons in wastewater flow between existing and proposed conditions, as detailed in Tables 5-1A through 5-1G of Appendix H-2, Utility Capacity Study. Unit flow rates for each land use are based on the City Sewer Master Plan (June 2017).

As discussed for water lines, all construction work of sewer tie-ins/lateral connections and upgraded sewer mains within the City public right-of-way, including construction-related traffic control (see Section 3.13, Transportation), would be subject to City municipal code requirements. Installation of new sewer lines and associated laterals would consist of either trenching to the depth of pipe placement or using a variety of different trenchless technology, both which could result in potential short-term erosion induced siltation of nearby waterways. Standard BMPs, installed as part of an NPDES-mandated SWPPP, would reduce potential water quality impacts to less-than-significant levels. As such, impacts associated with construction of sewer infrastructure would be **less than significant**. No mitigation is required.

Wastewater Treatment

Less Than Significant Impact. As indicated in Table 3.15-3, the projected wastewater output associated with the Proposed Project is approximately 2.22 mgd, which would represent a net increase of 1.58 mgd of wastewater compared to existing conditions (0.64 mgd). Wastewater from the Plan area would flow through existing sewer mains to either the CCWRF, which has a design flow capacity of 11.4 mgd and treats approximately 7.0 mgd, or the RP-1, which has a design flow capacity of 44.0 mgd and treats an average influent of 28.0 mgd. Collectively, the remaining capacity at these facilities is 20.4 mgd. The average additional flow of wastewater generated by the Proposed Project at the final build-out would represent an increase of approximately 7.7% of the remaining treatment capacity of the CCWRF and RP-1. Additionally, the Proposed Project would incorporate water efficiency measures, such as low-flow plumbing fixtures and xeriscaped lawns. These measures would be designed to minimize wastewater generation to the maximum extent practicable.

Based on the remaining treatment capacity, in combination with water efficiency measures, the Proposed Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Impacts would be **less than significant**. No mitigation is required.

Table 3.15-3
Projected On-Site Wastewater Output

Land Use	Water and Wastewater – Indoor (gallons/year)	Water and Wastewater - Outdoor (gallons/year)
Residential (mid-rise)	329,484,000	207,718,000
Residential (high-rise)	82,354,700	51,919,300
General office	58,840,500	36,063,600
Medical office	25,278,100	4,814,870
Hotel	1,522,010	169,112
Shopping center retail	86,727,800	53,155,800
Strip center retail (Monte Vista Ave)	5,383,590	3,299,620
Civic	14,706,800	9,013,830
Movie Theater	44,111,900	2,815,650
Total: gallons/year	**809,661,182**	
Total gallons/day	**2,218,250**	

Source: California Emissions Estimator Model (CalEEMod), see Section 3.5, Greenhouse Gas Emissions, Table 3.5-4, Estimated Annual Operational GHG Emissions.

Storm Water Drainage Facilities

Less Than Significant Impact. The Plan area and surrounding area are characterized as an urban, developed commercial and residential area with limited pervious surfaces. Planters with ornamental trees, shrubs, and grasses are scattered sparsely throughout the Plan area. The predominance of impervious surfaces prevents water from percolating into the ground, increasing the amount of runoff reaching the storm drain infrastructure. In addition, implementation of the Proposed Project would not result in an increase of impermeable surfaces.

As illustrated in Appendix H-5, Storm Drain Capacity Study Exhibits, each phase would incrementally add new 18-inch to 36-inch storm drains within the Plan area. In total, approximately 3,180 feet of 18-inch, 1,095 feet of 24-inch, 2,065 feet of 30-inch, and 220 feet of 36-inch new storm drains would be added as a result of Project development. Most of the existing storm drains would remain intact and these new storm drains would supplement and connect the existing storm drain system. These storm drains were designed for peak discharge from a 25-year storm event, such that on-site flooding would not occur. These storm drains would connect to existing off-site infrastructure, which includes:

a. A 30-inch RCP connects to the 72-inch RCP along the north side of the I-10 freeway;

b. An 18-inch RCP connects to the 72-inch RCP along the north side of the I-10 freeway;

c. A 24-inch RCP connects to the 48-inch RCP under Monte Vista Avenue; and

d. A 42-inch RCP connects to the 48-inch RCP under Monte Vista Avenue.

The northwest corner of the Plan area drains to a depression and into the 18-inch RCP that transitions into the 24-inch RCP, connecting to the 48-inch RCP under Monte Vista Avenue. In the southwest corner of the Plan area, stormwater flows off-site at two locations, including: 1) the ¼-acre Black Angus restaurant parking lot discharges via a parkway drain into Monte Vista Avenue, and 2) the retail center parking area discharges to curb and gutter along the southern property boundary, which in turn appears to connect to the 8- by 4-foot RCB along the north side of the I-10 freeway. Because impervious surfaces would not increase as a result of the Proposed Project, stormwater runoff volume and flow rates from the Plan area would not increase.

As indicated in Section 3.7, Hydrology and Water Quality, as a permittee subject to the MS4 permit, the City of Montclair is responsible for ensuring that all new development and redevelopment projects comply with the performance criteria contained in the MS4 Permit and does so primarily through enforcement of Montclair Municipal Code Chapter 9.24 (Storm Drain System). The Proposed Project is a redevelopment project, which is defined as the addition or replacement of 5,000 or more square feet of impervious surface on an already developed site, and thus, will be required to control pollutants, pollutant loads, and runoff volume emanating from the Plan area by: (1) minimizing the impervious surface area and implementing source control measures, (2) controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention and/or rainfall harvest and re-use), and (3) ensuring all structural BMPs are monitored and maintained for the life of the Proposed Project. With the implementation of these water quality control features, runoff from the Plan area would be reduced in comparison to existing conditions. Therefore, no new off-site/downstream storm drain construction would be required.

As discussed for water lines, all construction work of storm drain tie-ins within the City public right-of-way, including construction-related traffic control (see Section 3.13, Transportation), would be subject to City municipal code requirements. Installation of new storm drains would consist of either trenching to the depth of pipe placement or using a variety of different trenchless technology, both which could result in potential short-term erosion induced siltation of nearby waterways. Standard BMPs, installed as part of an NPDES-mandated SWPPP, would reduce potential water quality impacts to less-than-significant levels. As such, impacts associated with construction of storm drain infrastructure would be **less than significant**. No mitigation is required.

Electric Power

Less Than Significant Impact With Mitigation Incorporated. Upgrades would be required with respect to electric power, based on the change in land use. Electric power would be part of a dry utility package that would be installed on-site and in the adjacent public roadways to provide service to the Project. As illustrated in Appendix H-6, Electrical Capacity Study Exhibits, each phase would incrementally add new electrical infrastructure within the Plan area. Based on a conceptual utility study (Appendix H-2), it appears sufficient electrical source is available to complete Phases A through D of the Proposed Project. However, depending on the final layout of these early phases, there will be a need for multiple relocation orders with SCE to reconfigure the existing underground electrical facilities to match with the proposed development layout. The relocation work orders may also require some updating to the existing electrical systems to bring the system up to the current standards and to account for the potential increase in load demand.

As discussed for water lines, all construction work of electric power tie-ins within the City public right-of-way, including construction-related traffic control (see Section 3.13, Transportation), would be subject to City municipal code requirements. Installation of new electric lines and associated laterals would consist of either trenching to the depth of pipe placement or using a variety of different trenchless technology, both which could result in potential short-term erosion induced siltation of nearby waterways. Standard BMPs, installed as part of an NPDES-mandated SWPPP, would reduce potential water quality impacts to less-than-significant levels.

However, based on the conceptual utility study (Appendix H-2), it is unclear whether SCE would have sufficient power to supply the later stages of development (Phases E through G). In a worst-case scenario, SCE may require that the Applicant balance the overall electrical load of the development on different Edison circuits. This task may mandate additional off-site infrastructure improvements by the Applicant, including new or extended off-site backbone system upgrades on the three surrounding streets in order to bring additional electrical circuits to the Plan area. Completion of these improvements could result in unknown environmental impacts. As such, mitigation measure MM-UTIL-1 would be required. Impacts would be less than significant with mitigation.

Natural Gas

Less than Significant Impact. Upgrades would be required with respect to natural gas, based on the change in land use. Natural gas would be part of a dry utility package that would be installed on-site and in the adjacent public roadways to provide service to the Project. Based on a conceptual utility study (Appendix H-2), it appears sufficient natural

gas is available to complete Phases A through G of the Proposed Project. Gas mainlines are located in City streets on all three sides of the Plan area. The existing on-site natural gas main/service brances would be reconfigured to account for the proposed development layout, but this is typical of any proposed development. The Applicant would tie the upgraded gas system into all three surrounding streets.

As discussed for water lines, all construction work of natural gas tie-ins within the City public right-of-way, including construction-related traffic control (see Section 3.13, Transportation), would be subject to City municipal code requirements. Installation of new natural gas lines and associated laterals would consist of either trenching to the depth of pipe placement or using a variety of different trenchless technology, both which could result in potential short-term erosion induced siltation of nearby waterways. Standard BMPs, installed as part of an NPDES-mandated SWPPP, would reduce potential water quality impacts to less-than-significant levels. As such, impacts associated with construction of natural gas infrastructure would be **less than significant**. No mitigation is required.

Telecommunication

Less Than Significant Impact With Mitigation Incorporated. Upgrades would be required with respect to telecommunication infrastructure, based on the change in land use. Telecommunication would be part of a dry utility package that would be installed on-site and in the adjacent public roadways to provide service to the Project. Based on a conceptual utility study (Appendix H-2), it appears that Frontier Communication (telephone services) and Spectrum (CATV) have enough existing source on-site to serve Phases A through D of the Proposed Project; only minor upgrades would be required. The existing system would require relocation in some areas, based on the ultimate layout of the phased development.

As discussed for water lines, all construction work of telecommunication tie-ins within the City public right-of-way, including construction-related traffic control (see Section 3.13, Transportation), would be subject to City municipal code requirements. Installation of new telecommunication lines and associated laterals would consist of either trenching to the depth of pipe placement or using a variety of different trenchless technology, both of which could result in potential short-term erosion induced siltation of nearby waterways. Standard BMPs, installed as part of an NPDES-mandated SWPPP, would reduce potential water quality impacts to less-than-significant levels.

However, existing Frontier and Spectrum infrastructure may not be sufficient to support Phases E through G of the Proposed Project. At a minimum, infrastructure relocation would be required and new or extended off-site backbone system work may be required on the three surrounding streets in order to bring additional telephone and CATV

facilities to the Plan area. Completion of these improvements could result in unknown environmental impacts. As such, mitigation measure MM-UTIL-2 would be required. Impacts would be loess than significant with mitigation.

B. Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. MVWD is the water purveyor for the Proposed Project. In 2018, MVWD received approximately 45.3% of its water supply from groundwater, 42.4% from imported water, 2.3% from entitlement water deliveries, and 10% from recycled water from the IEUA (Appendix H). Future development under the Proposed Project would result in 6,321 additional dwellings units and an additional 513,000 square feet of commercial uses compared to existing conditions.

According to the site-specific WSA,[1] the Proposed Project is estimated to generate a water demand of 767 AFY in 2040, which is 531 AFY greater than calculated water demand under current development conditions (Table 3.15-4, Project Total Water Demand Projections). Approximately 83.6% (641 AFY) of water demand for the Project is proposed for residential land use categories, whereas 5.3% (40.4 AFY) of the water demand is proposed for commercial land use, and 11.1% (85.1 AFY) is proposed for open space land use (outdoor irrigation) (Appendix H).

Table 3.15-4
Project Total Water Demand Projections

Land Use	Year				
	2020	*2025*	*2030*	*2035*	*2040*
Core Residential	236.7	238.1	239.5	240.9	243.3
Main Street Residential	319.4	321.3	323.2	325.1	327.0
Town Center Residential	70.7	71.1	71.5	72.0	72.4
Commercial	39.5	39.8	40.0	40.2	40.4
Open Space	81.4	82.3	83.3	84.2	85.1
Total Water Demand (AFY)	**747.7**	**752.6**	**757.5**	**762.4**	**767.2**
Current Conditions Demand	229.7	231.2	232.7	234.2	235.8
Increase Water Demand (AFY)	**518.0**	**521.4**	**524.8**	**528.2**	**531.4**

Source: Appendix H-1 (Water Supply Assessment)
Note: AFY = acre-feet per year

[1] Please note that the nomenclature of the zoning areas in the WSA differs from the nomenclature identified in the Montclair Place District Specific Plan and this EIR. However, the overall buildout data and density ranges are the same in all documents related to this Project. Furthermore, the difference in zoning area nomenclature does not affect the demand on water supplies.

The 2015 MVWD UWMP has planned growth within the MVWD service area over the next 20 years. MVWD has made an allowance for future demand estimates based on historical growth rates in its service area. MVWD has identified several projects that would enable the District to meet future water demands for its service area. For example, the Chino Basin Watermaster, in partnership with IEUA, have begun to implement a suite of yield enhancement and production sustainability projects to increase recharge and maintain sustainable production in the Chino Basin (see Section 3.7, Hydrology and Water Quality). Furthermore, the District has identified opportunities to expand the direct and indirect reuse of recycled water to offset or enhance potable water supplies. Several other partnerships and capital improvement projects are additionally being considered to develop more reliable, cost-effective water supplies (MVWD 2016). Collectively, these additional measures expand regional water supply and enable MVWD to meet or exceed the water demand of the District's service area for now and into the reasonably foreseeable future.

Based on these projections, MVWD has adequately made allowance for water supply-demand increases for both domestic and commercial water supply, including groundwater, over the next 20 years. According to the MVWD 2015 UWMP, MVWD projects an increase in water demand of 1,164 AFY from 2020 (35,200 AFY) to 2040 (36,364 AFY) (MVWD 2016). As a result, the Proposed Project would represent approximately 45.6% of this projected growth. However, MVWD's projected water resources for 2040 is approximately 51,828 AFY.

As demonstrated in Table 3.15-5, Table 3.15-6, and Table 3.15-7, an analysis of water supply and demand projections for MVWD (Appendix H-1, Water Supply Assessment), including the Proposed Project, demonstrates that projected supplies exceed demand through the year 2040, under normal, single-dry, and multiple-dry year scenarios. These projections consider land use, water development programs and projects, and water conservation.

Table 3.15-5
20-Year Water Supply and Demand Comparison Normal Year Including the Project (AFY)

	2020	2025	2030	2035	2040
Chino Groundwater Basin	29,841	29,841	29,841	29,841	29,841
Water Facilities Authority	21,776	21,776	21,776	21,776	21,776
San Antonio Water Company	800	800	800	800	800
Recycled Water	1,031	990	1,019	1,069	1,069
Total Supply	**53,448**	**53,407**	**53,436**	**53,486**	**53,486**
Total Demand	**38,037**	**38,250**	**38,600**	**38,969**	**39,270**
Difference	**15,411**	**15,157**	**14,836**	**14,517**	**14,216**

Table 3.15-6
20-Year Water Supply and Demand Comparison Single Dry Year Including the Project (AFY)

	2020	2025	2030	2035	2040
Chino Groundwater Basin	29,841	29,841	29,841	29,841	29,841
Water Facilities Authority	21,776	21,776	21,776	21,776	21,776
San Antonio Water Company	656	656	656	656	656
Recycled Water	1,031	990	1,019	1,069	1,069
Total Supply	**53,304**	**53,263**	**53,292**	**53,342**	**53,342**
Total Demand	**38,037**	**38,250**	**38,600**	**38,969**	**39,270**
Difference	**15,267**	**15,013**	**14,692**	**14,373**	**14,072**

Table 3.15-7
20-Year Water Supply and Demand Comparison Multiple Dry Years Including the Project (AFY)

	2020	2025	2030	2035	2040
Year 1					
Chino Groundwater Basin	29,841	29,841	29,841	29,841	29,841
Water Facilities Authority	21,776	21,776	21,776	21,776	21,776
San Antonio Water Company	656	656	656	656	656
Recycled Water	1,031	990	1,019	1,069	1,069
Total Supply	**53,304**	**53,263**	**53,292**	**53,342**	**53,342**
Total Demand	**38,037**	**38,250**	**38,600**	**38,969**	**39,270**
Difference	**15,267**	**15,013**	**14,692**	**14,373**	**14,072**
Year 2					
Chino Groundwater Basin	29,841	29,841	29,841	29,841	29,841
Water Facilities Authority	21,776	21,776	21,776	21,776	21,776
San Antonio Water Company	560	560	560	560	560
Recycled Water	1,031	990	1,019	1,069	1,069
Total Supply	**53,208**	**53,167**	**53,196**	**53,246**	**53,246**

As the MVWD would have sufficient water supplies available to serve the Project during normal, dry, and multiple dry years, impacts would be **less than significant**. No mitigation is required.

C. Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As discussed in Threshold A, at the final build-out, the Proposed Project would not generate wastewater that would exceed the municipal

wastewater trunk capacity. Off-site wastewater would be conveyed through municipal sewage infrastructure to IEUA's CCWRF or RP-1, which collectively have the capacity to treat 55.4 mgd of wastewater and treat, on average, 27.4 mgd of wastewater. The average net wastewater expected to be generated by the Proposed Project is approximately 1.58 mgd. Projected wastewater from the Project would represent approximately 7.7% of the remaining capacity of the treatment facilities. Therefore, the Project would have adequate capacity to serve the projected demand in addition to the provider's existing commitments.

In addition, MVWD is empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' sewerage system for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the sewerage system to accommodate the Proposed Project. Furthermore, water conservation measures are established by the City's General Plan (e.g., xeriscaping, improved irrigation systems, public education about conservation) would be implemented and would help reduce the amount of wastewater generated by the Project. As a result, Proposed Project impacts would be **less than significant**. No mitigation is required.

D. Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Construction

Less Than Significant Impact. Project demolition and construction waste quantities are based on CalEEMod, USEPA, and CIWMB waste generation factors (CAPCOA 2017; CIWMB 1991; USEPA 2003). Waste values were generated, assuming that construction would occur in six phases over 20 years, beginning in January 2021. Each phase of construction is estimated to result in the demolition of 41,390 square feet of building space and the export of 10,000 cubic yards of soil. Cumulatively, the Project would demolish approximately 251,581 square feet of building space and export 60,000 cubic yards of soil. In addition, construction of the Project would result in the cumulative development of approximately 5,000,000 square feet of residential buildings and 512,635 square feet of non-residential structures. As shown on Table 3.15-8, Estimated Construction and Demolition Output, approximately 11.42 tons/day of demolition waste and approximately 1.65 tons/day of construction waste would be generated by the Proposed Project.

Table 3.15-8
Estimated Construction and Demolition Output

Demolition Solid Waste					
Total Demolition (SF)	*Lbs/SF Generation Rate*[1]	*Estimated Demoltion Waste (Lbs)*	*Estimated Demolition Waste (tons)*	*Estimated Annual (tons/year)*[2]	*Estimated Daily (tons/day)*
251,581	92	23,145,452	11,573	578.65	1.59
Exported Soil					
Estimated Exported Soil (CY)	*Lbs/CY Conversion Factor*[3]	*Estimated Soil Export (Lbs)*	*Estimated Soil Export (tons)*	*Estimated Annual (tons/year)*[2]	*Estimated Daily (tons/day)*
60,000	2,391.96	143,517,600	71,759	3,587.95	9.83
Cumulative Demolition Waste					
		Estimated Demolition Waste (Lbs)	*Estimated Demolition Waste (tons)*	*Estimated Annual (tons/year)*[2]	*Estimated Daily (tons/day)*
Total Demolition Waste		**166,663,052**	**83,332**	**4,166.60**	**11.42**
Residential Construction Waste					
Total New Construction (SF)	*Lbs/SF Generation Rate*[4]	*Estimated Construction Waste (Lbs)*	*Estimated Construction Waste (tons)*	*Estimated Annual (tons/year)*[2]	*Estimated Daily (tons/day)*
5,000,000	4.39	21,950,000	10,975	548.75	1.50
Non-Residential Construction Waste					
Total New Construction (SF)	*Lbs/SF Generation Rate*[5]	*Estimated Construction Waste (Lbs)*	*Estimated Construction Waste (tons)*	*Estimated Annual (tons/year)*[2]	*Estimated Daily (tons/day)*
512,635	4.34	2,224,836	1,112	55.60	0.15
Cumulative Construction Waste					
		Estimated Construction Waste (Lbs)	*Estimated Construction Waste (tons)*	*Estimated Annual (tons/year)*[2]	*Estimated Daily (tons/day)*
Total Construction Waste		**24,174,836**	**12,087**	**604.35**	**1.65**

Notes: SF = square feet; Lbs = pounds; CY = cubic yard;
1 Based on CalEEMod's estimated demolition solid waste generation rates (CAPCOA 2017)
2 Construction would occur in six phases over 20 years
3 Based on CIWMB's approximate material conversion rates (CIWMB 1991)
4 Based on USEPA's estimated residential construction solid waste generation rates (USEPA 2003)
5 Based on USEPA's estimated non-residential construction solid waste generation rates (USEPA 2003)

Currently, per CALGreen, 65% of construction and demolition waste must be diverted from landfills. As such, at least 65% of all construction and demolition debris from the Proposed Project (8.50 tons/day) would be diverted and recycled. Any hazardous wastes that are generated during construction activities would be managed and disposed of in compliance with all applicable federal, state, and local laws. The remaining 35% of construction and demolition material (4.57 tons/day) that is currently not required to be recycled, would either be disposed of or voluntarily recycled at a solid waste facility with

available capacity. As previously described, the San Timoteo Landfill is the only landfill in San Bernardino County to accept inert solid waste, has a daily maximum permitted throughput of 2,000 tons/day, has a remaining capacity of 11,402,000 cubic yards, and is expected to remain open for another 23 years (CalReycle 2020). The 35% of construction and demolition waste generated by the Proposed Project would represent approximately 0.23% of the available daily capacity at the landfill. Therefore, Proposed Project demolition and construction would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals (e.g., CALGreen standards). Impacts during construction would be **less than significant**. No mitigation is required.

Operation

Less Than Significant Impact. Once operational, the Proposed Project would produce solid waste on a regular basis associated with operation and maintenance activities. As shown in Table 3.15-2, existing solid waste generation attributable to the Plan area is 4.46 tons/day. As shown in Table 3.15-9, solid waste generated by the Proposed Project would be approximately 10.80 tons/day, which would represent a net increase of 5.54 tons/day compared to existing conditions.

Table 3.15-9
Projected On-Site Solid Waste Output

Land Use	Solid Waste (tons/year)
Residential (mid-rise)	1,163.11
Residential (high-rise)	290.72
General office	153.95
Medical office	1,087.83
Hotel	68.44
Shopping center retail	614.70
Strip center retail (Monte Vista Ave)	38.16
Civic	210.99
Movie Theater	313.05
Total: tons/year	**3,940.95**
Total: tons/day	**10.80**

Source: California Emissions Estimator Model (CalEEMod), see Section 3.5, Greenhouse Gas Emissions, Table 3.5-4, Estimated Annual Operational GHG Emissions

As previously described in Section 3.15.1, the City's commercial use is currently served by Burrtec Waste Industries for solid waste collection and disposal. Waste would likely be hauled to the nearest landfills, which includes the Mid-Valley and San Timoteo Sanitary Landfills. The Mid-Valley Landfill has a permitted throughput of 7,500 tons/day

and is expected to remain open for another 13 years. The net solid waste generated by the Proposed Project during operations would represent approximately 0.74% of the total daily capacity of permitted at the landfill. In addition, the San Timoteo Sanitary Landfill, which has a maximum permitted throughput of 2,000 tons/day, is expected to remain open for another 23 years. The net increase in waste generated by the Proposed Project during operations would represent approximately 0.28% of the available daily capacity at the landfill.

Once the Mid-Valley and San Timoteo Sanitary Landfills reach capacity, additional landfills and strategies would be identified, so that disposal needs continue to be met. Further, there are landfills within the County with up to 52 years of remaining life. For example, the Barstow Sanitary Landfill is expected to remain open for another 51 years, and the Landers Sanitary Landfill is expected to remain open another 52 years (CalRecycle 2020). As such, in the event of the closure of the Mid-Valley and San Timoteo Sanitary Landfills, other landfills in the region would be able to accommodate solid waste from the Proposed Project, and regional planning efforts would ensure continued landfill capacity into the foreseeable future. Therefore, the Proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts during operation would be **less than significant**. No mitigation is required.

F. ***Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

Less Than Significant Impact. As described above, solid waste from commercial uses in the City is sorted at one of five regional transfer stations, the closest of which is the West Valley Transfer Station. Solid waste is then transported to either the Mid-Valley Sanitary Landfill or the San Timoteo Sanitary Landfill. These facilities are regulated under federal, state, and local laws. Additionally, the City of Montclair is required to comply with the solid waste reduction and diversion requirements set for in AB 939, AB 341, AB 1327, and AB 1826. Per AB 341, businesses that generate 4 cubic yards or more of commercial solid waste per week are required to arrange for organic waste recycling services. The threshold for recycling requirements may be decreased by 2 cubic yards per week as of January 2020. In addition, as previously described, waste diversion and reduction during Project construction and operations would be completed in accordance with CALGreen standards and City diversion standards. As a result, the Proposed Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste and impacts would be considered **less than significant**. No mitigation is required.

3.15.5 Cumulative Impacts

Water Supply

Less Than Significant Impact. Development of the Proposed Project would increase land-use intensities in the area resulting in increased water usage. The Proposed Project would be served by the MVWD, which would increase the amount of water used in the MVWD's service area. The MVWD 2015 UWMP indicates that in 2015, the total annual water demand in MVWD's Service Area was 16,384 AF, which equates to approximately 5.5 billion gallons per year or 15.1 mgd. Collectively, the MVWD and other water agencies in Southern California have planned for the provision of regional water for the growing population, including drought scenarios for its service area. The plan includes a new water demand forecast prepared for the major categories of demand and uses regional population, demographic projections, the dry climate, historical water use to develop these forecasts. These projections consider land use, water development programs and projects, and water conservation. As such, the Proposed Project would not result in increased water usage, causing the need for new entitlements, resources, and/or treatment facilities that are not already being planned to accommodate regional growth forecasts.

The MVWD has the opportunity to increase supply to meet future demands through the following measures: 1) production of groundwater based on safe yield allocation and utilization of water in storage; 2) increasing imported water purchases, if available and if there is available WFA capacity; and 3) purchasing additional recycled water, if available. Collectively, these additional options would enable water supply to exceed water demand for MVWD now and into the future, including sufficient water supply for the Proposed Project (Appendix H-1).

Lastly, compliance with the CALGreen Building Code would be required for new development. For redevelopment projects, this generally indicates that newly installed appliances and plumbing would be more efficient than those used within the structures originally located on redevelopment sites. In addition, CALGreen Building Code standards require a mandatory reduction in outdoor water use, in accordance with the DWR Model Water Efficient Landscape Ordinance. This would ensure that many of the related projects, as well as the Proposed Project, do not result in wasteful or inefficient use of limited water resources and may, in fact, result in an overall decrease in water use per person.

Due to water planning efforts, water conservation standards, and the urban infill/redevelopment nature of the Proposed Project and many of the related projects, cumulative impacts would be **less than significant**. No mitigation is required.

Wastewater

Less Than Significant Impact. Each phase of the Proposed Project would incrementally increase the amount of wastewater that is being generated in the area. However, as previously described, the

existing sewer lines that serve the Proposed Project have the capacity to convey the estimated peak flow generated from the Plan area. Similarly, the capacity of receiving sewer lines associated with cumulative Project development would be determined on a project-specific basis. In the event that sewer upgrades are required, all construction work within the City public right-of-way would be subject to local municipal code requirements. Other than the lateral connections from the related project sites to existing sewer mains, these related projects are not expected to require or result in construction or expansion of off-site infrastructure. As a result, indirect, cumulative impacts associated with upgrades of sewer lateral connections to related project sites would not be cumulatively considerable.

In addition, the Proposed Project would generate a net increase of approximately 1.58 mgd of wastewater, which would represent approximately 7.7% of the IEUA's CCWRF and RP-1 collective treatment capacity. As cumulative increases in wastewater treatment demand within the service area require facility upgrades, the MVWD would include service connection fees in their capital improvement plans. Such fees would ensure that capital improvements are completed sufficiently to accommodate increased wastewater inflows associated with the Proposed Project. As such, cumulative impacts would be **less than significant**. No mitigation is required.

Solid Waste

Less Than Significant Impact. Development of the Proposed Project would increase land-use intensities in the area, resulting in increased solid waste generation in the service area for the Mid-Valley and San Timoteo Sanitary Landfills. However, the Proposed Project is a redevelopment project. As such, solid waste is already being generated at the Plan area. Further, AB 939, or the Integrated Waste Management Act of 1989, mandates that cities divert 50% of the total solid waste generated from landfills to recycling facilities. In order to maintain state diversion requirements, the Proposed Project would be required to implement waste reduction, diversion, and recycling during its demolition, construction, and operation. Through compliance with City and state solid waste diversion requirements, and due to the recycling collection process that would be part of the Proposed Project design, cumulative impacts would be **less than significant**. No mitigation is required.

Electric Power, Natural Gas, and Telecommunication

Less Than Significant Impact. The City of Montclair is built out, and upgrades in electrical power, natural gas, and telecommunication capabilities are anticipated primarily due to development in the form of the revitalization of outdated or underserved areas, and redevelopment of specific properties that would increase density and require more sophisticated technology, such as the Proposed Project. However, such upgrades would generally be confined to the lateral connections to the individual project sites, and possibly upgraded adjacent backbone infrastructure, and not any centralized facilities. Upgrades to centralized power, natural gas, and telecommunication facilities would be determined by each of the power, gas, and

telecommunications providers, as build-out continues within the region. Individual projects would be required to provide for specific project needs. As a result, cumulative impacts associated with upgrades of electric, natural gas, and telecommunication facilities would not be cumulatively considerable. Impacts would be **less than significant**. No mitigation is required.

3.15.6 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. The following mitigation measures shall be incorporated into the Proposed Project.

MM-UTIL-1 Prior to issuance of a grading permit by the City of Montclair Public Works Department for individual projects within Phases E through G of the Specific Plan area, the Applicant shall demonstrate that Southern California Edison has sufficient infrastructure capacity to accommodate the electric power requirements for completion of each Specific Plan phase. In the event such infrastructure is not available, the environmental impacts associated with installation of such infrastructure shall be evaluated in project-specific California Environmental Quality Act documents.

MM-UTIL-2 Prior to issuance of a grading permit by the City of Montclair Public Works Department for individual projects within Phases E through G of the Specific Plan area, the Applicant shall demonstrate that the Specific Plan area telecommunication provider has sufficient infrastructure capacity to accommodate the telecommunication requirements for completion of each Specific Plan phase. In the event such infrastructure is not available, the environmental impacts associated with installation of such infrastructure shall be evaluated in project-specific California Environmental Quality Act documents.

3.15.7 Significance After Mitigation

With the implementation of mitigation measures **MM-UTIL-1** and **MM-UTIL-2**, potential impacts related to adequacty of electric power and telecommunication infrastructure would be **less than significant**.

3.15.8 References

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CHAPTER 4
ALTERNATIVES

The California Environmental Quality Act (CEQA) requires that an EIR describe a range of reasonable alternatives to a proposed project that would feasibly attain most of the basic objectives of the project but would avoid or lessen any significant environmental impacts. EIRs are also required to evaluate the comparative merits of the alternatives. This chapter of the EIR describes and evaluates alternatives to the Proposed Project and implements the requirements set forth in the State CEQA Guidelines for alternatives analysis. This chapter also identifies the Environmentally Superior Project Alternative as required by State CEQA Guidelines Section 15126.6(e)(2).

4.1 SELECTION OF ALTERNATIVES

The range of alternatives and methods for selection is governed by CEQA and applicable CEQA case law. As stated in State CEQA Guidelines Section 15126.6(a), the lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. This chapter includes the range of Proposed Project alternatives that have been selected by the lead agency (in this case, the City of Montclair) for examination, as well as its reasoning for selecting these alternatives.

As stated in Section 15126.6(a) of the State CEQA Guidelines, there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. This rule is described in Section 15126.6(f) of the State CEQA Guidelines and requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. As defined in Section 15126.6(f), the rule of reason limits alternatives analyzed to those that would avoid or substantially lessen one or more of the significant effects of a project. Of those alternatives, an EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. Other relevant provisions set forth in the State CEQA Guidelines state that EIRs do not need to consider every conceivable alternative to a project, nor are they required to consider alternatives that are infeasible.

4.1.1 Proposed Project

As described above, project objectives and the significant impacts of a project are key determiners of the alternatives that are initially examined by the lead agency and the alternatives that are ultimately carried forward for detailed analysis in an EIR. To that end, this subsection includes (a) a summary of the Proposed Project's characteristics to facilitate comparison between the Proposed Project and its alternatives, (b) the list of Proposed Project objectives, and (c) a summary of the Proposed Project's significant impacts.

Proposed Project Summary

The proposed MPDSP would assign and create land use zones for parcels within the approximately 104.35-acre site ("Plan area") located in downtown Montclair, just north of the Interstate 10 (I-10) freeway and just south of the City's North Montclair Downtown Specific Plan Area. The MPDSP would provide development standards and architectural guidelines to guide development in the Plan area through 2040. The majority of the Plan area (approximately 75 acres) is currently occupied by the existing Montclair Place Mall (Mall) properties. A key feature of the MPDSP would provide for the demolition of all or a portion of the existing Mall, some or all appurtenant free-standing outbuildings, and portions of the existing surface parking lots, to construct a pedestrian-oriented, mixed-use downtown district, with structured parking facilities through a series of planned phases. The maximum number of dwelling units envisioned by the MPDSP is approximately 5 million square feet of residential uses (or 6,321 dwelling units) and the total additional commercial square footage envisioned by the MPDSP is approximately 512,000 square feet. Additionally, the MPDSP includes provisions for the construction of a hotel with approximately 100 to 200 rooms. The MPDSP would replace the existing C-3 zoning in the Plan area with new mixed-use zones, thereby enabling the future development of commercial, office, multi-family residential, hotel, and mixed-use projects within walking and biking distance of the nearby Montclair Transcenter.

Proposed Project Objectives

Section 15124(b) of the State CEQA Guidelines states that the project description of an EIR shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the Proposed Project is to redevelop and revitalize an underutilized site within downtown Montclair to support increased density, activity, and multi-modal transportation opportunities within proximity to transit opportunities.

The Proposed Project's specific objectives are provided below.

- Enable phased redevelopment of the existing Montclair Place Mall and the area south of the Mall including the Ashley Furniture site and the Montclair Entertainment Plaza area. The time frame for build-out in the Plan area is anticipated to take up to 20 years.
- Create a pedestrian-oriented, mixed-use downtown district within walking and biking distance of the Montclair Transcenter and anticipated extension of the Foothill Gold Line railway.
- Replace the existing C-3 zoning with new mixed-use zones that permit residential use in standalone and mixed-use configurations and office.
- Introduce appropriate land use zones and uses, intensity levels, and future street patterns for properties in the Plan area.

- Provide zoning that is flexible and responsive to changing market demands.
- Account for an increase in the maximum number of dwelling units and additional commercial/office square footage allowable by the Plan. The maximum amounts envisioned by the Plan are approximately 6,321 dwelling units (5 million square feet of residential uses) and a total of 512,000 additional square feet of commercial/office uses.
- Introduce form-based development, massing, and architectural standards to successfully implement the Plan.
- Reduce automobile trips by creating a mixed-use, pedestrian-oriented, multi-modal, park-once environment with access to alternative modes of transportation, including walking, biking, Metrolink, the proposed Foothill Gold Line railway extension, and curb space for transit network companies such as Uber and Lyft.

Environmental Impacts of the Proposed Project

Table 4-1 provides a summary of the environmental impacts of the proposed project.

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Aesthetics			
a. Would the project have a substantial adverse effect on a scenic vista?	Less than Significant Impact	None required	Less than Significant Impact
b. Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	None required	No Impact
c. Would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant Impact	None required	Less than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Potentially Significant Impact	**MM-AES-1** The project applicant shall prepare lighting and signage plans for the Proposed Project depicting the proposed locations and heights of light poles and signs. Concurrent with the building permit submittal, the project applicant shall incorporate lighting design specifications to meet the City's minimum safety and security standards as outlined in the City's Building Security Requirements. The following measures shall be included in all lighting plans: • Luminaires shall be designed with cutoff-type fixtures or features that cast low-angle illumination to minimize incidental spillover of light onto adjacent private properties. Fixtures that shine light upward or horizontally shall not spill any light onto adjacent properties. • Luminaires shall provide accurate color rendering and natural light qualities. Low-pressure sodium and high-pressure sodium fixtures that are not color-corrected shall not be used, except as part of an approved sign or landscape plan. • Luminaire mountings shall be downcast and pole heights minimized to reduce potential for back scatter into the nighttime sky and incidental spillover light onto adjacent properties. The height of light poles shall be reviewed and approved by the City to ensure consistency with the City's Municipal Code requirements. Luminaire mountings shall be treated with non-glare finishes.	Less Than Significant Impact
Would the project have a cumulative aesthetic and/or lighting impact?	Potentially Significant Impact	**MM-AES-1**	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Air Quality			
a. Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact	**Construction:** **MM-AQ-1** **Construction Equipment Emissions Reductions.** During Proposed Project construction, the applicant shall incorporate the following measures to reduce construction criteria air pollutant emissions, including VOC, NO_x, PM_{10}, and $PM_{2.5}$, generated by construction equipment used for future development projects implemented under the proposed MPDSP: a) For off-road equipment with engines rated at 75 horsepower or greater, no construction equipment shall be used that is less than Tier 4 Interim. An exemption from these requirements may be granted by the City in the event that the applicant documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment.[1] Before an exemption may be considered by the City, the applicant shall be required to demonstrate that two construction fleet owners/operators in the Los Angeles Region were contacted and that those owners/operators confirmed Tier 4 Interim or better equipment could not be located within the Los Angeles region. b) Minimize simultaneous operation of multiple construction equipment units. During construction, vehicles in loading and unloading queues shall not idle for more than 5 minutes, and shall turn their engines off when not in use to reduce vehicle emissions. c) Properly tune and maintain all construction equipment in accordance with manufacturer's specifications;	Significant and Unavoidable Impact

[1] For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded from a Tier 4 Interim to a higher tier (i.e., Tier 4 Final) or replaced with an alternative-fueled (not diesel-fueled) piece of equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards.

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		d) Where feasible, employ the use of electrical or natural gas-powered construction equipment, including forklifts and other comparable equipment types. e) To reduce the need for electric generators and other fuel-powered equipment, provide on-site electrical hookups for the use of hand tools such as saws, drills, and compressors used for building construction. f) Develop a Construction Traffic Control Plan to ensure construction traffic and equipment use is minimized to the extent practicable. The Construction Traffic Control Plan shall include measures to reduce the number of large pieces of equipment operating simultaneously during peak construction periods, scheduling of vendor and haul truck trips to occur during non-peak hours, establish dedicated construction parking areas to encourage carpooling and efficiently accommodate construction vehicles, identify alternative routes to reduce traffic congestion during peak activities, and increase construction employee carpooling. **MM-AQ-2** **Fugitive Dust Control.** During Proposed Project construction, the applicant shall incorporate the following measures to reduce construction fugitive dust emissions (PM_{10} and $PM_{2.5}$), generated by grading and construction activities of future development projects implemented under the proposed MPDSP, consistent with SCAQMD Rule 403, with a goal of retaining dust on the site: a) Water, or utilize another SCAQMD-approved dust control non-toxic agent, on the grading areas at least three times daily to minimize fugitive dust. b) All permanent roadway improvements shall be constructed and paved as early as possible in the construction process to reduce construction vehicle travel on unpaved roads. To reduce fugitive dust from earth-moving operations, building	

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		pads shall be finalized as soon as possible following site preparation and grading activities. c) Stabilize grading areas as quickly as possible to minimize fugitive dust. d) Apply chemical stabilizer, install a gravel pad, or pave the last 100 feet of internal travel path within the construction site prior to public road entry, and to on-site stockpiles of excavated material. e) Remove any visible track-out into traveled public streets with the use of sweepers, water trucks, or similar method as soon as possible. f) Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. Unpaved construction site egress points shall be graveled to prevent track-out. g) Wet wash the construction access point at the end of the workday if any vehicle travel on unpaved surfaces has occurred. h) Cover haul trucks or maintain at least 2 feet of freeboard to reduce blow-off during hauling. i) Evaluate the need for reduction in dust generating activity, potential to stop work, and/or implementation of additional dust control measures if winds exceed 25 miles per hour. j) Enforce a 15-mile-per-hour speed limit on unpaved surfaces. k) Provide haul truck staging areas for the loading and unloading of soil and materials. Staging areas shall be located away from sensitive receptors, at the furthest feasible distance. l) Construction Traffic Control Plans shall route delivery and haul trucks required during construction away from sensitive receptor locations and congested intersections, to the extent feasible. Construction Traffic Control plans shall be finalized and approved prior to	

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		issuance of grading permits. m) Review and comply with any additional requirements of SCAQMD Rule 403. **MM-AQ-3** **Architectural Coating VOC Emissions.** To address the impact relative to VOC emissions, Super-Compliant VOC-content architectural coatings (0 grams per liter to less than 10 grams per liter VOC) during Proposed Project construction, the applicant shall ensure the construction/application of paints and other architectural coatings to reduce ozone precursors. If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September. The developer shall procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113 (Architectural Coatings). **Operational:** **MM-AQ-4** **Vehicle Miles Traveled Reduction Strategies.** The City shall ensure the implementation of Transportation Demand Management (TDM) measures to facilitate increased opportunities for transit, bicycling, and pedestrian travel, as well as provide the resources, means, and incentives for ride-sharing and carpooling to reduce vehicle miles traveled and associated criteria air pollutant emissions. The following components are to be included in the TDM Program: *Bicycle and Pedestrian Travel* a) Develop a comprehensive pedestrian network designed to provide safe bicycle and pedestrian access between the various internal Proposed Project land uses, which will include design elements to enhance walkability and connectivity and shall minimize barriers to pedestrian access and interconnectivity. Physical barriers, such as walls or landscaping, that impede pedestrian circulation shall be eliminated.	

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		b) The Proposed Project design shall include a network that connects the Proposed Project uses to the existing off-site facilities (e.g., existing off-site bike paths). c) Proposed Project design shall include pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements. Roadways shall be designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips with traffic calming features. Traffic calming features may include: marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, and others. d) Provide bicycle parking facilities along main travel corridors: one bike rack space per 20 vehicle/employee parking spaces or to meet demand, whichever results in the greater number of bicycle racks. e) Provide shower and locker facilities to encourage employees to bike and/or walk to work: one shower and three lockers per every 25 employees. *Ride-Sharing and Commute Reduction* f) Promote ridesharing programs through a multi-faceted approach, such as designating a certain percentage of parking spaces for ridesharing vehicles; designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles; or providing a website or message board for coordinating rides. g) Implement marketing strategies to reduce commute trips. Information sharing and marketing are important components to successful commute trip-reduction strategies. Implementing	

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		commute trip-reduction strategies without a complementary marketing strategy would result in lower VMT reductions. Marketing strategies may include: new employee orientation of trip reduction and alternative mode options; event promotions; or publications. h) One percent (1%) of vehicle/employee parking spaces shall be reserved for preferential spaces for car pools and van pools. i) Coordinate with the Southern California Association of Governments (SCAG) for carpool, vanpool, and rideshare programs that are specific to the Proposed Project. j) Implement a demand-responsive shuttle service that provides access throughout the MPDSP area, to the park-and-ride lots, and to the nearby transit centers. *Transit* k) Bus pull-ins shall be constructed where appropriate within the Proposed Project area. l) Coordinate with SCAG on the future siting of transit stops/stations within or near the MPDSP. **MM-AQ-5** **Encourage Electric Vehicles.** The City shall ensure that each development project incorporate the following: a) Designate 10% of parking spaces to be for electric and alternative fuel vehicles. b) Install Level 2 EV charging stations in 6% of all parking spaces. **MM-AQ-6** **Idling Restriction.** For Proposed Project land uses that include truck idling, the City shall ensure that each implementing development project minimize idling time of all vehicles and equipment to the extent feasible; idling for periods of greater than five (5) minutes shall be prohibited. Signage shall be posted at truck parking spots, entrances, and truck bays advising that idling time shall not exceed five (5) minutes per idling location. To the extent feasible, the tenant	

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		shall restrict idling emission from trucks by using auxiliary power units and electrification. Each cold storage dock door shall provide electrification for transport refrigeration units (TRUs). **MM-AQ-7** **Energy Conservation.** The City shall ensure that each development project incorporate the following conservation measures into proposed building plans: a) Install a solar photovoltaic rooftop system to reduce the electric demand from the local grid. b) Install Energy Star rated heating, cooling, lighting, and appliances. c) Outdoor lighting shall be light emitting diodes (LED) or other high-efficiency lightbulbs. d) Provide information on energy efficiency, energy efficient lighting and lighting control systems, energy management, and existing energy incentive programs to future tenants. e) Non-residential structures shall meet the U.S. Green Building Council standards for cool roofs. This is defined as achieving a 3-year solar reflective index (SRI) of 64 for a low-sloped roof and 32 for a high-sloped roof. f) Outdoor pavement, such as walkways and patios, shall include paving materials with 3-year SRI of 0.28 or initial SRI of 0.33. g) Construction of modest cool roof, defined as Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance and 0.75 thermal emittance. h) Use of Heating, Ventilation and Air Conditioning (HVAC) equipment with a Seasonal Energy Efficiency Ratio (SEER) of 12 or higher. i) Installation of water heaters with an energy factor of 0.92 or higher. j) Maximize the use of natural lighting and include daylighting (e.g., skylights,	

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		windows) in rooms with exterior walls that would normally be occupied. k) Include high-efficacy artificial lighting in at least 50% of unit fixtures. l) Install low-NO_x water heaters and space heaters, solar water heaters, or tank-less water heaters. m) Use passive solar cooling/heating. n) Strategically plant trees to provide shade. o) Structures shall be equipped with outdoor electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment.	
b. Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Potentially Significant Impact	**MM-AQ-1** through **MM-AQ-7**	Significant and Unavoidable Impact
c. Would the project expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant Impact	**MM-AQ-1** through **MM-AQ-7** **MM-AQ-8** **Toxic Air Contaminant Reduction.** At the time of discretionary approval of new sources of TAC emissions in close proximity to existing sensitive land uses, the City shall require development projects to implement applicable best management practices, as necessary and feasible, that will reduce exposure to TACs. Such measures may include the installation of non-diesel fueled generators or the installation of diesel generators with an EPA-certified Tier 4 engine or engines that are retrofitted with a CARB Level 3 Verified Diesel Emissions Control Strategy. Specific reduction measures will be evaluated and determined depending on proposed land use TAC sources and feasibility.	Significant and Unavoidable Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		MM-AQ-9 Health Risk Assessment Requirements. Consistent with the California Air Resources Board's recommendations on siting new sensitive land uses, a formal health risk assessment shall be performed under the following conditions: a) *Distribution Centers*. For any distribution center that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week located within 1,000 feet of a sensitive receptor. In addition, configuration of entry and exit points of the distribution center shall be considered to minimize exposure to sensitive receptors. b) *Gasoline Dispensing Facilities*. For any large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater) within 300 feet of a sensitive receptor. For any typical gas dispensing facility (with a throughput of less than 3.6 million gallons per year) within 50 feet of a sensitive receptor. c) *Dry Cleaners Using Perchloroethylene*. For any dry cleaning operation within 300 feet of a sensitive receptor. For operations with three of more machines, consult with the South Coast Air Quality Management District for when a health risk assessment shall be prepared as the distance to the closest sensitive receptor may be less than 300 feet. d) *Other Sources of Toxic Air Contaminants*. For other sources of TACs, the City shall evaluate the need to prepare a health risk assessment based on the types of TACs and the distance to sensitive receptors.	
d. Would the project create objectionable odors affecting a substantial number of people?	Less Than Significant Impact	None required	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Would the project have a cumulative air quality impact?	Potentially Significant Impact	**MM-AQ-1 through MM-AQ-9**	Significant and Unavoidable Impact
Biological Resources			
a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Less Than Significant Impact	None required	Less Than Significant Impact
b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No Impact	None required	No Impact
c. Would the project have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the	No Impact	None required	No Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			
d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Potentially Significant Impact	**MM-BIO-1** Prior to the issuance of a demolition, grading, and/or building permit for activities during the avian nesting season (generally February through August), a qualified biologist shall conduct a nesting bird survey within 7 days of vegetation clearing, cutting, or removal activities. The survey would consist of full coverage of the proposed project footprint and an appropriate buffer, as determined by the biologist. If no active nests are discovered or identified, no further mitigation is required. In the event that active nests are discovered on site, a suitable buffer determined by the biologist (e.g., 30 to 50 feet for passerines) shall be established around any active nest. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Limits of construction to avoid a nest shall be established in the field by the biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The results of the survey shall be documented and filed with the City of Montclair within 5 days after the survey.	Less Than Significant Impact
e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less Than Significant Impact	None required	Less Than Significant Impact
f. Would the project conflict with the provisions of an	No Impact	None required	No Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			
Would the project have a cumulative biological resources impact?	Less Than Significant Impact	None required	Less Than Significant Impact
Cultural Resources			
a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines?	Less Than Significant Impact	None required	Less Than Significant Impact
b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines?	Potentially Significant Impact	**MM-CR-1** In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, shall evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find as determined by the archaeologist, the archaeologist may decide to record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted. Preservation in place shall be the preferred means of mitigation, if determined to be feasible by the archaeologist and the City.	Less Than Significant Impact
c. Would the project disturb any human remains, including those interred	Less Than Significant Impact	None required	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
outside of formal cemeteries?			
Would the project have a cumulative cultural resources impact?	Less Than Significant Impact	None required	Less Than Significant Impact
Energy			
a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	Potentially Significant	**MM-AQ-1, MM-AQ-4** through **MM-AQ-7** **MM-GHG-1 Water Conservation.** The following water conservation measures into Proposed Project building plans: a) Install low-water use appliances and fixtures b) Restrict the use of water for cleaning outdoor surfaces and prohibit systems that apply water to non-vegetated surfaces c) Implement water-sensitive urban design practices in new construction d) Install rainwater collection systems where feasible.	Less Than Significant Impact
b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have a cumulative energy impact?	Less Than Significant Impact	None required	Less Than Significant Impact
Geology and Soils			
A. Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a	Less Than Significant Impact	None required	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
known fault? Refer to Division of Mines and Geology Special Publication 42.			
ii. Strong seismic ground shaking?	Less Than Significant Impact	None required	Less Than Significant Impact
iii. Seismic-related ground failure, including liquefaction?	Less Than Significant Impact	None required	Less Than Significant Impact
iv. Landslides?	Less Than Significant Impact	None required	Less Than Significant Impact
b. Would the project result in substantial soil erosion or the loss of topsoil?	Less Than Significant Impact	None required	Less Than Significant Impact
c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less Than Significant Impact	None required	Less Than Significant Impact
d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less Than Significant Impact	None required	Less Than Significant Impact
e. Would the project have soils	No Impact	None required	No Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			
f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant	**MM-GEO-1** In the event that paleontological resources (fossil materials) are exposed during construction activities for the Proposed Project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology, can assess the nature and importance of the find. Depending upon the significance of the find, the paleontologist may record the find and allow work to continue, or may recommend salvage and recovery of the resource. All recommendations will be made in accordance with the Society of Vertebrate Paleontology's 1995 guidelines and shall be subject to review and approval by the City. Work in the area of the find may only resume upon approval of a qualified paleontologist.	Less Than Significant Impact
Would the project have a cumulative geology and soils impact?	Less Than Significant Impact	None required	Less Than Significant Impact
Greenhouse Gas Emissions			
a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Potentially Significant Impact	**MM-AQ-1** and **MM-AQ-4** through **MM-AQ-7** **MM-GHG-1 Water Conservation.** The following water conservation measures into Proposed Project building plans: a) Install low-water use appliances and fixtures b) Restrict the use of water for cleaning outdoor surfaces and prohibit systems that apply water to non-vegetated surfaces c) Implement water-sensitive urban design practices in new construction d) Install rainwater collection systems where	Significant and Unavoidable Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		feasible. **MM-GHG-2 Solid Waste Reduction.** Provide storage areas for recyclables and green waste in new construction, and food waste storage, if a pick-up service is available.	
b. Would the project conflict with a plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Potentially Significant Impact	**MM-AQ-1** and **MM-AQ-4** through **MM-AQ-7** **MM-GHG-1** **MM-GHG-2**	Significant and Unavoidable Impact
Would the project have a cumulative impact on greenhouse gas emissions?	Potentially Significant Impact	**MM-AQ-1** and **MM-AQ-4** through **MM-AQ-7** **MM-GHG-1** **MM-GHG-2**	Significant and Unavoidable Impact
Hazards and Hazardous Materials			
a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact	**MM-HAZ-1** Prior to the issuance of demolition permits for any buildings or structures that would be demolished in conjunction with individual development projects that would be accommodated by the Montclair Place District Specific Plan, the project applicant/developer shall conduct the following inspections and assessments for all buildings and structures on site and shall provide the City of Montclair Building Official with a copy of the report of each investigation or assessment. 1. The project applicant shall retain a California Certified Asbestos Consultant (CAC) to perform abatement project planning, monitoring (including air monitoring), oversight, and reporting of all asbestos-containing materials (ACM) encountered. The abatement, containment, and disposal of all ACM shall be conducted in accordance with the South Coast Air Quality Management District's Rule 1403 and California Code of Regulation Title 8, Section 1529 (Asbestos). 2. The project applicant shall retain a licensed or certified lead inspector/assessor to conduct the abatement, containment, and disposal of all lead waste encountered. The	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		contracted lead inspector/assessor shall be certified by the California Department of Public Health (CDPH). All lead abatement shall be performed by a CDPH-certified lead supervisor or a CDPH-certified worker under the direct supervision of a lead supervisor certified by CDPH. The abatement, containment, and disposal of all lead waste encountered shall be conducted in accordance with the US Occupational Safety and Health Administration Rule 29, CFR Part 1926, and California Code of Regulation, Title 8, Section 1532.1 (Lead). **3.** Evidence of the contracted professionals attained by the project applicant shall be provided to the City of Montclair Community Development Department. Additionally, contractors performing ACM and lead waste removal shall provide evidence of abatement activities to the City of Montclair Community Development Department and to the South Coast Air Quality Management District.	
b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Potentially Significant Impact	**MM-HAZ-1**	Less Than Significant Impact
c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less Than Significant Impact	None required	Less Than Significant Impact
d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to	Potentially Significant Impact	**MM-HAZ-1**	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?			
e. Would the project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	Less Than Significant Impact	None required	Less Than Significant Impact
f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less Than Significant Impact	None required	Less Than Significant Impact
g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have a cumulative impact related to hazards and hazardous materials?	Potentially Significant Impact	**MM-HAZ-1**	Less Than Significant Impact
Hydrology and Water Quality			
a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or	Potentially Significant Impact	**MM-HAZ-1** **MM-HYD-1** Prior to issuance of a grading permit by the City of Montclair Public Works Department for individual projects within the Specific Plan area, a Storm Water Pollution Prevention Plan (SWPPP) shall be developed. The SWPPP	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
ground water quality?		shall be implemented during Project grading, excavations, and construction. The following list includes, but is not limited to, examples of construction water quality Best Management Practices (BMPs) that are standard for most construction sites subject to the Construction General Permit: a) Silt fences and/or fiber rolls installed along limits of work and/or the Project construction site; b) Stockpile containment and exposed soil stabilization structures (e.g., visqueen plastic sheeting, fiber rolls, gravel bags and/or hydroseed); c) Runoff control devices (e.g., fiber rolls, gravel bag barriers/chevrons, etc.) used during construction phases conducted during the rainy season; d) Wind erosion (dust) controls; e) Tracking controls at the site entrance, including regular street sweeping and tire washes for equipment; f) Prevention of fluid leaks (inspections and drip pans) from construction vehicles; g) Materials pollution management; h) Proper waste/trash management; and i) Regular inspections and maintenance of BMPs. These BMPs shall be refined and/or added to as necessary by a Construction General Permit SWPPP Practitioner (QSP) and/or Qualified SWPPP Developer (QSD), as certified by the California Stormwater Quality Association, to meet the performance standards in the Construction General Permit. **MM-HYD-2** Prior to issuance of a building permit by the City of Montclair Public Works Department for individual projects within the Plan area, the Applicant shall include operational non-structural BMPs to address water quality impacts as part of the proposed Business Plan. These BMPs shall be annually inspected by the City NPDES Coordinator for compliance with the regional NPDES permit and Montclair Storm Water Ordinance. These operational BMPs shall include, but not be limited to:	

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		a) Regular sweeping of all open and planter areas, at a minimum, on a weekly basis in order to prevent dispersal of pollutants that may collect on those surfaces; b) Regular pruning of the trees and shrubs in the planter areas to avoid formation of dried leaves and trigs, which can clog surface inlets and drains; c) Use of trash and recycling containers that, if located outside, are fully enclosed and watertight in order to prevent contact of stormwater with wastewater, which can be a potential source of bacteria and other pollutants in runoff; d) Provide educational training materials for the property owners, such that the owners are aware of the structural BMPs installed in the Plan area, and their maintenance requirements; e) Provide materials to brief property owners about chemical management and proper methods of handling and disposing of wastes; and f) Minimization of pesticide and fertilizer use, to the maximum extent practicable, with on-site landscaping.	
b. Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	Less Than Significant Impact	None required	Less Than Significant Impact
c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			
i. result in substantial erosion or siltation on- or off-site?	Potentially Significant Impact	**MM-HYD-1** **MM-HYD-2**	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?	Potentially Significant Impact	**MM-HYD-1** **MM-HYD-2**	Less Than Significant Impact
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Potentially Significant Impact	**MM-HYD-1** **MM-HYD-2**	Less Than Significant Impact
iv. impede or redirect flood flows?	No Impact	None required	No Impact
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less Than Significant Impact	None required	Less Than Significant Impact
e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have a cumulative hydrology or water quality impact?	Potentially Significant Impact	**MM-HYD-1** **MM-HYD-2**	Less Than Significant Impact
Land Use and Planning			
a. Would the project physically divide an established community?	Less Than Significant Impact	None required	Less Than Significant Impact
b. Would the project cause a significant environmental impact due to a	Less Than Significant Impact	None required	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			
Would the project have a cumulative land use and planning impact?	Less Than Significant Impact	None required	Less Than Significant Impact
Noise			
a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less Than Significant Impact	None required	Less Than Significant Impact
b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant Impact	None required	Less Than Significant Impact
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or	Less Than Significant Impact	None required	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
public use airport, would the project expose people residing or working in the project area to excessive noise levels?			
Would the project have a cumulative noise impact?	Less Than Significant Impact	None required	Less Than Significant Impact
Population and Housing			
a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Potentially Significant	**MM-AES-1** **MM-AQ-1** through **MM-AQ-9** **MM-GHG-1** **MM-GHG-2** **MM-HAZ-1** **MM-HYD-1** **MM-HYD-2** **MM-PUB-1** (See Public Services Section of this Table) **MM-TCR-1** through **MM-TCR-2** (See Tribal Cultural Resources Section of this Table)	Significant and Unavoidable Impact
b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact	None required	No Impact
Would the project have a cumulative impact on population and housing?	Potentially Significant	**MM-AES-1** **MM-AQ-1** through **MM-AQ-9** **MM-GHG-1** **MM-GHG-2** **MM-HAZ-1** **MM-HYD-1** **MM-HYD-2** **MM-PUB-1** (See Public Services Section of this Table) **MM-TCR-1** through **MM-TCR-2** (See Tribal Cultural Resources Section of this Table)	Significant and Unavoidable Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Public Services			
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:			
Fire protection?	Potentially Significant Impact	**MM-PUB-1** Future development within the MPDSP area shall adhere to State and local law, including the California Code of Regulations, Title 24 (fire Code) and PRC 21157.1. As such, applicants of all future development within the MPDSP area shall be required to provide applicable in-lieu impact fees towards the City's fire protection services, as deemed necessary, in an effort to reduce any potential project-specific impacts to fire protection services.	Less Than Significant Impact
Police protection?	Less Than Significant Impact	None required	Less Than Significant Impact
Schools?	Less Than Significant Impact	None required	Less Than Significant Impact
Parks?	Potentially Significant Impact	None available	Significant and Unavoidable Impact
Other public facilities?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have cumulative public services impacts?	Potentially Significant Impact	**MM-PUB-1**	Significant and Unavoidable Impact
Recreation			
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Potentially Significant Impact	None available	Significant and Unavoidable Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
b. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Potentially Significant Impact	None available	Significant and Unavoidable Impact
Would the project have a cumulative impact on recreation?	Potentially Significant Impact	None available	Significant and Unavoidable Impact
Transportation			
a. Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less Than Significant Impact	None required	Less Than Significant Impact
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Less Than Significant Impact	None required	Less Than Significant Impact
c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant	None available	Significant and Unavoidable Impact
d. Would the project result in inadequate	Less Than Significant Impact	None required	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
emergency access?			
Would the project have cumulative impacts on transportation and traffic?	Potentially Significant	None available	Significant and Unavoidable Impact
Tribal Cultural Resources			
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	Less Than Significant Impact	None required	Less Than Significant Impact
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Potentially Significant	**MM-TCR-1** Prior to the issuance of any grading permit for the Proposed Project, the City of Montclair (City) shall ensure that the Project applicant retain the services of a Tribal monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation for Native American monitoring during ground-disturbing activities. This provision shall be included on Proposed Project plans and specifications. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or augering, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Plan area shall be made accessible to the monitor(s), provided adequate notice is given to the construction contractor and that a construction safety hazard does not occur. The monitor(s) shall be approved by the Gabrieleño Band of Mission Indians-Kizh Nation and shall be present on	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		site during the construction phases that involve any ground-disturbing activities. The monitor(s) shall possess Hazardous Waste Operations and Emergency Response (HAZWOPER) certification. In addition, the monitor(s) shall be required to provide insurance certificates, including liability insurance, for any tribal cultural resources and/or archaeological resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act (CEQA), California Public Resources Code (PRC) Division 13, Section 21083.2 (a) through (k). If evidence of any tribal cultural resources is found during ground-disturbing activities, the monitor(s) shall have the capacity to halt construction in the immediate vicinity of the find to recover and/or determine the appropriate plan of recovery for the resource. The recovery process shall not unreasonably delay the construction process. Construction activity shall not be contingent on the presence or availability of a monitor, and construction may proceed regardless of whether or not a monitor is present on site. The monitor shall complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Plan area grading and excavation activities are completed or when the monitor has indicated that the site has a low potential for tribal cultural resources and/or archaeological resources. **MM-TCR-2** All tribal cultural resources and/or archaeological resources unearthed by Proposed Project construction activities shall be evaluated by the qualified archaeologist and Native American monitor approved by the Gabrieleño Band of Mission Indians-Kizh	

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		Nation. Upon discovery of any archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. Construction work shall be permitted to continue on other parts of the Plan area while evaluation and, if necessary, preservation measures take place (State CEQA Guidelines Section15064.5 [f]). If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation tribe shall coordinate with the landowner regarding treatment and curation of these resources. If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures shall be made available through coordination between the Gabrieleño Band of Mission Indians-Kizh Nation and the Project applicant. The treatment plan established for the resources shall be in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5(f) for historical resources and Public Resources Code (PRC) Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.	
Would the project have cumulative impacts on tribal cultural resources?	Potentially Significant Impact	**MM-TCR-1** **MM-TCR-2**	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Utilities and Service Systems			
a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less Than Significant Impact	**MM-UTIL-1** Prior to issuance of a grading permit by the City of Montclair Public Works Department for individual projects within Phases E through G of the Specific Plan area, the Applicant shall demonstrate that Southern California Edison has sufficient infrastructure capacity to accommodate the electric power requirements for completion of each Specific Plan phase. In the event such infrastructure is not available, the environmental impacts associated with installation of such infrastructure shall be evaluated in project-specific California Environmental Quality Act documents. **MM-UTIL-2** Prior to issuance of a grading permit by the City of Montclair Public Works Department for individual projects within Phases E through G of the Specific Plan area, the Applicant shall demonstrate that the Specific Plan area telecommunication provider has sufficient infrastructure capacity to accommodate the telecommunication requirements for completion of each Specific Plan phase. In the event such infrastructure is not available, the environmental impacts associated with installation of such infrastructure shall be evaluated in project-specific California Environmental Quality Act documents.	Less Than Significant Impact
b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less Than Significant Impact	None required	Less Than Significant Impact
c. Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity	Less Than Significant Impact	None required	Less Than Significant Impact

Table 4-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
to serve the project's projected demand in addition to the provider's existing commitments?			
d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less Than Significant Impact	None required	Less Than Significant Impact
e. Would the project comply with federal, state, and local statutes and regulations related to solid waste?	Less Than Significant Impact	None required	Less Than Significant Impact
Would the project have cumulative public services and/or utilities impacts?	Less Than Significant Impact	None required	Less Than Significant Impact

4.2 ALTERNATIVES CARRIED FORWARD FOR CONSIDERATION

Pursuant to Section 15126.6 of the State CEQA Guidelines, the City selected a reasonable range of alternatives to the Proposed Project that would feasibly attain most of the basic objectives of the Proposed Project but would avoid or substantially lessen one or more of the significant effects of the Proposed Project. Each of the selected alternatives is described below. Pursuant to Section 15126.6(d) of the State CEQA Guidelines, these descriptions include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives is required to focus on alternatives to the

project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. As such, the four alternatives presented below would all avoid or substantially lessen at least one of the significant impacts of the Proposed Project that have been identified in Chapter 3 of this EIR.

4.2.1 Alternative 1 – No Project/No Build Alternative

The No Project Alternative is included pursuant to the requirements of CEQA and the State CEQA Guidelines. Under the No Project/No Build Alternative, it is assumed that the Proposed Project would not be approved and no development would occur.

Ability to Meet Proposed Amendment Objectives

While this alternative means that no new development would occur in the planning area, and therefore, greater environmental impacts would be avoided, none of the objectives of the Proposed Project would be achieved.

The environmental impacts of this alternative are briefly discussed below, along with a comparison of impacts with the Proposed Project.

Comparison of the Effects of Alternative 1 to the Proposed Project

Aesthetics

Scenic vistas are publicly accessible viewpoints that provide views of areas from a project site and onto a project site that exemplify a community's environment (i.e., scenic resources). There are no designated scenic vistas from public vantage points in the planning area. There are no scenic views from area roadways or other vantage points within the surrounding area onto the Plan area. Views from public areas near the planning area are dominated by commercial and residential development. However, views of the San Gabriel Mountains are available to the north, which can be particularly prominent visual features under optimal atmospheric conditions. Alternative 1 includes continuation of the existing conditions within the Plan area; no new development would occur. As such, no impacts with regard to scenic vistas would occur under Alternative 1, and impacts would be similar to the Proposed Project.

There are no officially designated state scenic highways, as identified by the California Scenic Highway Program (Caltrans 2011). Additionally, the City contains no scenic highway corridors (City of Montclair 1999). Therefore, Alternative 1 would not damage scenic resources within a state scenic highway, and impacts would be similar to the Proposed Project.

To ensure that both current and future development within the City is designated and constructed to conform to existing visual character and quality of the surrounding built environment, the Title 11, Zoning and Development, of the City's municipal code includes design standards specific to each Zoning District related to building height, parking, landscaping requirements, and other visual considerations. Under the existing conditions, development within the Plan area is required to conform to these regulations. Therefore, Alternative 1 would not conflict with applicable zoning and other regulations governing scenic quality, and impacts would be similar to the Proposed Project.

Currently there are numerous sources of nighttime lighting on the Plan area and in the surrounding areas, including nighttime lighting from the existing Montclair East Shopping Center, located east of the Plan area; nighttime lighting from retail, single-family and multi-family residential properties north of the Plan area; nighttime lighting from single-family and multi-family residential properties, retail uses, the Unitarian Universalist Congregation and International Montessori School, and Moreno Elementary School west of the Plan area; and the I-10 Freeway and commercial uses south of the Plan area. Alternative 1 includes continuation of the existing conditions within the Plan area; no new development would occur. As such, no impacts with regard to lighting and glare would occur under Alternative 1, and impacts would be less than the Proposed Project, which identified impacts associated with lighting and would be less than significant with mitigation.

Therefore, overall aesthetic impacts associated with Alternative 1 would be less than significant. These impacts would be less than the Proposed Project, which would be less than significant with mitigation.

Air Quality

As described below Alternative 1 would potentially result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and would potentially conflict with Consistency Criterion No. 1. Implementation of Alternative 1 would not exceed the demographic growth forecasts in the SCAG 2020 RTP/SCS; therefore, Alternative 1 would be consistent with the SCAQMD 2016 AQMP, which based future emission estimates on the SCAG 2020 RTP/SCS. Thus, Alternative 1 would not conflict with Consistency Criterion No. 2. However, because Alternative 1 would conflict with Consistency Criterion No. 1, impacts related to the potential to conflict with or obstruct implementation of the applicable air quality plan would be significant and unavoidable, similar to the Proposed Project.

Alternative 1 would not involve construction; therefore, criteria pollutant emissions would only be associated with operation of the alternative. Operation of Alternative 1 would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips; area sources,

including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources, including combustion of fuels used for space and water heating. As discussed in Section 3.2.3.2, Approach and Methodology (Operational Emissions), pollutant emissions associated with long-term operation of the Proposed Project and the Existing Scenario were quantified using CalEEMod. Mobile source emissions were estimated in CalEEMod based on project-specific trip rates. CalEEMod default values were used to estimate emissions from area and energy sources for both the Proposed Project and Existing Scenario. Table 3.2-11 in Section 3.2, Air Quality, presents the maximum daily area, energy, and mobile source emissions associated with operation of the Existing Scenario in 2020. As shown in Table 3.2-11, the Existing Scenario would exceed the SCAQMD operational thresholds for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$; SOx emissions are not anticipated to exceed SCAQMD thresholds. Therefore, similar to the Proposed Project, impacts would be significant and unavoidable.

Alternative 1 would not involve construction; therefore, impacts to sensitive receptors would only be associated with operation of the alternative. Therefore, localized significance threshold (LST) and toxic air contaminant (TAC) impacts associated with construction would be avoided. Operational TAC impacts associated with the Proposed Project, would also be avoided because Alternative 1 would not result in the development of new residential and commercial land uses which may result in the generation of TACs. Because operation of Alternative 1 would result in exceedances of the SCAQMD significance thresholds for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$, the potential health impacts associated with criteria air pollutants are considered significant and unavoidable.

Land uses and industrial operations that typically are associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). Although Alternative 1 does not involve the construction or operation of the aforementioned odor-generating land uses, anticipated odors could be generated from existing retail land uses, including food-service odors. However, these existing uses are not generally considered sources of objectionable odors. Therefore, the potential for Alternative 1 to generate an odor impact is considered less than significant, similar to the Proposed Project.

Although significant and unavoidable impacts associated with operational criteria air pollutant emissions, and their impacts to sensitive receptors, would not be avoided, impacts associated with construction would be avoided. Additionally, significant and unavoidable LST and TAC impacts to sensitive receptors would be avoided, when compared to the Proposed Project.

Therefore, Alternative 1 would be less impactful to air quality than the Proposed Project, which would result in a significant an unavoidable impact.

Biological Resources

Under existing conditions, the Plan area is developed with commercial structures and surface parking lots. Planters with ornamental trees, shrubs, and grasses are scattered sparsely throughout the surface parking lots. The Plan area is entirely covered with impervious surfaces with the exception of the planters and two vacant dirt lots, one of which is located at the northeastern corner of the site and the other of which is located at the southwestern corner of the site. These vacant areas are small in size, are highly disturbed, and support minimal amounts of low-growing vegetation. Therefore, while the site contains some vegetation and small amounts of unpaved areas, the vegetation is ornamental in nature, and the Plan area is entirely surrounded with urban development. The site has been developed for approximately 45 years. As such, the minimal amounts of vegetation on the site and the two vacant, dirt areas would not likely serve as suitable habitat for wildlife. The Plan area and the project vicinity are highly urbanized with few natural areas that could support wildlife. For the above reasons, implementation of the Proposed Project and Alternative 1 is not expected to result in the removal of sensitive species and is not expected to directly impact sensitive species, since none are expected to be present on-site. As such, Alternative 1 would have a less-than-significant impact on sensitive or special-status species, similar to the Project. Additionally, because Alternative 1 would not result in construction, or removal of trees, Alternative 1 would not require mitigation to avoid impacts to migratory birds, unlike the Proposed Project. Impacts would be less than the Proposed Project.

Cultural Resources

Alternative 1 would not involve construction or grading activities, which could disturb cultural resources. Alternative 1 would not require mitigation to avoid impacts to archaeological resources, unlike the proposed project. Impacts would be less than the Proposed Project.

Energy Consumption

Alternative 1 would not involve construction; therefore, energy consumption would only be associated with operation of the alternative. Operation of Alternative 1 requires electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. As a conservative analysis, CalEEMod default values for electricity consumption for the Existing Scenario land uses were applied in this analysis (CAPCOA 2017). Tables 3.3-1, of Section 3.3, Energy Consumption, presents the electricity demand for the Existing Scenario. Existing land uses are estimated to have a total electrical demand of 30,423,442 kWh per year (or 30 million kWh per year) for facility usage and water/wastewater conveyance. Therefore, electricity demand would be less when compared to the Proposed Project. Alternative 1 would not involve the implementation of more modern and stringent building codes and energy standards, as

would the project. However, Alternative 1 would result in less energy consumption than the Project and impacts would be less than significant.

Natural gas consumption during operation is required for various purposes, including building heating and cooling. For building consumption, default natural gas generation rates in CalEEMod for the Proposed Project and Existing land uses and climate zone were used. Table 3.3-3 present the natural gas demand for the MPDSP, Existing, and the net change, respectively. As shown in Table 3.3-3, the Existing Scenario is estimated to consume approximately 30,176,403 kBtu per year. Therefore, natural gas demand would be less when compared to the Proposed Project, and impacts would be less than significant.

Fuel consumption associated with the existing condition is attributable to various vehicles associated with each land use. Petroleum fuel consumption associated with motor vehicles traveling within the City during operation is a function of VMT. Trip generation rates for the Existing Scenario were based on the Traffic Impact Analysis (TIA). Similar to construction worker and vendor trips, fuel consumption for operation was estimated by converting the total mobile source CO_2 emissions from the Existing land uses to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. The estimated fuel use from the Proposed Project and Existing Scenario land uses operational mobile sources is shown in Table 3.3-9. As depicted in Table 3.3-9, the Existing Scenario land use mobile sources would result in approximately 7,949,068 gallons of petroleum fuel usage per year. For disclosure, by comparison, California as a whole consumes approximately 28.7 billion gallons of petroleum per year (EIA 2019c). Over time, the fuel efficiency of the vehicles being used is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the plan site during operation would decrease over time. As detailed in Section 3.3.2, there are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles that combines the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. As such, operation of the Alternative 1 is expected to use decreasing amounts of petroleum over time due to advances in fuel economy. Therefore, petroleum demand would be less when compared to the Proposed Project, and impacts would be less than significant.

Alternative 1 would not involve new construction; and therefore, would not comply with the latest Title 24 standards. However, energy consumption under Alternative 1 would be less than the Proposed Project. Therefore, impacts to energy consumption under Alternative 1 would be less than the Proposed Project.

Geology and Soils

As previously discussed, previous soil explorations in the vicinity of the MPDSP area did not encounter groundwater to a depth of 50 feet bgs, and multiple well readings in the Proposed

Project vicinity suggest that groundwater levels are more than 400 feet bgs. In addition, neither the CGS nor the County of San Bernardino determined that the MPDSP area is in a zone of liquefaction. Alternative 1 would not increase or exacerbate the potential for liquefaction or lateral spreading to occur and, therefore, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismically-related ground failure. As such, impacts would be less than significant, and similar to the Project.

Alternative 1 would not increase the potential for liquefaction and lateral spreading. In addition, the project area is located on gently sloping ground, is not located near any unstable slopes, and is not susceptible to seismically-induced ground failure. Therefore, the potential impacts associated with liquefaction/lateral spreading and landslides would be less than significant, similar to the Project.

Expansive soils are clay-rich soils that shrink when dry and swell when wet. This change in volume can exert substantial pressure on foundations, resulting in structural distress and/or damage. Soils in the vicinity of the plan site are generally comprised of medium dense to dense alluvial sands and silty sands, which typically lack substantial amounts of clay, and thus are usually not conducive to soil expansion. Similar to the Project, Alternative 1 would not increase or exacerbate the potential for expansive soils to occur and would not create substantial direct or indirect risks to life or property. As such, impacts would be less than significant. No mitigation is required.

Therefore, impacts to geology and soils under Alternative 1 would be similar to the Proposed Project, which would result in a less than significant impact.

Greenhouse Gas Emissions

Alternative 1 would not involve construction; therefore, criteria pollutant emissions would only be associated with operation of the alternative. Operation under the Existing Scenario would generate GHG emissions through motor vehicle trips; landscape maintenance equipment operation (area source); energy use (natural gas and electricity); solid waste disposal; and water supply, treatment, and distribution and wastewater treatment. CalEEMod was used to calculate the annual GHG emissions based on the operational assumptions described in Section 3.5.3.2, Approach and Methodology (Operational Emissions). The estimated operational Proposed Project-generated and Existing Scenario GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, and water usage and wastewater generation, and the net change in emissions (Proposed Project minus the Existing Scenario) are shown in Table 3.5-4. As shown in Table 3.5-4, the Existing Scenario is estimated to generate 81,226 MT CO2e per year. As such, annual operational GHG emissions would exceed the SCAQMD threshold of 3,000 MT CO2e per year.

Although the Project would generate more GHG emissions when compared to Alternative 1, GHG contributions under Alternative 1 would be cumulatively considerable and impacts would be significant and unavoidable, similar to the Proposed Project.

Hazards and Hazardous Materials

Alternative 1 would not involve construction and therefore would not require mitigation to prevent the release of lead and asbestos or to ensure that hazards on the construction site are managed appropriately, which would be required for the Project.

Similar to the Project, routine operation of Alternative 1 would include the use of various hazardous materials, including chemical reagents, solvents, fuels, paints, and cleansers. These materials would be used for building and grounds maintenance. Many of the hazardous materials used for building and grounds maintenance would be considered household hazardous wastes and/or universal wastes by the EPA, which regards these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment relative to other hazardous wastes, when they are properly stored, transported, used, and disposed of in accordance with local, state, and federal laws.

Therefore, similar to the Project, hazards and hazardous materials impacts under Alternative 1 would be less than significant.

Hydrology and Water Quality

Alternative 1 would not involve construction and therefore would not require mitigation to prevent erosion-induced siltation of downstream drainages and incidental spills of petroleum products, which would be required for the Project. Similarly, since Alternative 2 would remain in the existing condition, it would not meet the definition of a redevelopment project, and thus, would not be required to control pollutants, pollutant loads, and runoff volume emanating from the Plan area by: (1) minimizing the impervious surface area and implementing source control measures, (2) controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention and/or rainfall harvest and re-use), and (3) ensuring all structural BMPs are monitored and maintained. Therefore, mitigation would not be required, as is required for the Project.

Similar to the Proposed Project, Alternative 1 does not propose to directly extract groundwater during the construction or operation of the Proposed Project, and no direct adverse impacts to groundwater are expected to occur. MVWD uses groundwater as a part of its supply resources. However, water demand would remain the same as the existing condition. As such, Alternative 1 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the alternative may impede sustainable groundwater basin

management of the basin. However, Alternative 1 would consume less groundwater when compared to the Project.

Therefore, impacts to hydrology and water quality under Alternative 1 would be similar to the Proposed Project, which would result in a less than significant impact.

Land Use and Planning

Alternative 1 would not result in a change from the existing conditions, and thus would be consistent with existing land use plans. Alternative 1 would be consistent with the underlying assumptions in the SCAG 2020-2045 RTP/SCS.

Therefore, the Alternative 1 would be less impactful to land use and planning as compared to the Proposed Project, which would result in a less than significant impact.

Noise

Alternative 1 would not involve construction, and therefore, would not result in construction noise impacts. In addition, traffic noise would remain the same as the existing condition, and sensitive noise receptors immediately surrounding the plan site would not be exposed to additional noise. Furthermore, the existing land uses do not feature major on-site producers of groundborne vibration.

Cable Airport is located approximately 1.44 miles northeast of the Plan area. However, the Plan area is not located within Cable Airport's safety zone area. According to the ONT ALUCP Compatibility Policy Map 2-3, the Plan area is not located within a noise impact zone (City of Ontario 2011). Therefore, Alternative 1 would not expose people residing or working in the project area to excessive aviation traffic noise levels.

Therefore, noise impacts under Alternative 1 would be less when compared to the Proposed Project, which would result in a less than significant impact.

Population and Housing

Alternative 1 would not result in additional population, housing, or employment growth, because the existing land uses would be retained. The Proposed Project would exceed the SCAG population, housing, and employment growth projections for the City.

Therefore, impacts to population and housing under Alternative 1 would be less when compared to the Proposed Project, which would result in a significant and unavoidable impact.

Public Services

Alternative 1 would not result in additional population growth to the area, because existing conditions would be retained. Alternative 1 would not create additional demand for public services.

Therefore, impacts to public services under Alternative 1 would be less than the Proposed Project, which would result in a significant and unavoidable impact.

Recreation

Alternative 1 would not result in additional population growth to the area, because existing conditions would be retained. Alternative 1 would not create additional demand for parks, and impacts would be less than the Proposed Project.

Therefore, impacts to recreation under Alternative 1 would be less than the Proposed Project, which would result in a significant and unavoidable impact.

Transportation

While off-ramp queues during the AM peak hour exceed some of the storage pocket lengths, the total lengths of the off-ramps (stop bar at intersection to gore point at mainline lane) provide adequate storage, and queues would not extend into the mainline freeway lanes during the existing condition. However, during the PM peak hour, the westbound off-ramp queues at Central Avenue/I-10 westbound ramps exceed the total ramp length by approximately 187 feet. As PM peak hour 95th percentile queue extends into the I-10 mainline lanes at Central Avenue/I-10 westbound ramps in the existing condition, queueing along this off-ramp has the potential to impact mainline operations. Alternative 1 would result in an impact to the Central Avenue/I-10 westbound ramps. However, the Proposed Project would result in additional impacts to Central Avenue/I-10 eastbound ramps in the AM and PM peak hour in the existing plus project condition.

Therefore, impacts to transportation systems under Alternative 1 would be less than the Proposed Project which would result in a significant and unavoidable impact.

Tribal Cultural Resources

Alternative 1 would not involve construction, and therefore, would not result in impacts to tribal cultural resources.

Therefore, impacts to tribal cultural resources under Alternative 1 would be less than the Proposed Project, which would result in a less than significant impact with mitigation.

Utilities and Service Systems

Alternative 1 would not result in additional potable water demand, wastewater generation, solid waste generation, and would not require upgrades to electric, natural gas, and telecommunication facilities, because no new development would occur.

Therefore, impacts to utilities and service systems under Alternative 1 would be less than the Proposed Project, which would result in a less than significant impact.

4.2.2 Alternative 2 – No Project/Existing Planned Development Alternative

The No Project/Existing Planned Development Alternative assumes that additional development could occur, as long as the development is consistent with the current General Plan Land Use designations and zoning designations.

Ability to Meet Proposed Amendment Objectives

Under the No Project/Existing Planned Development Alternative, none of the objectives of the Proposed Project would be achieved. The environmental impacts of this alternative are briefly discussed below, along with a comparison of impacts with the Proposed Project.

Comparison of the Effects of Alternative 2 to the Proposed Project

Aesthetics

Scenic vistas are publicly accessible viewpoints that provide views of areas from a project site and onto a project site that exemplify a community's environment (i.e., scenic resources). There are no designated scenic vistas from public vantage points in the planning area. There are no scenic views from area roadways or other vantage points within the surrounding area onto the Plan area. Views from public areas near the planning area are dominated by commercial and residential development. However, views of the San Gabriel Mountains are available to the north, which can be particularly prominent visual features under optimal atmospheric conditions. However, due to the brief duration of increased view blockage to the San Gabriel Mountains along the Plan area frontage of the I-10 freeway, the presence of existing development, and the lack of scenic designation of the I-10 freeway, future redevelopment of the Plan area associated with Alternative 2 would not result in a substantial adverse effect on a scenic vista, and impacts would be similar to the Proposed Project. The C-3 zoning designation has a maximum building height of six stories according to the City’s municipal code; however, it is assumed that buildout of Alternative 2 would be consistent with the surrounding development in the area, which consists of one-story commercial buildings.

There are no officially designated state scenic highways, as identified by the California Scenic Highway Program (Caltrans 2011). Additionally, the City contains no scenic highway corridors (City of Montclair 1999). Therefore, Alternative 2 would not damage scenic resources within a state scenic highway, and impacts would be similar to the Proposed Project.

To ensure that both current and future development within the City is designated and constructed to conform to existing visual character and quality of the surrounding built environment, the Title 11, Zoning and Development, of the City's municipal code includes design standards specific to each Zoning District related to building height, parking, landscaping requirements, and other visual considerations. Under the Alternative 2, development within the Plan area is required to conform to these regulations. Therefore, Alternative 2 would not conflict with applicable zoning and other regulations governing scenic quality, and impacts would be similar to the Proposed Project.

Currently there are numerous sources of nighttime lighting on the Plan area and in the surrounding areas, including nighttime lighting from the existing Montclair East Shopping Center, located east of the Plan area; nighttime lighting from retail, single-family and multi-family residential properties north of the Plan area; nighttime lighting from single-family and multi-family residential properties, retail uses, the Unitarian Universalist Congregation and International Montessori School, and Moreno Elementary School west of the Plan area; and the I-10 Freeway and commercial uses south of the Plan area. Alternative 2 could involve new development consistent with existing zoning and land use designations. To ensure that no new impacts would occur as part of this development, mitigation similar to the Proposed Project (MM-AES-1) would be required. Therefore, Alternative 2 would result in similar impacts to the Proposed Project.

Therefore, overall aesthetic impacts associated with Alternative 2 would be similar to the Proposed Project, and impacts would be less than significant with mitigation incorporated.

Air Quality

As described below Alternative 2 would potentially result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and would potentially conflict with Consistency Criterion No. 1. Implementation of Alternative 2 would be consistent with existing zoning and land use designations for the Plan area, and would not exceed the demographic growth forecasts in the SCAG 2020 RTP/SCS; therefore, Alternative 2 would be consistent with the SCAQMD 2016 AQMP, which based future emission estimates on the SCAG 2020 RTP/SCS. Thus, Alternative 2 would not conflict with Consistency Criterion No. 2. However, because Alternative 2 would conflict with Consistency Criterion No. 1, impacts related to the potential to conflict with or

obstruct implementation of the applicable air quality plan would be significant and unavoidable, similar to the Proposed Project.

Alternative 2 would involve construction; however, because Alternative 2 could involve several different buildout scenarios, it is unclear whether construction criteria air pollutant emissions would exceed SCAQMD thresholds. To provide a conservative analysis, it is assumed that criteria air pollutant emissions would not exceed construction SCAQMD thresholds for criteria air pollutant emissions. Operation of Alternative 2 would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips; area sources, including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources, including combustion of fuels used for space and water heating. As discussed in Section 3.2.3.2, Approach and Methodology (Operational Emissions), pollutant emissions associated with long-term operation of the Proposed Project and the Existing Scenario were quantified using CalEEMod. Mobile source emissions were estimated in CalEEMod based on project-specific trip rates. CalEEMod default values were used to estimate emissions from area and energy sources for both the Proposed Project and Existing Scenario. Table 3.2-11 in Section 3.2, Air Quality, presents the maximum daily area, energy, and mobile source emissions associated with operation of the Existing Scenario in 2020. As shown in Table 3.2-11, the Existing Scenario would exceed the SCAQMD operational thresholds for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$; SOx emissions are not anticipated to exceed SCAQMD thresholds. Considering the existing condition results in operational criteria air pollutant emissions that exceed SCAQMD thresholds, it is assumed that any additional development, or slight changes in land uses would result in similar impacts. Therefore, similar to the Proposed Project, impacts would be significant and unavoidable.

Alternative 2 would involve construction; however, because Alternative 2 could involve several different buildout scenarios, it is unclear whether construction could result in significant LST and TAC impacts. To provide a conservative analysis, it is assumed that construction of Alternative 2 would not result in LST or TAC impacts. Operational TAC impacts associated with the Proposed Project, may not be avoided because Alternative 2 would result in new commercial land uses which may result in the generation of TACs. Because operation of Alternative 2 would result in exceedances of the SCAQMD significance thresholds for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$, the potential health impacts associated with criteria air pollutants are considered significant and unavoidable. Land uses and industrial operations that typically are associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). Although Alternative 2 does not involve the construction or operation of the aforementioned odor-generating land uses, anticipated odors could be generated from retail land uses, including food-service odors. However, these existing uses are not generally considered sources of objectionable odors. Therefore, the potential for Alternative 2 to generate an odor impact is considered less than significant, similar to the Proposed Project.

Although significant and unavoidable impacts associated with operational criteria air pollutant emissions, and their impacts to sensitive receptors, would not be avoided, impacts associated with construction would be avoided. Additionally, significant and unavoidable LST and TAC impacts to sensitive receptors would be avoided, when compared to the Proposed Project.

Therefore, air quality impacts under Alternative 2 would be less than the Proposed Project, which would result in a significant and unavoidable impact.

Biological Resources

Under existing conditions, the Plan area is developed with commercial structures and surface parking lots. Planters with ornamental trees, shrubs, and grasses are scattered sparsely throughout the surface parking lots. The Plan area is entirely covered with impervious surfaces with the exception of the planters and two vacant dirt lots, one of which is located at the northeastern corner of the site and the other of which is located at the southwestern corner of the site. These vacant areas are small in size, are highly disturbed, and support minimal amounts of low-growing vegetation. Therefore, while the site contains some vegetation and small amounts of unpaved areas, the vegetation is ornamental in nature, and the Plan area is entirely surrounded with urban development. The site has been developed for approximately 45 years. As such, the minimal amounts of vegetation on the site and the two vacant, dirt areas would not likely serve as suitable habitat for wildlife. The Plan area and the project vicinity are highly urbanized with few natural areas that could support wildlife. For the above reasons, implementation of the Proposed Project and Alternative 2 is not expected to result in the removal of sensitive species and is not expected to directly impact sensitive species, since none are expected to be present on-site. As such, Alternative 2 would have a less-than-significant impact on sensitive or special-status species, similar to the Project. Additionally, because Alternative 2 would involve construction, and possibly removal of trees, Alternative 2 would require mitigation, similar to the Project, to avoid impacts to migratory birds. Impacts would be similar to the Proposed Project, less than significant with mitigation.

Cultural Resources

Alternative 2 would involve construction and grading activities, which could disturb cultural resources. Alternative 2 would require mitigation similar to the Proposed Project to avoid impacts to archaeological resources. Impacts would be similar to the Proposed Project, less than significant with mitigation.

Energy Consumption

Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers and heating, ventilation, and air conditioning) during

construction would be provided by SCE. The electricity used for construction activities would be temporary and minimal; therefore, impacts would be less than significant, similar to the Proposed Project. Operation of Alternative 2 would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. As a conservative analysis, CalEEMod default values for electricity consumption for the Proposed Project and Existing Scenario land uses were applied in this analysis (CAPCOA 2017). Tables 3.3-1 and 3.3-2 presents the electricity demand for the Proposed Project compared to the Existing Scenario. Operational electricity demand would involve development of new buildings, which would be more energy efficient when compared to the existing condition. However, the development intensity would be less when compared to the Project. Therefore, impacts would be less than significant and less than the Proposed Project.

Natural gas consumption during operation is required for various purposes, including building heating and cooling. For building consumption, default natural gas generation rates in CalEEMod for the Proposed Project and Existing land uses and climate zone were used. Table 3.3-3 present the natural gas demand for the MPDS, Existing, and the net change, respectively. Operational natural gas demand would involve development of new buildings, which would be more energy efficient when compared to the existing condition. However, the development intensity would be less when compared to the Project. Therefore, impacts would be less than significant and less than the Proposed Project.

Fuel consumption associated with Alternative 2 would be attributable to various vehicles associated with each land use. Petroleum fuel consumption associated with motor vehicles traveling within the City during operation is a function of VMT. Trip generation rates for the Proposed Project and Existing Scenario were based on the Traffic Impact Analysis (TIA). The estimated fuel use from the Proposed Project and Existing Scenario land uses operational mobile sources is shown in Table 3.3-9. As depicted in Table 3.3-9, mobile sources from the MPDSP would result in approximately a maximum of 9,406,161 gallons of petroleum fuel usage per year. The Existing Scenario land use mobile sources would result in approximately 7,949,068 gallons of petroleum fuel usage per year. For disclosure, by comparison, California as a whole consumes approximately 28.7 billion gallons of petroleum per year (EIA 2019c). Over time, the fuel efficiency of the vehicles being used is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the plan site during operation would decrease over time. As detailed in Section 3.3.2, there are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles that combines the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. As such, operation of Alternative 2 is expected to use decreasing amounts of petroleum over time due to advances in fuel economy. Therefore, petroleum demand would be less when compared to the Proposed Project, because the

development intensity would be less than the Proposed Project, and impacts would be less than significant.

Alternative 2 would result in less electricity, natural gas, and petroleum consumption when compared to the Proposed Project. Impacts would be less than the Proposed Project.

Geology and Soils

As previously discussed, previous soil explorations in the vicinity of the MPDSP area did not encounter groundwater to a depth of 50 feet bgs, and multiple well readings in the Proposed Project vicinity suggest that groundwater levels are more than 400 feet bgs. In addition, neither the CGS nor the County of San Bernardino determined that the MPDSP area is in a zone of liquefaction. Alternative 2 would not increase or exacerbate the potential for liquefaction or lateral spreading to occur and, therefore, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismically-related ground failure. As such, impacts would be less than significant, and similar to the Project.

Alternative 2 would not increase the potential for liquefaction and lateral spreading. In addition, the project area is located on gently sloping ground, is not located near any unstable slopes, and is not susceptible to seismically-induced ground failure. Therefore, the potential impacts associated with liquefaction/lateral spreading and landslides would be less than significant, similar to the Project.

Expansive soils are clay-rich soils that shrink when dry and swell when wet. This change in volume can exert substantial pressure on foundations, resulting in structural distress and/or damage. Soils in the vicinity of the plan site are generally comprised of medium dense to dense alluvial sands and silty sands, which typically lack substantial amounts of clay, and thus are usually not conducive to soil expansion. Similar to the Project, Alternative 2 would not increase or exacerbate the potential for expansive soils to occur and would not create substantial direct or indirect risks to life or property. As such, impacts would be less than significant. No mitigation is required.

Therefore, impacts to geology and soils under Alternative 2 would be similar to the Proposed Project, which would result in a less than significant impact.

Greenhouse Gas Emissions

Operation of Alternative 2 would generate GHG emissions through motor vehicle trips; landscape maintenance equipment operation (area source); energy use (natural gas and electricity); solid waste disposal; and water supply, treatment, and distribution and wastewater treatment. Annual operational GHG emissions would likely exceed the SCAQMD threshold of 3,000 MT CO2e per year, because although development would be less intensive than the Proposed Project, emissions would likely be

greater than the existing condition. GHG contributions under Alternative 2 would be cumulatively considerable and impacts would be significant and unavoidable.

Therefore, although GHG emissions would be less when compared to the Project, GHG impacts under Alternative 2 would be similar to the Proposed Project, because Alternative 2 would also result in a significant and unavoidable impact.

Hazards and Hazardous Materials

Alternative 2 would involve construction and therefore would require similar mitigation as the Proposed Project to prevent the release of lead and asbestos or to ensure that hazards on the construction site are managed appropriately.

Similar to the Project, routine operation of Alternative 2 would include the use of various hazardous materials, including chemical reagents, solvents, fuels, paints, and cleansers. These materials would be used for building and grounds maintenance. Many of the hazardous materials used for building and grounds maintenance would be considered household hazardous wastes and/or universal wastes by the EPA, which regards these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment relative to other hazardous wastes, when they are properly stored, transported, used, and disposed of in accordance with local, state, and federal laws. Similar to the Proposed Project, hazards and hazardous materials impacts under Alternative 2 would be less than significant.

Therefore, impacts to hazards and hazardous materials under Alternative 2 would be similar to the Proposed Project, which would result in a less than significant impact.

Hydrology and Water Quality

Alternative 2 would involve construction and therefore would require mitigation to prevent erosion-induced siltation of downstream drainages and incidental spills of petroleum products, which would be required for the Project. Similarly, since Alternative 2 would meet the definition of a redevelopment project, and thus, would be required to control pollutants, pollutant loads, and runoff volume emanating from the Plan area by: (1) minimizing the impervious surface area and implementing source control measures, (2) controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention and/or rainfall harvest and re-use), and (3) ensuring all structural BMPs are monitored and maintained. Therefore, mitigation would be required, as is required for the Project.

Similar to the Proposed Project, Alternative 2 does not propose to directly extract groundwater during the construction or operation of the Proposed Project, and no direct adverse impacts to groundwater are expected to occur. MVWD uses groundwater as a part of its supply resources.

Water demand could increase relative to the existing condition. However, it is likely that demand would be less when compared to the Project. As such, Alternative 2 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the alternative may impede sustainable groundwater basin management of the basin. However, Alternative 2 would consume less groundwater when compared to the Project.

Therefore, impacts to hydrology and water quality under Alternative 2 would be similar to the Proposed Project, which would result in a less than significant impact.

Land Use and Planning

Alternative 2 would not result in a change from the existing land use and planning designations, and thus would be consistent with existing land use plans. Alternative 2 would be consistent with the underlying assumptions in the SCAG 2020-2045 RTP/SCS.

Therefore, Alternative 2would be less impactful to land use and planning as compared to the Proposed Project, which would result in a less than significant impact.

Noise

Alternative 2 would involve construction; however, the intensity of development is anticipated to be less than the Project. Therefore, construction noise impacts would be less than significant, because the Project would result in a less than significant noise impact.

In addition, traffic noise would be less as compared to the Project. Table 3.9-9 of Section 3.9, Noise, shows that at all eight listed representative receivers, the addition of Proposed Project traffic to the roadway network would result in a CNEL increase of less than 3 dB, which is below the discernible level of change for the average healthy human ear. Therefore, traffic noise would also be less than the discernible level of change for the average healthy human ear.

Development consistent with existing land use designations for the plan site would not feature major on site producers of groundborne vibration.

Cable Airport is located approximately 1.44 miles northeast of the site. However, the site is not located within Cable Airport's safety zone area. According to the ONT ALUCP Compatibility Policy Map 2-3, the Plan area is not located within a noise impact zone (City of Ontario 2011). Alternative 2 would not expose people residing or working in the project area to excessive aviation traffic noise levels.

Therefore, noise impacts under Alternative 2 would be less than the Proposed Project, which would result in a less than significant impact.

Population and Housing

Alternative 2 could result in additional population, housing, or employment growth as compared to the existing condition. However, under the existing land use designation and zoning, no residential land uses would be constructed. The Proposed Project would exceed the SCAG population, housing, and employment growth projections for the City. Alternative 2 would result in less growth and would be less impactful when compared to the Proposed Project.

Therefore, impacts to population and housing under Alternative 2 would be less than the Proposed Project and the significant and unavoidable Project impacts would be avoided under Alternative 2.

Public Services

Alternative 2 could result in new development to the Plan area; however, new development would be consistent with existing zoning and land use designations for the site. Additional growth to the area could occur and would be associated with new employee growth. However, this would be substantially less growth than the proposed project, because Alternative 2 would not result in development of residential units. Therefore, Alternative 2 impacts to public services would be less than the Proposed Project.

Therefore, impacts to public services under Alternative 2 would be less than the Proposed Project and the significant and unavoidable Project impacts would be avoided under Alternative 2.

Recreation

Alternative 2 could result in new development to the Plan area; however, new development would be consistent with existing zoning and land use designations for the site. Additional growth to the area could occur and would be associated with new employee growth. However, this would be substantially less growth than the proposed project, because Alternative 2 would not result in development of residential units.

Therefore, impacts to park and recreational resources under Alternative 2 would be less than the Proposed Project and the significant and unavoidable Project impacts would be avoided under Alternative 2.

Transportation

While off-ramp queues during the AM peak hour exceed some of the storage pocket lengths, the total lengths of the off-ramps (stop bar at intersection to gore point at mainline lane) provide adequate storage, and queues would not extend into the mainline freeway lanes during the existing condition. However, during the PM peak hour, the westbound off-ramp queues at

Central Avenue/I-10 westbound ramps exceed the total ramp length by approximately 187 feet. As PM peak hour 95th percentile queue extends into the I-10 mainline lanes at Central Avenue/I-10 westbound ramps in the existing condition, queueing along this off-ramp has the potential to impact mainline operations. Because the existing condition results in these impacts, Alternative 2 would result in an impact to the Central Avenue/I-10 westbound ramps. However, the Proposed Project would result in additional impacts to Central Avenue/I-10 eastbound ramps in the AM and PM peak hour in the existing plus project condition.

Therefore, impacts to transportation systems under Alternative 2 would be less than the Proposed Project, which would result in a significant and unavoidable impact.

Tribal Cultural Resources

The Plan area is located in an urban, developed commercial and residential area. The Plan area and all surrounding properties have undergone disturbance previously resulting from development of the existing Mall and the commercial and residential uses that surround it. Construction of Alternative 2 would be developed on a site that has been subject to previous ground-disturbing activities, which greatly limits the potential for buried, unrecorded cultural resources to underlay the site. However, similar to the Project, mitigation would be required to help to ensure that, in the event of an unanticipated find of a significant tribal cultural resource, the resource is protected, researched, and potentially preserved (if subsequently deemed warranted) to maintain integrity and significance.

Therefore, impacts to tribal cultural resources under Alternative 1 would be similar to the Proposed Project, which would result in a less than significant impact with mitigation.

Utilities and Service Systems

As described in Section 3.15, MVWD has the opportunity to increase supply to meet future demands through the following measures: 1) production of groundwater based on safe yield allocation and utilization of water in storage; 2) increasing imported water purchases, if available and if there is available WFA capacity; and 3) purchasing additional recycled water, if available. Collectively, these additional options would enable water supply to exceed water demand for MVWD now and into the future, including sufficient water supply for Alternative 2. Lastly, compliance with the CALGreen Building Code would be required for new development. For redevelopment projects, this generally indicates that newly installed appliances and plumbing would be more efficient than those used within the structures originally located on redevelopment sites. In addition, CALGreen Building Code standards require a mandatory reduction in outdoor water use, in accordance with the DWR Model Water Efficient Landscape Ordinance. Due to water planning efforts and water conservation standards impacts would be less than significant, similar to the Project.

Similar to the Project, the existing sewer lines that serve the Proposed Project have the capacity to convey the estimated peak flow generated from the Project area. In the event that sewer upgrades are required, all construction work within the City public right-of-way would be subject to local municipal code requirements.

Development of Alternative 2 could increase land-use intensities in the area, resulting in increased solid waste generation in the service area for the Mid-Valley and San Timoteo Sanitary Landfills. However, solid waste is already being generated at the Plan area. Through compliance with City and state solid waste diversion requirements, impacts would be less than significant, similar to the Project.

Similar to the Project, all construction work of telecommunication tie-ins within the City public right-of-way would be subject to City municipal code requirements. Installation of new telecommunication lines and associated laterals would consist of either trenching to the depth of pipe placement or using a variety of different trenchless technology, both which could result in potential short-term erosion induced siltation of nearby waterways. Standard BMPs, installed as part of an NPDES-mandated SWPPP, would reduce potential water quality impacts to less-than-significant levels. As such, impacts associated with construction of telecommunication infrastructure would be less than significant, similar to the Project.

Therefore, impacts to utilities and service systems under Alternative 2 would be similar to the Proposed Project, which would result in a less than significant impact.

4.2.3 Alternative 3 – Reduced Residential Alternative

The Reduced Residential Alternative would result in a 15% reduction in residential units as compared to the Proposed Project. This alternative would result in a total of 5,496 residential units total, whereas the Project proposes 6,321 units.

Ability to Meet Proposed Amendment Objectives

Under the Reduced Residential Alternative, all of the objectives of the Proposed Project would be achieved, except the following:

- Account for an increase in the maximum number of dwelling units and additional commercial/office square footage allowable by the Plan. The maximum amounts envisioned by the Plan are approximately 6,321 dwelling units (5 million square feet of residential uses) and a total of 512,000 additional square feet of commercial/office uses.

The environmental impacts of this alternative are briefly discussed below, along with a comparison of impacts with the Proposed Project.

Comparison of the Effects of Alternative 3 to the Proposed Amendment

Aesthetics

Scenic vistas are publicly accessible viewpoints that provide views of areas from a project site and onto a project site that exemplify a community's environment (i.e., scenic resources). There are no designated scenic vistas from public vantage points in the planning area. There are no scenic views from area roadways or other vantage points within the surrounding area onto the Plan area. Views from public areas near the planning area are dominated by commercial and residential development. However, views of the San Gabriel Mountains are available to the north, which can be particularly prominent visual features under optimal atmospheric conditions. However, due to the brief duration of increased view blockage to the San Gabriel Mountains along the Plan area frontage of the I-10 freeway, the presence of existing development, and the lack of scenic designation of the I-10 freeway, future redevelopment of the Plan area associated with Alternative 3 would not result in a substantial adverse effect on a scenic vista, and impacts would be similar to the Proposed Project.

There are no officially designated state scenic highways, as identified by the California Scenic Highway Program (Caltrans 2011). Additionally, the City contains no scenic highway corridors (City of Montclair 1999). Therefore, Alternative 3 would not damage scenic resources within a state scenic highway, and impacts would be similar to the Proposed Project.

To ensure that both current and future development within the City is designated and constructed to conform to existing visual character and quality of the surrounding built environment, the Title 11, Zoning and Development, of the City's municipal code includes design standards specific to each Zoning District related to building height, parking, landscaping requirements, and other visual considerations. Under the existing conditions, development within the Plan area is required to conform to these regulations. However, the project as proposed includes the adoption of the MPDSP, which would create a new comprehensive policy framework to guide future development within the City. Chapter 5, Development Code, of the MPDSP includes a form-based zoning framework that would provide development standards (building height, setbacks, frontage requirements, on-site open space, parking placement and standards) and building design standards (massing, articulation, materials, openings, landscape, screening, signage, etc.). The chapter also provides subdivision and block size requirements and standards for streetscape, landscape, hardscape, and public art that occurs within public streets and publicly accessible parks, plazas, and greens. Alternative 3 would result in the development of the same form-based framework as the Proposed Project.

Upon approval, the new regulations outlined in the MPDSP Development Code would replace the underlying zoning regulations. All future development within the Plan area would be

required to conform to these regulations. According to the MDPSP, these standards were designed to regulate the manner in which individual parcels and blocks are developed to create a diverse and finely-grained development. Furthermore, all future development applicants would be subject to an external peer review to ensure compliance with the development standards and design guidelines outlined in the MPDSP. The required external peer review a review would be conducted by an architect, urban designer, or planner in private practice, as chosen by the review authority. Conformance with the proposed development standard would ensure compatibility with adjoining properties, ensure a high standard of architectural quality and design variety, and ensure consistency with the MPDSP. Approval of the MPDSP would establish development standards and regulations for the Plan area and other associated discretionary approvals included as part of the Proposed Project (i.e., General Plan Amendment, Specific Plan Amendment, and zone change). Therefore, upon approval of the MPDSP, Alternative 3 would not conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant. Impacts would be similar to the Proposed Project.

Currently there are numerous sources of nighttime lighting on the Plan area and in the surrounding areas, including nighttime lighting from the existing Montclair East Shopping Center, located east of the Plan area; nighttime lighting from retail, single-family and multi-family residential properties north of the Plan area; nighttime lighting from single-family and multi-family residential properties, retail uses, the Unitarian Universalist Congregation and International Montessori School, and Moreno Elementary School west of the Plan area; and the I-10 Freeway and commercial uses south of the Plan area. Alternative 3 would involve new development that would require lighting and could result in additional glare as compared to existing conditions. To ensure that no new impacts would occur as part of this development, mitigation similar to the Proposed Project (MM-AES-1) would be required. Therefore, Alternative 3 would result in similar impacts to the Proposed Project.

Therefore, overall aesthetic impacts associated with Alternative 3 would be similar to the Proposed Project, which would result in less than significant impacts with mitigation incorporated.

Air Quality

As described below Alternative 3 would potentially result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and would potentially conflict with Consistency Criterion No. 1. Similar to the Proposed Project, implementation of Alternative 3 would not exceed the demographic growth forecasts in the SCAG 2020 RTP/SCS; therefore, Alternative 3 would be consistent with the SCAQMD 2016 AQMP, which based future emission estimates on the SCAG 2020 RTP/SCS. Thus, Alternative 3 would not conflict with Consistency Criterion No. 2. However, because Alternative 3 would conflict with Consistency

Criterion No. 1, impacts related to the potential to conflict with or obstruct implementation of the applicable air quality plan would be significant and unavoidable, similar to the Proposed Project.

Alternative 3 would involve slightly less construction when compared to the Proposed Project. But considering construction criteria air pollutant emissions associated with the Proposed Project were significantly above the SCAQMD thresholds for VOCs and NOx, a 15% reduction in residential units is not anticipated to avoid the construction emissions exceedances. Therefore, construction impacts would be significant and unavoidable, similar to the Proposed Project.

Operation of Alternative 3 would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips; area sources, including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources, including combustion of fuels used for space and water heating. Table 3.2-11 in Section 3.2, Air Quality, presents the net change maximum daily area, energy, and mobile source emissions associated with operation of the Proposed Project in 2040 and operation under the Existing Scenario in 2020, and the estimated net change in emissions (Proposed Project minus the Existing Scenario). The net change in combined daily area, energy, and mobile source emissions from the Proposed Project and the Existing Scenario would exceed the SCAQMD operational thresholds for VOC, PM10, and PM2.5; NOx, CO, and SOx emissions are not anticipated to exceed SCAQMD thresholds. Alternative 3 would involve a slight reduction in development intensity when compared to the Proposed Project. But considering operational criteria air pollutant emissions associated with the Proposed Project were significantly above the SCAQMD thresholds for VOC, PM10, and PM2.5, a 15% reduction in residential units is not anticipated to avoid the operational emissions exceedances. Therefore, operation impacts would be significant and unavoidable, similar to the Proposed Project.

Alternative 3 would involve slightly less construction when compared to the Proposed Project. However, because the buildout area would be the same, construction would likely result in significant LST and TAC impacts, similar to the Proposed Project. Operational TAC impacts associated with the Proposed Project may not be avoided because Alternative 3 would result in new residential and commercial land uses which may result in the generation of TACs; therefore, operational TAC impacts would be similar to the Proposed Project. Because operation of Alternative 3 would result in exceedances of the SCAQMD significance thresholds for VOC, PM10, and PM2.5, the potential health impacts associated with criteria air pollutants are considered significant and unavoidable.

Land uses and industrial operations that typically are associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). Although Alternative 3 does not involve the construction or operation of the aforementioned

odor-generating land uses, anticipated odors could be generated from retail land uses, including food-service odors. However, these existing uses are not generally considered sources of objectionable odors. Therefore, the potential for Alternative 3 to generate an odor impact is considered less than significant, similar to the Proposed Project.

Significant and unavoidable impacts associated with construction and operational criteria air pollutant emissions, and their impacts to sensitive receptors, would not be avoided. Additionally, significant and unavoidable LST and TAC impacts to sensitive receptors would not be avoided, when compared to the Proposed Project.

Therefore, Alternative 3 would result in slightly less air quality impacts when compared to the Proposed Project, but would still result in a significant and unavoidable impact.

Biological Resources

Under existing conditions, the Proposed Plan area is developed with commercial structures and surface parking lots. Planters with ornamental trees, shrubs, and grasses are scattered sparsely throughout the surface parking lots. The Plan area is entirely covered with impervious surfaces with the exception of the planters and two vacant dirt lots, one of which is located at the northeastern corner of the site and the other of which is located at the southwestern corner of the site. These vacant areas are small in size, are highly disturbed, and support minimal amounts of low-growing vegetation. Therefore, while the site contains some vegetation and small amounts of unpaved areas, the vegetation is ornamental in nature, and the Plan area is entirely surrounded with urban development. The site has been developed for approximately 45 years. As such, the minimal amounts of vegetation on the site and the two vacant, dirt areas would not likely serve as suitable habitat for wildlife. The Plan area and the project vicinity are highly urbanized with few natural areas that could support wildlife. For the above reasons, implementation of the Proposed Project and Alternative 3 is not expected to result in the removal of sensitive species and is not expected to directly impact sensitive species, since none are expected to be present on-site. As such, Alternative 3 would have a less-than-significant impact on sensitive or special-status species, similar to the Project. Additionally, because Alternative 3 would involve construction, and possibly removal of trees, Alternative 3 would require mitigation, similar to the Project, to avoid impacts to migratory birds. Impacts would be similar to the Proposed Project, less than significant with mitigation.

Cultural Resources

Alternative 3 would involve construction and grading activities, which could disturb cultural resources. Alternative 3 would require mitigation similar to the Proposed Project to avoid impacts to archaeological resources. Impacts would be similar to the Proposed Project, less than significant with mitigation.

Energy Consumption

Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers and heating, ventilation, and air conditioning) during construction would be provided by SCE. The electricity used for construction activities would be temporary and minimal; therefore, impacts would be less than significant, similar to the Proposed Project. Operation of Alternative 3 would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. As a conservative analysis, CalEEMod default values for electricity consumption for the Proposed Project and Existing Scenario land uses were applied in this analysis (CAPCOA 2017). Tables 3.3-1 and 3.3-2 presents the electricity demand for the Proposed Project compared to the Existing Scenario. Alternative 3 would result in less residential development when compared to the Project. Therefore, impacts would be less than significant and less than the Proposed Project.

Natural gas consumption during operation is required for various purposes, including building heating and cooling. For building consumption, default natural gas generation rates in CalEEMod for the Proposed Project and Existing land uses and climate zone were used. Table 3.3-3 present the natural gas demand for the MPDSP, Existing, and the net change, respectively. Operational natural gas demand would involve development of new buildings, which would be more energy efficient when compared to the existing condition. Alternative 3 would result in less residential development when compared to the Project. Therefore, impacts would be less than significant and less than the Proposed Project.

Fuel consumption associated with Alternative 3 would be attributable to various vehicles associated with each land use. Petroleum fuel consumption associated with motor vehicles traveling within the City during operation is a function of VMT. Trip generation rates for the Proposed Project and Existing Scenario were based on the Traffic Impact Analysis (TIA). The estimated fuel use from the Proposed Project and Existing Scenario land uses operational mobile sources is shown in Table 3.3-9. As depicted in Table 3.3-9, mobile sources from the MPDSP would result in approximately a maximum of 9,406,161 gallons of petroleum fuel usage per year. The Existing Scenario land use mobile sources would result in approximately 7,949,068 gallons of petroleum fuel usage per year. For disclosure, by comparison, California as a whole consumes approximately 28.7 billion gallons of petroleum per year (EIA 2019c). Over time, the fuel efficiency of the vehicles being used is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the plan site during operation would decrease over time. As detailed in Section 3.3.2, there are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles that combines the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. As such,

operation of the Alternative 3 is expected to use decreasing amounts of petroleum over time due to advances in fuel economy. Therefore, petroleum demand would be less when compared to the Proposed Project, because there would be less residential development when compared to the Project, and impacts would be less than significant.

Alternative 3 would result in less electricity, natural gas, and petroleum consumption when compared to the Proposed Project. Impacts would be less than the Proposed Project.

Geology and Soils

As previously discussed, previous soil explorations in the vicinity of the MPDSP area did not encounter groundwater to a depth of 50 feet bgs, and multiple well readings in the Proposed Project vicinity suggest that groundwater levels are more than 400 feet bgs. In addition, neither the CGS nor the County of San Bernardino determined that the MPDSP area is in a zone of liquefaction. Alternative 3 would not increase or exacerbate the potential for liquefaction or lateral spreading to occur and, therefore, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismically-related ground failure. As such, impacts would be less than significant, and similar to the Project.

Alternative 3 would not increase the potential for liquefaction and lateral spreading. In addition, the project area is located on gently sloping ground, is not located near any unstable slopes, and is not susceptible to seismically-induced ground failure. Therefore, the potential impacts associated with liquefaction/lateral spreading and landslides would be less than significant, similar to the Project.

Expansive soils are clay-rich soils that shrink when dry and swell when wet. This change in volume can exert substantial pressure on foundations, resulting in structural distress and/or damage. Soils in the vicinity of the plan site are generally comprised of medium dense to dense alluvial sands and silty sands, which typically lack substantial amounts of clay, and thus are usually not conducive to soil expansion. Similar to the Project, Alternative 3 would not increase or exacerbate the potential for expansive soils to occur and would not create substantial direct or indirect risks to life or property. As such, impacts would be less than significant. No mitigation is required.

Therefore, impacts to geology and soils under Alternative 3 would be similar to the Proposed Project, which would result in a less than significant impact.

Greenhouse Gas Emissions

Operation of Alternative 3 would generate GHG emissions through motor vehicle trips; landscape maintenance equipment operation (area source); energy use (natural gas and electricity); solid waste disposal; and water supply, treatment, and distribution and wastewater treatment. Annual operational

GHG emissions would likely exceed the SCAQMD threshold of 3,000 MT CO2e per year, because although Alternative 2 would result in 15% less residential development as compared to the Project, this reduction would not be significant enough to be below the SCAQMD threshold. Therefore, Alternative 3 GHG contributions would be cumulatively considerable and impacts would be significant and unavoidable, similar to the Project.

Therefore, although GHG emissions under Alternative 2 would be less than the Project, Alternative 2 would result in emission that exceed the SCAQMD threshold, and would result in a significant and unavoidable impact, similar to the Project.

Hazards and Hazardous Materials

Alternative 3 would involve construction, and therefore, would require similar mitigation as the Proposed Project to prevent the release of lead and asbestos or to ensure that hazards on the construction site are managed appropriately.

Similar to the Project, routine operation of Alternative 3 would include the use of various hazardous materials, including chemical reagents, solvents, fuels, paints, and cleansers. These materials would be used for building and grounds maintenance. Many of the hazardous materials used for building and grounds maintenance would be considered household hazardous wastes and/or universal wastes by the EPA, which regards these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment relative to other hazardous wastes, when they are properly stored, transported, used, and disposed of in accordance with local, state, and federal laws. Therefore, similar to the Project, impacts would be less than significant.

Therefore, impacts to hazards and hazardous materials under Alternative 3 would be similar to the Proposed Project, which would result in a less than significant impact.

Hydrology and Water Quality

Alternative 3 would involve construction and therefore would require mitigation to prevent erosion-induced siltation of downstream drainages and incidental spills of petroleum products, which would be required for the Project. Similarly, since Alternative 3 would meet the definition of a redevelopment project, and thus, would be required to control pollutants, pollutant loads, and runoff volume emanating from the Plan area by: (1) minimizing the impervious surface area and implementing source control measures, (2) controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention and/or rainfall harvest and re-use), and (3) ensuring all structural BMPs are monitored and maintained. Therefore, mitigation would be required, as is required for the Project.

Similar to the Proposed Project, Alternative 3 does not propose to directly extract groundwater during the construction or operation of the Proposed Project, and no direct adverse impacts to groundwater are expected to occur. MVWD uses groundwater as a part of its supply resources. Water demand could increase relative to the existing condition. However, with 15% less residential development as compared to the Project, demand would be less when compared to the Project. As such, Alternative 3 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the alternative may impede sustainable groundwater basin management of the basin. However, Alternative 3 would consume less groundwater when compared to the Project.

Therefore, impacts to hydrology and water quality under Alternative 3 would be similar to the Proposed Project, which would result in a less than significant impact.

Land Use and Planning

Similar to the Proposed Project, Alternative 3 would be consist with the SCAG 2020-2045 RTP/SCS, City of Montclair General Plan, City of Montclair Housing Element, City of Montclair Municipal Code (Title 11), NMSP, and NMDSP. The proposed MPDSP proposes to implement design guidelines to create a mix of residential and commercial land uses. The design guidelines would promote the transformation of the Plan area from the underutilized Montclair Place Mall and surrounding commercial uses, into a mixed-use downtown district within walking and biking distance of the Montclair Transcenter and anticipated extension of the Foothill Gold Line. The MPDSP sets forth the development standards of the Plan area; however, where the document does not specific development standards, and Montclair Municipal Code shall be the controlling documents. Thus, Alternative 3 would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant and similar to the Project.

Therefore, impacts to land use and planning under Alternative 3 would be similar to the Proposed Project, which would result in a less than significant impact.

Noise

Alternative 3 would involve construction; however, the intensity of development is anticipated to be slightly less than the Project. Therefore, construction noise impacts would be less than significant, because the Project would result in a less than significant noise impact.

In addition, traffic noise would be less as compared to the Project. Table 3.9-9 of Section 3.9, Noise, shows that at all eight listed representative receivers, the addition of Proposed Project traffic to the roadway network would result in a CNEL increase of less than 3 dB, which is

below the discernible level of change for the average healthy human ear. As such, traffic noise would also be less than the discernible level of change for the average healthy human ear.

Similar to the Project, Alternative 3 would not feature major on-site producers of groundborne vibration.

Cable Airport is located approximately 1.44 miles northeast of the site. However, the site is not located within Cable Airport's safety zone area. According to the ONT ALUCP Compatibility Policy Map 2-3, the Plan area is not located within a noise impact zone (City of Ontario 2011). Therefore, Alternative 3 would not expose people residing or working in the project area to excessive aviation traffic noise levels. Noise impacts would be similar to the Project.

Therefore, impacts from noise under Alternative 3 would be similar to the Proposed Project, which would result in a less than significant impact.

Population and Housing

Alternative 3 would result in additional population, housing, or employment growth as compared to the existing condition. The Proposed Project would exceed the SCAG population, housing, and employment growth projections for the City. Alternative 3 would result in 15% less residential units as compared to the Project, but is still anticipated to result in significant growth.

Therefore, impacts to population and housing under Alternative 3 would be similar to the Project, which would result in a significant and unavoidable impact.

Public Services

Alternative 3 would result in the development of additional residential units which would result in changes to both the makeup and population in this portion of the fire service area. As previously analyzed in Chapter 3.10 of this EIR, given this population increase, the Fire Department estimates that buildout of the Proposed Project would result in the need for additional physical facilities, expanded facilities, equipment and/or personnel in order to maintain existing fire department service ratios, response times, and other performance objectives (Zacile Rosette, pers. comm. 2019b). However, with the implementation of mitigation measure MM-PUB-1, impacts would be less than significant with mitigation incorporated. Although Alternative 3 would result in less growth when compared to the Proposed Project, population growth associated with this alternative would be on the same scale as the Project. Therefore, similar mitigation would be required.

Based on the population and growth discussed in Chapter 3.10 of this EIR, the City is deficient in meeting the required acreage for parkland. As described in Section 3.12, Recreation, there is a

deficit in parkland of approximately 62%. Continued growth in the City will increase the number of residents and consequently the demand for park space. If fees continue to be exacted and new park space is developed concurrent with, or in advance of new development in the City, impacts could be reduced. Similar to the Project, the relative lack of remaining open land in and around Montclair reduces the opportunity to create park space. Alternative 3 impacts would be significant and unavoidable, similar to the Project.

Therefore, impacts to public services under Alternative 3 would be similar to the Proposed Project, which would result in a significant and unavoidable impact.

Recreation

Similar to the Proposed Project, based on the City's requirement to provide three acres of parkland and recreational facilities for every 1,000 residents, the applicant would be required to either provide approximately 55 acres of parkland or to mitigate impacts to parks and recreation through payment of a comparable in lieu fee. With adherence to State and local law, and compliance with applicable fees as determined by the City Planning Commission, impacts to existing parks and recreational facilities as a result of Alternative 3 implementation would be reduced. However, considering the existing deficiency of recreational facilities in the City, the limited availability of land for new park space, and the estimated increase in population as a result of the proposed dwelling units, implementation of the Alternative 3 would exacerbate the City's existing park shortage. All 13 existing parks within the City are located approximately 0.02 to 2.3 miles from the Project area and could experience a substantial increase in use such that substantial physical deterioration of the facility could occur as a result of Alternative 3. Although Alternative 3 would result in less residential development as compared to the Project, development would be on a similar scale and, impacts to existing neighborhood and regional parks and/or recreational facilities would be similar to the Project is determined to be significant and unavoidable.

Therefore, impacts to recreation under Alternative 3 would be similar to the Proposed Project, which would result in a significant and unavoidable impact.

Transportation

As both AM and PM peak hour 95th percentile queues are forecast to extend into the I-10 mainline lanes at the Central Avenue/I-10 westbound and eastbound ramps in the General Plan Year (2040) plus Project condition, queueing along these off-ramps has the potential to impact mainline operations. Improvements to accommodate the General Plan Year (2040) plus Project queues at these off-ramps would require extensive coordination and further study under Caltrans direction to determine the appropriate designs to accommodate off-ramp queues. The Caltrans and SBCTA I-10 Corridor Project (EA 0C2500) was approved in May 2017 and proposes to add

Express Lanes in either direction along 33 miles of the I-10 freeway, which includes widening of the I-10 freeway bridge over Monte Vista Avenue and intersection improvements at the Monte Vista Avenue/I-10 freeway ramps. These improvements were incorporated into the General Plan Year 2040 queuing analysis at the Monte Vista interchange; however, there are no current or planned programs administered by the City for ramp improvements at the I-10 freeway/Central Avenue interchange, and since the City does not have jurisdiction over these facilities, there are no feasible mitigation measures to mitigate the Proposed Project's off-ramp queuing impacts. Therefore, because Alternative 3 would result in a similar scale of development, it may increase a hazardous condition at the I-10/Central Avenue eastbound and westbound off-ramps, and its impacts would be significant and unavoidable and similar to the Project.

Therefore, impacts to transportation systems under Alternative 3 would be similar to the Proposed Project, which would result in a significant and unavoidable impact.

Tribal Cultural Resources

The Plan area is located in urban, developed commercial and residential area. The Plan area and all surrounding properties have undergone disturbance previously resulting from development of the existing Mall and the commercial and residential uses that surround it. Construction of Alternative 3 would be developed on a site that has been subject to previous ground-disturbing actives, which greatly limits the potential for buried, unrecorded cultural resources to underlay the site. However, similar to the Project, mitigation would be required to help to ensure that, in the event of an unanticipated find of a significant tribal cultural resource, the resource is protected, researched, and potentially preserved (if subsequently deemed warranted) to maintain integrity and significance.

Therefore, impacts to tribal cultural resources under Alternative 3 would be similar to the Proposed Project, which would result in a less than significant impact with mitigation.

Utilities and Service Systems

As described in Section 3.15, MVWD has the opportunity to increase supply to meet future demands through the following measures: 1) production of groundwater based on safe yield allocation and utilization of water in storage; 2) increasing imported water purchases, if available and if there is available WFA capacity; and 3) purchasing additional recycled water, if available. Collectively, these additional options would enable water supply to exceed water demand for MVWD now and into the future, including sufficient water supply for Alternative 3. Lastly, compliance with the CALGreen Building Code would be required for new development. For redevelopment projects, this generally indicates that newly installed appliances and plumbing would be more efficient than those used within the structures originally located on redevelopment sites. In addition, CALGreen Building Code standards require a mandatory reduction in outdoor water use, in accordance with the DWR Model

Water Efficient Landscape Ordinance. Due to water planning efforts and water conservation standards impacts would be less than significant, similar to the Project.

Similar to the Project, the existing sewer lines that serve the Proposed Project have the capacity to convey the estimated peak flow generated from the Project area. In the event that sewer upgrades are required, all construction work within the City public right-of-way would be subject to local municipal code requirements.

Development of Alternative 3 would increase land-use intensities in the area, resulting in increased solid waste generation in the service area for the Mid-Valley and San Timoteo Sanitary Landfills. However, solid waste is already being generated at the Plan area. Through compliance with City and state solid waste diversion requirements, impacts would be less than significant, similar to the Project.

Similar to the Project, all construction work of telecommunication tie-ins within the City public right-of-way would be subject to City municipal code requirements. Installation of new telecommunication lines and associated laterals would consist of either trenching to the depth of pipe placement or using a variety of different trenchless technology, both which could result in potential short-term erosion induced siltation of nearby waterways. Standard BMPs, installed as part of an NPDES-mandated SWPPP, would reduce potential water quality impacts to less-than-significant levels. As such, impacts associated with construction of telecommunication infrastructure would be less than significant, similar to the Project.

Therefore, impacts to utilities and service systems under Alternative 3 would be similar to the Proposed Project, which would result in a less than significant impact.

4.2.4 Alternative 4 – Reduced Commercial/Office Alternative

The Reduced Commercial/Office Alternative would result in a 7.5% reduction in commercial and office space as compared to the Proposed Project. This alternative would result in a total of 1,905,139 square feet of commercial space, whereas, the Proposed Project would involve the development of 2,058,909 square feet of commercial space. Specifically, the southwest corner of the Proposed Project plan area would not be included in the Alternative 4 Plan area, and would remain in the existing condition.

Ability to Meet Proposed Amendment Objectives

Under the Reduced Residential Alternative, all of the objectives of the Proposed Project would be achieved, except the following:

- Account for an increase in the maximum number of dwelling units and additional commercial/office square footage allowable by the Plan. The maximum amounts envisioned

by the Plan are approximately 6,321 dwelling units (5 million square feet of residential uses) and a total of 512,000 additional square feet of commercial/office uses.

The environmental impacts of this alternative are briefly discussed below, along with a comparison of impacts with the Proposed Project.

Comparison of the Effects of Alternative 3 to the Proposed Amendment

Aesthetics

Scenic vistas are publicly accessible viewpoints that provide views of areas from a project site and onto a project site that exemplify a community's environment (i.e., scenic resources). There are no designated scenic vistas from public vantage points in the planning area. There are no scenic views from area roadways or other vantage points within the surrounding area onto the Plan area. Views from public areas near the planning area are dominated by commercial and residential development. However, views of the San Gabriel Mountains are available to the north, which can be particularly prominent visual features under optimal atmospheric conditions. However, due to the brief duration of increased view blockage to the San Gabriel Mountains along the Plan area frontage of the I-10 freeway, the presence of existing development, and the lack of scenic designation of the I-10 freeway, future redevelopment of the Plan area associated with Alternative 4 would not result in a substantial adverse effect on a scenic vista, and impacts would be similar to the Proposed Project.

There are no officially designated state scenic highways, as identified by the California Scenic Highway Program (Caltrans 2011). Additionally, the City contains no scenic highway corridors (City of Montclair 1999). Therefore, Alternative 4 would not damage scenic resources within a state scenic highway, and impacts would be similar to the Proposed Project.

To ensure that both current and future development within the City is designated and constructed to conform to existing visual character and quality of the surrounding built environment, the Title 11, Zoning and Development, of the City's municipal code includes design standards specific to each Zoning District related to building height, parking, landscaping requirements, and other visual considerations. Under the existing conditions, development within the Plan area is required to conform to these regulations. However, the project as proposed includes the adoption of the MPDSP, which would create a new comprehensive policy framework to guide future development within the City. Chapter 5, Development Code, of the MPDSP includes a form-based zoning framework that would provide development standards (building height, setbacks, frontage requirements, on-site open space, parking placement and standards) and building design standards (massing, articulation, materials, openings, landscape, screening, signage, etc.). The chapter also provides subdivision and block size requirements and standards for streetscape, landscape, hardscape, and public art that occurs within public streets and publicly

accessible parks, plazas, and greens. Alternative 4 would result in the development of the same form-based framework as the Proposed Project. However, the southwest corner of the Proposed Project plan area would not be included in the Alternative 4 Plan area, and would remain in the existing condition. However, this area is still subject to Title 11.

Upon approval, the new regulations outlined in the MPDSP Development Code would replace the underlying zoning regulations. All future development within the Plan area would be required to conform to these regulations. According to the MDPSP, these standards were designed to regulate the manner in which individual parcels and blocks are developed to create a diverse and finely-grained development. Furthermore, all future development applicants would be subject to an external peer review to ensure compliance with the development standards and design guidelines outlined in the MPDSP. The required external peer review a review would be conducted by an architect, urban designer, or planner in private practice, as chosen by the review authority. Conformance with the proposed development standard would ensure compatibility with adjoining properties, ensure a high standard of architectural quality and design variety, and ensure consistency with the MPDSP. Approval of the MPDSP would establish development standards and regulations for the Plan area and other associated discretionary approvals included as part of the Proposed Project (i.e., General Plan Amendment, Specific Plan Amendment, and zone change). Therefore, upon approval of the MPDSP, Alternative 4 would not conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant. Impacts would be similar to the Proposed Project.

Currently there are numerous sources of nighttime lighting on the Plan area and in the surrounding areas, including nighttime lighting from the existing Montclair East Shopping Center, located east of the Plan area; nighttime lighting from retail, single-family and multi-family residential properties north of the Plan area; nighttime lighting from single-family and multi-family residential properties, retail uses, the Unitarian Universalist Congregation and International Montessori School, and Moreno Elementary School west of the Plan area; and the I-10 Freeway and commercial uses south of the Plan area. Alternative 4 would involve new development that would require lighting and could result in additional glare as compared to existing conditions. To ensure that no new impacts would occur as part of this development, mitigation similar to the Proposed Project (MM-AES-1) would be required. Therefore, Alternative 4 would result in similar impacts to the Proposed Project.

Therefore, overall aesthetic impacts associated with Alternative 4 would be similar to the Proposed Project, which would result in less than significant impacts with mitigation incorporated.

Air Quality

As described below Alternative 4 would potentially result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and would potentially conflict with Consistency Criterion No. 1. Similar to the Proposed Project, implementation of Alternative 4 would not exceed the demographic growth forecasts in the SCAG 2020 RTP/SCS; therefore, Alternative 4 would be consistent with the SCAQMD 2020 AQMP, which based future emission estimates on the SCAG 2020 RTP/SCS. Thus, Alternative 4 would not conflict with Consistency Criterion No. 2. However, because Alternative 4 would conflict with Consistency Criterion No. 1, impacts related to the potential to conflict with or obstruct implementation of the applicable air quality plan would be significant and unavoidable, similar to the Proposed Project.

Alternative 4 would involve slightly less construction when compared to the Proposed Project. But considering construction criteria air pollutant emissions associated with the Proposed Project were significantly above the SCAQMD thresholds for VOCs and NOx, a 7.5% reduction in commercial development is not anticipated to avoid the construction emissions exceedances. Therefore, construction impacts would be significant and unavoidable, similar to the Proposed Project.

Operation of Alternative 4 would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips; area sources, including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources, including combustion of fuels used for space and water heating. Table 3.2-11 in Section 3.2, Air Quality, presents the net change maximum daily area, energy, and mobile source emissions associated with operation of the Proposed Project in 2040 and operation under the Existing Scenario in 2020, and the estimated net change in emissions (Proposed Project minus the Existing Scenario). The net change in combined daily area, energy, and mobile source emissions from the Proposed Project and the Existing Scenario would exceed the SCAQMD operational thresholds for VOC, PM10, and PM2.5; NOx, CO, and SOx emissions are not anticipated to exceed SCAQMD thresholds. Alternative 4 would involve a slight reduction in development intensity when compared to the Proposed Project. But considering operational criteria air pollutant emissions associated with the Proposed Project were significantly above the SCAQMD thresholds for VOC, PM10, and PM2.5, a 7.5% reduction in commercial development is not anticipated to avoid the operational emissions exceedances. Therefore, operation impacts would be significant and unavoidable, similar to the Proposed Project.

Alternative 4 would involve slightly less construction when compared to the Proposed Project. However, because the buildout area would be the same, construction would likely result in significant LST and TAC impacts, similar to the Proposed Project. Operational TAC impacts associated with the Proposed Project may not be avoided because Alternative 4 would result in new residential and commercial land uses which may result in the generation of TACs Because operation

of Alternative 4 would result in exceedances of the SCAQMD significance thresholds for VOC, PM10, and PM2.5, the potential health impacts associated with criteria air pollutants are considered significant and unavoidable.

Land uses and industrial operations that typically are associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). Although Alternative 4 does not involve the construction or operation of the aforementioned odor-generating land uses, anticipated odors could be generated from retail land uses, including food-service odors. However, these existing uses are not generally considered sources of objectionable odors. Therefore, the potential for Alternative 4 to generate an odor impact is considered less than significant, similar to the Proposed Project.

Significant and unavoidable impacts associated with construction and operational criteria air pollutant emissions, and their impacts to sensitive receptors, would not be avoided. Additionally, significant and unavoidable LST and TAC impacts to sensitive receptors would not be avoided, when compared to the Proposed Project.

Therefore, Alternative 4 would result in slightly less impacts to air quality when compared to the Proposed Project, but impacts would be significant and unavoidable.

Biological Resources

Under existing conditions, the Plan area is developed with commercial structures and surface parking lots. Planters with ornamental trees, shrubs, and grasses are scattered sparsely throughout the surface parking lots. The Plan area is entirely covered with impervious surfaces with the exception of the planters and two vacant dirt lots, one of which is located at the northeastern corner of the site and the other of which is located at the southwestern corner of the site. These vacant areas are small in size, are highly disturbed, and support minimal amounts of low-growing vegetation. Therefore, while the site contains some vegetation and small amounts of unpaved areas, the vegetation is ornamental in nature, and the Plan area is entirely surrounded with urban development. The site has been developed for approximately 45 years. As such, the minimal amounts of vegetation on the site and the two vacant, dirt areas would not likely serve as suitable habitat for wildlife. The Plan area and the project vicinity are highly urbanized with few natural areas that could support wildlife. For the above reasons, implementation of the Proposed Project and Alternative 4 is not expected to result in the removal of sensitive species and is not expected to directly impact sensitive species, since none are expected to be present on-site. As such, Alternative 4 would have a less-than-significant impact on sensitive or special-status species, similar to the Project. Additionally, because Alternative 4 would involve construction, and possibly removal of trees, Alternative 4 would require mitigation, similar to the

Project, to avoid impacts to migratory birds. Impacts would be similar to the Proposed Project, less than significant with mitigation.

Cultural Resources

Alternative 4 would involve construction and grading activities, which could disturb cultural resources. Alternative 4 would require mitigation similar to the Proposed Project to avoid impacts to archaeological resources. Impacts would be similar to the Proposed Project, less than significant with mitigation.

Energy Consumption

Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers and heating, ventilation, and air conditioning) during construction would be provided by SCE. The electricity used for construction activities would be temporary and minimal; therefore, impacts would be less than significant, similar to the Proposed Project. Operation of Alternative 4 would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. As a conservative analysis, CalEEMod default values for electricity consumption for the Proposed Project and Existing Scenario land uses were applied in this analysis (CAPCOA 2017). Tables 3.3-1 and 3.3-2 presents the electricity demand for the Proposed Project compared to the Existing Scenario. Alternative 4 would result in less commercial development when compared to the Project. Therefore, impacts would be less than significant and less than the Proposed Project.

Natural gas consumption during operation is required for various purposes, including building heating and cooling. For building consumption, default natural gas generation rates in CalEEMod for the Proposed Project and Existing land uses and climate zone were used. Table 3.3-3 present the natural gas demand for the MPDS, Existing, and the net change, respectively. Operational natural gas demand would involve development of new buildings, which would be more energy efficient when compared to the existing condition. Alternative 4 would result in less commercial development when compared to the Project. Therefore, impacts would be less than significant and less than the Proposed Project.

Fuel consumption associated with Alternative 4 would be attributable to various vehicles associated with each land use. Petroleum fuel consumption associated with motor vehicles traveling within the City during operation is a function of VMT. Trip generation rates for the Proposed Project and Existing Scenario were based on the Traffic Impact Analysis (TIA). The estimated fuel use from the Proposed Project and Existing Scenario land uses operational mobile sources is shown in Table 3.3-9. As depicted in Table 3.3-9, mobile sources from the MPDSP would result in approximately a maximum of 9,406,161 gallons of petroleum fuel usage per year. The Existing Scenario land use

mobile sources would result in approximately 7,949,068 gallons of petroleum fuel usage per year. For disclosure, by comparison, California as a whole consumes approximately 28.7 billion gallons of petroleum per year (EIA 2019c). Over time, the fuel efficiency of the vehicles being used is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the plan site during operation would decrease over time. As detailed in Section 3.3.2, there are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles that combines the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. As such, operation of the Alternative 4 is expected to use decreasing amounts of petroleum over time due to advances in fuel economy. Therefore, petroleum demand would be less when compared to the Proposed Project, because there would be less commercial development when compared to the Project, and impacts would be less than significant.

Alternative 4 would result in less electricity, natural gas, and petroleum consumption when compared to the Proposed Project. Impacts would be less than the Proposed Project.

Geology and Soils

As previously discussed, previous soil explorations in the vicinity of the MPDSP area did not encounter groundwater to a depth of 50 feet bgs, and multiple well readings in the Proposed Project vicinity suggest that groundwater levels are more than 400 feet bgs. In addition, neither the CGS nor the County of San Bernardino determined that the MPDSP area is in a zone of liquefaction. Alternative 4 would not increase or exacerbate the potential for liquefaction or lateral spreading to occur and, therefore, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismically-related ground failure. As such, impacts would be less than significant, and similar to the Project.

Alternative 4 would not increase the potential for liquefaction and lateral spreading. In addition, the project area is located on gently sloping ground, is not located near any unstable slopes, and is not susceptible to seismically-induced ground failure. Therefore, the potential impacts associated with liquefaction/lateral spreading and landslides would be less than significant, similar to the Project.

Expansive soils are clay-rich soils that shrink when dry and swell when wet. This change in volume can exert substantial pressure on foundations, resulting in structural distress and/or damage. Soils in the vicinity of the plan site are generally comprised of medium dense to dense alluvial sands and silty sands, which typically lack substantial amounts of clay, and thus are usually not conducive to soil expansion. Similar to the Project, Alternative 4 would not increase or exacerbate the potential for expansive soils to occur and would not create substantial direct or indirect risks to life or property. As such, impacts would be less than significant. No mitigation is required.

Therefore, impacts to geology and soils under Alternative 4 would be similar to the Proposed Project, which would result in a less than significant impact.

Greenhouse Gas Emissions

Operation of Alternative 4 would generate GHG emissions through motor vehicle trips; landscape maintenance equipment operation (area source); energy use (natural gas and electricity); solid waste disposal; and water supply, treatment, and distribution and wastewater treatment. Annual operational GHG emissions would likely exceed the SCAQMD threshold of 3,000 MT CO2e per year, because although Alternative 4 would result in 7.5% less commercial development as compared to the Project, this reduction would not be significant enough to be below the SCAQMD threshold. GHG contributions under Alternative 4 would be cumulatively considerable and impacts would be significant and unavoidable, similar to the Project.

Therefore, although GHG emissions under Alternative 4 would be less than the Project, Alternative 4 would result in emission that exceed the SCAQMD threshold, and would result in a significant and unavoidable impact, similar to the Project.

Hazards and Hazardous Materials

Alternative 4 would involve construction and therefore would require similar mitigation as the Proposed Project to prevent the release of lead and asbestos or to ensure that hazards on the construction site are managed appropriately. However, the southwest corner of the Proposed Project plan area would not be included in the Alternative 4 plan area, and would remain in the existing condition. Therefore, such mitigation would not be implemented in the southwest corner.

Similar to the Project, routine operation of Alternative 4 would include the use of various hazardous materials, including chemical reagents, solvents, fuels, paints, and cleansers. These materials would be used for building and grounds maintenance. Many of the hazardous materials used for building and grounds maintenance would be considered household hazardous wastes and/or universal wastes by the EPA, which regards these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment relative to other hazardous wastes, when they are properly stored, transported, used, and disposed of in accordance with local, state, and federal laws. Therefore, similar to the Project, impacts would be less than significant.

Therefore, impacts to hazards and hazardous materials under Alternative 4 would be similar to the Proposed Project, which would result in a less than significant impact.

Hydrology and Water Quality

Alternative 4 would involve construction and therefore would require mitigation to prevent erosion-induced siltation of downstream drainages and incidental spills of petroleum products, which would be required for the Project. Similarly, since Alternative 4 would meet the definition of a redevelopment project, and thus, would be required to control pollutants, pollutant loads, and runoff volume emanating from the Plan area by: (1) minimizing the impervious surface area and implementing source control measures, (2) controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention and/or rainfall harvest and re-use), and (3) ensuring all structural BMPs are monitored and maintained. Therefore, mitigation would be required, as is required for the Project. However, the southwest corner of the Proposed Project plan area would not be included in the Alternative 4 plan area, and would remain in the existing condition. Therefore, potential erosion-induced siltation of downstream drainages and incidental spills of petroleum products would be avoided in this area.

Similar to the Proposed Project, Alternative 4 does not propose to directly extract groundwater during the construction or operation of the Proposed Project, and no direct adverse impacts to groundwater are expected to occur. MVWD uses groundwater as a part of its supply resources. Water demand could increase relative to the existing condition. However, with 7.5% less commercial development as compared to the Project, demand would be less when compared to the Project. As such, Alternative 4 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the alternative may impede sustainable groundwater basin management of the basin. However, Alternative 4 would consume less groundwater when compared to the Project.

Therefore, impacts to hydrology and water quality under Alternative 4 would be similar to the Proposed Project, which would result in a less than significant impact.

Land Use and Planning

Similar to the Proposed Project, Alternative 4 would be consist with the SCAG 2020-2045 RTP/SCS, City of Montclair General Plan, City of Montclair Housing Element, City of Montclair Municipal Code (Title 11), NMSP, and NMDSP. The proposed MPDSP proposes to implement design guidelines to create a mix of residential and commercial land uses. The design guidelines would promote the transformation of the Plan area from the underutilized Montclair Place Mall and surrounding commercial uses, into a mixed-use downtown district within walking and biking distance of the Montclair Transcenter and anticipated extension of the Foothill Gold Line. The MPDSP sets forth the development standards of the Plan area; however, where the document does not specific development standards, and Montclair Municipal Code shall be the controlling documents. Thus, Alternative 4 would not conflict with any applicable land use plan,

policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant and similar to the Project.

Therefore, impacts to land use and planning under Alternative 4 would be similar to the Proposed Project, which would result in a less than significant impact.

Noise

Alternative 4 would involve construction; however, the intensity of development is anticipated to be slightly less than the Project. Therefore, construction noise impacts would be less than significant, because the Project would result in a less than significant noise impact. However, the southwest corner of the Proposed Project plan area would not be included in the Alternative 4 plan area, and would remain in the existing condition. Therefore, construction would not occur in this area, and no construction noise impacts are anticipated in this area.

In addition, traffic noise would be less as compared to the Project. Table 3.9-9 of Section 3.9, Noise, shows that at all eight listed representative receivers, the addition of Proposed Project traffic to the roadway network would result in a CNEL increase of less than 3 dB, which is below the discernible level of change for the average healthy human ear. Therefore, traffic noise would also be less than the discernible level of change for the average healthy human ear.

Similar to the Project, Alternative 4 would not feature major on-site producers of groundborne vibration.

Cable Airport is located approximately 1.44 miles northeast of the site. However, the site is not located within Cable Airport's safety zone area. According to the ONT ALUCP Compatibility Policy Map 2-3, the Plan area is not located within a noise impact zone (City of Ontario 2011). Therefore, Alternative 4 would not expose people residing or working in the project area to excessive aviation traffic noise levels. Therefore, noise impacts would be similar to the Project.

Therefore, impacts from noise under Alternative 4 would be similar to the Proposed Project, which would result in a less than significant impact.

Population and Housing

Alternative 4 would result in additional population, housing, or employment growth as compared to the existing condition. The Proposed Project would exceed the SCAG population, housing, and employment growth projections for the City. Alternative 4 would result in 7.5% less commercial development as compared to the Project, but is still anticipated to result in significant growth.

Therefore, impacts to population and housing under Alternative 4 would be similar to the Proposed Project, which would result in a significant and unavoidable impact.

Public Services

Alternative 4 would result in the development of additional residential units which would result in changes to both the makeup and population in this portion of the fire service area. As previously analyzed in Chapter 3.10 of this EIR, given this population increase, the Fire Department estimates that buildout of the Proposed Project would result in the need for additional physical facilities, expanded facilities, equipment and/or personnel in order to maintain existing fire department service ratios, response times, and other performance objectives (Zacile Rosette, pers. comm. 2019b). However, with the implementation of mitigation measure MM-PUB-1, impacts would be less than significant with mitigation incorporated. Although Alternative 4 would result in less growth when compared to the Proposed Project, population growth associated with this alternative would be on the same scale as the Project. Therefore, similar mitigation would be required.

Based on the population and growth discussed in Chapter 3.10 of this EIR, the City is deficient in meeting the required acreage for parkland. As described in Section 3.12, Recreation, there is a deficit in parkland of approximately 62%. Continued growth in the City will increase the number of residents and consequently the demand for park space. If fees continue to be exacted and new park space is developed concurrent with, or in advance of new development in the City, impacts could be reduced. Similar to the Project, the relative lack of remaining open land in and around Montclair reduces the opportunity to create park space. Alternative 4 impacts would be significant and unavoidable, similar to the Project.

Therefore, impacts to public services under Alternative 4 would be similar to the Proposed Project, which would result in a significant and unavoidable impact.

Recreation

Similar to the Proposed Project, based on the City's requirement to provide three acres of parkland and recreational facilities for every 1,000 residents, the applicant would be required to either provide approximately 55 acres of parkland or to mitigate impacts to parks and recreation through payment of a comparable in lieu fee. With adherence to State and local law, and compliance with applicable fees as determined by the City Planning Commission, impacts to existing parks and recreational facilities as a result of Alternative 4 implementation would be reduced. However, considering the existing deficiency of recreational facilities in the City, the limited availability of land for new park space, and the estimated increase in population as a result of the proposed dwelling units, implementation of the Alternative 4 would exacerbate the City's existing park shortage. All 13 existing parks within the City are located approximately

0.02 to 2.3 miles from the Project area and could experience a substantial increase in use such that substantial physical deterioration of the facility could occur as a result of Alternative 4. Although Alternative 4 would result in less commercial development as compared to the Project, development would be on a similar scale and, impacts to existing neighborhood and regional parks and/or recreational facilities would be similar to the Project is determined to be significant and unavoidable.

Therefore, impacts to recreation under Alternative 4 would be similar to the Proposed Project, which would result in a significant and unavoidable impact.

Transportation

As both AM and PM peak hour 95th percentile queues are forecast to extend into the I-10 mainline lanes at the Central Avenue/I-10 westbound and eastbound ramps in the General Plan Year (2040) plus Project condition, queueing along these off-ramps has the potential to impact mainline operations. The southwest corner of the Proposed Project plan area would not be included in the Alternative 4 plan area, and would remain in the existing condition. Although less traffic would be generated in this area, the trips associated with Alternative 4 would still result in queueing along the identified off-ramps.

Improvements to accommodate the General Plan Year (2040) plus Project queues at these off-ramps would require extensive coordination and further study under Caltrans direction to determine the appropriate designs to accommodate off-ramp queues. The Caltrans and SBCTA I-10 Corridor Project (EA 0C2500) was approved in May 2017 and proposes to add Express Lanes in either direction along 33 miles of the I-10 freeway, which includes widening of the I-10 freeway bridge over Monte Vista Avenue and intersection improvements at the Monte Vista Avenue/I-10 freeway ramps. These improvements were incorporated into the General Plan Year 2040 queuing analysis at the Monte Vista interchange; however, there are no current or planned programs administered by the City for ramp improvements at the I-10 freeway/Central Avenue interchange, and since the City does not have jurisdiction over these facilities, there are no feasible mitigation measures to mitigate the Proposed Project's off-ramp queuing impacts. Therefore, because Alternative 4 would result in a similar scale of development, it may increase a hazardous condition at the I-10/Central Avenue eastbound and westbound off-ramps, and its impacts would be significant and unavoidable and similar to the Project.

Therefore, impacts to transportation systems under Alternative 4 would be similar to the Proposed Project, which would result in a significant and unavoidable impact.

Tribal Cultural Resources

The Plan area is located in urban, developed commercial and residential area. The Plan area and all surrounding properties have undergone disturbance previously resulting from development of the existing Montclair Place Mall (Mall) and the commercial and residential uses that surround it. Construction of Alternative 4 would be developed on a site that has been subject to previous ground-disturbing actives, which greatly limits the potential for buried, unrecorded cultural resources to underlay the site. However, similar to the Project, mitigation would be required to help to ensure that, in the event of an unanticipated find of a significant tribal cultural resource, the resource is protected, researched, and potentially preserved (if subsequently deemed warranted) to maintain integrity and significance.

Therefore, impacts to tribal cultural resources under Alternative 4 would be similar to the Proposed Project, which would be less than significant with mitigation.

Utilities and Service Systems

As described in Section 3.15, MVWD has the opportunity to increase supply to meet future demands through the following measures: 1) production of groundwater based on safe yield allocation and utilization of water in storage; 2) increasing imported water purchases, if available and if there is available WFA capacity; and 3) purchasing additional recycled water, if available. Collectively, these additional options would enable water supply to exceed water demand for MVWD now and into the future, including sufficient water supply for Alternative 4. Lastly, compliance with the CALGreen Building Code would be required for new development. For redevelopment projects, this generally indicates that newly installed appliances and plumbing would be more efficient than those used within the structures originally located on redevelopment sites. In addition, CALGreen Building Code standards require a mandatory reduction in outdoor water use, in accordance with the DWR Model Water Efficient Landscape Ordinance. Due to water planning efforts and water conservation standards impacts would be less than significant, similar to the Project.

Similar to the Project, the existing sewer lines that serve the Proposed Project have the capacity to convey the estimated peak flow generated from the Project area. In the event that sewer upgrades are required, all construction work within the City public right-of-way would be subject to local municipal code requirements.

Development of Alternative 4 could increase land-use intensities in the area, resulting in increased solid waste generation in the service area for the Mid-Valley and San Timoteo Sanitary Landfills. However, solid waste is already being generated at the Plan area. Through compliance with City and state solid waste diversion requirements, impacts would be less than significant, similar to the Project.

Similar to the Project, all construction work of telecommunication tie-ins within the City public right-of-way would be subject to City municipal code requirements. Installation of new telecommunication lines and associated laterals would consist of either trenching to the depth of pipe placement or using a variety of different trenchless technology, both which could result in potential short-term erosion induced siltation of nearby waterways. Standard BMPs, installed as part of an NPDES-mandated SWPPP, would reduce potential water quality impacts to less-than-significant levels. As such, impacts associated with construction of telecommunication infrastructure would be less than significant, similar to the Project.

Therefore, impacts to utilities and service systems under Alternative 4 would be similar to the Proposed Project, which would result in a less than significant impact.

4.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

State CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The State CEQA Guidelines also state that, should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

A comparative summary of the environmental impacts associated with each alternative as compared to the Proposed Project is provided in Table 4-2. As shown, the No Project/No Build Alternative (Alternative 1) would be the environmentally superior alternative as it would result in no new environmental impacts, would avoid many of the Proposed Project's impacts, and would eliminate the significant and unavoidable impacts identified for the Proposed Project related to air quality (criteria air pollutant emissions associated with construction), population and housing, public services (parks), and recreation. However, Alternative 1 would result in significant and unavoidable operational air quality impacts, greenhouse gas emission impacts, and transportation impacts. Alternative 1 would not achieve any of the Project objectives.

As demonstrated above, Alternative 3 would not avoid the Project's significant and unavoidable impacts. However, because less development would be involved under Alternative 3, these impacts would be slightly less when compared to the Project. As shown in Table 4-2, energy consumption would be less when compared to the Project. Therefore, Alternative 3 is the Environmentally Superior Alternative. However, Alternative 3 would only partially meet the Project objectives.

Table 4-2
Comparison of Impacts

Impact Area	Proposed Project Impacts with Mitigation	Alternative 1 No Project / No Build Alternative	Alternative 2 No Project / Existing Planned Development Alternative	Alternative 3 Reduced Residential Alternative	Alternative 4 Reduced Commercial/ Office Alternative
Aesthetics	LTS	▼	—	—	—
Air Quality	S&U	▼	▼	—	—
Biological Resources	LTS	▼	—	—	—
Cultural Resources	LTS	▼	—	—	—
Energy Consumption	LTS	▼	▼	▼	▼
Geology & Soils	LTS	—	—	—	—
Greenhouse Gas Emissions	S&U	—	—	—	—
Hazards & Hazardous Materials	LTS	▼	—	—	—
Hydrology & Water Quality	LTS	▼	—	—	—
Land Use & Planning	LTS	▼	▼	—	—
Noise	LTS	▼	—	—	—
Population & Housing	S&U	▼	▼	—	—
Public Services	S&U	▼	▼	—	—
Recreation	S&U	▼	▼	—	—
Transportation	S&U	▼	▼	—	—
Tribal Cultural Resources	LTS	▼	—	—	—
Utilities & Service Systems	LTS	▼	—	—	—
Meets Most of the Basic Project Objectives?	Yes	No	No	Yes	Yes

▲ Alternative is likely to result in greater impacts to issue when compared to Proposed Amendment.
— Alternative is likely to result in similar impacts to issue when compared to Proposed Amendment.
▼ Alternative is likely to result in reduced impacts to issue when compared to Proposed Amendment.
LTS = less than significant.
S&U = significant and unavoidable.

4.4 REFERENCES

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CHAPTER 5
OTHER CEQA REQUIREMENTS

5.1 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACTS

This section is prepared in accordance with Section 15126.2(c) of the State CEQA Guidelines, which requires the discussion of any significant environmental effects that cannot be avoided if a project is implemented. These include impacts that can be mitigated, but cannot be reduced to a less than significant level. An analysis of environmental impacts caused by the Proposed Project has been conducted and is contained in this EIR. Fifteen issue areas were analyzed in detail in Chapter 3. According to the environmental impact analysis presented in Chapter 3, the Montclair Place District Specific Plan Project (MPDSP or Proposed Project) could result in significant and unavoidable adverse impacts in the following CEQA issue areas:

- Air Quality
- Greenhouse Gas Emissions
- Population and Housing
- Public Services
- Recreation
- Transportation

5.2 EFFECTS NOT FOUND TO BE SIGNIFICANT

Section 15128 of the State CEQA Guidelines requires a statement that briefly indicates the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. As stated in the State CEQA Guidelines, such a statement may be contained in an attached copy of an Initial Study. An Initial Study was prepared for the Proposed Project and is included as Appendix A in this Draft EIR. As described and substantiated in Appendix A, the following five issue areas were not found to be significant, and therefore, were not further analyzed in this EIR: agriculture and forestry resources, biological resources, cultural resources, mineral resources, and wildfire. Additionally, while the remaining fifteen issue areas are analyzed in this EIR, the analysis in the Initial Study found that the Proposed Project would result in no impacts, less than significant impacts, or less than significant impacts after mitigation for certain thresholds within some of the remaining fifteen issue areas. These thresholds have not been further analyzed in this EIR and are listed below.

- Aesthetics
    - Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

  - Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

- Geology and Soils
  - Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Refer to Division of Mines and Geology Special Publication 42).
    - Strong seismic ground shaking
    - Landslides
  - Result in substantial soil erosion or the loss of topsoil.
  - Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.
  - Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Hazards and Hazardous Materials
  - For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area.
  - Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
  - Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.
- Hydrology and Water Quality
  - Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    - impede or redirect flood flows?
  - In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?
  - Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

- Land Use and Planning
  - Would the project physically divide an established community?
- Population and Housing
  - Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the State CEQA Guidelines requires that an EIR analyze the extent to which the proposed project's primary and secondary effects would impact the environment and commit nonrenewable resources to uses that future generations will not be able to reverse. Nonrenewable resources that would be used on-site during construction and operation include natural gas, other fossil fuels, water, concrete, steel, and lumber. Construction and operation of future projects under the MPDSP would result in the commitment of such resources. (The Proposed Project's potential energy consumption is discussed in greater detail in Section 3.3 of this EIR.)

Electricity is provided to the Plan area by Southern California Edison (SCE). SCE serves approximately 180 cities in 11 counties across Central and Southern California. SCE's electrical energy generation sources include natural gas, coal, nuclear, renewable energy (geothermal, small hydroelectric, solar, and wind), and large hydroelectric facilities. The Southern California Gas Company provides the City with natural gas service. The company's service territory encompasses approximately 20,000 square miles and more than 500 communities. Potable and recycled water service would be served by the Monte Vista Water District (MVWD). MVWD is under regulatory obligations to treat the water to appropriate standards set by the U.S. Environmental Protection Agency (EPA), the State Water Resources Control Board, and the California Regional Water Quality Control Board (RWQCB). The MVWD currently serves a 9.56-square mile portion of the Chino Basin and derives most of its water from the Chino Groundwater Basin (MVWD 2016).

The Chino Groundwater Basin has a total underground water storage capacity of approximately 6 million acre-feet and currently holds approximately 5 million acre-feet of groundwater. The Chino Basin Judgment, adopted by the California Superior Court in 1978 under stipulation by local groundwater producers, designated a safe yield for the basin of 140,000 acre-feet, which is the amount of groundwater that can be pumped from the basin each year without causing undesirable results. Purchasing imported water from the Metropolitan Water District of Southern California (MWD), through the Inland Empire Utilities Agency (IEUA), for basin recharge generally makes up any excess of pumping over the safe yield. However, supplemental water may be obtained from any available source, including recycled water and imported water. The

Chino Basin Judgment also allows for the transfer and storage of excess rights and supplemental supplies. Currently, the District relies on approximately 75% of its water supply from 12 active groundwater wells and other local supplies and 25% from imported water. The MVWD retail area includes the City of Montclair, portions of the City of Chino, and unincorporated areas of San Bernardino County (MVWD 2016). These entities that supply the project site with resources are subject to a variety of policies that require reductions in resource usage and/or reductions in emissions. Examples include the California Renewables Portfolio Standard, AB 939, SB 1374, and the requirement to prepare Urban Water Management Plans.

- While the City does not have direct jurisdiction over the utilities that serve it, use of resources within the City is inventoried within the City's General Plan, and there are numerous policies and programs in place to reduce the use of nonrenewable resources within the City as a whole. The Conservation Element of the General Plan identifies opportunities for energy conservation, and the Air Quality Element identifies policies for improving air quality, some of which have an associated effect of reducing fossil fuel consumption. The General Plan Housing Element identifies opportunities for energy conservation (City of Montclair 1999). This section lists some basic residential energy conservation strategies, which should be encouraged and/or required in housing construction: Locate housing in reasonably close to proximity to employment centers, services, schools, parks and other facilities in order to reduce unnecessary automobile usage.
- Locate housing in areas served by public transportation and provide facilities which may better facilitate the use of that transportation.
- Construct homes utilizing full insulation and weatherization standards as required by State and federal regulations.
- Design subdivisions which will provide adequate solar access for planned and future use of solar energy. Subdivision designs which best provide for solar access include a predominant east/west street pattern, orientation of the major access of homes so as to align within 25 degrees of due south, and provide adequate open space to the south of each home so as to provide a "window" to the sun.
- Design homes which can easily accommodate passive and active solar principles and apparatus. Examples of such design include double thickness window glazing, natural flow-through ventilation, clerestory windows, and adequate, well-located southerly exposure roof area.
- Incorporate landscape around homes as a passive solar element in order to provide natural winter heating and summer cooling. The location of deciduous trees on the south side of a home is a particularly good tool for this purpose.

- Incorporate water conservation planning and design into the construction of homes. Low-flow water restrictors and the use of native, drought-resistant plant materials are ways of accomplishing this conservation.
- Make use of refuse separation techniques and collection points in order to recycle such items as aluminum, glass, and paper.
- Encourage trip reduction through programs such as compressed work weeks, flex schedules, carpooling, and telecommunication.
- Provide bicycle and pedestrian pathways and facilities to encourage non-motorized trips.

Additionally, the City also has a Green Building Standards Code, which regulates and controls the planning, design, operation, use and occupancy of newly constructed buildings and structures in the City. At this time, the City of Montclair has not adopted a Climate Action Plan or similar greenhouse gas (GHG) reduction strategy. However, the City has established a goal to reduce its community-wide GHG emissions to a level that is 20% below its 2008 GHG emissions level by 2020 (SANBAG 2014). As described in Section 3.5 of this EIR, approximately 54% of the City's GHG emissions in 2008 were attributed to on-road transportation. Building energy accounted for approximately 32%. Off-road equipment accounted for approximately 6%, solid waste management accounted for 4%, water conveyance accounted for 3%, and wastewater treatment made up the remaining 1% of the City's GHG emissions in 2008. The City of Montclair General Plan (City of Montclair 1999) includes various policies related to reducing GHGs (both directly and indirectly) in the Circulation Element, Housing Element, Air Quality Element, and Conservation Element. Efforts to reduce GHG emissions will have a related beneficial effect of reducing use of nonrenewable sources, such as fossil fuels.

The location and design of the MPDSP also encourages pedestrian and bicycle activity and use of transit in lieu of personal vehicles. While the MPDSP would allow for an intensification of development in the Plan area, it would locate housing and jobs within walking and biking distance to the Montclair Transcenter and the anticipated extension of the Foothill Gold Line railway. Additionally, the development would take place within an existing developed but underutilized area that is surrounded on all sides by urbanization.

As described above, the utilities that service the City, the City itself, and the design of future projects under the MPDSP are all subject to regulations that are working to reduce the amount of nonrenewable resources that are committed to development projects. Additionally, future projects under the MPDSP may incorporate voluntary sustainable design factors to go beyond the requirements. As such, the MPDSP is not anticipated to consume substantial amounts of energy in a wasteful manner, and it would not result in significant impacts from consumption of utilities (see Sections 3.3 and 3.15 of this EIR, respectively). Although irreversible

environmental changes would result from the Proposed Amendment, such changes would not be considered significant.

5.4 GROWTH-INDUCING IMPACTS

According to Section 15126.2(e) of the State CEQA Guidelines, growth-inducing impacts of a proposed project shall be discussed in an EIR. This discussion must include the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth. Increases in population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The discussion must also include characteristics of a project, if any, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Section 15126.2(e) states that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

As explained throughout this EIR, the Proposed Project involves a specific plan that would increase the development potential in the Plan area. The Plan area currently consists of an underutilized regional mall property, with extensive surface parking, strip commercial development, and freestanding commercial buildings. The Plan area is surrounded by development on all sides: to the north are commercial and residential uses that are within the North Montclair Downtown Specific Plan (NMDSP) area, to the east are commercial uses that are within the North Montclair Specific Plan (NMSP) area, to the south is the I-10 freeway, and to the west are commercial, institutional, and residential uses that are also within the NMSP area. Access to the Plan area is available via Monte Vista Avenue, Central Avenue, and Moreno Street.

The MPDSP would allow for development of up to 6,321 dwelling units and an additional 512,635 square feet of commercial space within the Plan area through 2040. The 6,321 dwelling units are expected support a residential population of approximately 18,331 persons (see Section 3.10, Population and Housing). The expansion of non-residential space would also increase the number of jobs available in the project area relative to existing conditions. The number of potential jobs available in the Plan area, assuming full buildout, would be 5,425 jobs, representing a net gain in employment within the Plan area of 1,404 employees. (See Section 3.10, Population and Housing, for details and associated calculations.)

The growth in population that would be allowed under the MPDSP exceeds the population and employment growth identified for the City in the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In regards to available employment opportunities, the City's employment

rates are decreasing compared to projections identified in the RTP/SCS but are anticipated to increase by 2045 (see Section 3.10 for further information). Growth projections in the RTP/SCS are used in part for infrastructure planning and development, to ensure that regional infrastructure is properly sized and planned for expected development. The projections are based in part on the underlying land use plans and zoning for the cities and counties that make up the SCAG region. The new land use and zoning designations for the Plan area that would go into effect under the MPDSP would allow for additional development relative to the existing designations. As such, the population and employment growth that would be permitted under the MPDSP is not reflected in the latest RTP/SCS, which is scheduled to be adopted August 2020. It should be noted that the City outpaced its current SCAG growth projections between 2016 and 2018 (see Section 3.10, Population and Housing, for details). As such, the City is already growing faster than anticipated. The MPDSP would, therefore, be in line with this more accelerated growth trend. Furthermore, buildout of the MPDSP would add housing to the City, which is considered to be "jobs rich" (see Section 3.10 for details). The Proposed Project would increase the jobs-to-housing balance in the City, placing more residences near areas of employment. As such, the residents that could be brought into the City by development in the Plan area would be, at least in part, supported by existing jobs. The existing "jobs rich" nature of the City would thus limit the economic growth that would be associated with the MPDSP.

A new and updated RTP/SCS is prepared every four years. As such, if the MPDSP were to be approved, its land use designations and associated growth would likely be reflected in future versions of the RTP/SCS. Adoption of the next RTP/SCS would occur about 20 years before expected buildout of the MPDSP. As such, for the majority of the implementation period of the MPDSP, its land use designations and associated growth potential would be reflected in regional land use planning efforts.

The current City General Plan was adopted in 1999 and also does not reflect the land uses and zoning that would be put in place for the Plan area under the MPDSP. As with the RTP/SCS, the latest General Plan does not account for this growth. The General Plan states that the City has an expected buildout population of 45,000 people through 2015 (City of Montclair 1999). As discussed in greater detail in Section 3.10, Population and Housing, the current City population (40,402 people as of 2018) remains below this anticipated buildout population. However, because the City's General Plan does not discuss population buildout beyond 2015, the analysis conducted within this Draft EIR reviewed the RTP/SCS to better understand population growth impacts for the planning horizon of the Proposed Project over approximately 20 years. The City's projected population for 2045, as anticipated by SCAG (49,200 people) is also below this expected buildout population (see Section 3.10, Population and Housing). With buildout of the MPDSP, the City would exceed the expected buildout population of 45,000 people. The City is currently undergoing a General Plan update, which is expected to be adopted in spring 2020. If the MPDSP is approved prior to General Plan adoption, the potential land use change and growth

associated with the MPDSP would be reflected in the General Plan that would be in place for the majority of MPDSP implementation.

Despite the planned updates to the City's General Plan and RTP/SCS and the potential benefits of the MPDSP on the City's balance of jobs and housing, the growth allowed under the MPDSP is not currently accounted for in local or regional planning efforts, indicating that the proposed growth could outpace existing community services. As explained above, the City is already outpacing projected growth. Development under the MPDSP would contribute to and accelerate this trend. This EIR analyzes the MPDSP's potential to require new public services, transportation infrastructure, utilities, and service systems (specifically, these issues are addressed in Section 3.11, Public Services; Section 3.12, Recreation; Section 3.13, Transportation; and Section 3.15, Utilities and Service Systems). As concluded in Section 3.11 and Section 3.12, the MPDSP would result in the need for additional public services facilities, including fire protection facilities and parks. However, the location, size, and extent of new public service infrastructure remains highly speculative at this time. Public service providers have indicated that the Proposed Project may result in the need for new facilities, equipment, and personnel. However, the specific number, size, and location of such infrastructure remains unknown at this time. The MPDSP has a buildout horizon of 20 years. While the MPDSP would allow for additional development in the Plan area, the timing and specific sizes of future projects developed under the MPDSP are currently unknown. It is also unknown whether full buildout of the MPDSP would be actualized. As such, the need for new public facilities, the location and size of such facilities, and the timing of when such facilities would be needed is unknown and highly speculative at this time. Regarding utilities, construction of new water, sewer, electric, natural gas, telecommunications, and stormwater infrastructure would primarily take place within the Plan area to provide connections for future projects built under the MPDSP. This infrastructure has been analyzed as part of the Proposed Project in this EIR and would be sized to support future projects in the Plan area only. As stated in Section 3.15, upgrades to the existing 10-inch sewer line in Monte Vista Avenue would be required as part of Project implementation, as the current line is inadequately sized to accommodate Proposed Project wastewater flows. In addition, some utilities (such as electrical, natural gas, and telecommunication facilities) may need to be upgraded off site in association with later phases of the Proposed Project (i.e., Phases E through G). These upgrades are considered speculative at this time and would likely be sized to accommodate the excess needs of the MPDSP only. Other than the lateral connections from the Plan area to existing water mains, the Proposed Project is not expected to require or result in construction or expansion of off-site water lines.

As described above, most of the infrastructure required for future projects constructed under the MPDSP would be internal to the Plan area and would be designed and constructed to support MPDSP development only. Water and sewer pipelines would connect projects within the MPDSP to existing infrastructure within surrounding roadways; internal roadways would connect vehicular,

bicycle, and pedestrian traffic to the surrounding roadways; and, parks and open space would help support the recreational needs of residents and employees within the Plan area. The infrastructure built within the Plan area is part of the MPDSP and, therefore, has been analyzed for its impacts on the environment in this EIR. The infrastructure within the Plan area would not be sized for use by development outside of the Plan area. As such, this infrastructure is not expected to support development in the surrounding environment. However, as described in the paragraph above, MPDSP buildout may also be associated with some development and/or expansion of off-site infrastructure, such as fire protection facilities and parkland. While the development of such infrastructure is considered highly speculative at this time, new infrastructure that is constructed could be used by other development projects in the surrounding areas, potentially contributing to economic growth, population growth, and/or additional housing in the surrounding environment. The potential for the Proposed Project to facilitate this type of growth would be considered a potential indirect growth-inducing effect of the Project. However, it should be mentioned that this indirect growth inducement would be unlikely and/or would be limited by a number of factors. First, the City is considered to be "landlocked" and has very little vacant land for development of new housing (City of Montclair 1999). Second, the Plan area is located within the NMSP area and adjacent to the NMDSP area. These adopted plans govern land use development in the vicinity of the Plan area. As such, growth in the vicinity of the MPDSP is governed by existing, adopted specific plans and is also limited by the landlocked and developed nature of the City. Third, the Plan area is bordered to the south by a 12-lane freeway. As such, the MPDSP is unlikely to facilitate or encourage development to the south of the Plan area. The potential for the MPDSP and associated off-site infrastructure to trigger development in the surrounding environment and/or to facilitate additional population growth is, therefore, unlikely, speculative, and limited. Any future projects in the surrounding environment would also be subject to environmental analysis pursuant to CEQA and must include the level of detail required for a project-level review process. In the event that significant environmental effects are identified during this process, mitigation measures, project alternatives, or the identification of overriding considerations would be required pursuant to CEQA. Furthermore, it should be noted that any future development in the vicinity of the Plan area would be limited to redevelopment and/or infill development. These types of projects are typically less impactful to the environment than new land development projects and are often supported and even encouraged by land use policies that seek to reduce urban sprawl and encourage transit-oriented development. Nevertheless, there remains some potential that future off-site infrastructure associated with the MPDSP could, at least in part, support or remove obstacles for other development in the vicinity of the MPDSP.

Approval of the MPDSP is not expected to encourage and/or facilitate other activities that could significantly affect the environment. As explained above, the Plan area is surrounded on three sides by existing development and is bordered on its fourth side by an approximately 12-lane freeway (the I-10). The development surrounding the Plan area is currently governed by two specific plans that are adopted and that have been analyzed under CEQA. The MPDSP fits into

the context of improvements that are taking place in the northern section of the City. Development of the MPDSP could potentially accelerate planned development in nearby areas. For example, the introduction of residential uses to the Plan area could support commercial development in the adjacent NMDSP area, potentially accelerating and/or allowing for implementation of that plan. This potential acceleration of nearby development is considered a potential indirect growth-inducing effect of the Project.

In conclusion, the MPDSP has the potential to indirectly support and/or accelerate growth in the vicinity of the Plan area. However, the MPDSP is being proposed within the context of existing redevelopment efforts in the north Montclair area and is, in part, a reaction to the proposed Foothill Gold Line railway extension. This transit extension is associated with a variety of transit-oriented, mixed-use developments that are being constructed and proposed near the anticipated Gold Line corridor across the region. The MPDSP is part of a regional planning and growth trend associated with policy decisions to develop public transit and to concentrate new development along transit corridors. The MPDSP would support increased use of transit and would also help balance the jobs-to-housing ratio within the City. Despite these potential benefits and overall consistencies with regional trends and policies, the MPDSP would nevertheless allow for population and employment growth that extends beyond what is currently contemplated for the City in its General Plan and in the SCAG RTP/SCS. Until the General Plan is updated, its growth projections and associated infrastructure planning efforts and environmental policies would not account for the growth allowed under the MPDSP. As projects are developed under the MPDSP, the associated growth may lead to development of off-site infrastructure that would have some potential to support and/or accelerate expanded development in the surrounding environment. Additionally, development of projects under the MPDSP may accelerate development in the vicinity, as it may provide new residents to support nearby services. As such, despite its potential benefits and its consistency with regional trends (e.g., increased mixed-use development along the future Gold Line route), the Proposed Project is considered to be potentially growth inducing.

5.5 REFERENCES

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CHAPTER 6
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