Claremont Housing Element Update

Draft Environmental Impact Report

prepared by

City of Claremont
Community Development Department
207 Harvard Avenue North
Claremont, California 91711
Contact: Brad Johnson, Community Development Director

prepared with the assistance of

Rincon Consultants, Inc.
706 South Hill Street, Suite 1200
Los Angeles, California 90014

January 2022

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Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed update of the City of Claremont Housing Element and Safety Element (Housing Element Update). This section summarizes the characteristics, alternatives, and the environmental impacts and mitigation measures associated with the Housing Element Update.

Project Synopsis

Project Applicant

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Project Description

The project consists of a comprehensive update to the City of Claremont Housing Element. The Housing Element is a State-required element in the City of Claremont General Plan. It provides an indication of the need for housing in the community, particularly the availability, affordability, and adequacy of housing. It is the only element of the General Plan that requires periodic updating per State law. The Housing Element provides the City of Claremont's goals, policies, actions, and objectives for housing development, and development and preservation of housing affordability during each State planning cycle. The current Housing Element was adopted in 2013 and is in effect through 2021.

The Housing Element Update for the 6th Cycle will cover the eight-year planning period from 2021-2029. Claremont continues to prioritize affordable and inclusionary housing availability for all residents, tailored to the unique demographics of the community. The results of the Regional Housing Needs Assessment (RHNA) allocation will inform planning and development to support the evolving housing needs of Claremont residents.

California Department of Housing and Community Development (HCD) requires local jurisdictions to identify enough future housing opportunity sites inventory to not only cover the jurisdiction's 6th Cycle RHNA, but to also provide a sufficient buffer capacity above the RHNA. The buffer capacity is required to accommodate realistic production rates of affordable housing units; plus having the buffer can allow for instances when a smaller residential project may have to be considered for a

given property. The "No Net Loss" Law (Government Code Section 65863) requires maintenance of sufficient sites to meet the RHNA for all income levels throughout the planning period.

With a 20 percent buffer, the City's Inventory of Sites will target identifying a capacity of at least 2,054 units, of which approximately 1,039 will be for low- and very low-income. The RHNA allocation and required buffer are detailed below in Table ES-1. Furthermore, 620 residual units are also included in the total number of potential housing units for an increased contingency buffer of 2,805 total possible units, although it is unlikely these units would be developed

Table ES-1 Project Characteristics

	Income Category *			
	Extremely Low (<30%) Very Low (31-50%) Low (51-80%)	Moderate (81-120%)	Above Moderate (120% or more)	Total Housing Units
RHNA Housing units	866	297	548	**1,711**
20 percent buffer	173	60	110	**343**
Total RHNA + buffer	1,039	357	658	**2,054**

*Percentage of Los Angeles County median income
Source: City of Claremont 2021

To meet the objectives of the RHNA and provide sufficient capacity for housing development, the Housing Element specifies sites for residential development. However, the Housing Element in and of itself does not develop housing. The Housing Element Update concluded that the city has sufficient capacity under existing land use conditions to accommodate its RHNA allocation and no changes to zoning maps, or General Plan density standards and land use designations would be required.

As described in the 2021 Housing Element Update, the City's RHNA can be accommodated in the following categories:

- Planned or pending projects where no rezoning is required
- Vacant or underutilized sites, where new residential units can be developed under current General Plan regulations
  Current accessory dwelling units trends

The Housing Element Update also includes an update to the Safety Element as required by the 2019 Assembly Bill (AB) 747 and 2019 Senate Bill (SB) 99. Information updates include evacuation routes and capacity, safety, and viability under a range of emergency scenarios as well as information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. A climate change vulnerability assessment is included in accordance with SB 379 from 2015. Proposed Safety Element updated areas cover climate change, fire hazards, evacuation plans, and disaster preparedness and response. The Safety Element Update addresses the requirements of the bills as does the City's Local Hazard Mitigation Plan update that was approved in September 2021.

Project Objectives

- Meet State required Regional Housing Needs Assessment (RHNA) for 6th Cycle Housing Element planning period of 2021 - 2029
- Bring the General Plan into conformance with recently enacted State laws

- Identify future housing opportunity sites with a collective capacity to meet the City's RHNA, including the requisite buffer capacity
- Locate future housing opportunity sites in existing urban areas, in close proximity to transit and commercial services, and to avoid placement of new housing in open space areas

Alternatives

As required by CEQA, this EIR evaluates a range of alternatives to the proposed Housing Element Update. Alternatives analyzed include the following:

- Alternative 1: No Project (continuation of the current Housing Element)
- Alternative 2: Increased Mixed Use Overlay Alternative
- Alternative 3: Reduced Units Alternative

Each of the alternatives discussed in this section has certain advantages and disadvantages as compared to the Housing Element Update, as described below.

- **Alternative 1: No Project (continuation of the current Housing Element)**

  Alternative 1 involves continued implementation of the existing 2013-2021 Housing Element and a continued growth rate predicted by SCAG to add an additional 1,711 units by 2029. Additionally, under the No Project Alternative, the policy changes proposed as part of the proposed Housing Element Update would not occur. The City would continue existing policies in the 2013-2021 Housing Element, but new policies that place additional focus on affirmatively furthering fair housing would not be adopted. Due to the limitation placed on development in the city under existing plans and policies, the No Project Alternative would not be consistent with Objective 1 to meet the City's fair share of housing through the planning horizon year of 2029 and Objective 4 to provide housing opportunity sites for more housing. Ultimately, this alternative would not fulfill the State requirements regarding updates to the Housing Element and SCAG's RHNA allocation and would not be certified by HCD.
- **Alternative 2: Increased Mixed-Use Overlay Alternative**

  Alternative 2 would include the Mixed-Use Overlay (MUO) zone on all of the commercial parcels along major transportation corridors applied at 30 dwelling units per acre (du/a). Major corridors include Baseline Road, Foothill Boulevard, Arrow Highway, Towne Avenue, and Indian Hill Boulevard. Like the proposed Housing Element Update, Alternative 3 would meet the City's RHNA allocation.
- **Alternative 3: Reduced Units Alternative**

  Alternative 3 would reduce all housing opportunity sites with 40 to 60 du/a to 30 du/a. Like the proposed Housing Element Update, Alternative 3 would meet the City's RHNA allocation.

No other alternatives were identified that would feasibly attain most of the basic project objectives, but also avoid or substantially lessen the significant effects of the Housing Element Update.

Areas of Known Controversy

Areas of known controversy, including issues raised by some members of the community, are potential impacts to aesthetics, air quality and greenhouse gas emissions energy use, noise, strain on public services, and traffic congestion.

Issues to be Resolved

The proposed Housing Element Update would require approval by the California Department of Housing and Community Development (HCD).

Issues Not Studied in Detail in the EIR

As indicated in the Initial Study prepared for the project, there is no substantial evidence that significant impacts would occur to the following issue areas: Agricultural and Forestry Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Public Services, Recreation (see Appendix A). Impacts to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Population and Housing, Transportation, Tribal Cultural Resources, and Utilities were found to be potentially significant and are addressed in this EIR.

Summary of Impacts and Mitigation Measures

Table ES-2 summarizes the environmental impacts of the Housing Element Update, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the *CEQA Guidelines*.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the *CEQA Guidelines*.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The proposed Housing Element Update would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure (s)	Residual Impact
Aesthetics		
Impact AES-1. Views of the San Gabriel Mountains are available from roadways throughout the City. Development of housing units facilitated by the Housing Element Update along major roadways would not interfere with scenic views from public viewing areas, such as roads or pedestrian walkways. However, development projected on housing opportunity site 32 may impact existing	**AES-1 Massing and Distribution of Buildings.** For development on Site 32, at 1550 Indian Hill Boulevard, project design shall be subject to architectural review by the City to ensure the building massing and arrangement would integrate with the views to the north and northeast. Architectural review shall confirm some visibility of the mountains and ridgelines through the proposed development. Building heights shall vary in a way to provide visual interest and shall not	Less than Significant with Mitigation

Impact	Mitigation Measure (s)	Residual Impact
views. Therefore, impacts would be less than significant with mitigation.	create an architectural wall that would block the vista from the roadway.	
Impact AES-2. The Housing Element Update proposes rezoning that would accommodate increased density that could include multi-story buildings on parcels adjacent to single-family residential neighborhoods, resulting in the potential for a significant impact to the visual quality of those neighborhoods. Impacts would be less than significant.	None	Less than significant
Impact AES-3. New development facilitated by the Housing Element Update could add new sources of light and glare. All development would be required to comply with the City's lighting regulations (dark skies ordinance) and impacts would be less than significant.	None	Less than significant
Air Quality		
Impact AQ-1. The Housing Element Update would not conflict with or obstruct implementation of the 2016 AQMP. In addition, operation of reasonably foreseeable development facilitated by the Housing Element Update would not result in a cumulatively considerable net increase in of any criteria pollutant for which the region is in non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant.	None	Less than significant
Impact AQ-2. Construction activities facilitated by the Housing Element Update would not result in a cumulatively considerable net increase in of any criteria pollutant for which the region is in non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant.	None	Less than significant
Impact AQ-3. The Housing Element Update would not expose sensitive receptors to substantial concentrations of carbon monoxide or TACs. Impacts would be less than significant.	None	Less than Significant
Biological Resources		
Impact BIO-1. The Plan Area is largely urbanized, and the Housing Element Update would prioritize development on infill sites that have been previously developed and/or disturbed. Nevertheless, reasonably foreseeable development facilitated by the Housing Element Update could occur on vacant sites or developed sties adjacent to open space. Development facilitated by the Housing Element Update has the potential to adversely impact special-status species or	**BIO-1 Biological Resources Screening and Assessment**: The following measures shall be implemented prior to final design approval of individual development projects under the proposed Housing Element Update, including those located at housing opportunity sites in and near the northern hillside area of the City, that involve ground disturbance in or directly adjacent to natural habitat, or the removal or trimming of trees:	Less than Significant with Mitigation

Impact	Mitigation Measure (s)	Residual Impact
their habitat. Special-status species and nesting birds expected to occur within the Plan Area may be affected by development under the Housing Element Update. Impacts would be less than significant with incorporation of Mitigation Measures BIO-1 through BIO-**3**	The project applicant shall retain a qualified biologist to conduct an analysis of the project to identify biological constraints and potential impacts to sensitive biological resources, including potential impacts to special-status plants, animals, and their habitats, as well as protected natural communities including wetland and terrestrial communities and protected trees. The qualified biologist shall submit the Biological Resources Screening and Assessment to the City for their review and approval prior to final project design approval. For those projects where ground disturbance would not affect natural habitat (i.e., work is limited to paved, ruderal, or developed areas only), a desktop analysis to identify biological constraints for the project may be sufficient. This analysis shall include queries of agency databases such as the CNDDB, the CNPS *Inventory of Rare and Endangered Plants of California*, the USFWS IPaC, USFWS *Critical Habitat Portal*, and USFWS *National Wetlands Inventory (NWI)* as well as other relevant literature for baseline information on special-status species and other sensitive biological resources occurring at the individual project site and in the immediate surrounding area. The qualified biologist shall determine, based on the nature of construction activities, if a field reconnaissance is necessary for such projects to completely assess biological constraints. If the biologist identifies protected biological resources within the limits of and/or potentially adversely affected by the project, the project applicant shall first prepare alternative designs that seek to avoid and/or minimize impacts to the biological resources. If the project cannot be designed without complete avoidance, the project applicant shall have the qualified biologist identify the specific impacts to special-status species, develop project-specific avoidance and mitigation procedures to be followed to reduce biological impacts to a less-than-significant level, identify any state or federal listed species that would necessitate coordination with the appropriate regulatory agency (i.e., USFWS, National Marine Fisheries Services [NMFS], CDFW, U.S. Army Corps of Engineers [USACE]) to obtain regulatory permits, and implement project-specific avoidance and mitigation measures prior to and during any construction activities. Mitigation actions that may be required should impacts to special-status species be identified include: ▪ Pre-construction surveys to identify the presence of special-status species within and adjacent to work areas.	

Impact	Mitigation Measure (s)	Residual Impact
	▪ Worker Environmental Awareness Program training for all construction personnel. ▪ Complete avoidance of special-status species where and if possible. Avoidance measures may include: ▪ Delimiting and flagging of special-status species avoidance buffer areas (Environmentally Sensitive Areas or ESAs) ▪ Monitoring of construction activity near ESAs ▪ Installation of special-status species exclusion fencing. ▪ Relocation of special-status species out of work areas (with applicable permits and authorizations as necessary). ▪ Restoration of temporarily disturbed special-status species' habitat. ▪ Compensatory mitigation for impacts to special-status species habitat at a minimum ratio appropriate for extent and quality of permanently disturbed habitat. Mitigation ratios may vary from 1:1 to 5:1 **BIO-2 Construction Best Management Practices:** For proposed projects evaluated for potential impacts to special-status species in a biological resources screening and assessment as required by Mitigation Measure BIO- 1, the project applicant shall incorporate one or more of the following construction Best Management Practices (BMPs) as recommended by a qualified biologist into grading and construction plans, for projects that would require grading and paving activities on vacant and/or undisturbed parcels, prior to final design approval of an individual project: ▪ Pre-construction surveys to identify the presence of special-status species within and adjacent to work areas. ▪ Worker Environmental Awareness Program training for all construction personnel. ▪ Complete avoidance of special-status species where and if possible. Avoidance measures may include: ▪ Delimiting and flagging of special-status species avoidance buffer areas (Environmentally Sensitive Areas or ESAs) ▪ Monitoring of construction activity near ESAs ▪ Installation of special-status species exclusion fencing. ▪ Relocation of special-status species out of work areas (with applicable permits and authorizations as necessary). ▪ Restoration of temporarily disturbed special-status species' habitat. ▪ Compensatory mitigation for impacts to special-status species habitat at a minimum	

Impact	Mitigation Measure (s)	Residual Impact
	ratio appropriate for extent and quality of permanently disturbed habitat. Mitigation ratios may vary from 1:1 to 5:1 **BIO-3 Nesting Bird Protection:** For development projects that require tree or vegetation removal, construction activities shall occur outside of the nesting season wherever feasible (September 16 to January 31). If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds covered by the CGFC no more than 14 days prior to vegetation removal. The surveys shall include the entire disturbance area plus a 200-foot buffer around the site as feasible. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 feet for non-raptor bird species and at least 150 feet for raptor species. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed, and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the City to document compliance within 30 days of its completion. ▪ A 15 mile-per-hour speed limit shall be designated in all construction areas to minimize dust emissions and noise. ▪ All vehicles and equipment shall be parked on pavement, existing roads, and previously disturbed areas, and clearing of vegetation for vehicle access shall be avoided to the greatest extent feasible. ▪ The number of access routes, number, and size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the goal of the project. ▪ Equipment washout and fueling areas shall be located within the limits of grading at a minimum of 100 feet from waters, wetlands, or other sensitive resources as identified by a qualified biologist. Washout areas shall be designed to fully contain polluted water and materials for subsequent removal from the site. ▪ The hours of noise generating construction activity shall be limited to the hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday (consistent with the construction noise	

Impact	Mitigation Measure (s)	Residual Impact
	exemption pursuant to City of Claremont Municipal Code Section 16.154.020(F)(4)). ▪ Mufflers shall be used on all construction equipment and vehicles shall be in good operating condition. ▪ Drip pans shall be placed under all stationary vehicles and mechanical equipment. ▪ All trash shall be placed in sealed containers and shall be removed from the project site a minimum of once per week. ▪ No pets are permitted on project site during construction.	
Impact BIO-2. Reasonably foreseeable development facilitated by the Housing Element Update could result in construction work within riparian habitats or other natural communities of special concern. Impacts would be less than significant with incorporation of Mitigation Measures BIO-4 and BIO-5.	**BIO-4 Riparian or Other Sensitive Natural Communities** For development under the Housing Element Update located within or immediately adjacent to natural areas, if the initial screening of biological resources under Mitigation Measure BIO-1 identifies presence of riparian or other sensitive natural communities within or adjacent to a project site, the project applicant shall design or modify the project to avoid direct and indirect impacts on these habitats, if feasible. Additionally, the project applicant shall minimize the loss of riparian vegetation by trimming rather than removal where feasible. Trimming riparian vegetation may require a CDFW Lake or Streambed Alteration Agreement. Prior to construction, the project applicant shall install orange construction barrier fencing to identify environmentally sensitive areas around the riparian area (50 feet from edge) and other sensitive natural communities (50 feet from edge), or as defined by the agency with regulatory authority over the resource(s). The location of the fencing shall be marked in the field with stakes and flagging and shown on the construction drawings. The fencing shall be installed before construction activities are initiated and shall be maintained throughout the construction period. The following paragraph shall be included in the construction specifications: The Contractor's attention is directed to the areas designated as "environmentally sensitive areas." These areas are protected, and no entry by the Contractor for any purpose will be allowed unless specifically authorized in writing by lead agency overseeing the bicycle improvement project. The Contractor will take measures to ensure that the Contractor's forces do not enter or disturb these areas, including giving written notice to employees and subcontractors. Temporary fences around the environmentally sensitive areas shall be installed as the first order of work. Temporary fences shall be furnished,	Less than Significant with Mitigation

Impact	Mitigation Measure (s)	Residual Impact
	constructed, maintained, and removed as shown on the plans, as specified in the special provisions, and as directed by the project engineer. The fencing shall be commercial-quality woven polypropylene, orange in color, and at least 4 feet high (Tensor Polygrid or equivalent). The fencing shall be tightly strung on posts with maximum 10-foot spacing. Immediately upon completion of construction activities, the contractor shall stabilize exposed soil/slopes. On highly erodible soils/slopes, the contractor shall use a non-vegetative material that binds the soil initially and breaks down within a few years. If more aggressive erosion control treatments are needed, geotextile mats, excelsior blankets, or other soil stabilization products shall be used. All stabilization efforts should include habitat restoration efforts. **BIO-5 Compensatory Mitigation:** If riparian and/or other sensitive natural communities are disturbed as part of an individual project, the project applicant shall compensate for the disturbance to ensure no net loss of habitat functions and values. Compensatory mitigation ratios shall be determined on a project-by-project basis during the site-specific biological survey once project impacts have been determined. Compensatory mitigation shall be at a minimum ratio of two acres restored, created, and/or preserved for each acre disturbed. Compensation may comprise of on-site restoration/creation, off-site restoration, preservation, or mitigation credits (or a combination of these elements). The project applicant shall develop and implement a restoration and monitoring plan that describes how the habitat shall be created, the success criteria that will be sued to quantify mitigation success, and the frequency and duration of monitoring.	
Impact BIO-3. Reasonably foreseeable development facilitated by the Housing Element Update could adversely impact state or federally protected wetlands during project construction. Impacts would be less than significant with incorporation of Mitigation Measures BIO-6 and BIO-7.	**BIO-6 Jurisdictional Delineation:** If potentially jurisdictional wetlands are identified by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), a qualified biologist shall complete a jurisdictional delineation. The jurisdictional delineation shall determine the extent of the jurisdiction for CDFW, USACE, and/or RWQCB, and shall be conducted in accordance with the requirement set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the City, USACE, RWQCB, and CDFW, as appropriate, for review and approval prior to the issuance of required permits. Jurisdictional areas shall be avoided to the maximum extent possible. If jurisdictional areas are expected to be impacted, then the RWQCB would require a Waste Discharge	Less than Significant with Mitigation

Impact	Mitigation Measure (s)	Residual Impact
	Requirement permit and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Lake or Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to Section 404 of the CWA would be required. Furthermore, a compensatory mitigation program shall be implemented by the project applicant in accordance with Mitigation Measure BIO-5 and the measures set forth by the regulatory agencies during the permitting process. Compensatory mitigations for all permanent impacts to waters of the U.S. and waters of the State shall be completed at a ratio as required in applicable permits. All temporary impacts to waters of the U.S. and waters of the State shall be fully restored to natural condition. **BIO-7 General Avoidance and Minimization:** Projects shall be designed to avoid potential jurisdictional features identified in jurisdictional delineation reports. Projects that may impact jurisdictional features shall provide the City with a report for approval prior to the start of construction detailing how all identified jurisdictional features will be avoided, including groundwater draw down. This report shall include, but not be limited to, the following standards for wetlands avoidance: 1. Any material/spoils generated from project activities shall be located away from jurisdictional areas or special-status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non-monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate. 2. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank. 3. Any spillage of material will be stopped if it can be done safely. The contaminated area shall be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative will be notified.	

Impact	Mitigation Measure (s)	Residual Impact
Impact BIO-4. Housing opportunity sites proposed under the Housing Element Update would be primarily concentrated in developed or previously disturbed areas. The construction of development facilitated by the Housing Element Update would not result in significant impacts to wildlife movement or nursery sites. No impacts would occur	None	No Impact
Impact BIO-5 The Housing Element Update would not conflict with any local policies protecting biological resources or the City of Claremont Municipal CODE. Therefore, the Housing Element Update would have a less than significant impact on adopted plans governing biological resources.	None	Less than Significant
Greenhouse Gas Emissions		
Impact GHG-1. Construction and operation of reasonably foreseeable development associated with the Housing Element Update would generate temporary and long-term increases in GHG emissions that would not result in a significant impact on the environment related to climate change. Impacts would be less than significant.	None	Less than Significant
Impact GHG-2. The proposed Housing Element Update would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Impacts would be less than significant.	None	Less than Significant
Population and Housing		
Impact PH-1. Reasonably foreseeable development under the Housing Element Update would be consistent with the 2021-2029 RHNA, but greater than SCAG 2020 RTP/SCS population forecasts. The Housing Element Update would update the Claremont 2006 General Plan to be consistent with the RHNA, and SCAG's next RTP/SCS would incorporate the City's Housing Element updates. The Housing Element Update would not include roadways or other infrastructure. Thus, the Housing Element Update would not induce unplanned growth directly or indirectly, and impacts would be less than significant.	None	Less than Significant

Impact	Mitigation Measure (s)	Residual Impact
Transportation		
Impact TRA-1. The Housing Element Update would facilitate development along major transit corridors in Claremont. Projects implemented under the Housing Element Update would not conflict with any program, plan, ordinance, or policy addressing the circulation system. There would be no impact.	None	No Impact
Impact TRA-2. The Housing Element Update would result in a VMT below the SGVCOG northeast regional average. Impacts would be less than significant.	None	Less than Significant
Impact TRA-3. The Housing Element Update would not introduce hazardous road design features or incompatible uses. Impacts would be less than significant.	None	Less than Significant
Impact TRA-4. Implementation of the Housing Element Update involves infill development in areas currently served by adequate emergency access. Although development density would increase, access to sites would not change. Impacts would be less than significant.	None	Less than Significant
Cultural and Tribal Cultural Resources		
Impact TCR-1. Development facilitated by the Housing Element Update could adversely impact historical resources. Mitigation Measure CR-1 would be required to reduce impacts to Historical resources. However, impacts would still remain significant and unavoidable.	**CR-2 Historical Resources Study Program.** As a condition of approval and prior to issuance of construction permits, a historical resources evaluation shall be prepared and submitted to the City by the project applicant for future projects involving a property which includes buildings, structures, objects, sites, landscape/site plans, or other features that are 45 years of age or older. The study shall, at a minimum, be conducted by a qualified professional meeting the Secretary of the Interior's (SOI) Professional Qualifications Standard (PQS) for architectural history (NPS 1980). The study shall include a pedestrian survey of the project site and background research including a records search at the Northwest Information Center (NWIC), building permit research, and/or research with the local historical society(ies). The subject property(ies) and/or structures shall be evaluated for federal, state, and local designation on California Department of Parks and Recreation 523 series forms, included as an appendix to the study. If historical impacts are identified, the study shall include recommendations to avoid or reduce impacts on historical resources and the project sponsor shall implement the recommendations or conduct additional environmental review. These recommendations may include designing the project to comply with the Secretary of the Interior's Standards for the Treatment of Historic	Significant and Unavoidable

Impact	Mitigation Measure (s)	Residual Impact
	Property, or historic documentation prepared in accordance with Historic American Building Survey guidelines.	
Impact TCR-2. Development facilitated by the Housing Element Update could adversely impact Tribal cultural resources during ground disturbing activities. Mitigation Measures TCR-1(a), TCR-1(b), TCR-1(c), TCR-1(d), and TCR-1(e) would be required to reduce impacts to Tribal cultural resources to a less than significant level.	**TCR-1 Cultural Resource Record Search.** The City shall comply with AB 52 and AB 168 as applicable, which may require formal tribal consultation on a project-by-project basis. If the City determines that a project may cause a substantial adverse change to a tribal cultural resource, they shall implement mitigation measures identified in the consultation process required under PRC Section 21080.3.2, or shall implement the following measures where feasible to avoid or minimize the project-specific significant adverse impacts: ▪ Avoidance and preservation of the resources in place, including, but not limited to: planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria. ▪ Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: ▪ Protecting the cultural character and integrity of the resource. ▪ Protecting the traditional use of the resource. ▪ Protecting the confidentiality of the resource. ▪ Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places. ▪ Native American monitoring by the appropriate tribe for all projects in areas identified as sensitive for potential tribal cultural resources and/or in the vicinity (within 100 feet) of known tribal cultural resources. ▪ If potential tribal cultural resources are encountered during ground-disturbing activities; work within 100 feet must halt and the appropriate tribal representative(s), the implementing agency, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service [NPS] 1983) must be contacted immediately to evaluate the find and determine the proper course of action.	Less than Significant with Mitigation

Impact	Mitigation Measure (s)	Residual Impact
Utilities and Service Systems		
Impact Util-1. Development facilitated the Housing Element Update may require the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities in Claremont. While new connections to existing utility service systems would be required, such connections would not result in disturbance beyond individual development sites and adjacent infrastructure corridors. Impacts would be less than significant.	None	Less than Significant
Impact Util-2. Population increase anticipated by implementation of the Housing Element Update could place increasing demand on water supply in normal and drought years. While projections considered in the UWMP are less than those afforded by implementation of the Housing Element Update, sufficient water supply exists to serve the population due to conservation efforts. Impacts would be less than significant.	None	Less than Significant

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1 Introduction

This document is an Environmental Impact Report (EIR) for the City of Claremont Housing Element Update (hereafter referred to as the "Housing Element Update"), which applies to the entire geographic area located within the boundaries of the City of Claremont. The Housing Element Update involves an update to the Housing Element for the 2021-2029 planning period. The City is also considering updates to the Safety Element and the inclusion of evacuation, disaster preparedness, climate adaptation, and safety goals, policies, and objectives.

The Housing Element Update includes goals, policies, programs, and objectives to further the development, improvement, and preservation of housing in Claremont in a manner that is aligned with community desires, regional growth projections, and State law. The Housing Element Update will provide evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) through the year 2029, as established by the Southern California Association of Governments (SCAG). The Housing Element Update will lay the foundation for achievement of the City's RHNA allocation of 1,711 additional units and provide a framework for introducing new housing at all levels of affordability. These units may occur anywhere in the city where residential uses are permitted, as well as in areas that may be rezoned in the future to allow for residential uses of adequate density.

This section discusses the following: (1) the project and EIR background; (2) the legal basis for preparing an EIR; (3) the scope and content of the EIR; (4) issue areas found not to be significant by the Initial Study; (5) the lead, responsible, and trustee agencies; and (6) the environmental review process required under the California Environmental Quality Act (CEQA). The Housing Element Update is described in detail in Section 2, *Project Description*.

1.1 Environmental Impact Report Background

The City of Claremont distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on September 17, 2021 and ending on October 22, 2021. In addition, the City held an EIR Scoping Meeting on September 29, 2021 at 6:00 p.m. The meeting was aimed at providing information about the Housing Element Update to members of public agencies, interested stakeholders and residents/community members. The meeting was conducted online via Zoom. The City received five letters from individuals in response to the NOP during the public review period, as well as various verbal comments during the EIR Scoping Meeting. The NOP is presented in Appendix A of this EIR, along with the Initial Study that was prepared for the project and the NOP responses received. Table 1-1 summarizes the content of the letters and verbal comments received during the NOP public review period and where the issues raised are addressed in the EIR.

Table 1-1 NOP Comments and EIR Response

Topic	Comment/Request	How and Where It Was Addressed
Public Comments		
Aesthetics	Concerns that the height of three to four story buildings would impact views and privacy.	Comments are addressed in Section 4.1, *Aesthetics*. Height restrictions, visual character, and landscaping are discussed in deference to existing 2006 General Plan policies and the Claremont Municipal Code (CMC).
	Concerns that proposed densities in in the Village South Specific Plan would necessitate heights that exceed limits.	
	Requests to review trees and impacts of removal (poorer air quality, less shade) or addition (water use).	
	Concerns that the visual character of Claremont would be impacted by higher density buildings.	
Air Quality and Greenhouse Gas Emissions	Density of housing units and lack of parking would cause worsened air quality and increased emissions from both the use of personal vehicles and increased use of ride hailing from lack of parking.	Discussed in Section 4.2 *Air Quality* and Section 4.4 *Greenhouse Gas Emissions*. Increased density close to downtown services and jobs would reduce VMT and associated pollutants and emissions.
	Requests to review trees and impacts of removal (poorer air quality).	Any development facilitated by implementation of the Housing Element Update would be required to adhere to CMC Chapter 12.26, which addresses removal of City Trees. This is discussed in Section 4.1, *Aesthetics*.
Construction	Request to require a local workforce to decrease AQ and GHG impacts and decrease worker VMT.	Labor is not a required topic under CEQA, but the case made by the commenter is noted and will be taken into consideration when specific projects are proposed under the Housing Element Update.
	Hazardous materials would be released by construction on the land south of the railroad tracks.	As discussed in Section 9, *Hazards and Hazardous Materials,* in the Initial Study (Appendix A), Mitigation Measure HAZ-2 would require soil sampling and remediation before the issuance of a grading permit near any site that could release hazards upon ground disturbance.
Energy	Concerns about impacts to energy use.	Energy use and impacts are discussed in Section 6, *Energy*, of the Initial Study (Appendix A), which concluded a less than significant impact. The capacity to handle increased energy demand is discussed in Section 4.8, *Utilities and Service Systems*.
Noise	Concerns that increased density would lead to noise.	As discussed in Section 13, *Noise*, of the Initial Study (Appendix A), increased operational noise from deliveries or heating, ventilation, and air conditioning equipment would not exceed City noise standards with the implementation of Mitigation Measure N-2, which requires an acoustical impact study for HVAC or other mechanical equipment.

Topic	Comment/Request	How and Where It Was Addressed
	Request to include the Cable Airport Land Use Compatibility Plan based on recommendations from the California Airport Land Use Planning Handbook.	The Cable Airport Land Use Compatibility Plan is discussed under impact (c) in Section 13, *Noise*, of the Initial Study (Appendix A). It was determined that no parcels proposed for future residential development would be within the Cable Airport Land Use Compatibility Plan's Airport Influence Area.
Public Services	Recreational areas would be overloaded by population growth in the historic downtown Claremont Village.	As discussed under Section 16, *Recreation*, of the Initial Study (Appendix A), the City would retain a ratio of at least 4.0 acres of parkland per 1,000 residents with full buildout under the Housing Element Update, which is the City's park dedication standard.
Transportation	Parking would be an issue considering that density of housing opportunity site No. 5.	The City reduced the proposed density of housing opportunity site No. 5 from 60 units to 30 units, see Appendix B.
	Traffic congestion and parking issues would be increased to the point that emergency vehicles would be impeded.	Pursuant to the *CEQA Guidelines*, congestion and parking issues are not required to be discussed as part of the environmental analysis. Thus, they are not considered in this EIR. However, impacts to vehicle miles traveled, emergency access, and transportation safety are discussed in Section 4.6, *Transportation*.
	Request to see impacts of traffic and parking.	
Utilities and Service Systems	Request to share more information on the source of water to support new residents amid drought conditions.	Impacts to utilities and service systems, including water supply, are discussed in Section 4.8, *Utilities and Service Systems*.
	Concern that utilities and service systems would be overloaded.	

1.2 Purpose and Legal Authority

This EIR has been prepared in accordance with CEQA and the state *CEQA Guidelines*. In accordance with Section 15121 (a) of the state *CEQA Guidelines* (California Code of Regulations (CCR), Title 14, Division 6, Chapter 3), the purpose of an EIR is to inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

This EIR fulfills the requirements for a program EIR. Although the legally required contents of a program EIR are the same as those of a project EIR, program EIRs are typically more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a project EIR. As provided in Section 15168 of the state *CEQA Guidelines*, a program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a program EIR provides the City (as Lead Agency) with the opportunity to consider broad policy alternatives and program-wide mitigation measures and provides the City with greater flexibility to address environmental issues and/or cumulative impacts on a comprehensive basis.

Agencies generally prepare program EIRs for programs or a series of related actions that are linked geographically; are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

By its nature, a program EIR considers the "macro" effects associated with implementing a program (such as a general plan update or specific plan).

Once a program EIR has been prepared, subsequent activities in the program must be examined in the light of that program EIR to determine what, if any, additional CEQA documentation needs to be prepared. If the program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the scope of the program EIR and additional environmental documents may not be required (*CEQA Guidelines* Section 15168(c)). When a lead agency relies on a program EIR for a subsequent activity, it must incorporate applicable mitigation measures and alternatives developed in the program EIR into the subsequent activities (*CEQA Guidelines* Section 15168(c)(3)). If a subsequent activity would have effects not identified in the program EIR, in other words, if a project is not exempt from environmental review per CEQA and the *CEQA Guidelines* or other California law, the lead agency must prepare additional CEQA documentation. In this case, the program EIR still serves a valuable purpose as the first-tier environmental analysis. The *CEQA Guidelines* (Section 15168(h)) encourage the use of program EIRs, citing five advantages:

1. Provision of a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR
2. Focus on cumulative impacts that might be slighted in a case-by-case analysis
3. Avoidance of continual reconsideration of recurring policy issues
4. Consideration of broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them
5. Reduction of paperwork by encouraging the reuse of data (through tiering)

As a "macro" level environmental document, this program EIR uses macro-level thresholds rather than the project-level thresholds that might otherwise be used for an EIR on a specific development project. It should not be assumed that impacts determined not to be significant at a macro level would not also be significant at a project level. In other words, determination that implementation of the Housing Element Update as a "program" would not have a significant environmental effect does not necessarily mean that an individual project would not have significant effects based on project-level CEQA thresholds, even if the project is consistent with the 2006 General Plan.

This EIR has been prepared to analyze potentially significant environmental impacts associated with reasonably foreseeable development under the Housing Element Update and addresses appropriate and feasible mitigation measures or project alternatives that would minimize or eliminate these impacts. The EIR is intended to provide decision-makers and the public with information that enables them to consider the environmental consequences of the Housing Element Update.

1.3 Scope and Content

This EIR addresses impacts identified by the Initial Study to be potentially significant. The following issues were found to include potentially significant impacts and have been studied in the EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Greenhouse Gas Emissions

- Population and Housing
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

In preparing the EIR, use was made of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Section 7, *References and Preparers*.

The alternatives section of the EIR (Section 6.0) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the "environmentally superior" alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required "No Project" alternative and two alternative development scenarios for the Plan Area.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *CEQA Guidelines* provides the standard of adequacy on which this document is based. The *CEQA Guidelines* state:

> An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

1.4 Issues Not Studied in Detail in the EIR

An environmental checklist was prepared for the Housing Element Update to determine issue areas to be discussed in this EIR. The Initial Study was circulated for public review with the Notice of Preparation from September 17 to October 22, 2021. As indicated in the Initial Study, there is no substantial evidence that significant impacts would occur in any of the following issue areas: Agricultural and Forestry Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Public Services, Recreation. The Initial Study is included in Appendix A.

1.5 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible and trustee agencies. The City of Claremont is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. The California Department of Housing and Community Development (HCD) reviews and determines whether the proposed Housing Element Update complies with State law. Although no other agencies have direct approval authority over the Housing Element Update, several other agencies potentially have approval authority over individual developments that could be reasonably anticipated under the Housing Element Update. These agencies include, but are not

limited to, California Department of Transportation (Caltrans), California Department of Fish and Wildlife (CDFW), the South Coast Air Quality Management District (SCAQMD), and the Los Angeles Regional Water Quality Control Board (LARWQCB). The EIR will also be submitted to these agencies for review and comment.

A trustee agency refers to a State agency having jurisdiction by law over natural resources affected by a project. CEQA Guidelines Section 15386 designates four agencies as trustee agencies: CDFW with regards to fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves; the State Lands Commission with regard to State-owned "sovereign" lands, such as the beds of navigable waters and State school lands; the California Department of Parks and Recreation with regard to units of the State park system; and, the University of California with regard to sites within the Natural Land and Water Reserves System. As a policy level document, implementation of the proposed Housing Element Update would not directly propose development in areas where trustee agencies have jurisdiction. However, potential future development projects facilitated by the Housing Element Update could be located on lands under trustee agency jurisdiction, at which time subsequent environmental review would occur.

1.6 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below. The steps are presented in sequential order.

1. **Notice of Preparation (NOP) and Initial Study**. After deciding that an EIR is required, the lead agency (City of Claremont) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP may be accompanied by an Initial Study that identifies the issue areas for which the project could create significant environmental impacts.
2. **Draft EIR Prepared.** The Draft EIR must contain a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion (NOC).** The lead agency must file a NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code 21091).
4. **Final EIR.** A Final EIR must include a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.

5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations**. For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

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2 Project Description

The City of Claremont 2021-2029 Housing Element (Housing Element Update) would amend the City of Claremont's General Plan (hereinafter referred to as the "2006 General Plan") by replacing the current Housing Element with the proposed Housing Element Update and updating the Land Use Map in the Land Use Element to include the Affordable Housing Overlay land use designation and land use changes. Additionally, the Safety Element of the 2006 General Plan, in accordance with recent changes to State law.[1] The 2006 General Plan and environmental documents are available for download on the City of Claremont, General Plan and Land Use Map website.[2]

2.1 Project Applicant

City of Claremont
Community Development Department
207 Harvard Avenue North
Claremont, California 91711

2.2 Lead Agency Contact Person

Brad Johnson
Community Development Director
City of Claremont
207 Harvard Avenue North
Claremont, California 91711
(909) 399-5342

2.3 Project Location

Claremont is in southern California in the San Gabriel Valley within the eastern portion of Los Angeles County. The city is bordered by the cities of Upland, Pomona, La Verne, and Montclair, San Bernardino County, and unincorporated Los Angeles County (Figure 2-1). Two highways transverse Claremont from east to west: Interstate 10 (I-10) and State Route (SR) 210. Claremont is approximately 40 miles east of the Pacific Ocean in the Pomona Valley and approximately 33 miles east of downtown Los Angeles.

The City's total area is approximately 13.49 square miles, which equates to about 8,544 square acres (Plan Area). The Plan Area includes all areas within the city limits and some adjacent areas of unincorporated Los Angeles County, within the City's Sphere of Influence (SOI). The Plan Area is shown in Figure 2-2. The study area considered in this EIR includes the areas in which the Housing Opportunity Sites are situated throughout Claremont, as depicted in Figure 2-3.

[1] The City's General Plan was last updated in July 2012 and a program Environmental Impact Report (EIR) for the General Plan was completed in October 2006.
[2] https://www.ci.claremont.ca.us/living/general-plan-1708

Figure 2-1 Regional Location

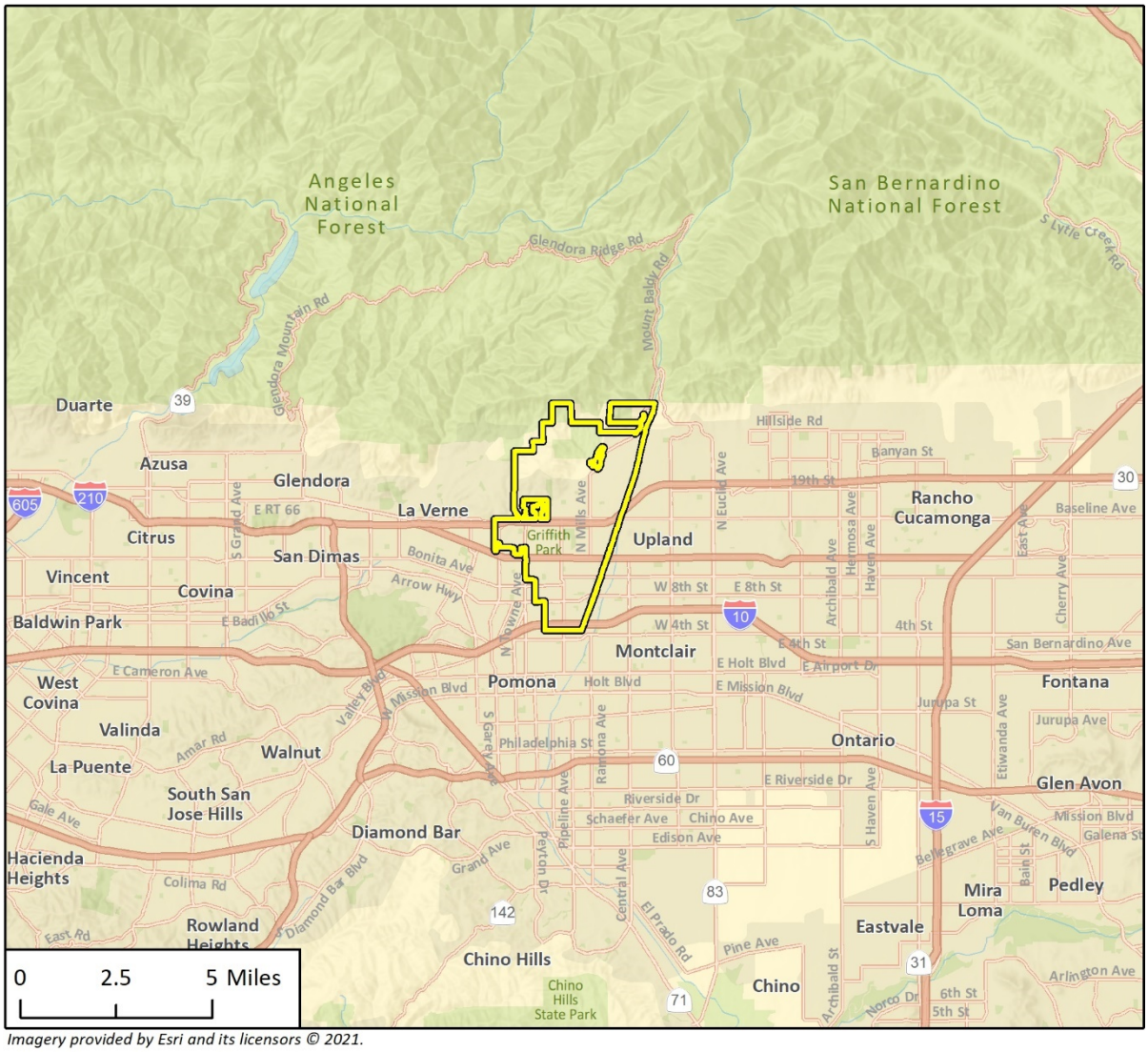

Figure 2-2 Plan Area

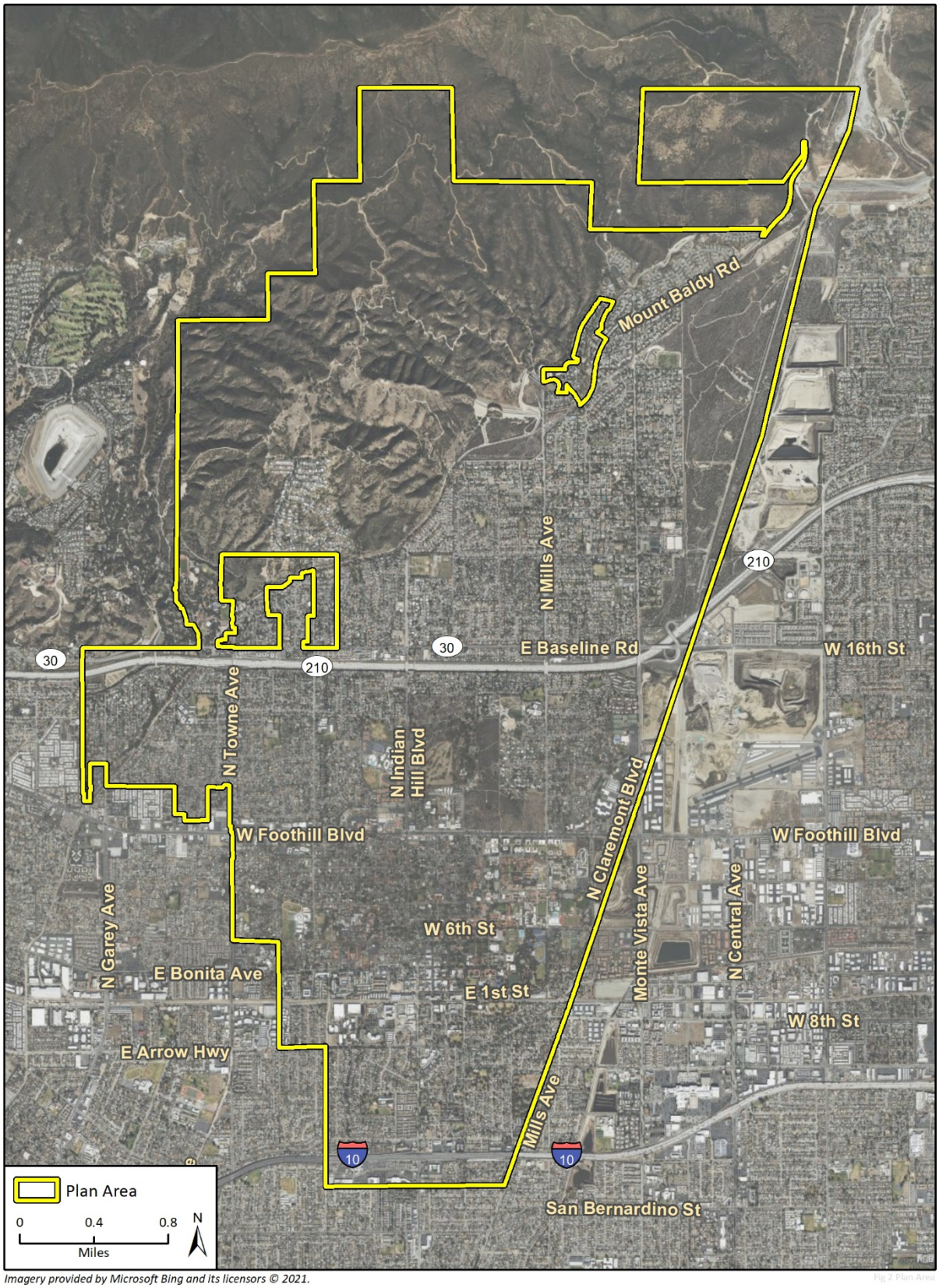

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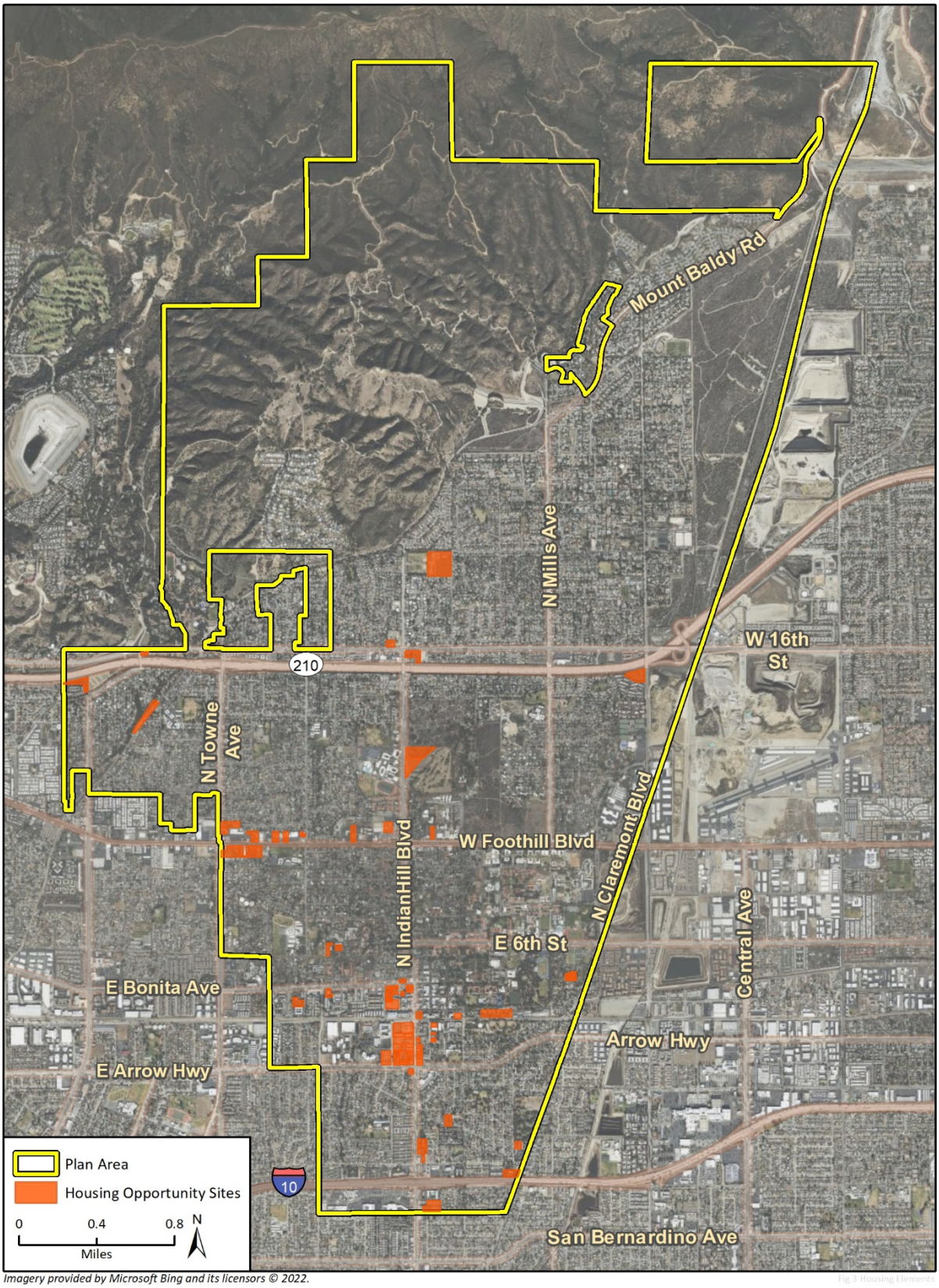
Figure 2-3 Housing Opportunity Sites



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Additional data provided by the City of Claremont, 2022.

2.4 Existing Land Uses

The Plan Area includes the city limits and unincorporated areas north of Baseline Road in the Claremont Hills Wilderness Area. The Housing Opportunity Sites identified in the Housing Element Update are situated throughout the city with most occurring along north/south transit corridors, including Indian Hill Boulevard and Towne Avenue, and east/west transit corridors, including Foothill Boulevard and Arrow Highway, as illustrated in Figure 2-3.

Claremont is an established community with distinct historic architecture at its core, including the area in and around the Claremont Colleges. Claremont is largely developed with a mix of residential, institutional, commercial, and light industrial uses. The open space preserves at the northern city limits give way to single-family neighborhoods south of Mt. Baldy Road to I-210, also known as the Foothill Freeway. Between I-210 and Foothill Boulevard single-family homes, schools, and the California Botanical Garden occur on the west and east sides of Indian Hill Boulevard. South of Foothill Boulevard, the historic neighborhood that surrounds the five Claremont Colleges extends to First Street, which is bordered by the Metrolink/Union Pacific Railroad (UPRR) tracks. Commercial and office uses occur alongside residential and institutional uses, particularly on major arterial roadways. South of the railroad tracks to Arrow Highway, multi-family and single-family residential uses occur alongside a mix of office and commercial uses, such as those on all corners of the intersection of First Street and Indian Hill Boulevard. Bonita Avenue includes, multi-family, retirement community campuses, residential complexes, the Village, College uses and some under-utilized lots along the roadway.

The range of housing types reflects the City's suburban character, with density increasing along the major roadways and near commercial and office uses. As reflected in the demographic information provided in the Housing Element Update, most housing units in Claremont are single-family homes (78.2 percent of all units in 2019), and multi-family units made up 21.7 percent of the housing stock, down slightly since 2000. Thus, most units added over the last 20 years have been single-family housing. Table 2-1 provides a detailed assessment of the city's housing stock and how it has changed from 2000 to 2019.

Table 2-1 Changes in Housing Unit Stock 2000 to 2019

	2000		2010		2019	
Housing Type	**No. of Units**	**Percent of Units**	**No. of Units**	**Percent of Units**	**No. of Units**	**Percent of Units**
Single-family detached	8,149	70.3	7,756	66.8	8,739	69.9
Single-family attached	844	7.3	1,154	9.9	8,739	69.9
Single-Family Total	**8,993**	**77.7**	**8,910**	**46.78**	**9,773**	**78.2**
Multi-family 2 to 4 units	621	5.4	961	8.3	839	6.7
Multi-family 5+ units	1,950	16.8	1,713	14.8	1,876	15.0
Multi-Family Total	**2,571**	**22.2**	**2,674**	**23.1**	**2,715**	**21.7**

Source: City of Claremont 2021

The City's zoning code helps regulate where residential development occurs and at what density. The 2006 General Plan land use designations correspond to the zoning map and include guidelines on height, setback, and other aspects of development. Table 2-2 offers a list of 2006 General Plan

land use designations, their corresponding zoning districts, currently allowed, and allowed residential types.

Table 2-2 Claremont Land Use Designations that Accommodate Residential Uses

Land Use	Consistent Zoning District	Density (du/ac)	Typical Residential Types(s)
Residential 2	RR, H, RS, SP7	0–2	Very-low-density single-family detached homes on large lots, with a custom character of development.
Residential 6	RS, AV, HC, SP2	2–6	Single-family detached homes in well-defined neighborhoods.
Residential 15	RM, CP, SP5	6–15	Includes single-family detached and attached units, townhomes, apartments, and condominiums.
Residential 22	RM	15–22	Single-family detached and attached units, townhomes, apartments, and condominiums.
Residential 30 Overlay	HDRO*	22–30	Single-family detached and attached units, townhomes, apartments, and condominiums.
Hillside Residential Overlay	H, SP6	**	Single-family detached units.
Institutional	IR, IE	30**	Single-family detached and attached units, townhouses, apartments, residential care facilities for seniors, student dormitories, and apartments
Claremont Village	CV, SP8	15–22	A complementary mix of retail stores, commercial services, restaurants, offices, residences, and civic uses within a small-town, pedestrian-oriented district.
Office/Professional	CP	6–15	A mix of office development, including legal, design, engineering, medical, corporate, government, and community facilities. Residential uses are permitted.
Mixed-Use	MU, SP9, SP10	15–22	A compatible mix of residential, office and retail/service uses integrated as a cohesive development, or such uses developed side-by-side in a manner that encourages interaction between uses.

* The City's Zoning Code was amended in 2009 to establish the High Density Residential Overlay (HDRO) District consistent with the General Plan Residential 30 Overlay designation.

** Density of development in the H District is subject to a Slope-Density formula

*** The IE District has no maximum density for student housing.

2.4.1 Surrounding Land Uses

The Plan Area is generally surrounded by residential and commercial uses in the adjacent cities of La Verne to the west, Pomona to the south, and Upland to the east. The community of San Antonio Heights is northeast and contains mostly residential development. The Claremont Wilderness Park, where a trailhead commences at the northwestern edge of the city, provides access to a 5-mile loop trail in the San Gabriel Mountain foothills open space. Mt. Baldy Village is located in unincorporated San Bernardino County in the San Gabriel mountains northeast of the city. Other open space and developed parks include the Big Dalton Wilderness Area to the west, and Puddingstone Reservoir Park to the southwest. Higher education facilities occur within the city and nearby, with California Polytechnic University, Pomona located 7.5 miles west of Claremont at the convergence of I-10 and

SR 57 in Pomona, and Chaffey College situated 11.6 miles northeast of the city in Rancho Cucamonga.

2.5 Project Objectives

The Housing Element is one of the State-mandated elements of the General Plan, and it identifies the City's housing conditions and needs, and establishes the goals, objectives, and policies that comprise the City's housing strategy to accommodate projected housing needs, including the provision of adequate housing for low-income households and for special-needs populations (e.g., unhoused people, seniors, single-parent households, large families, and persons with disabilities).The fifth cycle Housing Element was approved in July 2019 and outlines the City's housing goals from 2018 through 2021.

The Housing Element Update is for the sixth cycle and it was developed to bring the element into compliance with State legislation passed since adoption of the 2018-2021 Housing Element; it also addresses the 2021 Southern California Association of Governments (SCAG) Regional Housing Needs Assessment (RHNA). On March 4, 2021, the SCAG Regional Council adopted the sixth cycle final RHNA, which includes a "fair share" allocation for meeting regional housing needs for each community in the SCAG region.

State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). The Housing Element Update identifies sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups defined under state law (California Government Code Section 65583), analyzes governmental constraints to housing maintenance, improvement, and development, addresses conservation and improvement of the condition of existing affordable housing stock, and outlines policies that promote housing opportunities for all persons. The project involves an update the City of Claremont Housing Element as part of the sixth cycle planning period, which spans 2021 through 2029.

State law requires that all housing element updates include the following components:

- An assessment of the City's population, household, and housing stock characteristics, existing and future housing needs by household types, and special needs populations
- An analysis of resources and constraints related to housing production and preservation, including governmental regulations, infrastructure requirements and market conditions such as land, construction and labor costs, and restricted financing availability
- Identification of the City's quantified objectives for the 2021-2029 RHNA and inventory of sites determined to be suitable for housing
- Identification of "Opportunities for Conservation in Residential Development" related to energy conservation in residential development
- A review of the 5th cycle housing element to identify progress and evaluate the effectiveness of previous policies and programs
- A housing plan to address the City's identified housing needs, including housing goals, policies, and programs to facilitate the 6th Cycle planning goals

2.6 Project Characteristics

The Housing Element Update would include updates to the goals, policies, and programs designed to meet the 6th Cycle RHNA.

2.6.1 Housing Element Update

The Housing Element is one of the State-mandated elements of the General Plan. The current Housing Element was adopted in 2013 and is in effect through 2021. The Housing Element identifies the City's housing conditions and needs, and establishes the goals, objectives, and policies that comprise the City's housing strategy to accommodate projected housing needs, including the provision of adequate housing for low-income households and for special-needs populations (e.g., unhoused people, seniors, single-parent households, large families, and persons with disabilities).

The City completed a public review draft of the Housing Element Update in December 2021 and sent it to the California Department of Housing and Community Development (HCD) for review. The draft Housing Element Update is available on the City's website: https://www.ci.claremont.ca.us/living/draft-housing-element.

As required by State law, the Housing Element Update includes the following components:

- An **Introduction** that discusses the City's vision for meeting the housing needs of its residents, the statutory framework, the Housing Element requirements, its relationship to other elements, and a discussion of public participation
- A **Community Profile** that offers demographic information, including the city's population, household, and housing stock characteristics, existing and future housing needs by household types, and special needs populations
- An analysis of **Housing Constraints**, which discusses the resources and limitations related to housing production and preservation, including governmental regulations, infrastructure requirements and market conditions such as land, construction, and labor costs and the availability of financing for home acquisition
- A discussion of **Housing Resources** which includes a discussion of Claremont's RHNA allocation, how the allocation is already being met, and by what means the remaining allocation will be addressed, along with the Housing Opportunity Sites inventory, and the affordability, suitability, and availability analysis
- An assessment of the **Affirmatively Furthering Fair Housing** (AFFH) obligation that summarizes fair housing issues, assesses City's fair housing enforcement for new development, and compares Claremont to Los Angeles County as a whole.
- A **Housing Plan** with goals and programs to conserve and improve the conditions of the existing housing stock, provide adequate housing throughout the city, consider housing for people with special needs, ensure fair housing needs are met, and implement community-wide sustainability that balances social, environmental, and economic needs while protecting natural resources and attending to social inequalities
- **Appendices** summarize public participation (Appendix A), report on the past accomplishments of the 5th cycle housing element (Appendix B), and detail the residential sites inventory (Appendix C).

2.6.2 Regional Housing Needs Assessment and Required Buffer

According to State law, a Housing Element must address the City's fair share of the regional housing need and specific state statutory requirements and must reflect the vision and priorities of the local community. As of March 2021, SCAG determined a final RHNA allocation of 1,711 new housing units for Claremont, of which 866 must be affordable to lower-income households (see Table 8-28 in the Housing Element Update).

HCD requires local jurisdictions to identify sufficient future housing opportunity sites inventory to cover the jurisdiction's 6th Cycle RHNA, and to provide an additional buffer capacity above the RHNA. The buffer capacity is required to accommodate realistic production rates of affordable housing units. The buffer can also serve as a backup when a smaller residential project may have to be considered for a given property. The "No Net Loss" law (Government Code Section 65863) requires maintenance of sufficient sites to meet the RHNA for all income levels throughout the planning period. The recommendation from HCD is to adopt a housing site inventory with a buffer of at least 20 percent over the allocated RHNA, in case constraints limit building on any given site. This brings the City's total RHNA obligation to 2,054 housing units. The Housing Element Update provides a buffer 20 percent, which gives many options for project sites, in the event that one site proposed for development would be subject to constraints that make development infeasible. Furthermore, 620 residual units are also included in the total number of potential housing units for an increased contingency buffer of 2,805 total possible units, although it is unlikely these units would be developed. Nonetheless, this EIR takes a conservative approach and analyzes the full potential buildout of all indicated sites. The RHNA allocation and the 20 percent buffer are detailed in Table 2-3.

Table 2-3 City of Claremont Regional Housing Needs Allocation

	Income Category *			
	Extremely Low (<30%) Very Low (31-50%) Low (51-80%)	Moderate (81-120%)	Above Moderate (120% or more)	Total Housing Units
RHNA Housing units	866	297	548	**1,711**
20 percent buffer	173	60	110	**343**
Total RHNA + buffer	1,039	357	658	**2,054**

*Percentage of Los Angeles County median income
Source: City of Claremont 2021

2.6.3 Meeting the Regional Housing Needs Assessment Objectives

To meet the objectives of the 6th Cycle RHNA allocation and provide sufficient capacity for housing development, the Housing Element Update specifies sites for residential development, identifies sites to increase permitted residential densities to meet affordability requirements, in part by rezoning sites depicted in Table 2-2. The Housing Element Update in and of itself does not develop housing – it is a plan to provide for the possibility of housing, supported by consistent zoning standards. The Housing Element Update assumes that not all housing would realistically be built, based on previous development history in Claremont, as housing development is mainly accomplished by the private sector and depends upon factors the City does not control, including financial resources, market trends, and other factors. For the purposes of CEQA analysis, this EIR

assesses the higher range of development potential, considered the most conservative scenario, to fully analyze potential impacts if development occurs at a rate higher than it has historically, meaning all housing units accommodated might be built during the 8-year planning period.

The Housing Element Update integrates/updates supporting socioeconomic, demographic, and household data, and is specifically intended to accommodate the City's RHNA allocation of 1,711 dwelling units plus the buffer and residual units, for a total of 2,805 dwelling units. The 6th Cycle RHNA covers the 8-year planning period that begins October 15, 2021, and ends October 15, 2029. Cities can count housing units built, under construction, or approved from June 30, 2020, onward as fulfilling the City's RHNA obligation. The City has a credit of 384 accessory dwelling units that have been proposed or built since June 30, 2020. This leaves 1,327 remaining residential units that need to be addressed by the policies and programs in the Housing Element Update. This allocation will be met with the following resources.

Accessory Dwelling Units

Accessory dwelling units (ADU), also referred to as granny flats and secondary units, provide an affordable housing option and are an important tool to help meet the housing needs in communities. In 2016, 2017 and 2019, the State enacted legislation to further assist and support the development of ADUs, including "by right" approval for one-bedroom units less than 850 square feet and two-bedroom units less than 1,000 square feet.

The Claremont Municipal Code (CMC) was updated in February 2020, to amend the City's Development Code to comply with the latest State laws governing ADUs and Junior ADUs. The City's ADU ordinance allows for units up to 1,200 square feet and up to 50 percent of the living area of the primary unit. The Zoning Code indicates that ADUs must have the same architectural style as that of the primary dwelling unit, including the color, exterior materials, and pitch and texture of the roof (CMC Section 16.333.060 (B)(8)(a-e)). Projects of this type are also required to preserve on-site mature trees and to enhance landscaping to screen the additional unit from adjacent properties (CMC Section 16.333.060 (B)(8)(h). The CMC also prohibits ADUs on properties listed on national or State historic registers from causing substantial adverse change that would affect that listing (CMC Section 16.333.060 (B)(8)(j).

ADU construction has increased in Claremont over the last two years, from 11 units in 2017 to 38 units in 2019-2020. Based on this trend and anticipating a growth factor of 1.25, the City anticipates processing permits for at least 384 ADUs to be constructed during the 2021-2029 planning period.

Pending, Approved, and Under Construction Residential Projects

As stated previously, the State allows a jurisdiction to count the units that were proposed, approved, or under construction as of June 30, 2020. These entitled projects can be counted toward the total RHNA obligation. However, the City has 384 ADUs proposed or built since June 30, 2020 and two residential projects along Baseline Road completed in 2021. In addition to ADU's and the Baseline Road projects the City has 125 entitled units at the Old School House. Of the 125 entitled units 18 will be moderate income and the remaining 107 units will be market rate. Therefore, the Housing Element Update is able to count the 125 entitled units toward meeting the RHNA obligation.

Housing Opportunity Areas/Sites Inventory

After subtracting the anticipated 384 ADU credit, the remaining RHNA allocation need is 1,327, for which the City must demonstrate the availability of adequate sites with appropriate zoning and development standards that can facilitate and encourage the development of these units by October 15, 2029. Several areas in Claremont have been identified as able to accommodate the remaining RHNA, including the following types of sites:

- Vacant sites zoned for residential use
- Vacant and developed sites not zoned specifically for residential use but that allow residential uses along with other uses, such as office or commercial (i.e., mixed-use)
- Underutilized sites zoned for residential, or sites not zoned for residential that could be rezoned, all of which are capable of being developed at higher density or with greater intensity

A vacant site is not developed with any significant improvements and an underutilized site is a parcel or group of parcels with structures and/or other improvements that could be redeveloped with residential uses at a higher density.

Vacant and Underutilized Sites

The Housing Element Update identifies vacant and underutilized parcels suitable to meet the RHNA allocation during the 2021-2029 period. Housing opportunity sites that are currently zoned for non-residential use or intensified with residential use are identified in the Land Use Element with a corresponding use and density designation and zoned accordingly to meet RHNA allocations by income level. Site selection was conducted based on an analysis of site-specific constraints, including General Plan land use and zoning, access to utilities, location, development potential, density and whether the site is identified in a previous Housing Element. To count toward the RHNA allocation, sites must be in a land use category that meets a minimum residential density standard, have a minimum lot size, and be either vacant or not been developed to the maximum capacity allowed by the zoning category and can provide the potential for more residences on a site.

As listed in Appendix B, for the 6th Cycle update, the Housing Element Update identifies 39 housing opportunity sites throughout the city (depicted in Figure 2-3), totaling 124.36 acres of land. For most of these sites, current zoning would be adjusted to accommodate increased density, including smaller lot areas, mixed-use overlays, and inclusion in a specific plan, described below.

Rezone Sites

When a local jurisdiction cannot demonstrate that sufficient vacant or underutilized sites exist with the appropriate zoning to adequately meet its RHNA allocation, a ‘rezoning program’ must be put into place. A rezoning program ensures that there are enough sites with sufficient densities to address the housing need identified through the RHNA.

In accordance with HCD’s “default density” criteria for suburban jurisdictions such as Claremont, 30 dwelling units per acre (du/acre) is the minimum density threshold for sites to be considered suitable for providing housing affordable to very low and low-income households. Most residential zones in the city of Claremont establish a range of allowable density, expressed as dwelling units per acre (du/ac). To calculate realistic capacity assumptions for each site, a typical density achieving 75 percent of maximum du/ac was assumed, because this density was the average buildout percentage based on a review of similar projects over the past three years within the city and surrounding areas.

The City identified 115 parcels that fall under one of the three categories listed above. These are grouped in 39 clusters that represent the housing opportunity sites, totaling 124.36 acres. These sites could accommodate up to 2,805 dwelling units if fully built out. Of the 115 parcels, 61 are identified for rezoning, as reflected in Table 2-4.

Table 2-4 Housing Opportunity Sites Current Zoning and Potential Zoning Changes

Site ID	Number of Parcels included in the Site	Current Zoning	Proposed Zoning	Proposed Density (du/ac)	Anticipated D/U
1	1	CP	R-MF 30/ac	30	56
2	1	RS 8,000	R-MF 2,000	21	19
3	3	CP	MU 30/ac	30	81
4	1	RS 8,000	RM 4,000	10.89	14
6	2	CP	MU 60/ac MU 30/ac	60 30	17
7	1	B-IP	MU 30/ac	30	66
8	9	CP	VSSP	57	114
9	2	CP	VSSP	57	16
10	23	B-IP CP CH	VSSP	57	822
11	4	RM 2000 MU2	R-MF 60/ac	60	38
12	1	CV	MU 60/ac	60	30
13	1	CV	MU 60/ac	60	29
14	1	MU2	R-MF 60/ac	60	183
15	1	RM 2000	MU 30/ac	30	42
16	1	RM 2000	R-MF 60/ac	60	36
17	14	SP8	RMX MX	20 to 60	177
18	7	SP8	RMX	20	17
19	1	RM 2000	R-MF 30/acre	30	13
20**	6	AV1	AV1	7.26	9
21	1	IR	R-MF 30/acre	30	17
22	2	IR	R-MF 30/acre	30	22
23**	6	MU3	MU3	40 or 15	184
24	1	CP	RS 10,000	4	3
25**	2	MU3	MU3	15	4
26**	2	MU3	MU3	15	13
27**	2	MU3	MU3	15	17
28**	2	MU3	MU3	15	23
29	1	SP10	MU 30/acre	30	39
30	1	SP9	MU 30/acre	30	45

Site ID	Number of Parcels included in the Site	Current Zoning	Proposed Zoning	Proposed Density (du/ac)	Anticipated D/U
31	2	RM 2000 MU3**	R-MF MU3	30 15	67
32	2	IE	R-MF 30/acre	30	220
33**	3	RS 10,000	RS 10,000	4	6
34	1	RS 10,000	RM 3000	15	47
35	2	SP5 P/RC	R-MF 30/acre	30 30	69
36	1	RS 10,000	R-MF 30/acre	30	67
37	1	RS 10,000	R-MF 30/acre	30	13
38	1	CP	R-MF 30/acre	30	28
39	1	P	R-MF 30/acre	30	56
40	1	CF	R-MF 30/acre	30	85

*See Appendix B for the full list of Housing Opportunity Sites, including addresses and General Plan land use designation.

** Sites are not being rezoned.

Business-Industrial Park (B-IP) Commercial Professional (CP) Commercial Highway (CH) du/ac = dwelling units per acre
Freeway Commercial (CF) Institution Educational (IE) Institution Residential (IR) Mixed Use 2 (MU2)
Mixed Use (MU3) Residential Multi-Family (R-MF 30/acre) Public (P) Park/Resource Conservation (P/RC)
Residential Multi-Family 2,000 (RM 2000) Residential Single-Family 10,000 (R 10,000) Residential Mixed Use (RMU)
Residential Single-Family 10,000 (R 10,000) Specific Plan Area 5 (SP5) Specific Plan Area 8 (SP 8)
Specific Plan Area 9 (SP 9) Specific Plan Area (SP10) Village South Specific Plan (VSSP)

Source: City of Claremont 2021

The Housing Element Update would require updates to the City's zoning code to allow for increased residential density on some Housing Opportunity Sites with zones that are not currently zoned for residential use would be rezoned to allow for residential development at higher densities and with mixed-use development (a mix of housing and retail businesses or offices, for example). Therefore, the 2021-2029 Housing Element includes a rezone program to provide adequate sites to accommodate the RHNA.

Change in Housing Units from Existing Conditions

As of 2019, there were 12,511 housing units in Claremont, including vacant and occupied units, with 78.2 percent being single-family homes, most of which were detached units (City of Claremont 2021). Multi-family units were 21.7 percent of the total housing stock, a slight decrease since 2000. The Housing Element Update would accommodate the development of up to 2,054 net additional units by 2029, if all anticipated 384 ADUs were built, and all Housing Opportunity Sites were developed to full capacity. If all units are ultimately developed, there would be a total of 14,565 housing units in the Plan Area by 2029.

Geographic Distribution of Inventory of Sites

The Opportunity Sites identified in the Housing Element Update are generally located in areas near major transportation corridors, such as Foothill Boulevard, Arrow Highway, and I-10, and existing residential and commercial development. Figure 2-3 shows the locations of the sites identified in Appendix B.

2.6.4 Land Use Element Update

The Land Use Element is a guide for the City as it considers future development within Claremont. It designates the distribution and general location of land uses, such as residential, retail, institutional, industrial, open space, recreation, and public uses. The Land Use Element also addresses the permitted density and intensity of the various land use designations as reflected on the City's General Plan Land Use Map. Updates to the Land Use Element would include the following revisions to the land use table (General Plan Land Use Element Table II-1):

- The existing Residential Multi-family (R-MF) (20) designation would be modified to an expanded density designation of R-MF (30). This alteration would automatically increase the density allowance for all lands specified within the previous R-MF (20) designation.
- The "Anticipated Maximum Population Intensity" for the existing R-MF (12) and R-MF (16) land use designations would be modified.
- A new affordable Housing Overlay designation would be created to reflect allowed densities identified in the Housing Element Update.

The Land Use Map in the Land Use Element would be modified to include the new Affordable Housing Overlay land use designation and to change the R-MF (20) to R-MF (30).

2.6.5 Safety Element Update

Approved in 2019, Assembly Bill (AB) 747 requires each jurisdiction to review and update as necessary the Safety Element of its General Plan to identify evacuation routes and capacity, safety, and viability under a range of emergency scenarios. This information must be included by January 1, 2022, or upon approval of the next update to the Local Hazard Mitigation Plan. Also approved in 2019, Senate Bill (SB) 99 requires jurisdictions, upon the next revision of the Housing Element on or after January 1, 2020, to review and update the safety element to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. In accordance with Senate Bill 379, safety elements must also include a climate change vulnerability assessment, measures to address vulnerabilities, and comprehensive hazard mitigation and emergency response strategy. The proposed Safety Element Update addresses the requirements of these bills as does the City's Local Hazard Mitigation Plan update that was approved in September 2021.

Areas of the Safety Element that would be updated include climate change, fire hazards, evacuation plans, and disaster preparedness and response.

With recommendations from the Planning Commission, the City of Claremont City Council would need to take the following discretionary actions in conjunction with the Housing Element Update:

- Certification of the EIR prepared for the Housing Element Update
- Adoption of the Housing Element Update of the 2006 General Plan
- Adoption of the General Plan Land Use Map and associated text changes to the Land Use Element of the 2006 General Plan
- Adoption of amendments to the Safety Element of the 2006 General Plan

The Housing Element Update has been submitted to the HCD for review and comment. The City will seek certification of the Housing Element from the HCD subsequent to the City's adoption.

3 Environmental Setting

This section provides a general overview of the environmental setting for the Housing Element Update. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The City of Claremont is located in eastern Los Angeles County, approximately 30 miles east of downtown Los Angeles and adjacent to San Bernardino County to the east. The City is located approximately 33 miles inland from the coastline of the Pacific Ocean. A grid system of east-west and north-south roadways provide vehicular access throughout the City, and Interstate 10 (I-10) and State Route (SR) 210 traverse the City east-west. The Metrolink commuter rail system connects Claremont to the City of San Bernardino to the east and westerly, to the City of Los Angeles.

Los Angeles County is topographically diverse, with mountains, valleys, agricultural land, and distinct urban areas, all within relative proximity to the Pacific Ocean. The Mediterranean climate of the region and coastal influence produce moderate temperatures year-round, with rainfall concentrated in the winter months. The region is subject to various natural hazards, including earthquakes, landslides, and wildfires. Although air quality in the area has steadily improved in recent years, the Los Angeles region remains a nonattainment area for ozone (urban smog) and particulate matter. Figure 2-1 in Section 2.0, *Project Description*, shows the location of the Plan Area in the broader region.

Claremont is located within the planning area of the Southern California Association of Governments (SCAG). SCAG functions as the Metropolitan Planning Organization for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. The region encompasses a population exceeding 19.2 million persons in an area of more than 38,000 square miles (SCAG 2021).

3.2 City Overview

3.2.1 Geographic Setting

The Plan Area (City of Claremont and Sphere of Influence, which includes portions of unincorporated Los Angeles County) is located in the San Gabriel Valley and in eastern Los Angeles County. The Plan Area is bounded to the north by Angeles National Forest, to the east by the City of La Verne, to the south by the City of Pomona and City of Montclair, and to the west by the City of Upland in Riverside County. The East San Gabriel Valley Significant Ecological Area (SEA) is located about 3 miles west of the Plan Area.

I-10 runs east-west through the southern portion of the Plan Area and provides east-west circulation in conjunction with Foothill Boulevard and Arrow Highway. A grid system of east-west and north-south roadways provide vehicular access throughout the Plan Area. Major roadways include Mills Avenue, Indian Hill Boulevard, North Mountain Avenue, North Town Avenue, Base Line Road, Sixth Street, Arrow Highway, and West Bonita Avenue. Mount Baldy Road provide access to open spaces to the north, including Angeles National Forest. The City contains the Claremont

Colleges, which includes five private higher education institutions: Pomona College, Scripps College, Claremont McKenna College, Harvey Mudd College, and Pitzer College, as well as Claremont Graduate University, , Keck Graduate Institute, Claremont School of Theology and Claremont Lincoln University. Most of the City's land use is devoted to single family homes, which are largely concentrated between SR 210 and wilderness parks and between SR 66 and 210. There are four mixed use developments within the Plan Area, near the Claremont Colleges and in the vicinity of major roadways, as well as a Claremont Village adjacent to Pomona College. Several commercial land uses are located in the vicinity of major roadways.

3.2.2 City Topography, Climate, and Drainage

Claremont is located in the San Gabriel Valley. As such, the topography of the City is mostly flat and begins to steepen in the north, close to Claremont Hills Wilderness Park. The average elevation of the City is 1,150 feet (City of Claremont 2021).

Claremont has a Mediterranean climate characterized by warm, dry summers and mild winters. The annual average temperature is 63 degrees Fahrenheit. Annual average rainfall is 17.3 inches (City of Claremont 2021).

Streams in Claremont are classified by the United States Geologic Survey as intermittent, meaning water only flows during periods of sufficient rain or snow, generally from November to March. Some streams, such as Thompson Creek and San Antonio Creek, originate in the Plan Area and others originate at high elevations of the San Gabriel Mountains north of Claremont. The watersheds that pass through the City include the San Gabriel River and Santa Ana River watersheds. These watersheds either reach the Pacific Ocean or enter storm drains or underground water basins through percolation. The City does not fall into any Federal Emergency Management Agency (FEMA) defined flood zone or potential flood zone (City of Claremont 2006).

3.3 EIR Baseline

CEQA Guidelines Section 15125 states that an EIR "must include a description of the physical environmental conditions in the vicinity of the Housing Element Update, as they exist at the time the notice of preparation [NOP] is published." Section 15125 states that this approach "normally constitute[s] the baseline physical conditions by which a lead agency determines whether an impact is significant."

This EIR evaluates impacts against existing conditions, which are generally conditions existing at the time of the release of the NOP (September 2021) but may vary in individual sections due to the availability of data. It was determined that a comparison to current, existing baseline conditions would provide the most relevant information for the public, responsible agencies and City decision-makers. For some issue areas, this EIR also includes consideration of impacts against a forecast future baseline condition (generally 2029) in addition to the current baseline conditions, controlling for impacts caused by population growth and other factors that would occur whether or not the proposed Housing Element Update is approved.

For certain issue areas (including air quality, greenhouse gas emissions/climate change, and transportation/circulation), impacts would occur as a result of population growth, urbanization, and volume of average daily traffic increases in the Plan Area that would occur by 2029, with or without implementation of the Housing Element and Safety Element Update. Thus, for these issue areas, a

comparison to a future 2029 baseline is provided for informational purposes. However, all impact determinations are based on a comparison to existing 2021 baseline conditions.

On March 4, 2020, the Governor proclaimed a State of Emergency in California as a result of the threat of Coronavirus 2019 (COVID-19). The Los Angeles County Public Health Office issued school closures and the closure of County buildings prior to the Governor's "Shelter In Place" Executive Order N-33-20 went into effect on March 16, 2020. The threat of COVID-19, as well as the subsequent State and County proclamations and orders, have resulted in temporary changes to the existing economic and physical conditions in California and Los Angeles County regionally and in the City of Claremont locally. Temporary changes to existing environmental conditions have included reduced vehicle traffic and associated noise and pollutant emissions, and reduced electricity consumption. In addition, the timing and likelihood of cumulative development and regional buildout assumptions may be affected during or after the threat of COVID-19. The magnitude and duration of the State of Emergency and associated State and County orders, or future orders related to the threat of COVID-19, cannot be ascertained. Accordingly, the effect of COVID-19 on baseline and future environmental conditions effects of COVID-19 is currently speculative. *CEQA Guidelines* Section 15064(d)(3) states that:

> "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable."

Furthermore, *CEQA Guidelines* Section 15154 states that:

> "If, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact."

It would be speculative for the EIR to assume what changes to baseline or cumulative baseline conditions might occur as a result of COVID-19 or the subsequent State and County proclamations and orders. Therefore, this topic is not discussed further in the EIR.

3.4 Cumulative Impact Setting

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of the Housing Element Update. CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the Housing Element Update and other nearby projects. For example, traffic impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Because the Housing Element Update is a policy document, cumulative impacts are treated somewhat differently than they would be for a specific development. Section 15130 of the *CEQA Guidelines* provides the following direction relative to cumulative impact analysis:

> "Impacts should be based on a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact."

Because the Housing Element Update is essentially a set of guidelines for projects that could occur within the timeframe of the Housing Element Update, the Housing Element Update itself represents the cumulative development scenario for the reasonably foreseeable future in the Plan Area. Therefore, the analysis presented in this EIR generally represents a cumulative analysis of the Plan Area over the Housing Element planning horizon of 2029.

Existing and proposed land uses in the Plan Area include residential, business office, commercial, mixed use, public facilities, recreational and resource-protected open space. The Housing Element Update would accommodate an additional estimated housing capacity of 2,805 units and 7,545 residents in the Plan Area by 2029, which would result in a total of 15,316 units and 44,811 residents by that year (see Section 4.5, *Population and Housing*, for more details).

In instances where other cumulative development in the region including neighboring cities, the County, or specific region (e.g., hydrologic region or air basin) could contribute to impacts generated by the Housing Element Update, those impacts, as well as the context, are discussed in the cumulative impact discussion that follows the project-specific impacts in each section.

The analysis included in each cumulative impact section analyzes whether, after implementation of mitigation that minimize environmental effects, the residual impacts of the Housing Element Update would cause a cumulatively significant impact or would contribute considerably to existing or anticipated cumulatively significant effects. Where the Housing Element Update would so contribute, additional mitigation is recommended where feasible.

4 Environmental Impact Analysis

This section discusses the possible environmental effects of the Housing Element Update for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. A "significant effect" as defined by the *CEQA Guidelines* Section 15382:

> means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable**. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the *CEQA Guidelines*.
- **Less than Significant with Mitigation Incorporated**. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the *CEQA Guidelines*.
- **Less than Significant**. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other cumulative projects in the area as described in Section 3.0, *Environmental Setting*.

The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the Housing Element Update.

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4.1 Aesthetics

This section discusses the approach to ascertaining visual quality as it applies to a California Environmental Quality Act (CEQA) analysis of visual resources and describes the existing environmental setting for visual character and quality, scenic vistas, scenic corridors, and light and glare conditions within the Plan Area. Definitions of terms used in the analysis of visual resources follow.

Scenic or visual quality can be described best as the overall impression a viewer retains after driving through, walking through, or flying over an area (Bureau of Land Management 1984). Viewer response is a function of the number of viewers, number of views seen, distance of the viewers from a given key viewpoint, and the viewing duration. Viewer sensitivity reflects the extent of public concern for a particular viewshed. A brief description of these terms and criteria follows.

Viewshed

A viewshed is an area of the landscape visible from a particular location or series of points (e.g., an overlook or a trail, respectively) (FHWA 2015). A viewshed may be divided into viewing distances called foreground, middle ground, and background. Usually, the closer a resource is to the viewer, the more dominant it appears visually, and thus it has greater importance to the viewer than something farther away. A common set of criteria identifies the foreground as 0.25 to 0.5 mile from the viewer; the middle ground is three to five miles away; and the background extends away to the horizon.

Visual Character

Natural and human-built landscape features both contribute to the visual character of an area or view. Features include geology, water features, plants, wildlife, trails and parks, and architecture and transportation elements (e.g., bridges or city skylines). The way visual character is perceived can vary based on the season, the time of day, the light, and other elements that influence what is visible in a landscape. The basic components used to describe visual character are form, line, color, and texture of landscape features (USFS 1996, FHWA 2015).

Visual Quality

Visual quality is a term that indicates the uniqueness or desirability of a visual resource, within a frame of reference that accounts for the “apparent concern for appearance” by concerned viewers (e.g., residents, visitors, jurisdictions) (USDA 1978). A well-established approach to visual analysis is used to evaluate visual quality, using the concepts of vividness, intactness, and unity (FHWA 2015).

- Vividness describes the memorability of landscape components as they combine in striking patterns.
- Intactness refers to the visual integrity of the natural and human built.
- Unity indicates the visual coherence and compositional harmony of the landscape as a whole.

Visual Exposure and Sensitivity

Viewer sensitivity is determined based on the visibility of resources in the landscape, the proximity of viewers to the visual resource, the height from which viewers see the resource, and the types of

viewers with their associated expectations. Visual sensitivity also depends on the number and type of viewers, along with the frequency and duration of views experienced by these viewers.

Once an adequate description of the visual resource and its quality is developed, including the number and types of views for common uses (e.g., recreational, agriculture), an evaluation can be made as to the impact of the project upon the aesthetic and visual resources in the landscape.

4.1.1 Setting

Claremont is a suburban city that extends to the foothills of the San Gabriel Mountains in the north to the urbanized areas in the south, west, and east. The area east of Indian Hill Boulevard and south of Foothill Boulevard contains the historic Claremont Village and adjacent residential neighborhood, along with the campuses of the Claremont Colleges.

Housing Opportunity Sites Setting

The housing opportunity sites are largely situated along major transportation corridors as depicted in Figure 2-1 in Section 2, *Project Description*. These areas are developed for the most part with existing commercial, industrial, and residential uses. These include clusters of sites along Indian Hill Boulevard north of Arrow Highway and south of Bonita Avenue, where existing development includes retail centers with large surface parking lots, single-family residences, mobile home parks, and smaller, two-story apartment buildings and groups of sites along Foothill Boulevard, near Towne Avenue and some sites close to I-210 on the western border of the city. Many sites are currently developed but some are vacant lots surrounded by development. The clusters of sites anticipated to have greater aesthetic impacts are discussed in detail below.

A few parcels are near existing development but offer expansive views to the north/northeast of the mountains (Site 32: 1550 North Indian Hill Boulevard and1575 North College) where vacant structures are located on the parcel. From Indian Hill Boulevard, looking northeast across the parcel included in Site 32, pictured in Figure 4.1-1, the ridgelines to the northeast are visible in the background and the open space and mature trees in the California Botanic Garden can be seen in the middle ground.

Figure 4.1-1 Mt. Baldy Visible Across Site 32 from Indian Hill Boulevard

Source: Google Earth 2021

Indian Hill Boulevard and Arrow Highway

Further south along Indian Hill Boulevard, housing opportunity sites near Arrow Highway include developed lots with older homes, vacant automobile retail uses, and undeveloped lots (Figure 4.1-2). Many of the structures appear to have been built prior to 1970 but are less well-maintained than those further north. This includes the single-family residences on Indian Hill Boulevard closer to Arrow Highway. The architecture consists of a vernacular California Ranch, with small front yards and with varying degrees of upkeep. Landscaping includes mature trees and limited shrubs or native grass clusters. Commercial development occurs in former residential structures and in small clusters of buildings with large parking lots, such as automotive repair or sales facilities. Commercial structures have no landscaping and can appear abandoned, depending on the level of current activity. The visual quality along Indian Hill Boulevard closer to Arrow Highway is moderately low.

Figure 4.1-2 Indian Hill Boulevard and Arrow Highway

Source: Google Earth 2021

Foothill Boulevard

Another cluster of housing opportunity sites occurs along Foothill Boulevard, close to Towne Avenue and the border with the City of Pomona. Vacant lots on the south side of Foothill Boulevard are bordered by single-family residences to the south, a gas station to the west, and one-story office buildings designed in a Mission-style architecture, with larger surface parking lots on the south side of Foothill Boulevard, east of Town Avenue. On the north side of Foothill Boulevard medical offices and a grocery store feature a mix of architectural styles, some of which are similar to adjacent Mission-style buildings, and others that are a more rectangular, flat-roofed vernacular style that does not align with other buildings. All of these have large surface parking lots and a few mature street trees, beyond which the ridgelines of the San Gabriel Mountains can be seen in the distance (Figure 4.1-3). This area has a moderate visual quality as the architecture and landscaping are inconsistent, but the views of the mountains visible on a clear day, when they can be seen between existing development. At the intersection with Indian Hill Boulevard, Foothill Boulevard is developed similarly with office and commercial uses. These include clusters of stores and service uses or banks with large parking lots. Mature street and parking lot trees are visible above the buildings, which are vernacular Modern or vernacular Spanish-style architecture (Figure 4.1-4). They are not distinctive

examples of these, but they do appear maintained. Views of the mountains looking northeast from this intersection are not available due to intervening development and the above-ground power transmission lines dominate the foreground.

Figure 4.1-3 Foothill Boulevard near Towne Avenue looking northeast

Source: Google Earth 2021.

Figure 4.1-4 Foothill Boulevard at Indian Hill Boulevard looking southeast

Source: Google Earth 2021

Forbes Avenue near Indian Hill Boulevard

The housing opportunity site closest to the foothills is on vacant land on Forbes Avenue, just east of Indian Hill Boulevard. It is currently zoned for recreational use, but a developed park is located adjacent to the west of the vacant half of the parcel (Figure 4.1-5). Larger single-family residences are located east and north of the site, with the San Gabriel Mountains visible to the north from Forbes Avenue. The visual quality is high in this area as the development is consistent and views of the mountains from the public areas dominate the immediate background. From Indian Hill

Boulevard, looking northeast across La Puerta Sports Park, the mountains are not clearly visible due to mature trees that encircle the park, but looking north from Indian Hill Boulevard, the mountains form a striking backdrop beyond the surrounding single-family homes.

Figure 4.1-5 Forbes Avenue looking southwest across Housing Opportunity Site

Source: Google Earth 2021.

4.1.2 Regulatory Setting

The following section summarizes regulations that pertain to aesthetics and visual resources.

a. Federal Regulations

There are no federal regulations pertaining to visual resources within Claremont.

b. State Regulations

California Scenic Highway Program

The California Department of Transportation manages the State Scenic Highway Program. The program was created in 1963 with the goal of protecting the aesthetic significance of scenic highways throughout the state. According to the State Streets and Highways Code (Section 260 through 263), a highway may be designated as scenic based on its scenic quality, how much of the natural landscape can be seen by travelers, and the extent to which development intrudes on the traveler's enjoyment of the view. The California Scenic Highway Program's Scenic Highway System List identifies scenic highways that are either eligible for designation or have already been designated as such. According to the list of State-designated scenic highways, Claremont is not close to any designated or eligible scenic roadways (California Department of Transportation 2019).

California Green Building Code

The California Green Building Code, Section 5.106.8, stipulates that new project site lighting must conform to standards that keep light generated on site from leaving the site by using deflectors, shields, screen walls, and any other method which complies with the Code's intent to limit light pollution.

c. Local Regulations

Claremont General Plan

The City has implemented guidelines through the 2006 General Plan that address aesthetic resources. Objectives and policies that apply to aesthetic resources include the following:

Land Use, Community Character, and Historic Preservation

Goal 2.5: Maintain and enhance Claremont's unique character

Policy 2.5-1 Insist on excellence in architectural design of new construction in city.

Policy 2.5-3 Continue to require public art as part of new development projects.

Goal 2.11: Promote community identity and local history by encouraging context-sensitive design and development.

Policy 2.11-1 Encourage a variety of architectural styles for new and renovated structures that reflect local architectural characteristics.

Policy 2-11.2 Strengthen neighborhood identity with new development that is architecturally compatible with surrounding structures.

Policy 2-11.3 Require that new construction, additions, renovations, and infill developments be sensitive to neighborhood context and building forms and scale.

Policy 2-11.4 Prohibit new and large structures that compromise neighborhood quality. Work with the Architectural Commission to study and define design issues to safeguard neighborhoods.

Policy 2-11.5 Encourage designs and building layout that promote defensible spaces; discourage lengthy, blank walls.

Goal 2-12: Create distinctive places throughout Claremont.

Policy 2-12.3 Encourage new developments to incorporate drought tolerant and native landscaping that is pedestrian friendly, attractive, and consistent with the landscaped character of Claremont.

Policy 2-12.4 Encourage all new development to preserve the natural topography of a site and existing mature trees.

Policy 2-12.11 Preserve the diversity found in the age of the housing stock, in its architectural styles, and the various home sizes.

Goal 2-13 Achieve a city-wide network of streetscapes that are interesting and attractive**.**

Policy 2-13.1 Maintain and enhance the City's collection of street trees, and improve Claremont's image of a "City with trees."

Goal 2-14 Retain and celebrate Claremont's rich history and heritage, as evidenced through its development patterns, buildings and building materials, landscaping, street treatments, parks and open space, and civic architecture.

Policy 2-14.3 Continue to encourage pride in the quality and character of historic areas.

Claremont Municipal Code

Title 16, *Zoning,* of the Claremont Municipal Code (CMC) includes ordinances that restrict height, govern design, and determine the compatibility with surrounding land uses. For each zoning designation, design guidelines are codified such that proposed projects would be subject to provisions concerning the quality of materials, the style of architecture and the arrangement of buildings (massing), and the incorporation of public art. While city-wide design guidelines vary by zoning designation, the intent is to provide a cohesive architectural style to the entire city that enhances visual quality and human-scale experiences of the built environment. For example, mixed-use developments that would include residential and commercial or office uses, are subject to CMC Section 16.040.060, which specifies height limits. Additionally, CMC Section 16.040.080 specifies architectural character and massing, compatibility with surrounding development, and the provision of a transition in massing and scale of new development to that of surrounding development.

CMC Section 16.154.030 regulates outdoor lighting and glare by providing guidelines and restrictions on the fixtures, shielding, location, and direction of the light. This applies to single-family and multi-family residential areas, parking, and commercial signage. The ordinance also states that "all existing outdoor lighting which does not conform to the provisions of this section shall be removed or made to conform with the standards of this section by July 1, 1991.".

4.1.3 Impact Analysis

Methodology and Significance Thresholds

As addressed by the California Environmental Quality Act (CEQA) analysis, aesthetics refers to visual concerns. Aesthetics or visual resources analysis is a process to assess the visible change and anticipated viewer response to that change. The Federal Highway Administration (FHWA), BLM, and U.S. Forest Service (USFS) have developed methodologies for conducting visual analysis that are used across the industry (FHWA 2015, BLM 1984, USFS 1996). These methods have been synthesized and used for this analysis.

While the conclusions of these assessments may seem entirely subjective, value is measured based on generally accepted measures of quality, viewer sensitivity, and viewer response, supported by consistent levels of agreement in research on visual quality evaluation (BLM 1984, FHWA 2015). Modifications in a landscape that repeat basic elements found in that landscape are said to be in harmony with their surroundings; changes that do not harmonize often look out of place and can be found to form an unpleasant contrast when their effects are not evaluated adequately.

Significance Thresholds

The following thresholds of significance were developed based on the *CEQA Guidelines*, specifically, Appendix G. The Housing Element Update would have a significant impact with respect to aesthetics if it would:

1. Have a substantial adverse effect on a scenic vista
2. Substantially damage scenic resources in a designated State scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings; in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality
4. Create new sources of light or glare that would adversely affect day or nighttime views

Issues Not Evaluated Further

State Scenic Highways (Threshold 2)

The Initial Study for the Housing Element Update determined that Claremont is not located within the viewshed of an identified State Scenic Highway (as shown in Appendix A). Impacts were determined to be less than significant. Thus, the threshold related to this subject is not evaluated further in this EIR.

Updates to the Safety Element would not result in additional development in the Plan Area that would generate impacts to visual resources. The goals and policies included in the Safety Element would support improved emergency evacuation, reduced wildfire risk, environmental justice, and other safety-related aspects. Therefore, no impact related to aesthetics and visual resources would occur.

Project Impacts and Mitigation Measures

Threshold 1:	Would the Housing Element Update have a substantial adverse effect on a scenic vista?

Impact AES-1 VIEWS OF THE SAN GABRIEL MOUNTAINS ARE AVAILABLE FROM MAJOR ROADWAYS THROUGHOUT THE CITY. DEVELOPMENT OF HOUSING UNITS FACILITATED BY THE HOUSING ELEMENT UPDATE ALONG MAJOR ROADWAYS WOULD NOT INTERFERE WITH SCENIC VIEWS FROM PUBLIC VIEWING AREAS, SUCH AS ROADS OR PEDESTRIAN WALKWAYS. HOWEVER, DEVELOPMENT PROJECTED ON HOUSING OPPORTUNITY SITE 32 MAY IMPACT EXISTING VIEWS. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Development facilitated by the Housing Element Update could result in increased urbanization along major arterial roadways such as Indian Hill Boulevard, Foothill Boulevard, and Bonita Avenue, among others. Development and re-development that could be facilitated by the Housing Element Update would be visible along arterial roads and would increase density on vacant lots. Reasonably foreseeable development would be subject to the height limitations for various zoning districts contained in Title 16, Zoning, of the CMC. The CMC prohibits construction of structures that exceed three-stories in most housing opportunity sites zoning districts. However, within the Claremont Village South Specific Plan (VSSP) the maximum allowable height is up to three, four, partial four, or partial five, stories depending on the street (City of Claremont 2021). A total of 34 housing opportunity sites would be designated within the VSSP zone and could be developed with structures taller than three stories. The scenic vistas along these roadways are largely of the San Gabriel Mountains and those views currently include suburban/urban development such as residences, stores, gas stations, taller signage, and above-ground power transmission lines. Views for travelers on area roadways are restricted by these urbanized elements, but the broad form of the roadways continue to offer striking views looking toward the north, northeast, and northwest. The accessibility of the views varies depending on degree of development, the density of the urban forestation, and the location of the viewer on any given roadway. Pedestrians would have a similar visual experience of these natural areas north of the city, with views being restricted by their location and the degree of development. Therefore, residential development on the housing opportunity sites along most of Indian Hill Boulevard, Foothill Boulevard, and Bonita Avenue parcel would not substantially block existing views.

The parcel at 1550 Indian Hill Boulevard, part of Site 32, is developed with a structure that appears unoccupied, based on the image in Figure 4.1-1. The Housing Element Update would allow

demolition of the existing structure visible on the right of the image and development of up to 89 units on the site. Depending upon the design of the development, to accommodate this density development would have a potentially significant impact to scenic vistas of the ridgelines from North Indian Hill Boulevard and from the public areas of Claremont High School, such as the front entrance and the athletic fields. Development proposed on this site would be subject to Mitigation Measure AES-1.

From Forbes Avenue, the vacant parcel that forms the northernmost housing opportunity site, adjacent to the La Puerta Sports Park, viewers can see the nearby mountains over the rooftops of existing single-family residences. Views to the northeast might be obscured by proposed development on the parcel. However, northeast views are not currently expansive from the roadway looking northwest. Furthermore, as Forbes Avenue is a minor street, the number of motorists who may regard the view from the street would be minimal. Finally, from Indian Hill Boulevard, looking northeast across La Puerta Sports Park, views of the mountains are largely blocked by the mature trees and residential development beyond. Therefore, residential development on the Forbes Avenue parcel would not substantially block existing views.

Mitigation Measures

Mitigation Measure AES-1 Massing and Distribution of Buildings

For development on Site 32, at 1550 Indian Hill Boulevard, project design shall be subject to architectural review by the City to ensure the building massing and arrangement would integrate with the views to the north and northeast. Architectural review shall confirm some visibility of the mountains and ridgelines through the proposed development. Building heights shall vary in a way to provide visual interest and shall not create an architectural wall that would block the vista from the roadway.

Significance After Mitigation

All development on housing opportunity sites would be required to comply with the goals and policies of the 2006 General Plan and be designed in accordance with the city-wide design guidelines contained in the CMC. Design review would include an assessment of height and massing to determine if the arrangement of buildings on the parcel would be compatible with the intention of enhancing the neighborhood feeling and continuing to regard the backdrop of the San Gabriel Mountains as a scenic resource. Pursuant to Mitigation Measure AES-1 housing opportunity site 32 would be subject to architectural review to preserve existing views. With adherence to these guidelines and policies, and Mitigation Measure AES-1, impacts to scenic vistas would be less than significant.

Threshold 3:	Would the Housing Element Update, 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 a 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?

Impact AES-2 THE HOUSING ELEMENT UPDATE PROPOSES REZONING THAT WOULD ACCOMMODATE INCREASED DENSITY THAT COULD INCLUDE MULTI-STORY BUILDINGS ON PARCELS ADJACENT TO SINGLE-FAMILY RESIDENTIAL NEIGHBORHOODS, RESULTING IN THE POTENTIAL FOR A SIGNIFICANT IMPACT TO THE VISUAL QUALITY OF THOSE NEIGHBORHOODS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Claremont is a highly urbanized city, characterized by contiguous development with adjacent cities to the west, east, and south. Some neighborhoods are historic and feature Craftsman, California Bungalow, and other signature architectural styles. Other neighborhoods have historic-aged buildings that are not as distinctive as those in the Claremont Village area or other similar neighborhoods. Some of the housing opportunity sites are situated in areas where retail strip-mall style complexes are fronted by large, surface parking areas that do not feature distinctive architectural styles. Other sites would occur on currently undeveloped, minimally landscaped lots along major transportation corridors that are lined with above-ground power transmission lines, feature a mix of building signage, and have nearby single-family residential development.

CMC Chapter 16 provides design guidelines for all zoning designations that includes the edict to preserve historic resources, including existing homes and commercial districts with historic value. It also prescribes design criteria for various zones, including that RM uses within the Claremont Village Design Plan boundaries shall conform to the provisions in that plan (CMC Section 16.013.030). Mixed-use development is subject to the detailed design guidelines in CMC Section 16.040.080 that indicate guidelines for architectural character and massing, historic preservation, landscaping and open space, screening of mechanical equipment, and compatibility with surrounding development. Furthermore, the Village South Specific Plan, which encompasses the intersection of Arrow Highway and South Indian Hill Boulevard, provides detailed development standards that guide building placement and massing, building height, parking areas, sign design, and public open space (City of Claremont 2021). The Village South Specific Plan would execute the 2006 General Plan goals and policies that are directed at improving the appearance of the Arrow Highway area within Claremont, including Goal 2-13 (City of Claremont 2006a, 2006b).

The housing opportunity sites are situated along the transportation corridors formed by major north/south and east/west roadways (Indian Hill Boulevard, Foothill Boulevard, and Arrow Highway). Largely these are outside the historic Claremont Village and in areas where vacant lots and under-utilized parcels could accommodate new infill development without degrading the character of the neighborhood. In many cases, redevelopment would replace aging structures with well-designed new complexes that feature high-quality materials, increased, and maintained landscaping, and public art, having a beneficial visual impact on areas where existing development (e.g., older retail establishments and restaurants or unused auto sales facilities) is aging and does not align with newer development that was subject to the stringent city-wide design guidelines when developed.

The Housing Element Update presents housing opportunity sites that could accommodate a mix of housing types, including low income and moderate to high income housing, on the same site. This is to ensure the availability of all types of housing throughout the city and ensure that “affordable housing” does not equate to poorly designed facilities. Developments could also include retail

shops, spas, restaurants, and office spaces on the first floor or mixed in with the residential development. Mixed-use development would enhance and encourage walkability and limit the need for surface-level parking. Furthermore, according to goals and policies in the 2006 General Plan, the City is committed to maintaining and enhancing the existing character of Claremont through projects that feature high-quality architectural design that enhances the village feeling, walkability, dense urban forestation, and adds public art throughout the city. The 2006 General Plan expressly prohibits the development of projects that include "large structures that compromise neighborhood quality, [and states that the City will] work with the Architectural Commission to study and define design issues to safeguard neighborhoods." This applies throughout the city, including the single-family neighborhood near La Puerta Sports Park where one housing opportunity site is situated.

Finally, the 2006 General Plan contains policies that require new development to increase urban forestation in Claremont, thereby enhancing the visual quality on currently undeveloped sites with limited or unmaintained landscaping. CMC requires that new development install permanent outdoor artworks at development sites that are accessible to the public from public viewing areas, such as streets or parks. Public art throughout the city enhances the aesthetic and cultural quality, provides opportunities for the public to be exposed to a broad range of quality visual art, acknowledges the local artistic community, inspires pride and identity, creates a sense of place among the residents of the community, and enhances the general welfare of people living and working in Claremont.

With adherence to the design guidelines provided in the zoning code, the design guidelines in the Village Specific Plan, and the goals and policies in the 2006 General Plan, the Housing Element Update would not degrade visual character. Multi-story buildings proposed on housing opportunity sites could be higher than existing development, but they would be subject to the provisions in the CMC which would ensure visual impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

Threshold 4:	Would the Housing Element Update create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-3 NEW DEVELOPMENT FACILITATED BY THE HOUSING ELEMENT UPDATE COULD ADD NEW SOURCES OF LIGHT AND GLARE. ALL DEVELOPMENT WOULD BE REQUIRED TO COMPLY WITH THE CITY'S LIGHTING REGULATIONS (DARK SKIES ORDINANCE) AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

For purposes of this analysis, light refers to light emissions (brightness) generated by a source of light. Stationary sources of light include exterior parking lot and building security lighting; moving sources of light include the headlights of vehicles driving on roadways near the project site. Streetlights and other security lighting also serve as sources of light in the evening hours.

Glare is defined as focused, intense light emanated directly from a source or indirectly when light reflects from a surface. Daytime glare is caused in large part by sunlight shining on highly reflective surfaces at or above eye level. Reflective surfaces area associated with buildings that have expanses of polished or glass surfaces, light-colored pavement, and the windshields of parked cars.

Development that could occur through implementation of the Housing Element Update would increase the ambient nighttime lighting at and surrounding the housing opportunity sites. Increased lighting could come from exterior lights on buildings or light spilling from streetlights. Increased

glare could potentially occur because of reflective building materials, roofing materials, and windows situated so they reflect sunlight. CMC Section 16.154.030, Outdoor Lighting and Glare, provides general requirements that limit light and glare through the use of appropriate light fixtures, shielding devices to prevent light spilling onto adjacent properties, and directional lighting methods. This includes limiting the height at which light fixtures can be positioned above the ground in residential districts and states that outdoor lighting on apartment buildings and multi-use complexes be directed downward into the interior of the lot.

Development facilitated by the Housing Element Update would mainly occur as redevelopment of existing built sites or infill development of unused parcels between existing built sites. When facilities such as parking lots are replaced with buildings, these replacements may reduce nighttime sources of light, because parking lots are often more brightly lit during the nighttime than most buildings. Development of underutilized or vacant parcels may result in new light sources, but they would likely be congruous with nearby light sources (e.g., lighting from residential windows). Furthermore, as the development facilitated by the project would be mostly residential units, light from windows would be filtered or obscured by window coverings.

Finally, infill development on the housing opportunity sites along Foothill Boulevard, Indian Hill Boulevard, Arrow Highway, and other major transit corridors would be designed to encourage alternative forms of transportation. Therefore, the number of surface parking lots would be limited or replaced with other forms of parking, and glare associated with parked cars would be reduced. Impacts related to increased light and glare under project implementation would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

4.1.4 Cumulative Impacts

Anticipated Housing Element Update-related impacts, in conjunction with cumulative development allowed per existing regulations is expected to increase housing development citywide, in existing developed areas. Future housing development facilitated by the Housing Element Update could result in impacts to aesthetics. Potential aesthetic impacts of future housing development on the housing opportunity sites facilitated by implementation of the Housing Element Update would be site-specific and each project would require evaluation on a case-by-case basis at the project level in accordance with the architectural design review requirements. Consequently, future housing development facilitated by the Housing Element Update would not result in significant cumulative environmental impacts in conflict with aesthetics requirements for preserving visual character, public views, scenic vistas and resources, or requirements for minimizing and controlling potential light and glare. Therefore, implementation of the Housing Element Update would not cause a cumulatively considerable impact on aesthetics.

4.2 Air Quality

This section of the EIR identifies and evaluates issues related to air quality in the context of the Housing Element Update. It describes the physical and regulatory setting, the criteria used to evaluate the significance of potential impacts, the methods used to evaluate these impacts, and the results of the impact analysis.

4.2.1 Setting

Climate and Meteorology

The Plan Area is located in the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAB is 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 includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The regional climate in the SCAB is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality in the SCAB is primarily influenced by meteorology and a wide range of emission sources, such as dense population centers, substantial vehicular traffic, and industry.

The SCAB experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific High-pressure system. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion layer (i.e., the upper layer) until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid- to late afternoons on hot summer days. Winter inversions frequently break by mid-morning.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino counties. In the winter, the greatest pollution problem is the accumulation of carbon monoxide and nitrogen oxides (NO_X) due to low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and brighter sunshine combine to cause a reaction between hydrocarbons and NO_X to form photochemical smog (SCAQMD 2017).

Local climate conditions for the Plan Area are shown in Table 4.2-1. Precipitation and temperature data is sourced from the nearest United States Cooperative Observer Network stations with recent available data, which are the Covina City YRD FC387B station located in Covina approximately 9.7 miles west of the Plan Area and the Yorba Linda station in Yorba Linda approximately 15.3 miles south of the Plan Area. Wind data is sourced from the nearest Federal Aviation Administration Automated Surface Observing Systems station, which is the Cable Airport station located adjacent to Claremont city limits. As summarized therein, the warmest month of the year is August, and the coldest month of the year is January. The annual average maximum temperature is 77 degrees Fahrenheit (°F), while the annual average minimum temperature is 50°F.

Table 4.2-1 Claremont Climate Conditions

Temperature Condition	Amount
Average annual rainfall[1]	18.08 inches
Average annual maximum temperature[2]	77°F
Average annual minimum temperature[2]	49.7°F
Warmest month[2]	August
Coolest month[2]	January
Average annual mean temperature[2]	63.4°F
Average wind speed[3]	5.5 miles per hour
Predominant wind direction[3]	west

°F = degrees Fahrenheit

Note: Temperature data is based on the period of record from October 1, 1912 to June 10, 2016. Average annual rainfall is based on the period of record from October 1, 1929 to May 31, 2016. Wind data is based on the period of record from November 6, 2018 to February 23, 2021.

[1] Source: Western Regional Climate Center 2016a

[2] Source: Western Regional Climate Center 2016b

[3] Source: Iowa State University 2021

Sources of Air Pollution

Air pollutant emissions in the SCAB are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories:

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat.
- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and can also be divided into two major subcategories:

- On-road sources may be legally operated on roadways and highways.
- Off-road sources include aircraft, ships, trains, and self-propelled construction equipment.

Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles or when wildfires generate smoke containing particulate matter.

Air Pollutants of Primary Concern

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the U.S. Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for “criteria pollutants” and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an

exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide, volatile organic compounds (VOC)/reactive organic gases (ROG),[1] NO_X, particulate matter with diameters of up to ten microns (PM_{10}) and up to 2.5 microns ($PM_{2.5}$), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between VOC and NO_X. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). The characteristics, sources and effects of criteria pollutants are discussed in the following subsections. The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern.

Ozone

Ozone is produced by a photochemical reaction (triggered by sunlight) between NO_X and VOC. VOC are composed of non-methane hydrocarbons (with some specific exclusions), and NO_X is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and nitrogen dioxide. NO_X are formed during the combustion of fuels, while VOC are formed during combustion and evaporation of organic solvents. As a highly reactive molecule, ozone readily combines with many different components of the atmosphere. Consequently, high levels of ozone tend to exist only while high VOC and NO_X levels are present to sustain the ozone formation process. Once the precursors have been depleted, ozone levels rapidly decline. Because these reactions occur on a regional rather than local scale, ozone is considered a regional pollutant. In addition, because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans, including changes in breathing patterns, reduction of breathing capacity, increased susceptibility to infections, inflammation of lung tissue, and some immunological changes (SCAQMD 2005; U.S. EPA 2021a). Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

Carbon monoxide is a localized pollutant that is found in high concentrations only near its source. The major source of carbon monoxide, a colorless, odorless, poisonous gas, is the incomplete combustion of petroleum fuels by automobile traffic. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Other sources of carbon monoxide include the incomplete combustion of petroleum fuels at power plants and fuel combustion from wood stoves and fireplaces during the winter. The health effects of carbon monoxide are related to its affinity for hemoglobin in the blood. Carbon monoxide causes a number of health problems, including aggravation of some heart diseases (e.g., angina), reduced tolerance for exercise, impaired mental function, and impaired fetal development. At high levels of exposure, carbon monoxide reduces the amount of oxygen in the blood, leading to mortality (SCAQMD 2005; U.S. EPA 2021a). Carbon monoxide tends to dissipate rapidly into the atmosphere; consequently, violations of the NAAQS and/or CAAQS for carbon monoxide are generally associated with localized carbon monoxide "hotspots" that can occur at major roadway intersections during heavy peak-hour traffic conditions.

[1] CARB defines VOC and ROG similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term VOC is used in this EIR.

Nitrogen Dioxide

Nitrogen dioxide is a by-product of fuel combustion; the primary sources are motor vehicles and industrial boilers and furnaces. The principal form of NO_X produced by combustion is nitric oxide, but nitric oxide reacts rapidly to form nitrogen dioxide, creating the mixture of nitric oxide and nitrogen dioxide commonly called NO_X. Nitrogen dioxide is an acute irritant that can aggravate respiratory illnesses and symptoms, particularly in sensitive groups (SCAQMD 1993 and 2005; U.S. EPA 2021a). A relationship between nitrogen dioxide and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility (SCAQMD 1993 and 2005; U.S. EPA 2021a). It can also contribute to the formation of PM_{10} and acid rain.

Sulfur Dioxide

Sulfur dioxide is included in a group of highly reactive gases known as "oxides of sulfur." The largest sources of sulfur dioxide emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of sulfur dioxide emissions include industrial processes such as extracting metal from ore and the burning of fuels with a high sulfur content by locomotives, large ships, and off-road equipment. Sulfur dioxide is linked to a number of adverse effects on the respiratory system, including aggravation of respiratory diseases, such as asthma and emphysema, and reduced lung function (SCAQMD 2005; U.S. EPA 2021a).

Particulate Matter

Suspended atmospheric PM_{10} and $PM_{2.5}$ is comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. Both PM_{10} and $PM_{2.5}$ are directly emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. Particulate matter is also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with PM_{10} and $PM_{2.5}$ can be very different. PM_{10} is generally associated with dust mobilized by wind and vehicles while $PM_{2.5}$ is generally associated with combustion processes as well as formation in the atmosphere as a secondary pollutant through chemical reactions. $PM_{2.5}$ is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems (CARB 2021a). More than half of $PM_{2.5}$ that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance (SCAQMD 2005). Suspended particulates can also reduce lung function, aggravate respiratory and cardiovascular diseases, increase mortality rates, and reduce lung function growth in children (SCAQMD 2005; U.S. EPA 2021a).

Lead

Lead is a metal found naturally in the environment, as well as in manufacturing products. The major sources of lead emissions historically have been mobile and industrial sources. However, as a result of the U.S. EPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in lead emissions occurred prior to 1990 due to the removal of lead from gasoline sold for most highway vehicles. Lead emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least in part as a result of national emissions standards for hazardous air pollutants (U.S. EPA 2013). As a result of phasing out leaded gasoline,

metal processing currently is the primary source of lead emissions. The highest level of lead in the air is generally found near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. The health impacts of lead include behavioral and hearing disabilities in children and nervous system impairment (SCAQMD 2005; U.S. EPA 2021a).

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about 1/70th the diameter of a human hair) and thus is a subset of $PM_{2.5}$. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2021b). Particulate matter emitted from diesel engines contributes more than 70 percent of the air emission cancer risk associated with the on-road heavy-duty sector within the SCAB (SCAQMD 2017).

TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

4.2.2 Regulatory Setting

Federal and State Regulations

Federal and California Clean Air Acts

The federal Clean Air Act (CAA) governs air quality in the United States and is administered by the U.S. EPA at the federal level. Air quality in California is also governed by regulations under the California CAA, which is administered by CARB at the state level. At the regional and local levels, local air districts such as the SCAQMD typically administer the federal and California CAA. As part of implementing the federal and California CAA, the U.S. EPA and CARB have established ambient air quality standards (AAQS) for major pollutants at thresholds intended to protect public health. n air quality standard is defined as “the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harming public health” (CARB 2021c). Table 4.2-2 summarizes the CAAQS and the NAAQS. The CAAQS are more restrictive than the NAAQS for several pollutants, including the one-hour standard for carbon monoxide, the 24-hour standard for sulfur dioxide, and the 24-hour standard for PM_{10}.

California is divided geographically into 15 air basins for managing the air resources of the state on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, are expected to have similar ambient air quality. Depending on whether the standards are met or exceeded, the local air basin is classified as in “attainment” or “non-attainment.” Once a nonattainment area has achieved the air quality standards for a particular pollutant, it may be redesignated to an attainment area for that pollutant. To be redesignated, the area must meet air

quality standards and have a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the federal CAA. Areas that have been redesignated to attainment are called maintenance areas. Some areas are unclassified, which means insufficient monitoring data are available; unclassified areas are considered to be in attainment. Table 4.2-2 presents the attainment status of the SCAB for each of the CAAQS and NAAQS. As shown therein, the SCAB is designated nonattainment for the NAAQS for ozone, $PM_{2.5}$, and lead (in the Los Angeles County portion only) as well as the CAAQS for ozone, PM_{10}, and $PM_{2.5}$.

Table 4.2-2 Ambient Air Quality Standards and Basin Attainment Status

		California Ambient Air Quality Standards		National Ambient Air Quality Standards	
Pollutant	Averaging Time	Concentration	Attainment Status	Concentration	Attainment Status
Ozone	8-Hour	0.070 ppm	N	0.070 ppm	N
	1-Hour	0.09 ppm	N	–	–
Carbon Monoxide	8-Hour	9.0 ppm	A	9 ppm	A
	1-Hour	20 ppm	A	35 ppm	A
Nitrogen Dioxide	1-Hour	0.18 ppm	A	0.100 ppm	U/A
	Annual Arithmetic Mean	0.030 ppm	A	0.053 ppm	A
Sulfur Dioxide	24-Hour	0.04 ppm	A	0.14 ppm	U/A[1]
	1-Hour	0.25 ppm	A	0.075 ppm	U/A
	Annual Arithmetic Mean	–	–	0.030 ppm	U/A
Particulate Matter – Small (PM_{10})	Annual Arithmetic Mean	20 µg/m^3	N	--	–
	24-Hour	50 µg/m^3	N	150 µg/m^3	A
Particulate Matter – Fine ($PM_{2.5}$)	Annual Arithmetic Mean	12 µg/m^3	N	12 µg/m^3	N
	24-Hour	–	–	35 µg/m^3	N
Sulfates	24-Hour	25 µg/m^3	A	–	–
Lead	Rolling 3-Month Average	–	–	0.15 µg/m^3	N[2]
	30-Day Average	1.5 µg/m^3	A	–	–
Hydrogen Sulfide[3]	1-Hour	0.03 ppm (42 µg/m^3)	A	–	–
Vinyl Chloride (Chloroethene)[3]	24-Hour	0.010 ppm (26 µg/m^3)	A	–	–
Visibility Reducing Particles[3]	8-Hour (10:00 to 18:00 PST)	–	No information available	–	–

A = attainment; N = nonattainment; U = unclassified; ppm=parts per million; µg/m^3=micrograms per cubic meter; PST = Pacific Standard Time

[1] Designation pending.

[2] Partial Nonattainment designation – Los Angeles County portion of the SCAB only for near-source monitors. Expect re-designation to attainment based on current monitoring data.

[3] The project does not include substantial sources of hydrogen sulfide, vinyl chloride, or visibility reducing particles. Ambient air quality standards for these pollutants is provided for informational purposes only; however, these pollutants are not evaluated for the purposes of CEQA.

Source: SCAQMD 2016 and CARB 2021d

In accordance with Section 109(b) of the federal CAA, the national ambient air quality standards (NAAQS) established at the federal level are designed to be protective of public health with an adequate margin of safety. The NAAQS were designed to include an adequate margin of safety to be protective of those segments of the public most susceptible to respiratory distress, such as children under the age of 14, the elderly (over the age of 65), persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases (U.S. EPA 2016). To derive these standards, the U.S. EPA reviews data from integrated science assessments and risk/exposure assessments to determine the ambient pollutant concentrations at which human health impacts occur, then reduces these concentrations to establish a margin of safety (U.S. EPA 2018). As a result, human health impacts caused by the air pollutants discussed above may affect people when ambient air pollutant concentrations are at or above the concentrations established by the NAAQS. The closer a region is to attainting a particular NAAQS, the lower the human health impact is from that pollutant (Brief for San Joaquin Valley Unified Air Pollution Control District 2018). Accordingly, ambient air pollutant concentrations below the NAAQS are considered to be protective of human health (CARB 2021c). The NAAQS and the underlying science that forms the basis of the NAAQS are reviewed every five years to determine whether updates are necessary to continue protecting public health with an adequate margin of safety (CARB 2021c).

Safer Affordable Fuel-Efficient Vehicles Rule

On September 27, 2019, the U.S. EPA and the National Highway Safety Administration published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program. The Part One Rule revokes California's authority to set its own GHG emissions standards and zero-emission vehicle mandates in California. On April 30, 2020, the U.S. E.PA and the National Highway Safety Administration published Part Two of the SAFE Vehicles Rule, which revised corporate average fuel economy and carbon dioxide emissions standards for passenger cars and trucks of model years 2021-2026 such that the standards increase by approximately 1.5 percent each year through model year 2026 as compared to the approximately five percent annual increase required under the 2012 standards (National Highway Traffic Safety Administration 2021). To account for the effects of the SAFE Vehicles Rule, CARB released off-model adjustment factors to adjust criteria air pollutant emissions outputs from the EMFAC model.

Construction Equipment Fuel Efficiency Standard

The USEPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower (hp) and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 hp and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements, which are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles were completely phased in by the end of 2015.

California Building Standards Code

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The California Building Standards

Code's energy-efficiency and green building standards are outlined below. The 2019 California Buildings Standards Code (the most recent iteration of the code) was adopted by reference in Claremont Municipal Code Chapter 15.04. These standards are updated every three years.

PART 6 – BUILDING ENERGY EFFICIENCY STANDARDS/ENERGY CODE

CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). The 2019 Title 24 standards are the applicable building energy efficiency standards for the project because they became effective on January 1, 2020.

PART 11 – CALIFORNIA GREEN BUILDING STANDARDS

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The 2019 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers (Tiers I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

The mandatory standards require:

- 20 percent reduction in indoor water use relative to specified baseline levels;[2]
- 65 percent construction/demolition waste diverted from landfills;
- Inspections of energy systems to ensure optimal working efficiency;
- Low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards;
- Dedicated circuitry to facilitate installation of electric vehicle (EV) charging stations in newly constructed attached garages for single-family and duplex dwellings; and
- Designation of at least ten percent of parking spaces for multi-family residential developments as electric vehicle charging spaces capable of supporting future electric vehicle supply equipment.

The voluntary standards require:

- **Tier I:** stricter energy efficiency requirements, stricter water conservation requirements for specific fixtures, 65 percent reduction in construction waste with third-party verification, 10 percent recycled content for building materials, 20 percent permeable paving, 20 percent cement reduction, and cool/solar reflective roof; and

[2] Similar to the compliance reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen water reduction requirements must be demonstrated through completion of water use reporting forms. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

- **Tier II:** stricter energy efficiency requirements, stricter water conservation requirements for specific fixtures, 75 percent reduction in construction waste with third-party verification, 15 percent recycled content for building materials, 30 percent permeable paving, 25 percent cement reduction, and cool/solar reflective roof.

Local Regulations

2016 Air Quality Management Plan

Under state law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. Each iteration of the SCAQMD's Air Quality Management Plan (AQMP) is an update of the previous plan and has a 20-year horizon. The latest AQMP, the 2016 AQMP, was adopted on March 3, 2017. It incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP, including the approval of the new federal eight-hour ozone standard of 0.070 ppm that was finalized in 2015. The Final 2016 AQMP addresses several state and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality models. The Southern California Association of Governments' (SCAG) projections for socio-economic data (e.g., population, housing, and employment by industry) and transportation activities from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) are integrated into the 2016 AQMP. The 2016 AQMP builds upon the approaches taken in the 2012 AQMP for the attainment of federal PM and ozone standards and highlights the significant amount of reductions to be achieved. It emphasizes the need for interagency planning to identify additional strategies to achieve reductions within the timeframes allowed under the federal CAA, especially in the area of mobile sources. The 2016 AQMP also includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The 2016 AQMP also demonstrates strategies for attainment of the new federal eight-hour ozone standard and vehicle miles travelled emissions offsets, pursuant to recent USEPA requirements (SCAQMD 2017). The SCAQMD is currently preparing the next AQMP iteration, which will be the 2022 AQMP.

South Coast Air Quality Management District Rules and Regulations

The SCAQMD implements rules and regulations for emissions that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects. Rules and regulations relevant to the project include the following:

Rule 401 (Visible Emissions): This rule prohibits the discharge of visible air pollutant emissions from various sources as determined by shade and opacity criteria based on the Ringelmann Chart.

Rule 402 (Nuisance): This rule prohibits the discharge of quantities of air contaminants or other material that causes injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.

Rule 403 (Fugitive Dust Control): This rule includes various requirements to prevent, reduce, and mitigate the amount of particulate matter entrained in the ambient air from man-made fugitive dust sources.

Rule 1113 (Architectural Coatings): This rule establishes VOC content limits for a variety of architectural coatings, including 50 grams per liter for flat and non-flat coatings.

City of Claremont General Plan

The 2006 General Plan, adopted in 2006 and revised in October 2009, lists several air quality policies in its Open Space, Parkland, Conservation, and Air Quality Element that supplement those of the SCAQMD. The following policies are applicable to the Housing Element Update (City of Claremont 2006):

Goal 5-18: Reduce the amount of air pollution emissions from mobile and stationary sources and enhance the airshed.

Policy 5-18.1. Enhance pedestrian and bike facilities within the City and encourage alternative modes of transportation.

Policy 5-18.3. Promote the use of fuel- efficient heating and cooling equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces. and boiler units.

Policy 5-18.4. Promote the use of clean air technologies such as fuel cell technologies, renewable energy sources, UV coatings, and alternative, non- fossil fuels.

Policy 5-18.5. Continue to require the planting of street trees along City streets and inclusion of trees and landscaping for all development projects to help improve airshed and minimize urban heat island effects.

Policy 5-18.6. Encourage small businesses to utilize clean, innovative technologies to reduce air pollution.

Policy 5-18.7. Implement principles of green building.

Policy 5-18.3. Support jobs/ housing balance within the community so more people can both live and work within the community. To reduce vehicle trips, encourage people to telecommute or work out of home or in local satellite offices.

Policy 5-19.1. Support programs and policies of the South Coast Air Quality Management District regarding restrictions on grading operations at construction projects.

Policy 5-19.2. Cooperate with local, regional, state, and federal jurisdictions to control fugitive dust from stationary, mobile, and area sources.

Policy 5-19.3. Enforce regulations that do not allow vehicles to transport aggregate or similar material upon a roadway unless the material is stabilized or covered, in accordance with state law and South Coast Air Quality Management District regulations.

Policy 5-20.1. Encourage and publicly recognize approaches that improve air quality.

Current Air Quality

As discussed in Section 4.2.1(d), *Regulatory Setting*, the SCAB is designated nonattainment for the NAAQS for ozone, $PM_{2.5}$, and lead (in the Los Angeles County portion only) as well as the CAAQS for ozone, PM_{10}, and $PM_{2.5}$. The SCAQMD operates a network of air quality monitoring stations throughout the SCAB. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the NAAQS and CAAQS. According to the *SCAQMD CEQA Air Quality Handbook*, environmental documents should contain a summary of the most current air quality data to characterize the site-specific air quality setting (SCAQMD 1993). The *SCAQMD CEQA Air Quality Handbook* notes that the data must be derived from the nearest SCAQMD monitoring station located in the same Source Receptor Area (SRA) as the project. However, if there is no monitoring station located in the SRA, then information should be sourced from the nearest upwind station. The Housing Element Update covers the City of Claremont, which falls under SRA 10 (Pomona/Walnut Valley). The SCAQMD does not have a monitoring station in Claremont. Therefore, pursuant to guidance in the *SCAQMD CEQA Air Quality Handbook*, the nearest monitoring station in SRA 10 with available data should be used. The closest monitoring station in SRA 10 is located in Pomona approximately 3 miles southwest of the Claremont city limits. However, SO_2, $PM_{2.5}$, PM_{10}, and lead data are not available from the Pomona/Walnut Valley monitoring station; therefore, data for these pollutants have been taken from the next closest available monitoring station, the Central Los Angeles monitoring station, located approximately 29 miles west of the Claremont city limits.[3]

Table 4.2-3 summarizes the representative annual air quality data for all criteria pollutants for the local airshed from the nearest monitoring stations with available data for 2018 through 2020. As shown therein, daily exceedances of the worst-hour ozone CAAQS occurred on seven days in 2018, 3 days in 2019, and 51 days in 2020. Daily exceedances of the worst-hour ozone NAAQS occurred on 10 days in 2020. Daily exceedances of the eight-hour ozone CAAQS and NAAQS occurred on 10 days in 2018, 12 days in 2019, and 84 days in 2020. Daily exceedances of the CAAQS for PM_{10} occurred on 31 days in 2018, 15 days in 2019, and 34 days in 2020, and daily exceedances of the NAAQS for $PM_{2.5}$ occurred on 6 days in 2018, 1 day in 2019 and 12 days in 2020. The CAAQS or NAAQS for carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead were not exceeded at these monitoring stations in the last three years.

[3] The use of ambient air quality from the Central Los Angeles monitoring stations allows for a conservative estimate of the project's air quality impacts for SO_2, $PM_{2.5}$, PM_{10}, and lead. Ambient air quality at the Central Los Angeles monitoring stations is likely worse than ambient air quality in the Plan Area due to a greater intensity of urban development which results in a greater intensity of ongoing construction activities, greater mobile source vehicle and aircraft emissions, and greater area source and energy use emissions from buildings. As a result, the ambient air quality data used in this EIR assumes a worst-case scenario by assuming that ambient air quality is worse than it is in reality. Therefore, this EIR uses an overstated baseline, which results in a conservative estimation of air quality impacts.

Table 4.2-3 Annual Ambient Air Quality Data

Pollutant	2018	2019	2020
Ozone (ppm), Worst 1-Hour[1]	0.11	0.10	0.18
Number of days above CAAQS (>0.09 ppm)	7	3	51
Number of days above NAAQS (>0.12 ppm)	0	0	10
Ozone (ppm), Worst 8-Hour Average[1]	0.09	0.08	0.12
Number of days above CAAQS (>0.070 ppm)	10	12	84
Number of days above NAAQS (>0.070 ppm)	10	12	84
Carbon Monoxide (ppm), Highest 8-Hour Average[1]	1.8	1.3	1.1
Number of days above CAAQS or NAAQS (>9.0 ppm)	0	0	0
Nitrogen Dioxide (ppm), Worst 1-Hour[1]	0.07	0.06	0.07
Number of days above CAAQS (>0.180 ppm)	0	0	0
Number of days above NAAQS (>0.100 ppm)	0	0	0
Sulfur Dioxide (ppm), Worst Hour[2]	0.01	0.01	0.01
Number of days above CAAQS (>0.25 ppm)	0	0	0
Number of days above NAAQS (>0.075 ppm)	0	0	0
Particulate Matter ≤10 microns (μg/m^3), Worst 24 Hours[2]	68	62	83
Number of days above CAAQS (>50 μg/m^3)	31	15	34
Number of days above NAAQS (>150 μg/m^3)	0	0	0
Particulate Matter ≤2.5 microns (μg/m^3), Worst 24 Hours[1]	61.4	43.5	175
Number of days above NAAQS (>35 μg/m^3)	6	1	12
Lead (μg/m^3), 3-Month Average[2]	0.01	0.01	0.01
Number of days above NAAQS (>0.15 μg/m^3)	0	0	0

ppm = parts per million; μg/m^3 = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard

Note: The ambient air quality data presented in this table is intended to be representative of existing conditions and is not a comprehensive summary of all monitoring efforts for all the CAAQS and NAAQS. Additional ambient air quality data can be accessed at https://www.epa.gov/outdoor-air-quality-data/monitor-values-report.

[1] Data from CARB and the U.S. EPA at the nearest monitoring station with available data at 924 N. Garey Ave. in Pomona (approximately 3 miles southwest of the Claremont city limits).

[2] Data from the U.S. EPA at the nearest monitoring station with available data at 1630 N Main Street in Los Angeles (approximately 29 miles west of the Claremont city limits).

Source: CARB 2021e and U.S. EPA 2021b

Sensitive Receptors

The NAAQs and CAAQS were established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress as a result of poor air quality, such as children under 14, persons over 65, persons engaged in strenuous work or exercise, and people with pre-existing cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, long-term health care facilities, rehabilitation centers, convalescent centers, hospitals, retirement homes, and schools, playgrounds, and childcare

centers (SCAQMD 2005). Sensitive receptors are located throughout and in the vicinity of the Plan Area and include the following:

- Residences
- Retirement homes including Claremont Manor Retirement Community, Claremont Place, Sunrise of Claremont, Claremont Manor Care, Mountain View Centers, Leisure Living of Claremont, Genesis Manor V, Claremont Hacienda Memory Care, Home of Serenity, FIL-AM Home for Seniors, Gold Medal Senior Living Estates, At Open Arms, Claremont Care Center, Pilgrim Place, and Alta Loma Gardens Residential Care
- Schools including Chaparral Elementary School, El Roble Intermediate School, Vista Del Valle Elementary School, Claremont High School, The Children's School at Claremont McKenna College, Condit Elementary School, Sycamore Elementary School, Western Christian Schools, Mountain View Elementary School, International Montessori Schools, Oakmont Elementary School, San Antonio High School, Sumner Elementary School, The Webb Schools, Claremont Unified School District, Our Lady of the Assumption Catholic School, Western Christian Preschool, Danbury School, International Montessori Schools, Seedling School, Kiddie Academy of Claremont, Community Day School, Foothill Country Day School, Prestige Preschool Academy, Serrano Middle School, Montvue Elementary School, and Claremont Baptist Nursery School
- Parks including Memorial Park, Higginbotham Park, Cahuilla Park, Mallows Park, Chaparral Park, Larkin Park, Blaisdell Park, June Vail Park, Wheeler Park, La Puerta Sports Park, Claremont Hills Wilderness Park, and San Antonio Park.

Odors

The SCAQMD's *CEQA Air Quality Handbook* (1993) identifies multiple land uses that may cause odors including, but not limited to agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. There are no potential major odor sources in the Plan Area. The nearest potential major odor source outside the Plan Area is the Weymouth Water Treatment Plant located approximately 3.7 miles northwest of the Plan Area.

4.2.3 Impact Analysis

Methodology and Significance Thresholds

At this time, projects facilitated by the Housing Element Update do not have sufficient detail (e.g., construction schedule, amount of soil export, specific buildout parameters) to allow for project-level analysis given the programmatic nature of the plan and thus it would be speculative to analyze project-level impacts for comparison with SCAQMD's project-level significance thresholds outlined under *Significance Thresholds*. Therefore, a more qualitative approach to characterizing air quality impacts has been employed for this analysis. In addition, the impact of the Housing Element Update on vehicle miles traveled (VMT) and population growth is used to quantitatively evaluate the Housing Element Update's consistency with the 2016 AQMP.

Significance Thresholds

The following thresholds of significance were developed based on the *CEQA Guidelines*, specifically, Appendix G. The Housing Element Update would have a significant impact with respect to air quality if it would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard;
3. Expose sensitive receptors to substantial pollutant concentrations; or
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Issues Not Evaluated Further

Odors (Threshold 4)

Impacts regarding other emissions, such as those leading to odors (Significance Threshold 4), are discussed in the Initial Study, which is provided in Appendix A. As discussed therein, construction and use of future residential and mixed-use development under the Housing Element Update is not anticipated to create objectionable odors affecting a substantial number of people. This impact would be less than significant and is not discussed further in this EIR.

SCAQMD Thresholds

As stated in the *CEQA Guidelines*, the significance criteria established by the regional air quality management district or air pollution control district may be relied upon to make significance determinations. The SCAQMD has adopted guidelines for quantifying and determining the significance of air quality emissions in its *SCAQMD CEQA Air Quality Handbook* and supplemental updates (SCAQMD 1993, 2008, and 2019).

Regional Significance Thresholds

The SCAQMD recommends the use of quantitative regional significance thresholds to evaluate emissions generated by temporary construction activities and long-term project operation in the SCAB, which are shown in Table 4.2-4. Project-level significance thresholds established by local air districts set the level at which a project would cause or have a cumulatively considerable contribution to an exceedance of a federal or state ambient air quality standard. Therefore, if a project's air pollutant emissions exceed the significance thresholds, the project could cause or contribute to the human health impacts described under Section 4.2.1(c), *Air Pollutants of Primary Concern*. For example, SCAQMD has set its operational significance threshold for VOCs based in part on the significance level for stationary sources of emissions established by Section 182(e) of the federal CAA. SCAQMD developed its other significance thresholds "based on scientific and factual data that is contained in the federal and state Clean Air Acts" (SCAQMD 1993).

Table 4.2-4 SCAQMD Regional Significance Thresholds

Construction Thresholds	Operational Thresholds
75 pounds per day of VOC	55 pounds per day of VOC
100 pounds per day of NO_X	55 pounds per day of NO_X
550 pounds per day of CO	550 pounds per day of CO
150 pounds per day of SO_X	150 pounds per day of SO_X
150 pounds per day of PM_{10}	150 pounds per day of PM_{10}
55 pounds per day of $PM_{2.5}$	55 pounds per day of $PM_{2.5}$

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X =sulfur oxides; PM_{10} = particulate matter measuring 10 microns or less in diameter; $PM_{2.5}$ = particulate matter measuring 2.5 microns or less in diameter

Source: SCAQMD 2019

Localized Significance Thresholds

In addition to the regional thresholds discussed above, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the *CEQA Air Quality Handbook* (1993). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and have been developed for NO_X, carbon monoxide, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each SRA, distance to the sensitive receptor, and project size. LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008). As such, LSTs are typically applied only to construction emissions because the majority of operational emissions are associated with project-generated vehicle trips. The LSTs for construction activities are based on the results of air dispersion modeling that calculated NO_X and CO exhaust emissions from construction equipment and fugitive dust emissions from ground disturbance for construction sites that measure up to one, two, or five acres in size (SCAQMD 2008).

The Plan Area is located in SRA 10 (Pomona/Walnut Valley) and is approximately 17 square miles (or 10,874 acres) in size. However, the majority of the sites evaluated in the housing inventory are five acres or less in size. Furthermore, given realistic construction practices, the active area of ground disturbance and/or heavy equipment usage during construction at any one site would not be expected to exceed five acres of the construction site at once. Therefore, it is appropriate to use the LSTs for construction sites up to five acres in size for this analysis (SCAQMD 2008). This provides a conservative evaluation of project impacts because the LSTs for these sizes of construction sites provide more stringent thresholds for construction emissions as compared to the analysis of emissions over a larger area. LSTs are provided for receptors at a distance of 82 to 1,640 feet (25 to 500 meters) from the project site boundary. As described in *Sensitive Receptors*, sensitive receptors are located throughout the Plan Area and therefore could be adjacent to sites housing opportunity sites. Therefore, for this analysis, it is conservatively assumed that the nearest sensitive receptor would be located at a distance of 82 feet. LSTs for active construction sites in SRA 10 ranging in size from one to five acres for a receptor at 82 feet are shown in Table 4.2-5.

Table 4.2-5 SCAQMD LSTs for Construction in SRA 10 for a Receptor at 82 Feet (pounds per day)

Pollutant	Active One-acre Construction Site	Active Two-acre Construction Site	Active Five-acre Construction Site
Gradual conversion of NO_x to NO_2	103	149	236
CO	612	885	1,566
PM_{10}	4	6	12
$PM_{2.5}$	3	4	7

LST = Localized Significance Threshold; SRA = Source Receptor Area; NO_X = nitrogen oxides; NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter measuring 10 microns in diameter or less; $PM_{2.5}$ = particulate matter measuring 2.5 microns in diameter or less

Source: SCAQMD 2009

Toxic Air Contaminants

The U.S. EPA considers those pollutants that could cause cancer risks between one in 10,000 (1.0×10^{4}) and one in one million (1.0×10^{-6}) for risk management. Proposition 65 (California Health and Safety Code Section 25249.6), enacted in 1986, prohibits a person in the course of doing business from knowingly and intentionally exposing any individual to a chemical that has been listed as known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning. For a chemical that is listed as a carcinogen, the "no significant risk" level under Proposition 65 is defined as the level that is calculated to result in not more than one excess case of cancer in 100,000 individuals (1.0×10^{-5}). The SCAQMD recommends the use of this risk level (also reportable as 10 in one million) as the significance threshold for TACs (SCAQMD 2019). The SCAQMD also recommends that the non-carcinogenic hazards of TACs should not exceed a hazard index (the summation of the hazard quotients for all chemicals to which an individual would be exposed) of 1.0 for either chronic or acute effects (SCAQMD 2019).

Project Impacts and Mitigation Measures

Threshold 1:	Would the Housing Element Update conflict with or obstruct implementation of the applicable air quality plan?
Threshold 2:	Would the Housing Element Update result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard?

Impact AQ-1 THE HOUSING ELEMENT UPDATE WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE 2016 AQMP. IN ADDITION, OPERATION OF REASONABLY FORESEEABLE DEVELOPMENT FACILITATED BY THE HOUSING ELEMENT UPDATE WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE IN OF ANY CRITERIA POLLUTANT FOR WHICH THE REGION IS IN NON-ATTAINMENT UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Updates to the Safety Element would not result in additional development in the Plan Area that would generate long-term emissions of criteria air pollutants. The goals and policies included in the Safety Element would support improved emergency evacuation, reduced wildfire risk, and other

safety-related aspects. Therefore, no impact related to consistency with the 2016 AQMP or long-term criteria air pollutant emissions would occur.

Construction and operation of the residential developments facilitated by the Housing Element Update would generate criteria air pollutant emissions associated diesel-powered construction equipment, with area sources (e.g., fireplaces, architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating and cooking), and mobile sources (i.e., vehicle trips to and from the project sites). Emissions associated with reasonably foreseeable development, depending on project type and size, could exceed project-specific thresholds established by the SCAQMD, as shown in Table 4.2-4. However, the City's 2006 General Plan includes policies to programmatically address long-term increases in air pollutant emissions, such as Policies 5-18 through 5-20, which encourage transportation alternatives and advancing the use of clean and efficient energy use. In addition, as discussed further below under *Consistency with AQMP Control Measures*, the proposed housing opportunity sites and policies in the Housing Element Update would serve to minimize VMT associated with reasonably foreseeable development. Specifically, because Policies 8-3.2 and 8-3.5 of the Housing Element Update encourage mixed-use development and housing near or on Claremont Colleges, residents of proposed sites would be less reliant on personal vehicles to reach services and jobs. Therefore, the following analysis focuses on the consistency of the Housing Element Update with the growth and emissions forecasts upon which the AQMP is based and with applicable AQMP control measures.

Consistency with AQMP Growth Forecasts

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. The 2016 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local general plans and the SCAG 2016-2040 RTP/SCS socioeconomic forecast projections of regional population, housing and employment growth.[4] The SCAG socioeconomic forecast projections are based on local general plans adopted at the time of preparation of the forecasts.

The development of 2,805 residential units would cause a direct increase in the population of Claremont. As discussed in Section 4.5, *Population and Housing*, the Housing Element Update would result in the addition of approximately 7,545 persons to the population of the Plan Area by 2029, assuming full buildout. SCAG forecasts the population of Claremont will reach approximately 37,905 residents by 2040 (SCAG 2016). Therefore, the City's cumulative plus Housing Element Update population forecast of approximately 44,811[5] residents by 2029 would exceed SCAG's forecast 2040 population of 37,905 residents for Claremont.

The city of Claremont contains approximately 12,511 housing units (City of Claremont 2021). The Housing Element Update would increase the city's housing stock by 2,805 units to approximately 15,316 units. SCAG forecasts that the number of households in Claremont will increase to approximately 13,200 units by 2040 (SCAG 2016). Therefore, the City's existing housing stock nearly meets the 2040 SCAG forecast, and the Housing Element Update would create an exceedance.

[4] On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (titled Connect SoCal). However, the 2016 AQMP was adopted prior to this date and relies on the demographic and growth forecasts of the 2016-2040 RTP/SCS; therefore, these forecasts are utilized in the analysis of the Housing Element Update's consistency with the AQMP.

[5] The Plan Area 2019 population is estimated at 37,266 residents. The Housing Element Update would accommodate up to 2,805 additional housing units, which would add an estimated 7,545 additional persons, based on 2.69 persons per household. This would bring the 2029 Plan Area population to 44,811.

Given the above discussion, population and housing growth associated with the Housing Element Update would exceed SCAG population growth forecasts, and the Housing Element Update would therefore be inconsistent with the underlying assumptions of the emissions forecasts contained in the AQMP. However, although the Housing Element Update would facilitate development beyond what is forecast in the 2016 AQMP, it would bring the forecasts for the City's General Plan and the AQMP into consistency because the new population forecast based on the City's Housing Element Update would be incorporated into SCAQMD's 2022 AQMP as will other new population forecasts for each city in the region. Therefore, Housing Element Update impacts related to consistency with emissions forecasts in the AQMP would be less than significant.

Consistency with AQMP Control Measures

Consistency with the 2016 AQMP is also a function of consistency with applicable AQMP control measures. The AQMP includes specific control measures to reduce air pollutant emissions in order to meet Federal and State air quality standards. One of the most important methods the AQMP relies on to achieve its goals is the use of Transportation Control Measures (TCM). TCMs are defined in the 2016 AQMP as "measures for the purpose of reducing emissions or concentrations of air pollutants from transportation sources by reducing vehicle use or changing traffic flow or congestion conditions." The TCMs included in the 2016 AQMP are described in SCAG's Final 2016 RTP/SCS.[6] There are no committed TCMs identified in the 2016 RTP/SCS as occurring in Claremont and the Housing Element Update would not result in changes to other transportation improvements in Los Angeles County as the Housing Element Update focuses on residential development (SCAQMD 2017).

The following policies in the Community Mobility Element would help reduce air pollutant emissions through transportation and land use design factors that would promote VMT reductions:

Community Mobility Element Policies

Policy 4-1.3 Support initiatives to provide better public transportation. Work actively to ensure that public transportation is part of every regional transportation corridor.

Policy 4-1.7 Promote transit-oriented development to facilitate that use of the community's transit services.

Policy 4-2.1 Require new development to minimize traffic impacts created by the development and to incorporate mitigation measures which are acceptable to the City.

Policy 4-2.12 Continue to promote an efficient network of different travel options.

Policy 4-3.1 Promote walking throughout the community. Install sidewalks where missing and make improvements to existing sidewalks for accessibility purposes. Particular attention should be given to needed sidewalk improvement near schools and activity centers.

Policy 4-3.4 Explore development of a community bicycle plan which can be implemented with the assistance of volunteers and/or private funding.

[6] On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (titled Connect SoCal). However, the 2016 AQMP was adopted prior to this date and relies on the TCMs of the 2016-2040 RTP/SCS; therefore, these TCMs are utilized in the analysis of the Housing Element Updates consistency with the AQMP.

Policy 4-4.5 Promote activity centers and transit-oriented development projects around the transit station.

Policy 4-5.3 Promote convenient, clean, efficient, and accessible public transit that serves transit-dependent riders and attracts discretionary riders as an alternative to reliance on single-occupant automobiles.

By promoting intensification and reuse of already developed lands, development of residential land uses in close proximity to existing commercial areas, and development of lands adjacent to existing urban development, the Housing Element Update would help reduce reliance on the automobile and increase use of alternative transportation modes. As discussed in Section 4.6, *Transportation*, home-based VMT per capita associated with reasonably foreseeable development under the Housing Element Update would be approximately 11 percent lower the baseline regional home-based VMT for existing development in Claremont because the proposed housing opportunity sites and Housing Element Update policies would promote re-use and infill development that would result in lower daily VMT and associated air pollutant emissions. Furthermore, the increase in affordable housing units would provide housing opportunities in proximity to jobs for those employed in the City that meet these household income categories. Approximately 87.9 percent of workers in Claremont commute from outside of the City, which indicates that affordable housing units would provide opportunities for a better balance of jobs and housing that reduces regional VMT and associated impacts related to air pollutant emissions (U.S. Census 2018). Therefore, the Housing Element Update would be consistent with the AQMP control measures.

Summary

In summary, the Housing Element Update would be consistent with the 2016 AQMP because the Housing Element Update would bring the forecasts for the City's General Plan and the AQMP into consistency because the new population forecast based on the City's Housing Element Update would be incorporated into SCAQMD's 2022 AQMP and because the Housing Element Update would be consistent with applicable AQMP control measures. Therefore, impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

Threshold 2:	Would the Housing Element Update 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?

Impact AQ-2 CONSTRUCTION ACTIVITIES FACILITATED BY THE HOUSING ELEMENT UPDATE WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE IN OF ANY CRITERIA POLLUTANT FOR WHICH THE REGION IS IN NON-ATTAINMENT UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Safety Element updates would not result in construction activities in the Plan Area that would generate air pollutant emissions. The goals and policies included in the Safety Element would support improved emergency evacuation, reduced wildfire risk, and other safety-related aspects. Therefore, no impact related to temporary criteria air pollutant emissions during construction activities would occur.

Construction activities facilitated by the Housing Element Update would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment and construction vehicles in addition to VOC emissions that would be released during the paving phase and the drying phase of architectural coatings. The extent of daily emissions, particularly NO_X emissions, generated by construction equipment, would depend on the equipment used and the hours of operation for each project facilitated by the Housing Element Update. The extent of $PM_{2.5}$ and PM_{10} emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting excavated materials off site is necessary. The extent of VOC emissions would primarily depend on the square footage of buildings being painted and asphalt surfaces being paved each day.

As discussed in Section 4.2.3, *Methodology and Significance Thresholds*, the SCAQMD has not established plan-level significance thresholds for construction air pollutant emissions. At this time, projects facilitated by the Housing Element Update do not have sufficient detail (e.g., construction schedule, amount of soil export, specific buildout parameters) to allow for project-level analysis given the programmatic nature of the plan and thus it would be speculative to analyze project-level impacts. Therefore, a more qualitative approach to characterizing construction-related air emissions has been employed for this analysis.

Construction activities would occur at the 39 housing opportunity sites, totaling 115 parcels, identified in Section 2, *Project Description*, which are located in urbanized portions of the Plan Area such as Claremont Village near the Colleges and along Indian Hill Boulevard and Foothill Boulevard. Reasonably foreseeable development would be subject to compliance with applicable SCAQMD rules, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coatings). Specifically, Rule 403 requires the use of best available control measures for all construction activities to reduce fugitive dust emissions. The major construction elements addressed by Rule 403 include earth moving, disturbed surface areas, unpaved roads, open storage piles, demolition, and other various construction activities. Rule 403 compliance by individual property owners, developers, and/or contractors would reduce temporary construction-related air pollutant emissions of fugitive dust. In addition, Rule 1113 limits the VOC content of architectural coatings to minimize VOC emissions from the off-gassing of exterior and interior paints. Furthermore, Policy 5-19.1 of the 2006 General Plan Open Space, Parkland, Conservation, and Air Quality Element aims to reduce air quality impacts associated with construction activities by supporting programs and policies of the SCAQMD regarding restrictions on grading operations during project construction.

Compliance with SCAQMD rules and General Plan Policy 5-19.1 would reduce the overall level of air quality impacts associated with construction activities under the Housing Element Update. Furthermore, reasonably foreseeable development facilitated by the Housing Element Update would be required to implement additional mitigation if project-specific analysis identifies the potential to exceed the SCAQMD's regional thresholds and LSTs for construction activities, as shown in Table 4.2-4 and Table 4.2-5 in Section 4.2.2(a), *Methodology and Significance Thresholds*. Therefore, impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

Threshold 3:	Would the Housing Element Update expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 THE HOUSING ELEMENT UPDATE WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL CONCENTRATIONS OF CARBON MONOXIDE OR TACS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Safety Element updates would not result in additional development that would contribute to carbon monoxide hotspots or generate TAC emissions. The goals and policies included in the Safety Element would support improved emergency evacuation, reduced wildfire risk, and other safety-related aspects. Therefore, the Safety Element Update would not result in an increase in vehicle trips or development and no impact related to the exposure of sensitive receptors to substantial concentrations of carbon monoxide or TACs would occur.

Carbon Monoxide Hotspots

A carbon monoxide hotspot is a localized concentration of carbon monoxide that is above the NAAQS and CAAQS for carbon monoxide. Localized carbon monoxide hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local carbon monoxide concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and state eight-hour standard of 9.0 ppm (CARB 2016).

The SCAQMD conducted a detailed carbon monoxide analysis for the SCAB during the preparation of the 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the SCAB that would be expected to experience the highest carbon monoxide concentrations. The highest carbon monoxide concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of Los Angeles near Interstate 405 (I-405), which had an ADT of approximately 100,000 vehicles per day. The one-hour concentration of carbon monoxide at this intersection was 4.6 ppm, which is well below the one-hour NAAQS of 35 ppm and the one-hour CAAQS of 20 ppm. Moreover, the SCAB has been in attainment of the carbon monoxide NAAQS and CAAQS since 2007 (SCAQMD 2016). As shown in Table 4.2-3, the maximum 8-hour average CO value at the Pomona monitoring station (the nearest monitoring station with available data) in 2018 was 1.8 ppm, which is well below the State and federal 8-hour carbon monoxide standard of 9.0 ppm (U.S. EPA 2021b). Based on the low background level of carbon monoxide in the Plan Area, ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the low level of operational carbon monoxide emissions anticipated for reasonably foreseeable development facilitated by the Housing Element Update, the Housing Element Update would not create new hotspots or contribute substantially to existing hotspots. Therefore, the Housing Element Update would not expose sensitive receptors to substantial concentrations of carbon monoxide, and impacts would be less than significant.

Toxic Air Contaminants

The following subsections discuss the potential of the Housing Element Update to result in impacts related to TAC emissions during construction and operation.

CONSTRUCTION

Construction-related activities would result in temporary project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts (CARB 2021a) and is therefore the focus of this analysis. At this time, projects facilitated by the Housing Element Update do not have sufficient detail (e.g., construction schedule, amount of soil export, specific buildout parameters) to allow for project-level analysis given the programmatic nature of the plan and thus it would be speculative to analyze project-level impacts. Therefore, a more qualitative approach to characterizing construction-related air emissions has been employed for this analysis.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of housing units facilitated by the Housing Element Update would occur over timeframes ranging generally from one to five years. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of proposed construction activities (i.e., one to five years) is approximately 3 to 17 percent of the total exposure period used for 30-year health risk calculations. Current models and methodologies for conducting health-risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities, resulting in difficulties in producing accurate estimates of health risk (Bay Area Air Quality Management District 2017).

The maximum PM_{10} and $PM_{2.5}$ emissions would occur during demolition, site preparation and grading activities, which would only occur for a portion of the overall estimated timeframe of one to five years for construction of housing units facilitated by the Housing Element Update. These activities would typically last for approximately two weeks to two years, depending on the extent of grading and excavation required (e.g., projects with subterranean parking structures or geological constraints require additional grading as compared to those without). PM emissions would decrease for the remaining construction period because construction activities such as building construction and architectural coating would require less intensive construction equipment. While the maximum DPM emissions associated with demolition, site preparation, and grading activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period. This would represent between 0.1 to 7 percent of the total 30-year exposure period for health risk calculation. Additionally, SCAQMD CEQA guidance does not require preparation of a health risk assessment for short-term construction emissions. Moreover, the proposed housing opportunity sites are spread throughout the Plan Area such that people affected by construction-related TAC emissions generated at one housing opportunity site would not be affected by construction-related TAC emissions generated at another housing opportunity site should construction activities occur simultaneously.

Furthermore, reasonably foreseeably development facilitated by the Housing Element Update would be required to implement additional mitigation if project-specific analysis identifies the potential for construction-related TAC emissions to exceed the SCAQMD's thresholds for TACs. Therefore, construction-related impacts associated with TAC emissions would be less than significant.

OPERATION

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005). Together, CARB and SCAQMD guidelines recommend siting distances both for the development of sensitive land uses in proximity to TAC sources and for the addition of new TAC sources in proximity to existing sensitive land uses. Residential land uses are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed residential land uses would be below thresholds warranting further study under the California Accidental Release Program. Because the Housing Element Update would not include substantial TAC sources and is consistent with CARB and SCAQMD guidelines, it would not result in the exposure of off-site sensitive receptors to significant amounts of carcinogenic or TACs. Impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

4.2.4 Cumulative Impacts

The geographic scope for the cumulative air quality impact analysis is the jurisdictional area of the SCAQMD. Because the SCAQMD is designated non-attainment for the federal standards for ozone and $PM_{2.5}$ and the state standards for ozone, PM_{10}, and $PM_{2.5}$ and Los Angeles County is designated non-attainment for the federal lead standard, there are existing significant cumulative air quality impacts related to these pollutants. SCAQMD's approach to determining cumulative air quality impacts for criteria air pollutants is to first determine whether the proposed Housing Element Update would result in a significant project-level impact to regional air quality based on SCAQMD significance thresholds. If the project would not generate emissions exceeding SCAQMD thresholds, then the lead agency needs to consider the additive effects of related projects only if the proposed Housing Element Update is part of an ongoing regulatory program, such as a market program for reducing air pollution, or is contemplated in a Program EIR, and the related projects are located within approximately one mile of the project site. If there are related projects within the vicinity (one-mile radius) of the project site that are part of an ongoing regulatory program or are contemplated in a Program EIR, then the additive effect of the related projects should be considered.

The Housing Element Update is not part of an ongoing regulatory program and was not contemplated in a prior Program EIR, although it is itself considered in this Program EIR. The SCAQMD therefore recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed under Impact AQ-1, the Housing Element Update would be consistent with the AQMP and long-term operational emissions would not result in significant air

quality impacts. As discussed under Impact AQ-2, construction-related emissions would not result in significant air quality impacts. As discussed under impact AQ-3, localized emissions of carbon monoxide and TACs would not result in significant air quality impacts. Therefore, in accordance with SCAQMD guidance on determining cumulative impacts, the Housing Element Update's contribution to cumulative regional long-term air quality impacts would not be cumulatively considerable.

4.3 Biological Resources

This section assesses potential for projects under the Housing Element Update to directly or indirectly impact biological resources known to occur in the Plan Area. The following analysis is based on biological resource databases and information on biological resources described in literature, such as, but not limited to, the City of Claremont 2006 General Plan, U.S. Geological Survey's (USGS) National Hydrography Dataset, and California Native Plant Society (CNPS) rare plant inventory (USGS 2021, City of Claremont 2006, CNPS 2021).

4.3.1 Setting

Open space areas are located throughout the City of Claremont and include the Wilderness Park and hills in the northwest portion of the city and planned public parks, tree lined streets, and landscaped areas. The southern urbanized portion of the City has substantially reduced abundance and diversity of biological resources. In addition, Claremont is surrounded by other areas of development including the cities of La Verne, Pomona, Montclair, and Upland.

According to the USGS National Hydrography Dataset (2021), streams in the City of Claremont are generally classified as intermittent canals or ditches, meaning water does not flow year-round but occurs during periods of sufficient rainfall and/or snowmelt, generally from November to March. Some of the streams originate within the City limits, while others originate at higher elevations of the San Gabriel Mountains north of Claremont. Watercourses in the San Gabriel River Watershed that originate within the boundaries of Claremont include intermittent streams in the following canyons: Webb, Gail, Burbank, Cobal, Williams, and Chicken.

The intermittent streams in Live Oak and Palmer Canyons originate farther north of the City limits. Flows from Burbank, Cobal, Williams, and Palmer Canyons are checked by the Thompson Creek Dam. Below this dam the watercourse is called Thompson Creek Wash, which is a flood control channel maintained by the County of Los Angeles. San Antonio Creek Channel and the watercourse in Evey Canyon, both of which are in the Santa Ana River Watershed, originate north of Claremont in the San Gabriel Mountains. Both watercourses are intermittent. Below San Antonio Dam, the portion of San Antonio Creek located within Claremont is channelized for flood control purposes.

A query of the U.S. Fish and Wildlife Service (USFWS) I*nformation for Planning and Conservation* (IPaC) (USFWS 2021a), the CNPS *Inventory of Rare and Endangered Plants of California* (CNPS 2021) and the California Department of Fish and Wildlife's (CDFW) *California Natural Diversity Database* (CNDDB) (CDFW 2021) for the U.S. Geological Survey (USGS) *Ontario* and eight surrounding 7.5-minute series quadrangles (*Mt. Baldy, Cucamonga Peak, Guasti, Corona North, Prado Dam, Yorba Linda, San Dimas*, and *Glendora*) were conducted to obtain comprehensive information regarding the occurrences of special-status species in the vicinity of Claremont. This query range, encompassing the City limits plus a 5-mile buffer, is sufficient to accommodate for regional habitat diversity and to overcome the limitations of the CNDDB, because the CNDDB is based on reports of actual occurrences and does not constitute an exhaustive inventory of every resource. Special-status plant and wildlife species with the potential to occur in the regional vicinity of the City are listed in Appendix C.

Urban development has altered much of Claremont's landscape, restricting natural vegetation primarily to undeveloped hillside areas in the northern portion of the City. Many species are locally rare or no longer occur in portions of Claremont because of urban development within the City

limits. The database query identified 56 special-status animal species and 41 special-status plant species with the potential to occur in the regional vicinity surrounding the City, including 20 federal and/or state listed species (Appendix C). No federally designated critical habitat occurs within the City limits. The closest critical habitat to Claremont is designated for Coastal California gnatcatcher (*Polioptila californica californica*) located approximately three miles to the southwest of the City's boundary around Puddingstone Reservoir (USFWS 2021b).

Birds protected under the California Fish and Game Code (CFGC) and Migratory Bird Treaty Act (MBTA) nest in a wide range of habitats including previously disturbed and ruderal areas (e.g., medians and road shoulders) and within areas of maintained ornamental vegetation (i.e., lawns, gardens, parks, and trails). Wetlands and associated riparian areas often function as habitat for special-status species and may act as important wildlife movement corridors.

4.3.2 Regulatory Setting

a. Federal Regulations

Federal Endangered Species Act

The Federal Endangered Species Act of 1973 (FESA) and subsequent amendments provide for the conservation of endangered and threatened species, and the ecosystems upon which they depend.

FESA is intended to prevent the unlawful "take" of listed fish, wildlife, and plant species. Section 9(a)(1)(B) specifically states take of species listed as threatened or endangered is unlawful. Take is defined as any action that would harass, harm, pursue, hunt, wound, shoot, kill, trap, capture, or collect any threatened or endangered species.

Section 10 of the FESA allows the USFWS to issue incidental take permits if take of a listed species may occur during otherwise lawful activities. Section 10(a)(1)(B) requires a Habitat Conservation Plan for an incidental take permit on non-federal lands. Section 7 of the FESA requires federal agencies to aid in the conservation of listed species, and to ensure that the activities of federal agencies will not jeopardize the continued existence of listed species or adversely modify designated critical habitat. The USFWS and the National Oceanic and Atmospheric Administration (NOAA) are responsible for administration of the FESA and have regulatory authority over federally listed species.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) makes it unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, or kill migratory birds, and prohibits the removal of nests occupied by migratory birds. The USFWS administers the MBTA.

United States Army Corps of Engineers Jurisdiction

The United States Army Corps of Engineers (USACE), under provisions of Section 404 of the Clean Water Act (CWA) and USACE implementing regulations, has jurisdiction over the placement of dredged or fill material into "waters of the United States." Congress enacted the CWA "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." In practice, the boundaries of certain waters subject to USACE jurisdiction under Section 404 have not been fully defined. Previous regulations codified in 1986 defined "waters of the United States" as traditional navigable waters, interstate waters, all other waters that could affect interstate or foreign

commerce, impoundments of waters of the United States, tributaries, the territorial seas, and adjacent wetlands.

On April 21, 2020, the USACE and U.S. Environmental Protection Agency (USEPA) published the Navigable Waters Protection Rule to define "Waters of the United States." This rule, effective on June 22, 2020, defines four categories of jurisdictional waters, documents certain types of waters that are excluded from jurisdiction, and clarifies some regulatory terms. Under the Navigable Waters Protection Rule, "waters of the United States" include:

1. Territorial seas and traditional navigable waters;
2. Perennial and intermittent tributaries that contribute surface flow to those waters;
3. Certain Lakes and ponds, and impoundments of jurisdictional waters, and;
4. Wetlands adjacent to jurisdictional waters.

Tributaries are defined as "a river, stream, or similar naturally occurring surface water channel that contributes surface water flow to the territorial seas or traditional navigable waters in a typical year either directly or through one or more tributaries, jurisdictional lakes, ponds, and impoundments of jurisdictional waters, or adjacent wetlands." The tributary category also includes a ditch that "either relocates a tributary, is constructed in a tributary, or is constructed in an adjacent wetland as long as the ditch is perennial or intermittent and contributes surface water flow to a traditional navigable water or territorial sea in a typical year."

Adjacent wetlands are defined as wetlands that:

1. Abut, meaning to touch at least at one point or side of, a defined Water of the U.S.;
2. Are inundated by flooding from a defined Water of the U.S. in a typical year;
3. Are physically separated from a defined Water of the U.S. by a natural berm, bank, dune, or similar natural features or by artificial dike, barrier or similar artificial structures as long as direct hydrological surface connection to defined Waters of the U.S. are allowed; or,
4. Are impounded of Waters of the U.S. in a typical year through a culvert, flood or tide gate, pump or similar artificial structure.

The Navigable Waters Protection Rule states that the following areas not considered to be jurisdictional waters even where they otherwise meet the definitions described above:

1. Groundwater, including groundwater drained through subsurface drainage systems;
2. Ephemeral features that flow only in direct response to precipitation including ephemeral streams, swales, gullies, rills and pools;
3. Diffuse stormwater runoff and directional sheet flow over uplands;
4. Ditches that are not defined Waters of the U.S. and not constructed in adjacent wetlands subject to certain limitations;
5. Prior converted cropland;
6. Artificially irrigated areas that would revert to upland if artificial irrigation ceases;
7. Artificial lakes and ponds that are not jurisdictional impoundments and that are constructed or excavated in upland or non-jurisdictional waters;
8. Water-filled depressions constructed or excavated in upland or in non-jurisdictional waters for the purpose of obtaining fill, sand, or gravel;

9. Stormwater control features constructed or excavated in uplands or in non-jurisdictional water to convey, treat, infiltrate, or stormwater run-off;
10. Groundwater recharge, water reuse, and wastewater recycling structures constructed or excavated in upland or in non-jurisdictional waters; and,
11. Waste treatment systems.

USACE jurisdictional limits are typically identified by the Ordinary High Water Mark (OHWM) or the landward edge of adjacent wetlands (where present). The OHWM is the "line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding area" (33 CFR 328.3).

The USACE defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3). The USACE's delineation procedures identify wetlands in the field based on indicators of three wetland parameters: hydrophytic vegetation, hydric soils, and wetland hydrology.

b. State Regulations

California Endangered Species Act

The CDFW is responsible for administration of CESA. For projects that may affect both a State and federal listed species, compliance with the FESA will satisfy the CESA, provided the CDFW determines that the federal incidental take authorization is consistent with the CESA.

Take is defined in CFGC Section 86 as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." The CESA allows for take incidental to otherwise lawful activities under CFGC Section 2081. Project proponents wishing to obtain incidental take permits are able to do so through a permitting process outlined in California Code of Regulations (CCR) Section 783. Additionally, some sensitive mammals and birds are protected by the state as Fully Protected Mammals or Fully Protected Birds, as described in the CFGC, Sections 4700 and 3511, respectively.

Projects that may result in a take of a California listed species require a take permit under the CESA. The federal and State acts lend protection to species considered rare enough by the scientific community and trustee agencies to warrant special consideration, particularly with regard to protection of isolated populations, nesting or den locations, communal roosts, and other essential habitat. Unlike the FESA, the CESA prohibits the take of not just listed endangered or threatened species, but also candidate species (species petitioned for listing).

The CESA defines an endangered species as:

> …a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.

A threatened species is defined as:

> a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species.

Candidate species are defined as:

> a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list.

Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike the FESA, CESA does not include listing provisions for invertebrate species. Article 3, Sections 2080 through 2085, of the CESA addresses the taking of threatened or endangered species by stating:

> no person shall import into this State, export out of this State, or take, possess, purchase, or sell within this State, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided.

Nesting Bird Protection – California Fish and Game Code

According to CFGC Section 3503 it is unlawful to take, possess, or the nest or eggs of any bird [except English sparrows (*Passer domesticus*) and European starlings (*Sturnus vulgaris*)]. Sections 3503 and 3513 prohibit the taking of specific birds, their nests, eggs, or any portion thereof during the nesting season. Section 3503.5 specifically protects birds in the orders Falconiformes and Strigiformes (birds-of-prey). Section 3513 essentially overlaps with the federal MBTA, prohibiting the take or possession of any migratory nongame bird.

California Native Plant Protection Act

The California Native Plant Protection Act (NPPA) was enacted in 1977 and allows the California Fish and Wildlife Commission to designate plants as rare or endangered. Currently, 64 species, subspecies, and varieties of plants are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations. Effective in 2015, CDFW promulgated regulations (14 CCR 786.9) under the authority of the NPPA, establishing that the CESA permitting procedures (CFG Code Section 2081) would be applied to plants listed under the NPPA as "Rare." With this change, there is little practical difference between regulations and protocols for plants listed under CESA and those listed under the NPPA.

Los Angeles Regional Water Quality Control Board

The State Water Resources Control Board (SWRCB) and the local Los Angeles RWQCB assert jurisdiction, on behalf of USEPA, over waters of the U.S. pursuant to Section 401 of the CWA. In addition, where Federal jurisdiction is not asserted (for example, due to a lack of connectivity to a Relatively Permanent Waters [RPW] and Traditional Navigable Waters [TNW]), RWQCB assert

jurisdiction over "waters of the State" pursuant to Section 13263 of Porter-Cologne, which are defined as any surface water or groundwater, including saline waters, within the boundaries of the State. In this event, the SWRCB may issue general Waste Discharge Requirements (WDRs) regarding discharges to "isolated" waters of the State if limiting criteria are not exceeded (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the USACE to be Outside of Federal Jurisdiction) or project-specific WDRs.

California Department of Fish and Wildlife

Stream and Riparian Habitat

Pursuant to CFGC Section 1600, CDFW has authority over all perennial, intermittent, and ephemeral rivers, streams, and lakes in the state, and requires any person, state or local governmental agency, or public utility to notify the CDFW before beginning any activity that would "substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake" that supports fish or wildlife resources.

A stream is defined as a "body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation" (California Code of Regulations, Title 14 Section 1.72). A Lake or Streambed Alteration Agreement may be required for any proposed project that would result in an adverse impact to a river, stream, or lake. CDFW jurisdiction typically extends to the top of the bank and out to the outer edge of adjacent riparian vegetation if present. However, CDFW can take jurisdiction over a body of flowing water and the landform that conveys it, including water sources and adjoining landscape elements that are byproducts of and affected by interactions with flowing water without regard to size, duration, or the timing of flow (Brady and Vyverberg 2013).

Special-Status Species Protection

Special-status wildlife species are those species included on the CDFW "Special Animals" list (CDFW 2020). "Special Animal" is a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal or protection status. The CDFW considers the taxa on this list to be those of greatest conservation need. The species on this list generally fall into one or more of the following categories:

- Officially listed or proposed for listing under the CESA and/or FESA
- State or Federal candidate for possible listing
- Taxa that meet the criteria for listing, even if not currently included on any list, as described in
- CEQA Guidelines Section 15380
- Taxa considered by the Department to be a Species of Special Concern
- Taxa that are biologically rare, very restricted in distribution, declining throughout their range, or have a critical vulnerable stage in their life cycle that warrants monitoring
- Populations in California that may be on the periphery of a taxon's range but are threatened with extirpation in California

c. Local Regulations

City of Claremont General Plan

The City of Claremont General Plan outlines policies adopted by the City for riparian areas and wildlife movement corridors (2006). The Open Space, Parkland, Conservation, and Air Quality Element includes the following policies aimed at protection of sensitive and protected species and habitats from impacts of future development:

Goal 5-1: Maintain unique and diverse open space resources throughout Claremont for purposes of resource and habitat protection.

Policy 5-1.1. Strive to acquire or otherwise protect open space areas that provide key wildlife corridors and provide connectivity between habitat areas.

Policy 5-1.2. Work with state and federal agencies to protect areas containing rate or endangered species of plants and animals

Policy 5-1.3. Encourage new development to preserve, where possible, on-site natural elements that contribute to the community's aesthetic character.

Policy 5-1.4. Develop and implement specific management programs for hillside properties and other natural areas acquired by the City. These programs should be based on sound ecological principles and professionally accepted methods to protect and enhance sensitive animal populations and their habitats.

Policy 5-1.7. Preserve the integrity of riparian habitat areas, creek corridors, and other drainages that support biological resources, and contribute to the overall health of the watershed through the preservation of native plants and the removal of invasive, non-native plants.

Policy 5-1.9. Minimize impacts to birds by site disturbance activities.

Goal 5-8: Preserve Claremont's unique community forests and provide for sustainable increase and maintenance of this valuable resource.

Policy 5-8.1. Develop a tree planting policy that stives to accomplish 50 percent shading of constructed paved and concrete surfaces within five years of construction.

Policy 5-8.2. Provide adequate funding to manage and maintain the City's urban forest, including sufficient funds for tree planting, pest control, scheduled pruning, and removal and replacement of dead trees.

Policy 5-8.3. Coordinate with local and regional plant experts (e.g., Rancho Santa Ana Botanic Garden) in selecting tree species that respect the natural region in which Claremont is located, to help create a healthier, more sustainable urban forest.

Policy 5-8.4. Safeguard and enhance Claremont's community forest by protecting existing stands of trees and other plant material of substantial value.

Policy 5-8.5. Continue to plant new trees (in particular native tree species where appropriate), and work to preserve mature native trees.

Goal 5-12: Conserve and properly manage natural resources for future generations

Policy 5-12.2. Consider the environmental impacts of proposed development of natural areas, recognizing the loss of natural resources is irreversible. The environmental analysis shall carefully weight the costs and benefits of such development.

Claremont Municipal Code

Claremont Municipal Code (CMC) Chapters 12.26.070 includes the City's tree ordinance. The City of Claremont requires that a permit be obtained from the Director of Community Services prior to planting or disturbance of any City trees. Applications for permits must be sent to the Community Services Department for review. All work undertaken by the permittee may be stopped immediately if the work conditions outlined the permit are not complied with. A written appeal may be submitted to the Community and Humans Services Commission within ten days of the Director's decision. If no timely appeal is filed, then the decision is final.

CMC Chapters 12.26.090 declares it unlawful for any person to injure, cut, damage, carve, transplant, prune, root prune or remove any public tree. The municipal code protects City trees from tampering, which includes attaching objects to the trees, tampering with the drip line, or allowing poisons or harmful substances within proximity to the trees. In addition, trees of any species or variety of the genus *Ulmus* which are found to be infected with *Ceratocystis ulmi* (Dutch Elm disease) must be removed to curb the spread of the disease. This municipal code also requires that during construction, all City trees within the vicinity of the activity be protected or guarded in a manner identified in the tree policy manual to prevent injury to the tree. The costs of any such protection shall be borne by the person responsible for the improvement.

4.3.3 Impact Analysis

Methodology and Significance Thresholds

Methodology

The analysis of biological resource impacts within this EIR was based on review of applicable biological resource databases, plans and policies, as described previously in the *Regulatory Setting* section of this EIR, as well as review of online resource databases such as the CNDDB and CNPS Inventory of Rare Plants.

The impact analysis considers the direct and indirect impacts to biological resources, which could include the direct take of a species or the removal or disturbance of habitats from future development or more indirect delayed or secondary effects from future development, such as fragmentation, pollination interruption, plant and wildlife dispersal interruption, increased risk of fire, and increased invasion of non-native animals and plants that out-compete native species.

For purposes of this analysis, "special status species" include:

- Plants and wildlife species listed as rare, threatened, or endangered under the FESA or the CESA;
- Species that are candidates for listing under federal or State law;
- Species designated by the USFWS as proposed or candidates for listing and/or species designated as Species of Special Concern by CDFW;
- Species protected by MBTA;
- Species identified as rare, threatened, or endangered by CNPS; and

- Any other species that may be considered endangered or rare pursuant to CEQA Guidelines Section 15380(b).

For the purpose of this analysis, "sensitive natural communities" are considered to be habitats or natural communities that are unique, of relatively limited distribution in the region, and/or of particularly high value for wildlife. Sensitive habitats include specific natural communities defined by CDFW, as well as wetlands and riparian communities, which are considered special status natural communities due to their limited distribution in California. SEAs support sensitive natural communities.

As a programmatic evaluation, this section considers the potential for direct and indirect impacts to sensitive biological resources that could occur if reasonably foreseeable future development under the Housing Element Update is constructed in specific vegetation communities or habitats.

Significance Thresholds

The following thresholds of significance were developed based on the *CEQA Guidelines*, specifically, Appendix G. The Housing Element Update would have a significant impact with respect to biological resources if it would:

1. 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 Wildlife or U.S. Fish and Wildlife Service.
2. 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 Wildlife or U.S. Fish and Wildlife Service.
3. Have a substantial adverse effect on 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.
4. 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.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Issues Not Evaluated Further

Habitat Conservation Plan (Threshold 6)

The Initial Study for the Housing Element Update determined that the project is not located with any approved local, regional, or state Habitat Conservation Plan or Natural Community Conservation Plan (as shown in Appendix A). It was determined that there would be no impact. Thus, the threshold related to this subject is not evaluated further in this EIR.

Project Impacts and Mitigation Measures

Threshold 1:	Would the Housing Element Update 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 Wildlife or U.S. Fish and Wildlife Service?

Impact BIO-1 THE PLAN AREA IS LARGELY URBANIZED, AND THE HOUSING ELEMENT UPDATE WOULD PRIORITIZE DEVELOPMENT ON INFILL SITES THAT HAVE BEEN PREVIOUSLY DEVELOPED AND/OR DISTURBED. NEVERTHELESS, REASONABLY FORESEEABLE DEVELOPMENT FACILITATED BY THE HOUSING ELEMENT UPDATE COULD OCCUR ON VACANT SITES OR DEVELOPED STIES ADJACENT TO OPEN SPACE. DEVELOPMENT FACILITATED BY THE HOUSING ELEMENT UPDATE HAS THE POTENTIAL TO ADVERSELY IMPACT SPECIAL-STATUS SPECIES OR THEIR HABITAT. SPECIAL-STATUS SPECIES AND NESTING BIRDS EXPECTED TO OCCUR WITHIN THE PLAN AREA MAY BE AFFECTED BY DEVELOPMENT UNDER THE HOUSING ELEMENT UPDATE. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH INCORPORATION OF MITIGATION MEASURES BIO-1 THROUGH BIO-3.

The Housing Element Update would prioritize development of new residences on infill sites in areas previously developed in the central and southern portions of the city, with few housing opportunity sites in the north. Reasonably foreseeable future development under the Housing Element Update would be primarily concentrated on underutilized sites that have been previously developed and disturbed or are surrounded by existing development. If construction work, staging, parking, and associated activity is within previously disturbed areas, projects facilitated by the Housing Element Update would not modify or otherwise impact suitable habitat for sensitive species. It is not expected that projects would directly disturb natural habitat, where soil compaction could cause direct mortality from the collapse of underground burrows, or the trimming or removal of obligate host plants could cause direct mortality or loss of suitable habitat for special-status species. In addition, proposed developments may be required to assess potential presence of sensitive biological resources on a specific property prior to approval.

Given the lack of suitable habitat to support special status species in already developed and disturbed areas where additional residential development is likely to be proposed and concentrated, reasonably foreseeable development under the Housing Element Update is not expected to result in significant adverse impacts to special status species or the habitats that support them. Therefore, projects occurring entirely within disturbed areas would not result in significant impacts to non-avian federal or state listed species or other non-avian special-status species.

Some proposed housing opportunity sites located in the northern portion of the City adjacent to hillside open space areas may support habitat for special-status species and species may be present. The housing opportunity sites listed in Table 4.3-1, include several sites that are located on land designated as open space or is vacant and includes areas of natural vegetation such as large native trees that could support special-status species. Portions of the channelized Live Oak Wash and Thompson Creek Wash run adjacent to Sites ID 8419, 625, 600, 602, and 607 (See Appendix A for Site ID address). In the unlikely event construction associated with reasonably foreseeable development at these sites would require in filling of seasonal or perennial wetlands, or removal of riparian vegetation adjacent to wetlands or other jurisdictional waters, projects could result in direct mortality of special-status species. In addition, these activities could result in the loss of breeding, foraging, and refuge habitat.

Table 4.3-1 Housing Opportunity Sites with Potential Effects on Biological Resources

Site ID	Site Address/APN[1]	Existing Land Use	Current Zone Description	Proposed Zone Description	Acres
176	230 Brooks Avenue	Vacant	AV1	AV1	0.34
600	8302-018-027	Vacant	RS 10,000	RS 10,000	1.43
602	8302-018-028	Vacant	RS 10,000	RS 10,000	1.37
607	8302-021-053	Vacant	RS 10,000	RS 10,000	0.37
625	8302-032-025	Vacant	SP5	MFR 30/acre	0.18
702	242 Brooks Avenue	Vacant	AV1	AV1	0.17
822	8314-010-012	Vacant	AV1	AV1	0.17
826	8314-010-013	Vacant	AV1	AV1	0.35
827	8314-010-015	Vacant	AV1	AV1	0.17
3624	236 Brooks Avenue	Single Family Residential	AV1	AV1	0.34
8315	2475 Forbes Avenue	Open Space and Recreation	P	MFR 30/acre	9.67
8384	144 N. Indian Hill Boulevard	Vacant	IE	MFR 30/acre	2.97
8419	8302-032-900	Vacant	P/RC	MFR 30/acre	2.14
8987	8302-014-016	Vacant	RS 10,000	MFR 30/acre	0.46
9254	8307-002-041	Vacant	RS 10,000	RM 3000	3.16
9397	1575 N. College Avenue	Vacant	IE	MFR 30/acre	4.37
6772-11128	2050 N. Indian Hill Boulevard	Religious Facilities	RS 10,000	MFR 30/acre	3.27

[1] Where address is unknown the APN is provided for the site location.

Proposed development under the Housing Element Update that would occur on these sites would have the potential to temporarily or permanently disturb or remove natural habitat, which could directly impact special-status species. In addition, higher usage of these areas due to increased population density could cause increased mortality of species in nearby natural habitat. Construction of reasonably foreseeable development under the Housing Element could result in potentially significant impacts to federal and state listed species, while impacts to non-listed species may be considered significant if they result in reduced viability of the survival of a local or regional population. Therefore, the Housing Element Update would result in direct and indirect effects on sensitive biological resources including special-status species.

Reasonably foreseeable development under the Housing Element Update would be required to be consistent with adopted federal and state regulations that protect special-status species, including their habitat and movement corridors and would ensure that the City incorporate appropriate design measures, including avoidance, if appropriate. In addition, projects involving ground disturbance in or directly adjacent to natural habitat, or removal or trimming of trees, would be required to implement Mitigation Measures BIO-1 and BIO-2 prior to final design approval of projects.

Nesting Birds

The Housing Element Update would allow for the development of new residences the construction of which could occur during the bird nesting season, generally from March 1 through September 15

and begins as early as February 1 for raptors and may impact nesting birds. Rezoned sites would be within existing developed areas of the City that include vegetation and trees could support bird nesting. As such, potential construction impacts resulting in vegetation trimming or removal during the nesting season would have the potential to disturb active nests, either directly (e.g., injury, mortality, or disruption of normal nesting behaviors) or indirectly (e.g., construction noise, dust, and vibration from equipment). Therefore, construction activities and post-construction vegetation maintenance could result in impacts to nesting birds and raptors. Therefore, Mitigation Measure BIO-3 is required to ensure future development would not impact nesting birds. With implementation of Mitigation Measure BIO-3 potential impacts would be less than significant.

Mitigation Measures

BIO-1 Biological Resources Screening and Assessment

The following measures shall be implemented prior to final design approval of individual development projects under the proposed Housing Element Update, including those located at housing opportunity sites in and near the northern hillside area of the City, that involve ground disturbance in or directly adjacent to natural habitat, or the removal or trimming of trees:

The project applicant shall retain a qualified biologist to conduct an analysis of the project to identify biological constraints and potential impacts to sensitive biological resources, including potential impacts to special-status plants, animals, and their habitats, as well as protected natural communities including wetland and terrestrial communities and protected trees. The qualified biologist shall submit the Biological Resources Screening and Assessment to the City for their review and approval prior to final project design approval. For those projects where ground disturbance would not affect natural habitat (i.e., work is limited to paved, ruderal, or developed areas only), a desktop analysis to identify biological constraints for the project may be sufficient. This analysis shall include queries of agency databases such as the CNDDB, the CNPS *Inventory of Rare and Endangered Plants of California*, the USFWS IPaC, USFWS *Critical Habitat Portal*, and USFWS *National Wetlands Inventory (NWI)* as well as other relevant literature for baseline information on special-status species and other sensitive biological resources occurring at the individual project site and in the immediate surrounding area. The qualified biologist shall determine, based on the nature of construction activities, if a field reconnaissance is necessary for such projects to completely assess biological constraints.

If the biologist identifies protected biological resources within the limits of and/or potentially adversely affected by the project, the project applicant shall first prepare alternative designs that seek to avoid and/or minimize impacts to the biological resources. If the project cannot be designed without complete avoidance, the project applicant shall have the qualified biologist identify the specific impacts to special-status species, develop project-specific avoidance and mitigation procedures to be followed to reduce biological impacts to a less-than-significant level, identify any state or federal listed species that would necessitate coordination with the appropriate regulatory agency (i.e., USFWS, National Marine Fisheries Services [NMFS], CDFW, U.S. Army Corps of Engineers [USACE]) to obtain regulatory permits, and implement project-specific avoidance and mitigation measures prior to and during any construction activities.

Mitigation actions that may be required should impacts to special-status species be identified include:

- Pre-construction surveys to identify the presence of special-status species within and adjacent to work areas.

- Worker Environmental Awareness Program training for all construction personnel.
- Complete avoidance of special-status species where and if possible. Avoidance measures may include:
- Delimiting and flagging of special-status species avoidance buffer areas (Environmentally Sensitive Areas or ESAs)
- Monitoring of construction activity near ESAs
- Installation of special-status species exclusion fencing.
- Relocation of special-status species out of work areas (with applicable permits and authorizations as necessary).
- Restoration of temporarily disturbed special-status species' habitat.
- Compensatory mitigation for impacts to special-status species habitat at a minimum ratio appropriate for extent and quality of permanently disturbed habitat. Mitigation ratios may vary from 1:1 to 5:1

BIO-2 Construction Best Management Practices

For proposed projects evaluated for potential impacts to special-status species in a biological resources screening and assessment as required by Mitigation Measure BIO- 1, the project applicant shall incorporate one or more of the following construction Best Management Practices (BMPs) as recommended by a qualified biologist into grading and construction plans, for projects that would require grading and paving activities on vacant and/or undisturbed parcels, prior to final design approval of an individual project:

- A 15 mile-per-hour speed limit shall be designated in all construction areas to minimize dust emissions and noise.
- All vehicles and equipment shall be parked on pavement, existing roads, and previously disturbed areas, and clearing of vegetation for vehicle access shall be avoided to the greatest extent feasible.
- The number of access routes, number, and size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the goal of the project.
- Equipment washout and fueling areas shall be located within the limits of grading at a minimum of 100 feet from waters, wetlands, or other sensitive resources as identified by a qualified biologist. Washout areas shall be designed to fully contain polluted water and materials for subsequent removal from the site.
- The hours of noise generating construction activity shall be limited to the hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday (consistent with the construction noise exemption pursuant to City of Claremont Municipal Code Section 16.154.020(F)(4)).
- Mufflers shall be used on all construction equipment and vehicles shall be in good operating condition.
- Drip pans shall be placed under all stationary vehicles and mechanical equipment.
- All trash shall be placed in sealed containers and shall be removed from the project site a minimum of once per week.
- No pets are permitted on project site during construction.

BIO-3 Nesting Bird Protection

For development projects that require tree or vegetation removal, construction activities shall occur outside of the nesting season wherever feasible (September 16 to January 31). If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds covered by the CGFC no more than 14 days prior to vegetation removal. The surveys shall include the entire disturbance area plus a 200-foot buffer around the site as feasible. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 feet for non-raptor bird species and at least 150 feet for raptor species. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed, and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the City to document compliance within 30 days of its completion.

Significance After Mitigation

Implementation of Mitigation Measures BIO-1 through BIO-3 would reduce potential impacts to special-status and nesting birds to less than significant levels.

Threshold 2:	Would the Housing Element Update have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Impact BIO-2 REASONABLY FORESEEABLE DEVELOPMENT FACILITATED BY THE HOUSING ELEMENT UPDATE COULD RESULT IN CONSTRUCTION WORK WITHIN RIPARIAN HABITATS OR OTHER NATURAL COMMUNITIES OF SPECIAL CONCERN. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH INCORPORATION OF MITIGATION MEASURES BIO-4 AND BIO-5.

Naturally occurring plant communities in California are primarily identified in the *List of Vegetation Alliances and Associations (Natural Communities List)* (CDFW 2020). This document provides comprehensive lists of officially recognized plant communities occurring in Los Angeles County and the State of California. In this document, each plant community is assigned a conservation status rank (also known as "Rare Rank"), which is used to determine the sensitivity of the plant community. Plant communities with global or state status ranks of GI through G3, or S1 through S3, respectively, are considered sensitive, and are referred to as "natural communities of special concern." Plant communities are classified based on plant species composition and abundance, as well as the underlying abiotic conditions of the stand, such as slope, aspect, or soil type.

A query of CDFW's CNDDB for the USGS *Ontario* and eight surrounding 7.5-minute series quadrangles shows that Claremont and the surrounding area has the potential to support 10 natural communities of special concern. These natural communities include California Walnut Woodland, Canyon Live Oak Ravine Forest, Coastal and Valley Freshwater Marsh, Riversidian Alluvian Fan Sage Scrub, Southern California Arroyo Chub/Santa Ana Sucker Stream, Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, Southern Sycamore Alder Riparian Woodland, Southern Willow Scrub, and Walnut Forest. Of these sensitive natural communities, three communities, Riversidian Alluvial Fan Sage Scrub, Southern Sycamore Alder Riparian Woodland, and

Southern Coast Live Oak Riparian Forest, occur within City limits. Riversidian Alluvial Fan Sage Scrub is located along the eastern boundary of the city and loosely follows the San Antonio Creek Channel, while Southern Sycamore Alder Riparian Woodland and Southern Coast Live Oak Riparian Forest communities are recorded in the northern hillside areas of the city along various streams and washes.

Most of the housing opportunity sites are not located in or near areas containing natural communities of special concern. However, one housing opportunity site (ID 9254) is located immediately west of the mapped Riversidian Alluvial Fan Sage Scrub community and appears to exhibit contiguous vegetation composition with the scrub community. Additionally, riparian habitat occurs along several streams in the region and may be affected by development of individual housing opportunity sites (USFWS 2021c). As such reasonably foreseeable development under the Housing Element Update could potentially result in construction work within jurisdictional limits including cut and fill below the top of delineated banks, removal, or modification to wetlands, trimming and clearing of riparian vegetation, or impacts to other natural communities of special concern. Therefore, reasonably foreseeable development under the Housing Element Update would have a potentially significant impact on riparian habitat and other sensitive natural communities.

As such, projects involving ground disturbance in or directly adjacent to riparian or other sensitive natural communities, would be required to implement Mitigation Measures BIO-3 and BIO-4 prior to final design approval of projects. Development at housing opportunity Site ID 9254 as well as at sites ID 600, 602 and 607 along the Thompson Creek Wash, would be required to implement these mitigation measures. However, other reasonably foreseeable development under the Housing Element Update may also require implementation of Mitigation Measures BIO-4 and BIO-5 to ensure avoidance of impacts or mitigate those impacts to less than significant through a project-level analysis to delineate sensitive natural communities and aquatic environments, and design or modify the project to avoid direct and indirect impacts on these areas through compensatory mitigation. By delineating, avoiding, and/or compensating for the loss of sensitive habitats, implementation of Mitigation Measures BIO-4 and BIO-5 would reduce the impact on sensitive habitats to a less than significant level.

Mitigation Measures

BIO-4 Riparian or Other Sensitive Natural Communities

For development under the Housing Element Update located within or immediately adjacent to natural areas, if the initial screening of biological resources under Mitigation Measure BIO-1 identifies presence of riparian or other sensitive natural communities within or adjacent to a project site, the project applicant shall design or modify the project to avoid direct and indirect impacts on these habitats, if feasible. Additionally, the project applicant shall minimize the loss of riparian vegetation by trimming rather than removal where feasible. Trimming riparian vegetation may require a CDFW Lake or Streambed Alteration Agreement.

Prior to construction, the project applicant shall install orange construction barrier fencing to identify environmentally sensitive areas around the riparian area (50 feet from edge) and other sensitive natural communities (50 feet from edge), or as defined by the agency with regulatory authority over the resource(s). The location of the fencing shall be marked in the field with stakes and flagging and shown on the construction drawings. The fencing shall be installed before construction activities are initiated and shall be maintained throughout the construction period. The following paragraph shall be included in the construction specifications:

> The Contractor's attention is directed to the areas designated as "environmentally sensitive areas." These areas are protected, and no entry by the Contractor for any purpose will be allowed unless specifically authorized in writing by lead agency overseeing the bicycle improvement project. The Contractor will take measures to ensure that the Contractor's forces do not enter or disturb these areas, including giving written notice to employees and subcontractors.

Temporary fences around the environmentally sensitive areas shall be installed as the first order of work. Temporary fences shall be furnished, constructed, maintained, and removed as shown on the plans, as specified in the special provisions, and as directed by the project engineer. The fencing shall be commercial-quality woven polypropylene, orange in color, and at least 4 feet high (Tensor Polygrid or equivalent). The fencing shall be tightly strung on posts with maximum 10-foot spacing.

Immediately upon completion of construction activities, the contractor shall stabilize exposed soil/slopes. On highly erodible soils/slopes, the contractor shall use a non-vegetative material that binds the soil initially and breaks down within a few years. If more aggressive erosion control treatments are needed, geotextile mats, excelsior blankets, or other soil stabilization products shall be used. All stabilization efforts should include habitat restoration efforts.

BIO-5 Compensatory Mitigation

If riparian and/or other sensitive natural communities are disturbed as part of an individual project, the project applicant shall compensate for the disturbance to ensure no net loss of habitat functions and values. Compensatory mitigation ratios shall be determined on a project-by-project basis during the site-specific biological survey once project impacts have been determined. Compensatory mitigation shall be at a minimum ratio of two acres restored, created, and/or preserved for each acre disturbed. Compensation may comprise of on-site restoration/creation, off-site restoration, preservation, or mitigation credits (or a combination of these elements). The project applicant shall develop and implement a restoration and monitoring plan that describes how the habitat shall be created, the success criteria that will be sued to quantify mitigation success, and the frequency and duration of monitoring.

Significance After Mitigation

Implementation of Mitigation Measures BIO-4 and BIO-5 would reduce potential impacts to riparian and other sensitive habitats to less than significant levels.

Threshold 3:	Would the Housing Element Update have a substantial adverse effect on state or federally protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact BIO-3 REASONABLY FORESEEABLE DEVELOPMENT FACILITATED BY THE HOUSING ELEMENT UPDATE COULD ADVERSELY IMPACT STATE OR FEDERALLY PROTECTED WETLANDS DURING PROJECT CONSTRUCTION. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH INCORPORATION OF MITIGATION MEASURES BIO-6 AND BIO-7.

According to the USFWS NWI there are freshwater forested/shrub and wetland habitat; freshwater pond; and freshwater emergent wetland in the southern developed portion of Claremont where buildout of the Housing Element Update would occur (USFWS 2021c). As such, individual development projects may be in or adjacent to wetlands and several creeks, canals, and drainages. Specifically, the housing opportunity sites adjacent to the channelized Live Oak Wash (ID 8419 and 625) and Thompson Creek Wash (ID 600, 602, and 607) would be developed adjacent to these riverine features in the northern portion of the city. Reasonably foreseeable development under the Housing Element Update has the potential to impact federal and state Jurisdictional Waters under Sections 401 and 404 of the Clean Water Act and Sections 1600-1616 of the CFGC. Cut and fill activity below the top of delineated banks, removal or modification to wetlands, or trimming and clearing of riparian vegetation could affect state or federally regulated aquatic resources in several ways including disturbances to the hydrologic structure, increased siltation, and modifications to bed and bank.

A formal Jurisdictional Delineation would be required to assess the extent of impacts to waters of the state and waters of the U.S., such as at housing opportunity sites ID 8419, 625 near the Live Oak Wash and sites ID 600, 602, and 607 near the Thompson Creek Wash, and to support Clean Water Act and Sections 1600-1616 permitting for projects that could directly impact USACE, CDFW, or Regional Water Quality Control Board (RWQCB) jurisdictional areas. If it is determined that proposed development projects would impact wetland resources, the appropriate permits under Sections 401 and 404 of the Clean Water Act, the Porter-Cologne Water Quality Control Act, and Sections 1600-1616 of the CFGC would be required. Mitigation Measures BIO-5 and BIO-6 would ensure avoidance of impacts or mitigate those impacts to less than significant through a project-level analysis to delineate jurisdictional waters and wetlands and perform restoration if necessary. Implementation of Mitigation Measures BIO-6 and BIO-7 would reduce the level of impact on wetlands to a less than significant level.

Mitigation Measures

BIO-6 Jurisdictional Delineation

If potentially jurisdictional wetlands are identified by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), a qualified biologist shall complete a jurisdictional delineation. The jurisdictional delineation shall determine the extent of the jurisdiction for CDFW, USACE, and/or RWQCB, and shall be conducted in accordance with the requirement set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the City, USACE, RWQCB, and CDFW, as appropriate, for review and approval prior to the issuance of required permits. Jurisdictional areas shall be avoided to the maximum extent possible. If jurisdictional areas are expected to be impacted, then the RWQCB would require a

Waste Discharge Requirement permit and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Lake or Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to Section 404 of the CWA would be required. Furthermore, a compensatory mitigation program shall be implemented by the project applicant in accordance with Mitigation Measure BIO-5 and the measures set forth by the regulatory agencies during the permitting process. Compensatory mitigations for all permanent impacts to waters of the U.S. and waters of the State shall be completed at a ratio as required in applicable permits. All temporary impacts to waters of the U.S. and waters of the State shall be fully restored to natural condition.

BIO-7 General Avoidance and Minimization

Projects shall be designed to avoid potential jurisdictional features identified in jurisdictional delineation reports. Projects that may impact jurisdictional features shall provide the City with a report for approval prior to the start of construction detailing how all identified jurisdictional features will be avoided, including groundwater draw down. This report shall include, but not be limited to, the following standards for wetlands avoidance:

1. Any material/spoils generated from project activities shall be located away from jurisdictional areas or special-status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non-monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate.
2. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank.
3. Any spillage of material will be stopped if it can be done safely. The contaminated area shall be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative will be notified.

Significance After Mitigation

Implementation of Mitigation Measures BIO-6 and BIO-7 would reduce potential impacts to wetlands to less than significant levels.

Threshold 4:	Would the Housing Element Update 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?

Impact BIO-4 HOUSING OPPORTUNITY SITES PROPOSED UNDER THE HOUSING ELEMENT UPDATE WOULD BE PRIMARILY CONCENTRATED IN DEVELOPED OR PREVIOUSLY DISTURBED AREAS. THE CONSTRUCTION OF DEVELOPMENT FACILITATED BY THE HOUSING ELEMENT UPDATE WOULD NOT RESULT IN SIGNIFICANT IMPACTS TO WILDLIFE MOVEMENT OR NURSERY SITES. NO IMPACTS WOULD OCCUR.

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. Regional and local wildlife movements are expected to be concentrated near topographic features that allow convenient passage, including roads, drainages, and ridgelines.

Habitat fragmentation occurs when a proposed action results in a single, unified habitat area being divided into two or more areas in such a way that the division isolates the two new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or from one habitat type to another, as in the fragmentation of habitats within and around “checkerboard” residential development. Habitat fragmentation also can occur when a portion of one or more habitats is converted into another habitat, as when annual burning converts scrub habitats to grassland habitats.

Much of the land in Claremont has been converted from open space to residential, commercial, and recreational uses, resulting in habitat fragmentation. There are no regional wildlife habitat linkages or described wildlife movement in the central and southern portions of the city, and the few housing opportunity sites in the north, where development would occur under the Housing Element Update (Los Angeles County 2009). While there are small fragments of open space in the developed portion of Claremont, it is unlikely for wildlife movement to occur in these areas due to their small size and existence in a highly urbanized area. Claremont is surrounded by residential and commercial development to the south, east, and west, and is not situated to form a link between blocks of intact habitat.

Reasonably foreseeable development under the Housing Element Update would be primarily concentrated on sites that have been previously developed and disturbed or are surrounded by development. Likewise, the encouragement of dense development on infill sites under the Housing Element Update would not result in impacts to potential local wildlife movement. As a result, the Housing Element Update is not expected to result in significant adverse impacts to wildlife corridors or nursery sites. No impact would occur.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

Threshold 5:	Would the Housing Element Update conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact BIO-5 THE HOUSING ELEMENT UPDATE WOULD NOT CONFLICT WITH ANY LOCAL POLICIES PROTECTING BIOLOGICAL RESOURCES OR THE CITY OF CLAREMONT MUNICIPAL CODE. THEREFORE, THE HOUSING ELEMENT UPDATE WOULD HAVE A LESS THAN SIGNIFICANT IMPACT ON ADOPTED PLANS GOVERNING BIOLOGICAL RESOURCES.

Significant Ecological Areas

According to Los Angeles County's Department of Regional Planning (DRP) Significant Ecological Areas Program, Claremont does not include a significant ecological area (SEA) within the central and southern portions of the city, and the few housing opportunity sites in the north, where development would occur under buildout of the Housing Element Update. The nearest SEA is San Dimas Canyon/San Antonio Wash, located in the hilly northern portion of Claremont approximately 0.5 mile north of the nearest proposed housing opportunity site (Los Angeles County 2015). Reasonably anticipated development resulting from the Housing Element Update would not result in significant adverse impacts to SEAs given the location of proposed housing opportunity sites and absence of SEA.

Protected Trees and Heritage Trees

Although the City of Claremont is a highly developed urban area and surrounded by urbanized uses, there are trees located within the city. The CMC Section 12.26.090 states that it is unlawful to injure, cut, damage, carve, transplant, prune, or remove any public trees without approval and permits from the City. Furthermore, during construction, trees, shrubs, and plants are protected pursuant to guidance in the City's tree policy manual.

If future development resulting from the implementation of the Housing Element Update includes the removal of trees on City property (including street trees), the plans will be reviewed by the City and required to comply with the CMC and the City's tree policy. Therefore, potential conflicts with local policies or ordinances would be reduced with adherence to the CMC and would result in less than significant impacts.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

4.3.4 Cumulative Impacts

Section 15130 of the *CEQA Guidelines* provides guidance on the discussion of cumulative impacts. Two conditions apply to determine the cumulative effect of a project: first, the overall effect on biological resources caused by existing and known or forecasted projects must be considered significant under the significance thresholds discussed above; and second, the project must have a "cumulatively considerable" contribution to that effect. The following are considered with respect to analyzing cumulative impacts to biological resources:

- The cumulative contribution of other approved and proposed projects to fragmentation of open space in the project vicinity;
- The loss of sensitive habitats and species;
- The contribution of the project to urban expansion into natural areas; and

- Isolation of open space in the vicinity by proposed/future projects.

The geographic area to analyze cumulatively considerable biological resource impacts includes the city limits and the surrounding region. Most future development under the Housing Element Update would be infill in existing urban areas.

Special-Status Species, Sensitive Habitats, and Wetlands

The Housing Element's Update contribution to cumulative impacts to special-status species and sensitive habitats is considered cumulatively considerable without mitigation. Some housing opportunity sites are proposed in the northern portion of the Plan Area in the hillside open spaces areas in proximity to open space and habitat that supports special-status species. Conversion of natural habitat could reduce the availability of habitat for special-status species and the natural areas remaining could become isolated and not support biological resources beyond their carrying capacity. Development facilitated by the Housing Element Update may result in the increase of urban buildout and contribute to the loss of habitat for special-status species, as well as common species. However, implementation of Mitigation Measures BIO-1 through BIO-4 would reduce direct and indirect impacts to wildlife and sensitive vegetation and habitat to less than significant.

If a future project under the Housing Element Update would result in removal of riparian and or/other sensitive natural communities, then compensatory mitigation (Mitigation Measure BIO-5) may be required depending on the amount of vegetation impacted, which would ensure no net loss of habitat following implementation of the project. As described in Impact BIO-3, impacts to sensitive habitats (i.e., jurisdictional wetlands, riparian vegetation, and aquatic habitat) under the Housing Element Update would be cumulatively considerable without mitigation. Implementation of Mitigation Measures BIO-6 through BIO-7, would reduce these cumulative impacts through identification, avoidance, and project-specific permitting requirements through appropriate regulatory agencies. Mitigation for wetlands would be coordinated with the appropriate regulatory agencies on a project-by-project basis to ensure no net loss of functions and values. Thus, the Housing Element Update would not result in a cumulatively considerable impact to sensitive habitats and wetlands.

City Protected Trees

The City's Protection of City Trees (CMC Title 12, Chapter 12.26) provides protection to public trees in Claremont. Reasonably foreseeable development in the City, including development under the Housing Element Update, would be subject to these existing ordinances. Compliance with the CMC and the City's *Tree Policies and Guidelines Manual* would ensure that there would be no net loss of protected trees citywide. In addition, the City's goal is to preserve existing tree canopy and reasonably foreseeable development under the Housing Element Update would be required to present plans to the City for review if any removal of trees on City property is proposed. Therefore, the incremental effect of reasonably foreseeable development under the Housing Element Update would not be cumulatively considerable and cumulative impacts related to City trees would be less than significant.

Wildlife Movement

As discussed under Impact BIO-4, development under the Housing Element Update would not affect wildlife movement and nursery sites. Therefore, development facilitated by the Housing Element Update would not have a cumulatively considerable impact.

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4.4 Greenhouse Gas Emissions

This section of the EIR identifies and evaluates issues related to greenhouse gas (GHG) emissions and climate change in the context of the Housing Element Update. It describes the physical and regulatory setting, the criteria used to evaluate the significance of potential impacts, the methods used to evaluate these impacts, and the results of the impact analysis.

4.4.1 Setting

Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record, which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The United Nations Intergovernmental Panel on Climate Change (IPCC) expressed that the rise and continued growth of atmospheric carbon dioxide (CO_2) concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatons of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2021). Furthermore, since the late 1700s, estimated concentrations of CO_2, methane, and nitrous oxide in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity (United States Environmental Protection Agency [U.S. EPA] 2021a). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases widely seen as the principal contributors to human-induced climate change include CO_2, methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere, and natural processes, such as oceanic evaporation, largely determine its atmospheric concentrations.

GHGs are emitted by natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are usually by-products of fossil fuel combustion, and CH_4 results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (U.S. EPA 2021a).

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (IPCC 2021).[1]

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 33 degrees Celsius (°C) cooler (World Meteorological Organization 2020). However, since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity (Forster et al. 2007). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

Greenhouse Gas Emissions Inventory

Global Emissions Inventory

In 2015, worldwide anthropogenic total 47,000 million MT of CO_2e, which is a 43 percent increase from 1990 GHG levels (U.S. EPA 2021b). Specifically, 34,522 million metric tons (MMT) of CO_2e of CO_2, 8,241 MMT of CO_2e of CH_4, 2,997 MMT of CO_2e of N_2O, and 1,001 MMT of CO_2e of fluorinated gases were emitted in 2015. The largest source of GHG emissions were energy production and use (includes fuels used by vehicles and buildings), which accounted for 75 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 12 percent and six percent, respectively. Waste sources contributed for three percent and two percent was due to international transportation sources. These sources account for approximately 98 percent because there was a net sink of two percent from land-use change and forestry. (U.S. EPA 2021b).

United States Emissions Inventory

Total United States (U.S.) GHG emissions were 6,558 MMT of CO_2e in 2019. Emissions decreased by 1.7 percent from 2018 to 2019; since 1990, total U.S. emissions have increased by an average annual rate of 0.06 percent for a total increase of 1.8 percent between 1990 and 2019. The decrease from 2018 to 2019 reflects the combined influences of several long-term trends, including population changes, economic growth, energy market shifts, technological changes such as improvements in energy efficiency, and decrease carbon intensity of energy fuel choices. In 2019, the industrial and transportation end-use sectors accounted for 30 percent and 29 percent, respectively, of nationwide GHG emissions while the commercial and residential end-use sectors accounted for 16 percent and 15 percent of nationwide GHG emissions, respectively, with electricity emissions distributed among the various sectors (U.S. EPA 2021c).

[1] The Intergovernmental Panel on Climate Change's (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the Intergovernmental Panel on Climate Change's (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

California Emissions Inventory

Based on the California Air Resource Board's (CARB) California Greenhouse Gas Inventory for 2000-2019, California produced 418.2 MMT of CO_2e in 2019, which is a 7.2 MMT of CO_2e reduction from 2018 levels (CARB 2021). The major source of GHG emissions in California is the transportation sector, which comprises 40 percent of the state's total GHG emissions. The industrial sector is the second largest source, comprising 21 percent of the state's GHG emissions, while electric power accounts for approximately14 percent (CARB 2021). The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, the State of California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO_2e (CARB 2021). The annual 2030 statewide target emissions level is 260 MMT of CO_2e (CARB 2017).

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature (GMST) from 2011 to 2020 was approximately 0.82°C higher than the average GMST for the 20th century (National Oceanic and Atmospheric Administration 2021). Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature (LSAT) obtained from station observations jointly indicate that LSAT and sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, is it virtually certain that there will be continued ice loss for the Greenland Ice Sheet and likely for the Antarctic Ice Sheet over the 21st century (IPCC 2021).

According to *California's Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 0.6 to 1.1°C higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years (State of California 2018). In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state and regionally-specific climate change case studies (State of California 2018). However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. A summary follows of some of the potential effects that could be experienced in California as a result of climate change.

Air Quality

Scientists project that the annual average maximum daily temperatures in California could rise by 2.5 to 5.8°F in the next 50 years and by 5.6 to 8.8°F in the next century. Since 1896, the top five warmest years in the Los Angeles region (in terms of annual average temperature) have all occurred since 2012 (State of California 2018). Higher temperatures are conducive to air pollution formation, and rising temperatures could therefore result in worsened air quality in California. As a result,

climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the state has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains. In southern California, the average size of summertime non-Santa Ana based fires has significantly increased from 1,129 hectares in the 1960s to 2,121 hectares in the 2000s (State of California 2018). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality could worsen. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains could tend to temporarily clear the air of particulate pollution, which would effectively reduce the number of large wildfires and thereby ameliorate the pollution associated with them (California Natural Resources Agency 2009).

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year variability in statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common (California Department of Water Resources 2018). This trend of increased dry and wet extremes is expected to increase in the future across most of the Los Angeles region (State of California 2018). The uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The average early spring snowpack in the western U.S., including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the central and southern California coasts (State of California 2018). The Sierra snowpack provides the majority of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the proportion of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack. Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (State of California 2018).

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding. The number of atmospheric rivers (regions of high water vapor transport from the tropics to the Pacific Coast that produce intense topographic-induced precipitation along southern California mountain ranges) is expected to increase in the future, resulting in an extended flood hazard season (State of California 2018). Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from coastal flooding. The rate of increase of global mean sea levels between 1993 to 2020, observed by satellites, is approximately 3.6 millimeters per year, more than double the twentieth century trend of 1.6 millimeters per year (World Meteorological Organization 2013; National Aeronautics and Space Administration 2021). Sea levels are rising faster now than in the previous two millennia, and the rise will probably

accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea level rise ranging between 0.25 to 0 1.01 meters by 2100 with the ranges dependent on a low, intermediate, or high GHG emissions scenario (IPCC 2021). A rise in sea levels could erode 31 to 67 percent of southern California beaches and cause flooding of approximately 370 miles of coastal highways during 100-year storm events. This would also jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure (State of California 2018). Furthermore, increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events. In the Los Angeles region, the effects of sea level rise on the coastline is expected to be compounded by the impacts of wave events during coastal storms because much of the coastline is comprised of wide sandy beaches (State of California 2018).

Agriculture

California has an over $50 billion annual agricultural industry ($176 million of which is from Los Angeles County) that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts (California Department of Food and Agriculture 2021). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (State of California 2018). Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

Ecosystems and Wildlife

Climate change and the potential resultant changes in weather patterns could have ecological effects on global and local scales. Soil moisture is likely to decline in many regions as a result of higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: timing of ecological events; geographic distribution and range of species; species composition and the incidence of nonnative species within communities; and ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2018).

4.4.2 Regulatory Setting

The following regulations and case law address both climate change and GHG emissions.

Federal

Federal Clean Air Act

The U.S. Supreme Court determined in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) that the U.S. EPA has the authority to regulate motor vehicle GHG emissions under the federal Clean Air Act. The U.S. EPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, the U.S. EPA issued a Final Rule that

established the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities.

In *Utility Air Regulatory Group v. Environmental Protection Agency* (134 Supreme Court 2427 [2014]), the U.S. Supreme Court held the U.S. EPA may not treat GHGs as an air pollutant for purposes of determining whether a source can be considered a major source required to obtain a Prevention of Significant Deterioration or Title V permit. The Court also held that Prevention of Significant Deterioration permits otherwise required based on emissions of other pollutants may continue to require limitations on GHG emissions based on the application of Best Available Control Technology.

Safer Affordable Fuel-Efficient Vehicles Rule

On September 27, 2019, the U.S. E.PA and the National Highway Traffic Safety Administration published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program. The SAFE Rule Part One revokes California's authority to set its own GHG emissions standards and to adopt its own zero-emission vehicle mandates. On April 30, 2020, the U.S. E.PA and the National Highway Traffic Safety Administration published Part Two of the SAFE Vehicles Rule, which revised corporate average fuel economy and CO_2 emissions standards for passenger cars and trucks of model years 2021 to 2026 such that the standards increase by approximately 1.5 percent each year through model year 2026 as compared to the approximately five percent annual increase required under the 2012 standards (National Highway Traffic Safety Administration 2020). To account for the effects of the SAFE Vehicles Rule, CARB released off-model adjustment factors on June 26, 2020 to adjust GHG emissions outputs from the EMFAC model (CARB 2020b).

State

CARB is responsible for the coordination and oversight of state and local air pollution control programs in California. There are numerous regulations aimed at reducing the state's GHG emissions. These initiatives are summarized below.

California Advanced Clean Cars Program

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, the U.S. EPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles, beginning with the 2009 model year, which allowed California to implement more stringent vehicle emission standards than those promulgated by the U.S. EPA. Pavley I regulates model years from 2009 to 2016 and Pavley II, now referred to as "LEV (Low Emission Vehicle) III GHG," regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, the rules will be fully implemented, and new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011). However, as a result of the SAFE Vehicles Rule discussed above, California's waiver of Clean Air Act preemption was revoked, thereby rescinding the CARB's authority to implement the Advanced Clean Cars program.

California Global Warming Solutions Act of 2006 (Assembly Bill 32 and Senate Bill 32)

The "California Global Warming Solutions Act of 2006," (AB 32), outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO_2e, which was achieved in 2016. The CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others (CARB 2008). Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since the Scoping Plan's approval.

The CARB approved the 2013 Scoping Plan update in May 2014. The update defined the CARB's climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the state's longer term GHG reduction strategies with other state policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100 (discussed later). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with statewide per capita goals of six MT of CO_2e by 2030 and two MT of CO_2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the state (CARB 2017).

Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed in August 2008, enhances the state's ability to reach AB 32 goals by directing the CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations. Metropolitan Planning Organizations (MPOs) are required to adopt a Sustainable Communities Strategy (SCS), which allocates land uses in the MPO's Regional Transportation Plan (RTP). Qualified projects consistent with an approved SCS or Alternative Planning Strategy (categorized as "transit priority projects") can receive incentives to streamline CEQA processing.

On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Southern California Association of Governments (SCAG) was assigned targets of an 8 percent reduction in per capita GHG emissions from passenger vehicles by 2020 and

a 19 percent reduction in per capita GHG emissions from passenger vehicles by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements. On September 3, 2020, the SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS entitled Connect SoCal, which meets the requirements of SB 375.

Senate Bill 1383

Adopted in September 2016, SB 1383 (Lara, Chapter 395, Statues of 2016) requires the CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. SB 1383 requires the strategy to achieve the following reduction targets by 2030:

- Methane – 40 percent below 2013 levels
- Hydrofluorocarbons – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

As a result, the CARB adopted the Short-Lived Climate Pollutant Reduction Strategy in 2017 and has initiated implementation. SB 1383 also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with the CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills. CalRecycle has initiated the rulemaking process for these regulations with the proposed regulation text submitted to the Office of Administrative Law in October 2020.

Senate Bill 100

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the state's Renewables Portfolio Standard (RPS) Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Executive Order B-55-18

On September 10, 2018, the former Governor Brown issued Executive Order (EO) B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

California Building Standards Code

Title 24 of the California Code of Regulations (CCR) is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2019 Title 24 standards, which the City of Claremont has adopted in Claremont Municipal Code (CMC) Chapter 15.04. The California Building Standards Code's energy-efficiency and green building standards are outlined below.

PART 6 – BUILDING ENERGY EFFICIENCY STANDARDS/ENERGY CODE

CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC).

PART 11 – CALIFORNIA GREEN BUILDING STANDARDS

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The 2019 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers (Tiers I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

The mandatory standards require:

- 20 percent reduction in indoor water use relative to specified baseline levels;[2]
- 65 percent construction/demolition waste diverted from landfills;
- Inspections of energy systems to ensure optimal working efficiency;
- Low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards;
- Dedicated circuitry to facilitate installation of electric vehicle (EV) charging stations in newly constructed attached garages for single-family and duplex dwellings ("EV ready"); and
- Designation of at least ten percent of parking spaces for multi-family residential developments as electric vehicle charging spaces capable of supporting future electric vehicle supply equipment ("EV capable").

The voluntary standards require:

- **Tier I:** stricter energy efficiency requirements, stricter water conservation requirements for specific fixtures, 65 percent reduction in construction waste with third-party verification, 10 percent recycled content for building materials, 20 percent permeable paving, 20 percent cement reduction, and cool/solar reflective roof; and
- **Tier II:** stricter energy efficiency requirements, stricter water conservation requirements for specific fixtures, 75 percent reduction in construction waste with third-party verification, 15 percent recycled content for building materials, 30 percent permeable paving, 25 percent cement reduction, and cool/solar reflective roof.

Similar to the compliance reporting procedure for demonstrating Building Energy Efficiency Standards compliance in new buildings and major renovations, compliance with the CALGreen

[2] Similar to the compliance reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen water-reduction requirements must be demonstrated through completion of water use reporting forms. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified by CALGreen or a reduced per-plumbing-fixture water use rate.

water-reduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

California Integrated Waste Management Act (Assembly Bill 341)

The California Integrated Waste Management Act of 1989, as modified by AB 341 in 2011, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995 through source reduction, recycling, and composting activities and (2) diversion of 50 percent of all solid waste on and after January 1, 2000.

Regional and Local

2020 - 2045 RTP/SCS

On September 3, 2020, the SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS entitled Connect SoCal. The 2020-2045 RTP/SCS builds upon the progress made through implementation of the 2016-2040 RTP/SCS and includes ten goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The SCS establishes a land use vision of center focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation (SCAG 2020).

City of Claremont General Plan

The Claremont 2006 General Plan, adopted in 2006 and revised in October 2009, lists policies related to GHG emissions in its Open Space, Parkland, Conservation, and Air Quality Element that would be applicable to the Housing Element Update (City of Claremont 2006):

Goal 5-13: Maximize energy conservation throughout all segments of the community to reduce air pollution emissions, and to reduce consumption of natural resources and fossil fuels.

Policy 5-13.5. Continue to promote the use of solar power and other energy conservation measures.

Policy 5-13.7. Promote the use of different technologies that reduce use of non-renewable energy resources.

Goal 5-14: Incorporate green building and other sustainable building practices into development projects.

Policy 5-14.2. Promote sustainable building practices that go beyond the requirements of Title 24 of the California Administrative Code, and encourage energy-efficient design elements, as appropriate.

Goal 5-15: Achieve the highest level of water conservation possible.

Policy 5-15.1. Support water conservation through requirements for landscaping with drought-tolerant plants and efficient irrigation

Goal 5-16: Strive to achieve waste recycling levels that meet or exceed state mandates

Policy 5-16.1. Promote reuse and recycling throughout the community

Policy 5-16.2. Utilize source reduction, recycling, and other appropriate measures to reduce the amount of solid waste generated in Claremont that is disposed of in landfills.

Policy 5-16.3. Facilitate the maximum diversion from landfills of construction and demolition materials created in Claremont through recycling and reuse.

Policy 5-16.4. Achieve maximum waste recycling in all sectors of the community, including residential, commercial, industrial, institutional, and the construction industry.

Goal 5-18: Reduce the amount of air pollution emissions from mobile and stationary sources and enhance the airshed.

Policy 5-18.2. Encourage the use of clean fuel vehicles.

Policy 5-18.3. Promote the use of fuel-efficient heating and cooling equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces, and boiler units.

Policy 5-18.4. Promote the use of clean air technologies such as fuel cell technologies, renewable energy sources, UV coatings and alternative, non-fossil fuels.

Policy 5-18.8. Support jobs/housing balance within the community so more people can both live and work within the community. To reduce vehicle trips, encourage people to telecommute or work out of home or in local satellite offices.

City of Claremont Sustainable City Plan

The Claremont City Council adopted the first Sustainable City Plan (SCP) in 2008, and the most recent update was adopted on April 13, 2021 (City of Claremont 2021a). The SCP establishes a framework in which the Claremont community can achieve its vision of becoming a sustainable city. The SCP calls for City government to serve as leaders in sustainability matters, directs the City to provide a series of incentives and educational programs around sustainability, and suggests ways broader community members can work towards sustainability goals. Several goals in the SCP are related to GHG emissions, specifically goals aimed to reduce GHG emissions from the built environment and decrease waste into landfills.

Clean Power Alliance

In 2019, Claremont joined the Clean Power Alliance, a community choice energy program providing local control and clean renewable energy with a variety of options for renewable power mixes for customers.[3] Claremont residents and businesses are automatically enrolled to receive 50 percent renewable power and have the option to switch to 40 percent or 100 percent renewable energy (City of Claremont 2021b).

[3] The current offerings available to residential customers are 40 percent ("Lean Power"), 50 percent ("Clean Power"), and 100 percent ("100% Green Power") renewable energy.

4.4.3 Impact Analysis

Methodology

Construction and operational GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2020.4.0. CalEEMod uses project-specific information, including the project's land uses, square footages for different uses (e.g., high-rise condominiums, hotel, enclosed parking garage), and location, to estimate a project's construction and operational emissions. Emissions were modeled for reasonably foreseeable development, which would consist of full buildout of the Housing Element Update with 2,805 residential units, as outlined in Section 2, *Project Description*. GHG emissions were modeled for year 2030.

Construction Emissions

Construction activities emit GHGs primarily through combustion of fuels (mostly diesel) in the engines of off-road construction equipment and in on-road construction vehicles and in the commute vehicles of the construction workers. Smaller amounts of GHGs are emitted indirectly through the energy required for water used for fugitive dust control and lighting for the construction activity. Every phase of the construction process, including demolition, grading, paving, building, and architectural coating, emits GHG emissions in volumes proportional to the quantity and type of construction equipment used. Heavier equipment typically emits more GHGs per hour than does lighter equipment because of its engine design and greater fuel consumption. CalEEMod estimates construction emissions by multiplying the time equipment is in operation by emission factors. Construction of the Housing Element Update was analyzed based on the CalEEMod default construction schedule and construction equipment list. Demolition calculations conservatively assume 100 percent building coverage on developed parcels. Estimated square footage is included in Appendix D. This analysis conservatively assumes that all construction activities facilitated by the Housing Element Update would occur over the entirety of the planning horizon. It is assumed that all construction equipment used would be diesel-powered. This analysis assumes that the development facilitated by the Housing Element Update would comply with all applicable regulatory standards. In accordance with South Coast Air Quality Management District's (SCAQMD) recommendation, GHG emissions from construction of the Housing Element Update were amortized over a 30-year period and added to annual operational emissions to determine the Housing Element Update's total annual GHG emissions (SCAQMD 2008).

Operational Emissions

AREA SOURCE EMISSIONS

Area sources include GHG emissions that would occur from the use of landscaping equipment and fireplaces, which emit GHGs associated with fuel combustion. The landscaping equipment emission values were derived from the 2011 Off-Road Equipment Inventory Model (California Air Pollution Control Officers Association [CAPCOA] 2021). Reasonably foreseeable development facilitated by the Housing Element Update may include natural gas fireplaces; however, in accordance with SCAQMD Rule 445, no wood-burning devices would be installed.

ENERGY USE EMISSIONS

GHGs are emitted on-site during the combustion of natural gas for space and water heating. CalEEMod estimates GHG emissions from energy use by multiplying average rates of residential and

non-residential energy consumption by the quantities of residential units and non-residential square footage entered in the land use module to obtain total projected energy use. This value is then multiplied by electricity and natural gas GHG emission factors applicable to the project location and utility provider. Building energy use is typically divided into energy consumed by the built environment and energy consumed by uses that are independent of the building, such as plug-in appliances. Non-building energy use, or "plug-in energy use," can be further subdivided by specific end-use (refrigeration, cooking, office equipment, etc.).

Claremont has joined the Clean Power Alliance, a collection of municipalities, to offer clean renewable energy to Claremont residences and businesses through a partnership with Southern California Edison. As of May 2019, Clean Power Alliance became the new electricity provider for residences and businesses in Claremont, while Southern California Edison continues to deliver the power to residences and businesses (City of Claremont 2021a). Residents are offered 40 percent clean power by default, with the option to use 50 percent clean power or 100 percent renewable energy.

In California, Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. The energy use estimates account for the 2019 Title 24 standards. This is a conservative assumption since the energy use estimates do not account for potential energy efficiency measures required by subsequent Title 24 updates in 2022, 2025, and 2028.

In accordance with Section 150.1(b)14 of the 2019 Building Energy Efficiency Standards in Title 24, all new residential uses under three stories must install photovoltaic (PV) solar panels that generate an amount of electricity equal to expected electricity usage. Reasonably foreseeable development would be subject to the height limitations for various zoning districts contained in Title 16, Zoning of the CMC. The CMC prohibits construction of structures that exceed three-stories in most housing opportunity sites zoning districts. However, within the Claremont Village South Specific Plan (VSSP) the maximum allowable height is up to three, four, partial four, or partial five, stories depending on the street (City of Claremont 2021c). A total of 34 housing opportunity sites would be designated within the VSSP zone and potentially be developed above three stories. Therefore, it was assumed that the Housing Element Update's electricity usage would be partially supplied by on-site PV solar panels and generation of GHG emissions would be mitigated.

MOBILE SOURCE EMISSIONS

Mobile source emissions consist of emissions generated by vehicle trips associated with operation of on-site development. Vehicle trips were calculated using the daily trip generation rate of 5.44 trips per day, as assumed by CalEEMod for mid-rise apartment buildings. Mobile emissions also assumed 2030 fleet mixes and emission factors, as this is the year in which the Housing Element Update's development is analyzed against GHG reduction goals.

WATER AND WASTEWATER EMISSIONS

Water used and wastewater generated by a project generate indirect GHG emissions. These emissions are a result of the energy used to supply, convey, and treat water and wastewater. In addition to the indirect GHG emissions associated with energy use, the wastewater treatment process itself can directly emit both methane and nitrous oxide.

The indoor and outdoor water use consumption data for each land use subtype comes from the Pacific Institute's 2003 *Waste Not, Want Not: The Potential for Urban Water Conservation in California* (CAPCOA 2021). Based on that report, a percentage of total water consumption was

dedicated to landscape irrigation, which is used to determine outdoor water use. Wastewater generation was similarly based on a reported percentage of total indoor water use.

All wastewater generated by the Housing Element Update would be treated by the Pomona Water Reclamation Plant, which does not utilize septic tanks or facultative lagoons and does not include a co-generation system (Los Angeles County Sanitation Districts 2021). As a result, CalEEMod was adjusted to account for 100 percent aerobic treatment of the Housing Element Update's wastewater with no co-generation of electricity.

SOLID WASTE EMISSIONS

The disposal of solid waste produces GHG emissions from the transportation of waste, anaerobic decomposition in landfills, and incineration. To calculate the GHG emissions generated by solid waste disposal, the total volume of solid waste was calculated using waste disposal rates identified by the California Department of Resources Recycling and Recovery (CalRecycle). The methods for quantifying GHG emissions from solid waste are based on the IPCC method, using the degradable organic content of waste.

Service Population

The service population of a project is the number of estimated residents and employees accommodated by the project. As discussed in Section 4.5, *Population and Housing*, the Housing Element Update is expected to increase the population in Claremont by approximately 7,545 persons by 2029, assuming full build-out. It was conservatively assumed that no new employment opportunities would be associated with the Housing Element Update. Therefore, the service population would be 7,545 persons. To compare the estimated emissions to the locally-applicable, project-specific efficiency threshold (see *Significance Thresholds* below), the per person GHG emissions for the Housing Element Update were calculated by dividing total GHG emissions by the service population.

Significance Thresholds

The following thresholds of significance were developed based on the *CEQA Guidelines*, specifically, Appendix G. The Housing Element Update would have a significant impact with respect to GHG emissions if it would:

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

The majority of individual projects do not generate sufficient GHG emissions to create significant project-specific environmental effects. However, the environmental effects of a project's GHG emissions can contribute incrementally to cumulative environmental effects that are significant, such as climate change, even if an individual project's environmental effects are limited (*CEQA Guidelines* Section 15064[h][1]). The issue of a project's environmental effects and contribution towards climate change typically involves an analysis of whether or not a project's contribution towards climate change is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines* Section 15064[h][1]).

Section 15064.4 of the *CEQA Guidelines* recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions. *CEQA Guidelines* Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (*CEQA Guidelines* Section 15064.7[c]).

According to *CEQA Guidelines* Section 15183.5, projects can tier off of a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. However, the City has not adopted a qualified GHG reduction plan; therefore, it is not appropriate to use this approach for evaluating the Housing Element Update. Accordingly, this analysis utilizes two thresholds to evaluate the significance of the project's GHG emissions, which are discussed in subsequent subsections.

Locally-Appropriate, Project-Specific Efficiency Threshold

Because the City has not adopted a general use threshold for evaluating the significance of GHG emissions, the City has chosen to use project-specific thresholds that are prepared for projects on a case-by-case basis. For the Housing Element Update, the City has calculated a locally-appropriate 2030 project-specific efficiency threshold. Efficiency thresholds are quantitative thresholds based on a measurement of GHG efficiency for a given project, regardless of the amount of mass emissions. These thresholds identify the emission level below which new development would not interfere with attainment of statewide GHG reduction targets. A project that attains such an efficiency target, with or without mitigation, would result in less than significant GHG emissions. This project-specific efficiency threshold was derived from the statewide GHG emission reduction target under SB 32 and CARB's recommendations in the 2017 Climate Change Scoping Plan Update and incorporates local and project-specific conditions that the tailor the threshold to the Housing Element Update.

A project-specific efficiency threshold can be calculated by dividing statewide GHG emissions by the sum of statewide jobs and residents. However, not all statewide emission sources would be relevant to the Housing Element Update and local jurisdiction (e.g., agriculture and industrial sources). Accordingly, the 2030 statewide inventory target was modified with substantial evidence provided to establish a locally-appropriate, evidence-based, mix of land uses project-specific threshold consistent with the SB 32 target.

To develop this threshold, the Plan Area was first evaluated to determine emissions sectors that are present and would be directly affected by potential land use changes. A description of the major emissions sectors that are included in the 2017 Scoping Plan and representative sources in Claremont can be found in Table 4.4-1. According to the 2006 General Plan Land Use Plan, there are no agricultural or industrial land uses within the Plan Area (City of Claremont 2005). Therefore, the Agricultural and Industrial Emissions Sectors were considered locally inappropriate and were removed from the state 2030 emissions forecast. Furthermore, Cap and Trade emissions reductions occur independent of any local jurisdictional land use decisions and were also excluded from the locally-appropriate target. After removing Agricultural, Industrial, and Cap and Trade emissions, the remaining emissions sectors with sources within the Plan Area were then summed to create a

locally-appropriate emissions total for the Housing Element Update. These emissions sectors are applicable to the housing projects that would be facilitated by the proposed Housing Element Update because the projects would include residential uses, require electric power, include sources of GHGs with high global warming potentials such as air conditioning systems, generate solid waste and recycling products, and result in vehicle trips by residents. This locally-appropriate, project-specific emissions total is divided by the statewide 2030 service person population to determine a locally-appropriate, project-level threshold of 3.3 MT of CO_2e per service population that is consistent with SB 32 targets, as shown in Table 4.4-1 and Table 4.4-2.

Table 4.4-1 SB 32 Scoping Plan Emissions Sector Targets

GHG Emissions Sector[1]	2030 State Emissions Target (MMT of CO_2e)[1]	Locally Appropriate[2]	Project-Specific	Major Sources[3]
Residential and Commercial	38	Yes	Yes	Natural gas end uses, including space and water heating of buildings
Electric Power	53	Yes	Yes	Electricity uses, including lighting, appliances, machinery, and heating
High Global Warming Potential	11	Yes	Yes	SF_6 from power stations, HFCs from refrigerants and air conditioning[4]
Recycling and Waste	8	Yes	Yes	Waste generated by residential, commercial, and other facilities
Transportation	103	Yes	Yes	Passenger, heavy duty, and other vehicle emissions
Industrial	83	No	No	Oil, gas, and hydrogen production, refineries, general fuel use, and mining operations do not occur within the Plan Area
Agriculture	24	No	No	Enteric fermentation, crop residue burning, and manure management do not occur within the Plan Area
Cap and Trade Reductions	-60	No	No	Reductions from facilities emitting more than 25,000 MT of CO_2e per year[5]
Scoping Plan Target (All Sectors)	**260**	**No**	**No**	**All emissions sectors**
Locally Inapplicable Sector (Industrial)	-83	Yes	No	Oil, gas, and hydrogen production, refineries, general fuel use, and mining operations[5]
Locally Inapplicable Sector (Agriculture)	-24	No	No	Enteric fermentation, crop residue burning, and manure management
Locally Inapplicable Sector (Cap and Trade)	60	No	No	Reductions from facilities emitting more than 25,000 MT of CO_2e per year[5]
2030 Locally Applicable Emissions Sectors	**213**	**Yes**	**Yes**	**Emissions applicable to Plan Area**

[1] See the 2017 Climate Change Scoping Plan, page 31 for sector details (CARB 2017).

[2] Locally-appropriate is defined as having significant emissions in Scoping Plan Categorization categories within Claremont.

[3] See CARB GHG Emissions Inventory Scoping Plan Categorization for details, available at: https://www.arb.ca.gov/cc/inventory/data/data.htm

[4] SF_6 is used primarily as an insulator in electrical substations while HFCs can be found in many residential and commercial refrigeration and air conditioning units. HFCs are in the process of being phased out through 2036 in most developed countries.

[5] Cap and Trade is excluded as reductions will occur independent of local project land use decisions and are therefore not locally appropriate.

MMT = million metric tons; MT = metric tons; CO_2e = carbon dioxide equivalents, SF_6 = sulfur hexafluoride; HFC= hydrofluorocarbons

Table 4.4-2 SB 32 Locally-Appropriate Project-Specific Threshold

California 2017 Climate Change Scoping Plan	California 2030 Population (persons)[1]	41,860,549
	California 2030 Employment Projection (persons)[2]	23,459,500
	Service Population (persons)	65,320,049
Locally-Appropriate 2030 Project Threshold	2030 Locally-Appropriate Emissions Sectors (MT of CO_2e)	213,000,000
	2030 Service Population (persons)	65,320,049
	2030 Service Person Target (MT of CO_2e per Service Person)	3.3

[1] California Department of Finance 2021

[2] Average of employment range projections under implementation scenario. See CARB 2017 Climate Change Scoping Plan Update, page 55 (CARB 2017).

MT = metric tons; CO_2e = carbon dioxide equivalents

At this time, the state has codified a target of reducing emissions to 40 percent below 1990 emissions levels by 2030 (SB 32) and has developed the 2017 Scoping Plan to demonstrate how the state will achieve the 2030 target and make substantial progress toward the 2050 goal of an 80 percent reduction in 1990 GHG emission levels set by EO S-3-05. In EO B-55-18 (2018), which identifies a new goal of carbon neutrality by 2045 and supersedes the goal established by EO S-3-05, CARB has been tasked with including a pathway toward the EO B-55-18 carbon neutrality goal in the next Scoping Plan update.

While state and regional regulators of energy and transportation systems, along with the state's Cap and Trade program, are designed to be set at limits to achieve most of the reductions needed to hit the state's long-term targets, local governments can do their fair share toward meeting the state's targets by siting and approving projects that accommodate planned population growth and projects that are GHG-efficient. The Association of Environmental Professionals (AEP) Climate Change Committee recommends that CEQA GHG analyses evaluate project emissions in light of the trajectory of state climate change legislation and assess their "substantial progress" toward achieving long-term reduction targets identified in available plans, legislation, or EOs. Consistent with AEP Climate Change Committee recommendations (2016), GHG impacts are analyzed in terms of whether the Housing Element Update would impede "substantial progress" toward meeting the reduction goal identified in SB 32 and EO B-55-18. As SB 32 is considered an interim target toward meeting the 2045 state goal, consistency with SB 32 would be considered contributing substantial progress toward meeting the state's long-term 2045 goals. Avoiding interference with, and making substantial progress toward, these long-term state targets is important because these targets have been set at levels that achieve California's fair share of international emissions reduction targets that will stabilize global climate change effects and avoid the adverse environmental consequences described under Section 4.3.2, *State Regulations* (EO B-55-18).

Consistency with Applicable Plans, Policies, and Regulations for the Reduction of GHG Emissions

Pursuant to *CEQA Guidelines* Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the

law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Therefore, a lead agency can make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions. The Housing Element Update's consistency with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions is evaluated qualitatively. A project is considered consistent with the provisions of these documents if it meets the general intent in reducing GHG emissions in order to facilitate the achievement of local- and state-adopted goals and does not impede attainment of those goals.

Project Impacts and Mitigation Measures

Threshold 1:	Would the Housing Element Update generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
Threshold 2:	Would the Housing Element Update conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-1 CONSTRUCTION AND OPERATION OF REASONABLY FORESEEABLE DEVELOPMENT ASSOCIATED WITH THE HOUSING ELEMENT UPDATE WOULD GENERATE TEMPORARY AND LONG-TERM INCREASES IN GHG EMISSIONS THAT WOULD NOT RESULT IN A SIGNIFICANT IMPACT ON THE ENVIRONMENT RELATED TO CLIMATE CHANGE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Quantitative GHG Emissions Assessment

Updates to the Safety Element would not result in additional development in the Plan Area that would generate GHG emissions. The goals and policies included in the Safety Element would support improved emergency evacuation, reduced wildfire risk, and other safety-related aspects. Therefore, no impact related to consistency with the generation of GHG emissions would occur.

Construction and operation resulting from development facilitated by the Housing Element Update would generate GHG emissions. This analysis considers the combined impact of GHG emissions from both construction and operation. Calculations of CO_2, methane, and nitrous oxide emissions are provided to identify the magnitude of potential project effects.

Construction activities facilitated by the Housing Update would generate temporary GHG emissions primarily as a result of operation of construction equipment on-site as well as from vehicles transporting construction workers to and from the project sites and heavy trucks to transport demolition debris, building materials, and soil export. As shown in Table 4.4-3, construction of reasonably foreseeable development under the Housing Element Update would generate an estimated total of 22,241 MT of CO_2e. Amortized over a 30-year period per SCAQMD guidance, construction of reasonably foreseeable development under the Housing Element Update would generate an estimated 741 MT of CO_2e per year.

Table 4.4-3 Estimated GHG Emissions during Construction

Year	Annual Emissions (MT of CO_2e)
2022	1,159
2023	3,026
2024	3,601
2025	3,511
2026	3,441
2027	3,376
2028	3,306
2029	821
Total	**22,241**
Amortized over 30 years	**741**

MT = metric tons; CO_2e = carbon dioxide equivalents

See Appendix D for GHG emissions modeling output files.

Operation of the reasonably foreseeable development facilitated by the Housing Element Update would generate GHG emissions associated with area sources (e.g., fireplaces, landscape maintenance), energy and water usage, vehicle trips, and wastewater and solid waste generation. As shown in Table 4.4-4, annual operational emissions generated by the 2,805 new residential units facilitated by the Housing Element Update combined with amortized construction emissions would total approximately 20,553 MT of CO_2e per year, or approximately 2.7 MT of CO_2e per service person per year, which would not exceed the locally-applicable, project-specific threshold of 3.3 MT of CO_2e per year. Therefore, impacts would be less than significant.

Table 4.4-4 Combined Annual GHG Emissions

Emission Source	Annual Emissions (MT of CO_2e per year)
Construction	**741**
Operational[1]	**19,812**
Area	684
Energy	2,627
Mobile	14,797
Solid Waste	720
Water	993
Total Emissions	**20,553**
Service Population (Residents)	7,545
Emissions per Service Person	**2.7**
Locally-Applicable, Project-Specific Efficiency Threshold (per Service Person)	3.3
Threshold Exceeded?	**No**

[1] Operational emissions are taken from Table 2.2, Mitigated Operational, in Appendix D to reflect that development facilitated by the Housing Element Update that is under three stories would include PV panels on rooftops.

Summary

Emissions associated with the Housing Element Update would result in approximately 2.7 MT of CO_2e per service person per year, which would not exceed the locally-applicable, project-specific threshold of 3.3 MT of CO_2e per service person per year. Therefore, the Housing Element Update would not generate GHG emissions that may have a significant impact on the environment. Impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

Threshold 2:	Would the Housing Element Update conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2 ADDITION, THE HOUSING ELEMENT UPDATE WOULD NOT CONFLICT WITH AN APPLICABLE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING GHG EMISSIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Several plans and policies have been adopted to reduce GHG emissions in the southern California region, including the State's 2017 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and local policies contained in the City's 2006 General Plan. The Housing Element Update's consistency with these plans is discussed in the following subsections. As discussed therein, the Housing Element Update would not conflict with plans and policies aimed at reducing GHG emissions. A less than significant impact would occur.

City of Claremont General Plan

As discussed in Section 4.4.2, *Regional and Local Regulations*, the 2006 General Plan includes several policies related to reducing GHG emissions. New housing units facilitated by the Housing Element Update would be required to comply with the California Building Energy Efficiency Standards and CALGreen, which would achieve energy conservation (Policies 5-13.5 and 5-13.7 from the Open Space, Parkland, Conservation, and Air Quality Element). Furthermore, housing units would be opted into the Clean Power Alliance by default, which would supply electricity from 50 percent clean, renewable energy, with the option to switch to 40 percent or 100 percent (Policies 5-14.2 and 5-18.4). These factors would minimize GHG emissions associated with electricity and natural gas consumption as well as solid waste disposal. Furthermore, as demonstrated in Table 4.4-4, per capita GHG emissions associated with the Housing Element Update would not exceed the locally-applicable, project-specific threshold that was determined based on the GHG reduction target contained in SB 32, which is more stringent than the GHG reduction target contained in AB 32. As a result, the Housing Element Update would be consistent with the GHG reduction policies of the 2006 General Plan.

2020-2045 SCAG RTP/SCS

On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (titled Connect SoCal). The SCAG 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by 8 percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. The 2016-2040 RTP/SCS includes ten goals with corresponding implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging

technology innovations, and supporting implementation of sustainability policies. The Housing Element Update's consistency with the 2020-2045 RTP/SCS is discussed in Table 4.4-5. As shown therein, the Housing Element Update would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS. Further, parts of Claremont are identified as Priority Growth Areas and some housing opportunity sites may be located in those areas.

Table 4.4-5 Housing Element Update Consistency with Applicable SCAG 2020-2045 RTP/SCS Strategies

Reduction Strategy	Project Consistency
Focus Growth Near Destinations & Mobility Options. ▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations ▪ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets ▪ Plan for growth near transit investments and support implementation of first/last mile strategies ▪ Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses ▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods ▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) ▪ Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking)	**Consistent**. The proposed housing opportunity sites primarily recommend housing production on vacant and underutilized sites near major transportation corridors, such as the Claremont Metrolink station, and within biking and walking distance of existing residential and commercial development, and the Claremont Colleges. In addition, the Housing Element Update would rezone underutilized sites for increased density, encourage mixed-use land use, and continue facilitation of ADUs, which would incentivize additional infill development. Therefore, the Housing Element Update would emphasize land use patterns that facilitate multimodal access to work, educational, and other destinations; prioritize infill and redevelopment of underutilized land to accommodate new growth; and increase connectivity in existing neighborhoods. Further, the proximity to the Claremont Colleges would encourage walking and bicycling to campuses instead of a reliance on single-occupancy passenger automobiles.
Promote Diverse Housing Choices. ▪ Preserve and rehabilitate affordable housing and prevent displacement ▪ Identify funding opportunities for new workforce and affordable housing development ▪ Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply ▪ Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of GHGs	**Consistent**. The Housing Element Update demonstrates a pathway to achieving the City's RHNA allocation, which would include a rezoning program to better utilize underutilized zoning areas, encourage mixed-use land use, and update projections for ADUs. The Housing Element Update also includes an updated housing site inventory, which proposes sites along major transportation corridors and in proximity to existing residential and commercial development, which would minimize GHG emissions associated with vehicle trips. Therefore, the Housing Element Update would promote diverse housing choices that support the reduction of GHGs.

Reduction Strategy	Project Consistency
Leverage Technology Innovations. ▪ Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space ▪ Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments ▪ Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Consistent.** Residential projects facilitated by the Housing Element Update would be required to comply with State and local regulations, including the latest California Building Energy Efficiency Standards and CALGreen, related to the provision of electric vehicle supply equipment for parking spaces and the installation of photovoltaic solar panels on all low-rise residential buildings (three stories or less) that generate an amount of electricity equal to expected electricity usage. Therefore, the Housing Element Update would leverage technology innovations.
Support Implementation of Sustainability Policies. ▪ Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions ▪ Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations ▪ Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space ▪ Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies ▪ Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region ▪ Continue to support long range planning efforts by local jurisdictions ▪ Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Consistent.** The Housing Element Update would be consistent with the GHG reduction policies of the City's 2006 General Plan (discussed above) and would be constructed in accordance with the California Building Energy Efficiency Standards and CALGreen. Therefore, the Housing Element Update would support implementation of sustainability policies.

Reduction Strategy	Project Consistency
Promote a Green Region. ▪ Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards ▪ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration ▪ Integrate local food production into the regional landscape ▪ Promote more resource efficient development focused on conservation, recycling and reclamation ▪ Preserve, enhance, and restore regional wildlife connectivity ▪ Reduce consumption of resource areas, including agricultural land ▪ Identify ways to improve access to public park space	**Consistent**. The housing site inventory update primarily includes infill development sites for housing units. In addition, the Housing Element Update would rezone underutilized sites for increased density, encourage mixed-use land use, and continue facilitation of ADUs, which would incentivize additional infill development. Projects facilitated by the Housing Element Update would be required to install photovoltaic solar panels on all low-rise residential buildings (three stories or less) that generate an amount of electricity equal to expected electricity usage in accordance with the California Building Energy Efficiency Standards. Therefore, the Housing Element Update would support development of a green region.

Source: SCAG 2020

2017 Scoping Plan

The principal state plans and policies are the California Global Warming Solutions Act of 2006, and the subsequent legislation, SB 32. The quantitative goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. Pursuant to the SB 32 goal, the 2017 Scoping Plan was created to outline goals and measures for the state to achieve the reductions. The 2017 Scoping Plan's strategies that are applicable to the Housing Element Update include reducing fossil fuel use, energy demand, and VMT; maximizing recycling and diversion from landfills; and increasing water conservation. The Housing Element Update would be consistent with these goals as the City would require individual projects to comply with the latest Title 24 Green Building Code and Building Efficiency Energy Standards and install energy-efficient LED lighting, water-efficient faucets and toilets, water efficient landscaping and irrigation, and EV charging stations. Further, projects facilitated by the Housing Element Update would be served by Clean Power Alliance, whereby the City's default electricity option is 50 percent clean, renewable energy with the option to increase to 100 percent. Furthermore, the Housing Element Update primarily recommends housing production on vacant and underutilized sites near transportation corridors and within biking and walking distance of existing residential and commercial development. This proximity would facilitate the use of walking, biking, and transit to access destinations, which would reduce future residents' VMT and associated fossil fuel usage. Therefore, the Housing Element Update would be consistent with the 2017 Scoping Plan.

The Safety Element Update includes a goals and policies related to adaption to extreme heat and climate change. Policies address protecting residents during extreme heat events and incorporating climate change considerations into infrastructure planning. Therefore, no impact related to consistency with the 2017 Scoping Plan would occur.

Summary

The Housing Element Update would be consistent with the GHG emission reduction policies of the 2006 General Plan, the SCAG 2020-2045 RTP/SCS, and the CARB 2017 Scoping Plan. Therefore, impacts related to GHG emissions would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

4.4.4 Cumulative Impacts

The geographic scope for related projects considered in the cumulative impact analysis for GHG emissions is global because the impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources. Therefore, GHG emissions and climate change are, by definition, cumulative impacts. As discussed under Section 4.4.1, *Potential Effects of Climate Change*, the adverse environmental impacts of cumulative GHG emissions, including sea level rise, increased average temperatures, more drought years, and more large forest fires, are already occurring. As a result, cumulative impacts related to GHG emissions are significant. Thus, the issue of climate change involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. Refer to Impacts GHG-1 and GHG-2 for a detailed discussion of the impacts of the Housing Element Update related to climate change and GHG emissions. As discussed therein, the Housing Element Update would be consistent with the GHG emission reduction policies of the City's General Plan, the SCAG 2020-2045 RTP/SCS, and the CARB 2017 Scoping Plan. Furthermore, emissions associated with the Housing Element Update would be approximately 2.9 MT of CO_2e per service person per year, which would not exceed the locally-applicable, project-specific threshold of 3.3 MT of CO_2e per service person per year. Therefore, the contribution of the Housing Element Update to the cumulative impact of climate change would not be cumulatively considerable.

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4.5 Population and Housing

This section evaluates potential impacts to population and housing that could arise from the implementation of the Housing Element Update.

4.5.1 Setting

Population

The City of Claremont had a population of 37,266 residents in 2020, representing 0.37 percent of the Los Angeles County population of 10,014,009 (City of Claremont 2021). The City's population increased by 2,340 persons, or 6.7 percent, from the 2010 population of 34,926 (City of Claremont 2021). In comparison, the County of Los Angeles population grew by approximately 2 percent over the same period (City of Claremont 2021). Neighboring jurisdictions such as Ontario, Upland, and Chino Hills experienced a similar increase in growth during this time.

As shown in Table 4.5-1, the City has experienced steady population growth over the last three decades, with the highest growth rate in that period during 1990-2000. In 1990, the City had 32,503 residents. From 1990 to 2000, Claremont saw an average growth of 150 people per year, or 0.5 percent annual growth rate (City of Claremont 2021). From 2010-2020, the annual growth rate was an average of about 234 new residents per year, or 0.7 percent per year.

Table 4.5-1 City of Claremont Historical Population Growth

	2000	2010	2020
Population	33,998	34,926	37,266
Difference from Previous Decade[1]	1,495	928	2,340
Percent Total Increase from Previous Decade[1]	4.5	2.7	6.7
Percent Average Annual Growth Rate during Previous Decade[1]	0.5	0.3	0.7

[1] Difference from 1990 to 2000 for the year 2000.

Source: City of Claremont 2021

In terms of future trends, the Southern California Association of Governments (SCAG) Demographics and Growth Forecast projects an increase of 2,534 persons (6.8 percent), in the City's population over the next 24 years, for an estimated 2045 population of 39,800 residents (SCAG 2020a). This forecasted growth represents approximately 106 new residents per year. Based on this rate, the City is expected to add approximately 1,060 new residents by 2030, bringing the total Claremont population to 38,326. SCAG growth projections are based on the Claremont 2006 General Plan and previous Housing Element.

According to the 2019 five-year American Community Survey, the majority of residents in Claremont identify as White (approximately 70 percent), and the median age in the City (39.5) is higher than the median age for Los Angeles County as a whole (36.5) (U.S. Census 2019a, City of Claremont 2021).

Housing

In 2019, there were 12,488 housing units in the City. In Claremont, 9,773 (78.2 percent) were detached or attached single-family units, and 2,715 (21.7 percent) were multi-family units. Less than one percent were mobile homes[1] (City of Claremont 2021). As a comparison, for Los Angeles County, multi-family housing comprised 43.3 percent of housing units in 2019 (City of Claremont 2021). A total of 5,446 City residents (15.3 percent) live in group quarters, due to the prevalence of college student housing in the City (Department of Finance [DOF] 2021).

Housing units in the City also include accessory dwelling units (ADUs). In February 2020, the City Council adopted Ordinance 2020-02 that amends Chapter 16.333 of the City's Municipal Code to comply with the latest State laws governing ADUs and Junior ADUs. ADU construction is allowed to be built by-right for units up to 850 square feet for one-bedrooms and 1,000 square feet for two bedrooms.

In 2019, the City's housing vacancy rate was 1.2 percent, lower than the County's vacancy rate of 2.4 percent for renters and 1 percent for owners. The average household size in Claremont is 2.69 persons, lower than the County's average household size of 2.99 (DOF 2021).

Table 4.4-2 provides the number of housing units in the City in 2000, 2010, and 2019. The pace of housing development was approximately 3 units per year on average from 2000 to 2010 but increased to 91 units per year from 2010 to 2019 (City of Claremont 2021).

Table 4.4-2 City of Claremont Housing Growth

	2000	2010	2019
Housing Units	11,577	11,606	12,511
Difference from Previous Decade	–	25	905
Percent Total Increase from Previous Decade	–	0.2	7.8
Percent Average Annual Growth Rate during Previous Decade	–	>0.1	0.8

Source: U.S. Census 2000, DOF 2021

The U.S. Department of Housing and Urban Development (HUD) defines cost-burdened families as those "who pay more than 30 percent of their income for housing" and "may have difficulty affording necessities such as food, clothing, transportation, and medical care." Severe rent burden is defined as paying more than 50 percent of one's income on rent (HUD 2014). In 2019, 50 percent of renters and 16.9 percent of owners used more than 30 percent of household income on housing costs (City of Claremont 2021).

Approximately 2.2 percent of renters and 0.8 percent of owners in Claremont have been identified as overcrowded (either overcrowded or severe overcrowded), in contrast to the 15.6 percent of renters and 6.4 percent of owners identified countywide as living in overcrowded conditions (SCAG 2020b, City of Claremont 2021).

[1] Mobile homes are limited to the northern part of the City between Foothill Boulevard and Foothill Freeway, and in the hills in the north of Claremont. These homes are likely manufactured or prefabricated homes that are dispersed and not concentrated in a mobile home park.

Employment

The SCAG Demographics and Growth Forecast projects a 7.4 percent increase in Claremont's employment by 2045, for an estimated 20,200 jobs in 2045 as compared to 18,800 jobs in 2016 (SCAG 2020a). SCAG's Local Profile for Claremont further breaks down employment by sector. As of 2018, education was the largest employment sector at 53.2 percent, followed by leisure (9.5 percent), professional (8.3 percent) and retail (6.6 percent) (SCAG 2019). While the percentage of jobs in the education sector increased between 2007 and 2017, professional and retail sectors experienced a decrease in employment. Based on the 2019 American Community Survey data Table DP03, the labor force participation rate in the City was 60.6 percent, which is lower than the County's rate of 65.3 percent. The City's unemployment rate in 2019 was 5.4 percent, which is slightly higher than the County's unemployment rate of 5.0 percent (U.S. Census 2019b).

Approximately 91.1 percent of Claremont residents commute outside the City, an indication of the shortage of local employment opportunities for the community's workforce (SCAG 2019). Simultaneously, 87.9 percent of workers within Claremont commute from outside the City, indicating a shortage of affordable housing. Similarly, Claremont residents face long commutes, with an average travel time of 27 minutes in 2018 with 37 percent of the City's employed residents commuting 30 minutes or more to work (SCAG 2019). As shown in Figure 4.5-1, the highest concentration of employment in Claremont is located in the southern portion of the City near Interstate 10, centered around the Claremont Colleges.

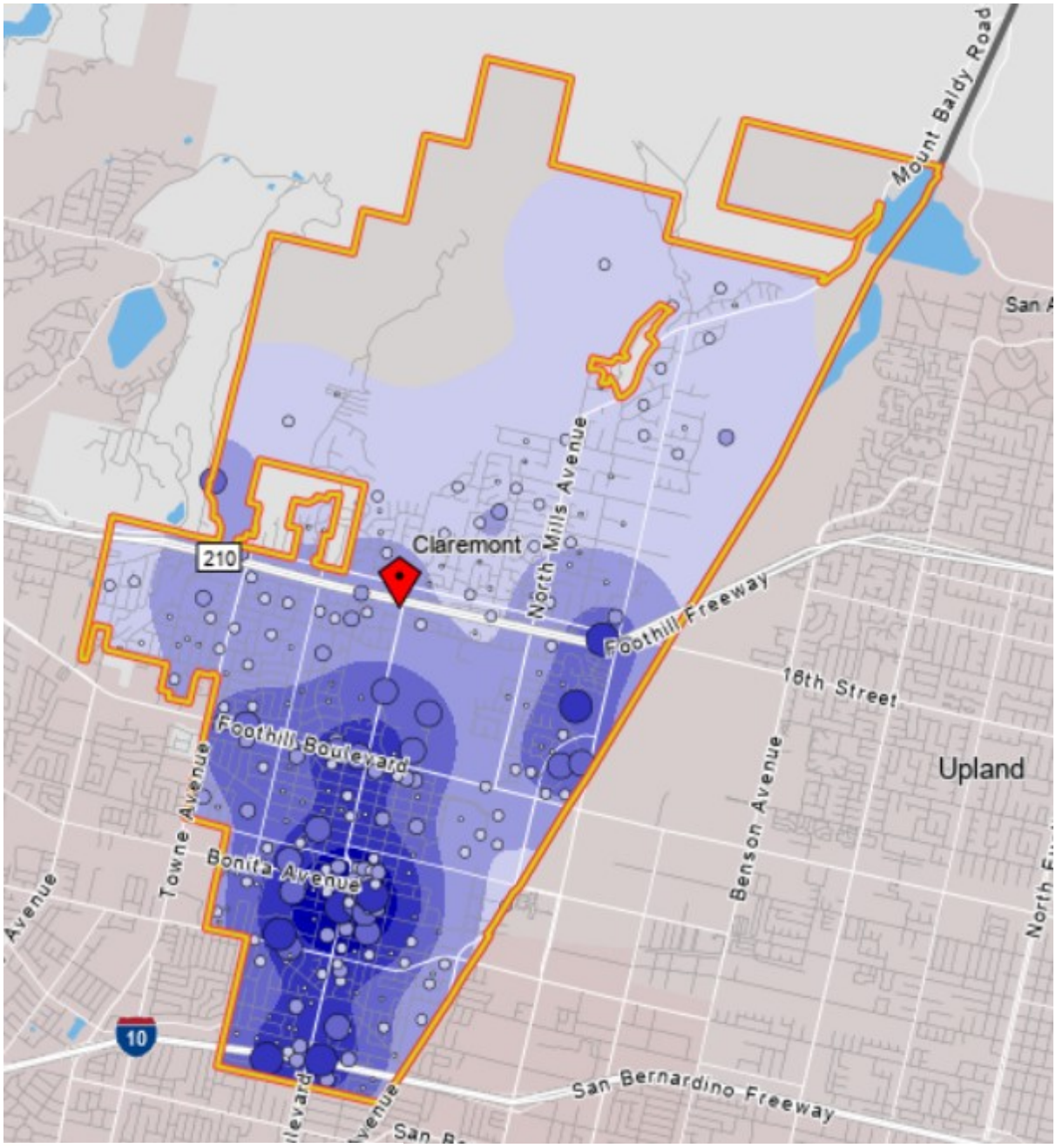
More than 88 percent of jobs (9,516) in the City are held by residents from other jurisdictions, while only 12 percent of jobs (1,304) inside the City are held by City residents. Further, 91 percent of employed City residents (13,358) commute outside the City to work (U.S. Census 2018).

Claremont had an estimated job count of 18,849 in 2017 (SCAG 2019). Using the SCAG jobs estimate to capture all jobs, the jobs-to-housing ratio is roughly 18,849 jobs / 12,406 housing units (in 2017), or 1.5. This indicates that there are fewer housing units than jobs and may serve as a barrier for employees in Claremont to become residents.

The 2019 median household income in the City was $101,420, which is higher than the County's median household income of $68,044. Approximately 6.6 percent of families and people had incomes classified as below the poverty rate, compared to 13.4 percent for the County (U.S. Census 2021a, 2021b).

Claremont, in summary, has a higher degree of single-family housing than the County as a whole, is considered jobs-rich compared to the number of housing units, and has a higher median household income and lower poverty rate than Los Angeles County, with a large in- and out- commuting pattern.

Figure 4.5-1 Distribution and Number of Jobs in 2018



Source: U.S. Census 2018: Claremont Work Area Profile Analysis (https://onthemap.ces.census.gov/)

4.5.2 Regulatory Setting

The following section summarizes regulations that pertain to population and housing.

State

Housing Element Law: California Government Code Section 65584(a)(1)

Pursuant to California Government Code Section 65584(a)(1), the California Department of Housing and Community Development (HCD) is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's planning body known as a "council of governments" (COG), SCAG being the COG serving the Southern California area. HCD prepares an initial housing needs assessment and then coordinates with each COG to arrive at the final regional housing needs assessment. To date, there have been five previous housing element update "cycles." California is now in its sixth "housing-element update cycle." The SCAG Regional Housing Needs Assessment (RHNA) and the City's General Plan Housing Element are discussed further below.

The Sustainable Communities and Climate Protection Act of 2008 (SB 375, Steinberg)

Senate Bill (SB) 375 focuses on aligning transportation, housing, and other land uses to achieve regional greenhouse gas (GHG) emission reduction targets established under the California Global Warming Solutions Act, also known as Assembly Bill (AB) 32. SB 375 requires Metropolitan Planning Organizations (MPO) to develop a Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan (RTP), with the purpose of identifying policies and strategies to reduce per capita passenger vehicle-generated GHG emissions. As set forth in SB 375, the SCS must: (1) identify the general location of land uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period; (3) identify areas within the region sufficient to house an eight-year projection of the regional housing need; (4) identify a transportation network to service the regional transportation needs; (5) gather and consider the best practically available scientific information regarding resource areas and farmland in the region; (6) consider the state housing goals; (7) establish the land use development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, will reduce GHG emissions from automobiles and light-duty trucks to achieve GHG emission reduction targets set by the California Air Resources Board (CARB), if there is a feasible way to do so; and (8) comply with air quality requirements established under the Clean Air Act.

The City of Claremont is located in the jurisdiction of SCAG, a Joint Powers Agency established under California Government Code Section 6502 et seq. Pursuant to federal and state law, SCAG serves as a Council of Governments, a Regional Transportation Planning Agency, and the MPO for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. SCAG is responsible for preparing the RTP/SCS and RHNA in coordination with other State and local agencies. These documents include population, employment, and housing projections for the region and its 15 subregions.

Existing law requires local governments to adopt a housing element as part of their general plan and update the housing element every four to eight years. SB 375 requires the RHNA to allocate housing units within the region in a manner consistent with the development pattern adopted by the SCS.

On September 3, 2020, SCAG adopted its Connect SoCal: The 2020-2045 RTP/SCS, which is an update to the previous 2016 RTP/SCS (SCAG 2020a). Using growth forecasts and economic trends, the RTP/SCS provides a vision for transportation throughout the region for the next 25 years that achieves the statewide reduction targets and in so doing identifies the amount and location of growth expected to occur within the region.

Housing Crisis Act of 2019 – (SB 330, Skinner)

The Housing Crisis Act of 2019 (SB 330) seeks to speed up housing production in the next half decade by eliminating some of the most common entitlement impediments to the creation of new housing, including delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. The bill is in effect as of January 1, 2020 and expires on January 1, 2025.

Fair Employment and Housing Act (FEHA)

The FEHA of 1959 (Government Code Section 12900 et seq.) prohibits housing discrimination on the basis of race, color, religion, sexual orientation, marital status, national origin, ancestry, familial status, disability, or source of income.

The Unruh Civil Rights Act

The Unruh Civil Rights Act of 1959 (Civ. Code Section 51) prohibits discrimination in "all business establishments of every kind whatsoever." The provision has been interpreted to include businesses and persons engaged in the sale or rental of housing accommodations.

AB 1763

AB 1763, effective January 1, 2020, amends the State Density Bonus Law (Section 65915) to allow for taller and denser 100 percent affordable housing developments, especially those near transit, through the creation of an enhanced affordable housing density bonus.

Housing Element Law: California Government Code Section 65583(c)(7)

Section 65583 of the California Government Code requires cities and counties to prepare a housing element, as one of the state-mandated elements of the General Plan, with specific direction on its content. Pursuant to Section 65583(c)(7), the Housing Element must develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households.

Housing Element Law: California Government Code Section 65583.2(g)(3)

Pursuant to California Government Code Section 65583.2(g)(3), the Housing Element is required to include a program to impose housing replacement requirements on certain sites identified in the inventory of sites. Under these requirements, the replacement of units affordable to the same or lower income level, consistent with those requirements set forth in State Density Bonus Law (Government Code Section 65915(c)(3)), would be required.

Relocation Assistance: California Government Code Section 7261(a)

Section 7261(a) of the California Government Code requires that programs or projects undertaken by a public entity must be planned in a manner that (1) recognizes, at an early stage in the planning of the programs or projects and before the commencement of any actions which will cause displacements, the problems associated with the displacement of individuals, families, businesses, and farm operations, and (2) provides for the resolution of these problems minimize adverse impacts on displaced persons and to expedite program or project advancement and completion. The displacing agency must ensure the relocation assistance advisory services are made available to all persons displaced by the public entity. If the agency determines that any person occupying property immediately adjacent to the property where the displacing activity occurs is caused substantial economic injury as a result of the displacement, the agency may also make the advisory services available to that person.

Regional

Regional Housing Needs Assessment

SCAG prepares the RHNA mandated by State law so that local jurisdictions can use this information during their periodic updates of the General Plan Housing Element. The RHNA identifies the housing needs for very low income, low income, moderate income, and above moderate-income groups, and allocates these targets among the local jurisdictions that comprise SCAG. The RHNA addresses existing and future housing needs based on the most recent U.S. Census, data on forecasted household growth, historical growth patterns, job creation, household formation rates, and other factors. The need for new housing is distributed among income groups so that each community moves closer to the regional average income distribution. The most recent RHNA allocation, the 6th Cycle Final RHNA Allocation Plan, was adopted by SCAG's Regional Council on March 4, 2021. The City of Claremont was assigned a RHNA of 1,711 units for the 2021 to 2029 planning period (SCAG 2021). This allocation identifies housing needs for the planning period between October 2021 and October 2029. Local jurisdictions are required by State law to update their General Plan Housing Elements based on the most recently adopted RHNA allocation.

Local

City of Claremont General Plan

The 2006 General Plan, adopted in 2006 and last updated in 2019, was prepared pursuant to State law to guide future development and to identify the community's environmental, social, and economic goals and functions as a blueprint that defines how the City will evolve. The 2006 General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while at the same time integrating a range of State-mandated elements including Land Use, Community Mobility, Noise, Safety, Housing, and Open Space.

The Housing Element of the General Plan is prepared pursuant to State law and provides planning guidance in meeting the housing needs identified in SCAG's RHNA. The Housing Element identifies the City's housing conditions and needs; establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy. The 2018-2021 Housing Element was adopted by the City Council in July 2019 (City of Claremont 2019).

Claremont Municipal Code

Zoning regulations provide for the types and densities of residential and other uses permitted in each of the City's zones. Zoning in the City establishes the maximum allowable development in a zone. Zoning also includes height limitations and other development standards which together regulate setbacks, building heights, floor area ratios (FAR), open space and parking for each parcel within the City, as applicable.

4.5.3 Impact Analysis

Methodology and Significance Thresholds

The following thresholds of significance were developed based on the *CEQA Guidelines*, specifically, Appendix G. The Housing Element Update would have a significant impact concerning population and housing if it would:

1. 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).

Issues Not Evaluated Further

Displacement of Substantial People or Housing (Threshold 2)

The Initial Study for the Housing Element Update determined that development facilitated by the Housing Element Update would more than offset displacement of existing housing that may foreseeably occur (please see discussion in Appendix A). Impacts were determined to be less than significant. Thus, the threshold related to this subject is not evaluated further in this EIR.

Project Impacts and Mitigation Measures

Threshold 1:	Would the Housing Element Update 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)?

Impact PH-1: REASONABLY FORESEEABLE DEVELOPMENT UNDER THE HOUSING ELEMENT UPDATE WOULD BE CONSISTENT WITH THE 2021-2029 RHNA, BUT GREATER THAN SCAG 2020 RTP/SCS POPULATION FORECASTS. THE HOUSING ELEMENT UPDATE WOULD UPDATE THE CLAREMONT 2006 GENERAL PLAN TO BE CONSISTENT WITH THE RHNA, AND SCAG'S NEXT RTP/SCS WOULD INCORPORATE THE CITY'S HOUSING ELEMENT UPDATES. THE HOUSING ELEMENT UPDATE WOULD NOT INCLUDE ROADWAYS OR OTHER INFRASTRUCTURE. THUS, THE HOUSING ELEMENT UPDATE WOULD NOT INDUCE UNPLANNED GROWTH DIRECTLY OR INDIRECTLY, AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

For purposes of this analysis, "substantial" unplanned population growth is defined as growth exceeding that forecast in existing local and regional plans, including the 2021-2029 RHNA, the Claremont 2006 General Plan, and the SCAG 2020 RTP/SCS.

The Housing Element Update would increase the development capacity of the City through the rezoning of certain selected parcels to meet the City's final RHNA allocation for the 2021 to 2029

planning period. As noted in Section 2.0, *Project Description*, the development potential accommodated by the changes to the land use designations would be at most 2,805 housing units.

Development would be facilitated through the rezoning of selected sites in the City limits to accommodate new or higher residential density and provide an additional buffer capacity above the RHNA. Rezoning of sites for higher density or mixed-use would involve currently developed sites in areas that are generally located near existing residential uses, transit corridors, job centers, neighborhood services, and amenities. Further, vacant sites currently zoned residential would be developed. Additionally, ADU development would be utilized, as they can be approved by-right for one-bedroom units less than 850 square feet and two-bedroom units less than 1,000 square feet. ADUs, by their nature being an accessory to a primary dwelling unit, would be infill residences and not necessitate the expansion of current residential land uses. These housing development strategies would accommodate the densities appropriate for the 6th Cycle RHNA allocation.

The Plan Area contained 12,511 housing units in 2019. The Plan Area population is estimated at 37,266 residents in 2020. The Housing Element Update would accommodate up to 2,805 additional housing units, which would add an estimated 7,545 additional persons, based on 2.69 persons per household (2,805 housing units x 2.69 persons per household). This would bring the 2029 Plan Area population to 44,811, a 20.2 percent increase over existing conditions.

Comparison to the Claremont 2006 General Plan

The 2006 General Plan Land Use, Community Character, and Heritage Preservation Element anticipated facilitating a maximum buildout development for an estimated additional 5,248 residents, or a population of 42,584 (City of Claremont 2005b). Therefore, the 2029 population forecast for the Plan Area under the Housing Element Update would exceed the 2006 General Plan forecast by 3,013 residents. The maximum number of housing units forecast under the Housing Element Update by 2029 would be 15,316 units in the City. This would exceed the 2006 General Plan 2029 forecasted capacity of 13,422 units by 1,894 units. Table 4.4-3 shows the difference between the forecasts for the Housing Element Update and the 2006 General Plan. The Housing Element Update would accommodate development of residential units that would be 14.1 percent above the 2006 General Plan capacity forecast, which would result in a City population that would be 5.2 percent above the 2006 General Plan forecast.

Table 4.4-3 Comparison of Claremont General Plan and Housing Element Update Projections

	Existing Conditions (2019)	Housing Element Update Growth Accommodation	2029 Plan Area Conditions with Housing Element Update	Claremont 2006 General Plan Projections	Difference	Percent Difference Over 2006 General Plan
Housing Units	12,511	2,805 units	15,316	13,422	1,894	14.1
Population	37,266	7,545 residents	44,811	42,584	2,227	5.2

Sources: City of Claremont 2005b, 2021

Comparison to the SCAG 2020 RTP/SCS Forecast

SCAG's 2020 RTP/SCS only provides 2045 development projections, so the projected 2029 population and housing numbers were interpolated from the 2045 projections using the average

percent growth per year for the City. SCAG's 2020 RTP/SCS forecasts Claremont's population to grow from 36,200 to 39,800 residents between 2016 and 2045. The difference of 3,600 residents is equal to 9.9 percent total growth. Divided by 29 years, SCAG forecasts an average annual growth rate of approximately 0.34 percent.

To obtain the SCAG RTP/SCS 2029 forecast for the Plan Area, the 0.34 percent annual growth rate was applied to the Plan Area population and multiplied by nine years (2020-2029). This number was added to the baseline 2020 population to obtain the 2029 forecasted population. The Plan Area's 2020 population is 37,266. Applying the SCAG RTP/SCS forecast growth rate for the City, the Plan Area population would increase by approximately 1,140 residents by 2029 (0.0034 x 37,266 x 9 years) for a forecasted 2029 population of 38,406.

SCAG's 2020 RTP/SCS forecasts the City's housing stock to grow from 11,800 housing units in 2016 to 13,700 housing units by 2045, an increase of 1,900 units from 2016, or 16.1 percent. Divided by 29 years, SCAG forecasts an average annual growth rate of the City's housing stock of approximately 0.56 percent.

As of 2019 the Plan Area has 12,511 housing units. Using the same methodology as above, the average annual growth rate is applied and multiplied by nine to approximate the number of forecast housing units in the Plan Area. Under the SCAG RTP/SCS 2029 forecast, the Plan Area would add 701 housing units by 2029 (0.0056 x 12,511 x 10) for a total of 13,212 housing units in 2029.

Table 4.4-4 shows the difference between the growth forecasts for the Housing Element Update and the SCAG RTP/SCS 2029 forecast for the Plan Area under 2029 conditions. The population growth under the Housing Element Update would exceed SCAG's population growth forecast by 16.7 percent and the housing growth forecast under the Housing Element Update would exceed SCAG's forecast by 15.9 percent.

Table 4.4-4 Comparison of SCAG RTP/SCS Forecast and Housing Element Update Projections

	Existing Conditions (2019/2020)	Housing Element Update Growth Accommodation	2029 Plan Area Conditions with Housing Element Update	SCAG 2029 Forecast for City of Claremont	Difference	Percent Difference Over SCAG RTP/SCS Forecast
Housing Units	12,511	2,805 units	15,316	13,212	2,104	15.9
Population	37,266	7,545 residents	44,811	38,406	6,405	16.7

Sources: City of Claremont 2021, SCAG 2020a

Conclusion

The Housing Element Update would be consistent with State requirements for the RHNA. Although the Housing Element Update would facilitate development beyond what is forecast in both the 2006 General Plan and SCAG's 2020 RTP/SCS, it would bring the forecasts for the 2006 General Plan and the RTP/SCS into consistency since the next iteration of the RTP/SCS will be updated to reflect new forecasts for each city in the region.

The State requires that all local governments plan to meet the housing needs of their communities. Given that the State is currently in an ongoing housing crisis due to an insufficient housing supply (SCAG 2020c), the additional units under the Housing Element Update would further assist in

addressing the existing crisis and meeting the housing needs of the Claremont community. Furthermore, the Housing Element Update would first be submitted to the HCD for review and approval to ensure that it would address the housing needs and demands of the City. Approval by the HCD would ensure that population and housing growth under the Housing Element Update would not be substantial or unplanned.

The increase in affordable housing units as proposed under the Housing Element Update would provide housing opportunities in proximity to jobs for those employed in the City that meet these household income categories. Since only 12.1 percent of employees in Claremont also live within the City, affordable housing units would provide opportunities for a better balance of jobs and housing that reduces regional vehicle miles traveled (VMT) and associated impacts related to transportation, air quality, and GHG emissions.

The estimate of 2,805 new residential units is the maximum number of units the City expects to accommodate. For the purposes of CEQA analysis, the population and housing analysis assesses a higher range of development potential, full buildout of the Housing Element Update, to fully analyze potential impacts if development occurs at a rate higher than it has historically. However, the Housing Element Update in and of itself does not develop residential units because it is a plan. Therefore, the induced growth discussed previously is the highest number of units possible under the Housing Element Update and does not necessarily reflect how much housing would be built in reality.

The future housing development facilitated by the Housing Element Update is intended to be dispersed throughout the community to create managed levels of growth in specific areas. As discussed in Section 4.8, *Utilities and Service Systems*, the City is mostly developed and water, wastewater treatment, storm water drainage, electricity, natural gas, and telecommunications facilities that support existing infrastructure would serve new development facilitated by the Housing Element Update. The Housing Element Update would not create new roads and would not indirectly induce unplanned population growth. Therefore, the Housing Element Update would not induce substantial unplanned population growth, either directly or indirectly, and impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

4.5.4 Cumulative Impact Analysis

Cumulative population and housing impacts consider residential and nonresidential development and growth in the Plan Area. The City is expected to grow in population and housing through 2029. As shown in Table 4.4-3, the Plan Area population would be expected to grow by 7,545 residents by 2029 with development facilitated by the Housing Element Update.

Inducement of Substantial Population Growth

The Housing Element Update would accommodate all projected citywide population and housing growth through 2029. Employment growth associated with potential commercial development on mixed-use sites would be mostly filled by the existing workforce and would not induce substantial population growth. Therefore, cumulative impacts relating to population and housing would be the same as project impacts under Impact 4.4-1 and would be less than significant. The Housing Element

Update incorporates regional growth anticipated by SCAG's RHNA projections and thus considers cumulative growth.

Displacement of People and Housing

Implementation of the Housing Element Update would accommodate the City's forecasted population and housing demand through 2029. The Housing Element Update would result in an overall net increase of housing units in the City, including affordable housing, and would not result in the displacement of people or housing. Other jurisdictions in the region are updating their respective Housing Elements and have similar impacts related to displacement, but they would contain programs and policies to provide housing for low-income and special needs populations. Therefore, the Housing Element Update would not contribute to cumulative impacts.

4.6 Transportation

This section analyzes the potential impacts of the project on transportation, including conflicts with transportation plans, vehicle miles traveled (VMT), project-related transportation hazards, and emergency access, associated with the implementation of the proposed Housing Element Update.

4.6.1 Setting

The existing vehicular circulation, bicycle and pedestrian facilities, and transit services in the project vicinity are described below.

Circulation System

Overview

Claremont is served by a circulation system that facilitates multimodal travel including walking, bicycling, public transportation, and motor vehicles, and includes a network of freeways, highways, local streets, and bicycle facilities. The 2006 General Plan Circulation Element discussed in greater depth in *Regulatory Setting*, contains definitions, goals and objectives, and regulatory requirements for a variety of roadway classifications that make up the City's roadway system.

Regional

Regional access to the Plan Area is provided by freeways, including Interstate (I-) 210 and I-10, the design, operation, and maintenance of which is under the jurisdiction of the California Department of Transportation (Caltrans).

Principal Arterial Roadways

The City contains public streets that accommodate motorized vehicles, including private motorized vehicles, taxis, freight vehicles, and transit vehicles. Arterial streets facilitate movement of large volumes of traffic from cities in locations where freeways do not provide easy access. The following is a description of some arterial roadways in Claremont.

- **Baseline Road** is an east-west arterial that extends across the northern boundary of Claremont from its intersection with Foothill Boulevard in the west to the city of Highland, east of San Bernardino County. It parallels I-210.
- **Foothill Boulevard** is an arterial roadway in the northern part of the city that runs in an east/west direction from the city of Pasadena to San Bernardino County. Several years ago, the City took jurisdiction over from Caltrans which is also known as State Route (SR) 66. In 2020 the City completed a major reconstruction of Foothill Boulevard transforming it into a "complete street" and "green street", accommodating multi modal travel accommodations with approximately $17 Million dollars in grant monies.
- **Arrow Highway** is an east/west arterial roadway on the southern edge of Claremont paralleling I-10. Arrow Highway forms a buffer between business park uses to the north and single-family residential areas to the south. East of Indian Hill Boulevard, residential uses are on both sides of the street. The City will be embarking on engineering studies of Arrow Highway to also transform this highway into a "complete street" and "green street". Over

the next several years it is anticipated that capital improvement projects along Arrow Highway will be constructed for safety and livability improvements.

- **Towne Avenue** is a north/south arterial on the western edge of Claremont, between Claremont and Pomona. The intersection with Foothill Boulevard is a western gateway for Claremont. The City will be starting a capital improvement project to improve Towne Avenue with complete street and green street measures in 2022.
- **Indian Hill Boulevard** is the central north/south roadway through Claremont.

Collector Streets

Collector streets serve as intermediate routes handling traffic between arterial roadways and local streets. Collectors are designed primarily to move traffic, but they also provide access to abutting properties. Traffic calming and complete street measures will be considered for some segments of collector streets, where deemed appropriate and when funding sources are identified. Some collector streets in Claremont include the following:

- Radcliffe Drive
- Scripps Drive
- Sixth Street
- Sumner Avenue
- Williams Avenue
- Bonita Avenue
- Mountain Avenue
- Mills Avenue
- Padua Avenue.

a. Transit Access and Circulation

The Claremont Metrolink Transit Center at First Street and Harvard Street is served by Foothill Transit local bus lines, Metrolink trains, local Dial-a-Ride service, and Amtrack ThruWay buses.

Metrolink

The Los Angeles Metrolink provides regional train service on the San Bernardino Line from the Claremont station at 201 West First Street to the San Bernardino Station in the east and Union Station in downtown Los Angeles.

L Line

The L Line is a 31-mile light rail line that links East Los Angeles to Union Station before heading north into the San Gabriel Valley where it currently terminates at the APU/Citrus College stop in Azusa. It is planned for eastward extension to the Montclair Metrolink Station, with a stop at the Claremont Metrolink Station (LA Metro 2021). The extension segment from APU/Citrus College to Pomona is fully funded and under construction, however the segment from Pomona terminating in Montclair has not yet received funding. The Metro Board approved the extension in 2019 and the line is under construction with an estimated opening date in 2027 (Chiland 2017).

Foothill Transit

Foothill Transit provides public transportation services throughout eastern Los Angeles County and into parts of San Bernardino County (Foothill Transit 2021). Foothill Transit offers Line 292 within Claremont, with stops at Park West High School, Pomona Civic Center, Pomona Library, Garey High School, Historical Society of Pomona, Pomona Catholic High School, Pomona High School, Pomona Valley Hospital Medical Center, Claremont High School, Claremont Botanic Garden, Claremont Colleges, Claremont Village, and Montclair Plaza.

Pomona Valley Transportation Authority

Pomona Valley Transportation Authority (PVTA) is the community transit provider for the Pomona Valley providing specialized transportation services that allow riders to travel throughout and between Claremont, La Verne, Pomona, and San Dimas. PVTA operates through a voluntary agreement of these four cities, which contribute their Proposition A local sales tax funds as the primary source of revenue for PVTA. Each city determines the services they will participate in and the level of service to be provided. Claremont participates in the following services:

Claremont Dial-a-Ride is a curb-to-curb, general public, shared, Dial-a-Ride service operated by PVTA providing transportation within the city and to specified destinations outside Claremont.

Group Van Services are operated by PVTA on an advanced-reservation or subscription basis to groups of six or more individuals traveling to the same destination. Group transportation is available in Claremont and the area covered by the Claremont Unified School District plus other destinations approved by the PVTA.

Get About provides transportation services to registered senior residents and disabled persons of any age. Get About operates in Claremont, La Verne, Pomona, and San Dimas, and to selected destinations in adjacent areas.

Non-Motorized Transportation

In Claremont, pedestrian and bicycle transportation is popular with students and faculty at the Claremont Colleges and the 2006 General Plan identifies the need for increased neighborhood center style development that would facilitate safe walking and congregating. The 2006 General Plan notes that “walkability, access, and connections are essential components of a circulation system that easily and specifically accommodates pedestrians. Walkability includes wide sidewalks, safe street crossings,and a pleasant and safe walking environment” (City of Claremont 2006).

Cycling is a popular mode of transportation and recreation. A Bike Priority Zone is designated within the Claremont Village, the Claremont Colleges, and the residential neighborhoods south of Foothill Boulevard and north of First Street. A bike plan is illustrated on Figure 4-3 of the 2006 General Plan showing the Bike Priority Zone in gray and various bicycle facilities (lanes that accommodate cyclists coincidental with the roadways) that are situated within the arterial roads listed above and extend to other east/west streets (City of Claremont 2006, page 4-25). Bicycle facilities are classified into four types, including:

1. **Multi-Use Paths (Class I Bikeways)** – provide a completely separated, exclusive right-of-way for bicycling, walking, and other non-motorized uses.
2. **Bicycle Lanes (Class II Bikeways)** – use the appropriate striping, legends, and signs to mark a portion of a roadway that has been set aside for the preferential or exclusive use of bicyclists.

3. **Bicycle Routes (Class III Bikeways)** – are signed bicycle routes where riders share a travel lane with motorists.
4. **Separated Bikeway (Class IV Bikeways)** – are for the exclusive use of bicycles and include a physical barrier of separation between the bikeway and adjacent vehicle traffic.

4.6.2 Regulatory Setting

a. Federal Regulations

There are no federal transportation regulations that apply to projects within the city of Claremont.

b. State Regulations

California Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes eliminated automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior rules treated automobile delay and congestion as an environmental impact. Instead, SB 743 requires the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reducing greenhouse gas emissions. In November 2017, Office of Planning and Research (OPR) released the final update to *CEQA Guidelines* consistent with SB 743, which recommend using VMT as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. All jurisdictions in California are required to use VMT-based thresholds of significance by July 2020.

c. Regional and Local Regulations

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the southern California region, which includes Ventura, Los Angeles, San Bernardino, Orange, Riverside, and Imperial Counties. In 2020, SCAG's Regional Council approved and adopted Connect SoCal, the agency's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern (SCAG 2020). It 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 those who live in southern California. Connect SoCal provides maps of priority growth/neighborhood mobility areas, high-quality transit areas, and transit priority areas, some of which occur in Claremont, that provide the potential to streamline development along the transportation corridors within cities.

City of Claremont General Plan

The Circulation and Mobility Element of the 2006 General Plan contains the following goals and policies relevant to the Housing Element Update:

Goal 4.1: Support efforts that will enhance the regional transportation network and benefit Claremont residents.

Policy 4.1-1. Participate in regional transportation planning and encourage systems that meet regional goals while protecting Claremont from external impacts.

Policy 4-1.3. Support initiatives to provide better public transportation. Work actively to ensure that public transportation is part of every regional transportation corridor:

Policy 4-1.7. Promote transit-oriented development to facilitate the use of the community's transit services.

Goal 4.2: Reduce traffic congestion while retaining the historic patterns and functions of city streets.

Policy 4-2.1. Require new development to minimize traffic impacts created by the development and to incorporate mitigation measures which are acceptable to the City.

Policy 4-2.9. Evaluate the cumulative effects of development projects within the city so that required improvements to City streets are planned for, funded, and completed.

Goal 4.3: Establish and maintain a comprehensive system of pedestrian ways and bicycle routes that provides viable options to travel by automobile.

Policy 4-3.1. Promote walking throughout the community. Install sidewalks where missing and make improvements to existing sidewalks for accessibility purposes. Particular attention should be given to needed sidewalk improvement near schools and activity centers.

Policy 4-3.5. Recognize and accommodate the pedestrian ADA access in Claremont's neighborhoods and continue to make improvements to increase pedestrian safety.

Policy 4.3-6. Improve the pedestrian environment on Arrow Highway, Base Line Road, Bonita Avenue, Foothill Boulevard, Indian Hill Boulevard, San Jose Avenue, and Sixth Street.

Village South Specific Plan

Goal 4 in the Village South Specific Plan addresses active mobility and states the plan seeks to "provide a very high quality, comfortable, and safe pedestrian and bicycling environment throughout the Plan Area – including existing and new streets, new paseos, plazas and courts – connecting the Plan Area to the KGI campus to the west, neighborhoods located to the south and east, and the Village and transit located to the north and east" (City of Claremont 2021b). One desired outcome is that Indian Hill Boulevard between Arrow Highway and the railroad tracks is transformed from the "least attractive to the most attractive" stretch of Claremont's central north-south spine.

4.6.3 Impact Analysis

Analysis in this section regarding VMT comes from a VMT Transportation Impact Study prepared by CR Associates using the SCAG Travel Demand Model with City specific information of the housing opportunity sites. The SCAG RTP/SCS trip-based model is a travel demand model with socioeconomic and transportation network inputs, such as population, employment, and the

regional and local roadway network. The model outputs several travel behavior metrics, such as vehicle trips and trip lengths, that can be used to calculate VMT. The assessment is based on SB 743 requirements and OPR guidance. The full assessment can be found as Appendix E.

a. Significance Thresholds

The following thresholds of significance were developed based on the *CEQA Guidelines*, specifically, Appendix G. The Housing Element Update would have a significant impact with respect to transportation if it would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
2. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
4. Result in inadequate emergency access?

The City of Claremont adopted *Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* in August 2020. The Transportation Study Guidelines recommend using an efficiency metric of resident VMT per capita for residential project, such as the Housing Element Update. Based on the guidance in the Transportation Study Guidelines, the VMT analysis of the Housing Element Update compares regional VMT averages to the project's VMT per capita outputs. Regional VMT is the average resident VMT per capita of the San Gabriel Valley Council of Governments Northeast (SGVCOG) region. The SGVCOG region consists of 31 incorporated cities, unincorporated communities in Los Angeles County, and three San Gabriel Valley Municipal Water Districts. Project VMT per capita rates that are higher than 15 percent below regional averages are considered to have a significant VMT impact under CEQA (City of Claremont 2020).

b. Methodology

Section 15064.3 of the *CEQA Guidelines* provides that VMT is the most appropriate metric for the analysis of transportation impacts under CEQA.

VMT measures the amount of driving that a project generates. For example, a project generating 100 total (inbound and outbound) vehicle trips per day with an average of 5.0 miles per trip results in 500 project generated VMT per day. For the purposes of analyzing transportation impacts of residential projects, the VMT generated by the project is converted to an efficiency metric by dividing the amount of VMT generated by the number of residents. Efficiency metrics are used in VMT analysis because the goal of the analysis is to show whether or not a particular development would generate low enough VMT to aid the State in meeting its climate targets relative to projected growth in population, employment, etc.

This baseline VMT methodology includes vehicle trips within the SCAG model to generate a resident VMT per capita metric that is applicable to the Housing Element Update. Resident VMT per capita includes all daily vehicle-based person trips originated from or ended at the home location of the individual (driver or passenger). Only home-based VMT are included in this calculation. The VMT for each individual is then summed for all individuals in the analysis area and divided by the population of the same analysis area to arrive at resident VMT per capita. The City's Transportation Study Guidelines recommends that VMT per capita results should be compared to the 85th percentile of SGVCOG northeast region's average for that land use type – in this case, the SGVCOG northeast

region average resident VMT per capita was used. Therefore, for the purposes of this analysis the threshold 15-percent reduction from baseline VMT. If the Housing Element Update would generate VMT higher than the threshold, it would be expected to have a significant VMT impact, and if the project would generate VMT lower than the threshold, then it would not be expected to have a less than significant VMT impact. Table 4.6-1 presents the City's VMT impact thresholds.

Table 4.6-1 Baseline VMT for City of Claremont (2018)

VMT Metrics		Baseline VMT (2018)	VMT Impact Threshold[1]
Claremont Residential VMT	Baseline VMT Per Capita	19.5	16.6

[1] The VMT impact threshold for each VMT metric is 15 percent below the respective baseline VMT.

Source: CR Associates 2021 (Appendix E)

A project that is below the VMT impact thresholds and therefore does not have a VMT impact under baseline conditions would also not have a cumulative impact as long as it is aligned with long-term State environmental goals, such as reducing greenhouse gas emissions, and relevant plans, such as the SCAG RTP/SCS (OPR 2018).

Project Impacts and Mitigation Measures

Threshold 1: Would the Housing Element Update conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Impact TRA-1 THE HOUSING ELEMENT UPDATE WOULD FACILITATE DEVELOPMENT ALONG MAJOR TRANSIT CORRIDORS IN CLAREMONT. PROJECTS IMPLEMENTED UNDER THE HOUSING ELEMENT UPDATE WOULD NOT CONFLICT WITH ANY PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM. THERE WOULD BE NO IMPACT.

As detailed in Section 4.6.2, *Regulatory Setting,* the 2006 General Plan Circulation and Mobility Element includes goals and policies that focus on improving alternative transportation facilities. The Village South Specific Plan Goal #4 encourages development along transit corridors. Regionally, SCAG's Connect SoCal encourages development along high-quality transit corridors where public transportation facilities have regular stops and offer connectivity with other forms of public transportation (e.g., bus to train).

The transportation-related goals and policies in the 2006 General Plan and Village South Specific Plan are compatible with and supportive of the goals and objectives of the City's programs, plans, and policies that seek to encourage alternative forms of mobility, increase walking and cycling, and make pedestrian safety a priority. Projects proposed under Housing Element Update would be required to comply with the goals and policies outlined in these documents. Because the Housing Element Update encourages development on infill sites and sites close to transit such as the Claremont Metro station, the Housing Element Update would improve residential transit access and potentially increase transit ridership. Therefore, the Housing Element Update would not conflict with existing plans. There would be no impact

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

Threshold 2: Would the Housing Element Update conflict or be inconsistent with *CEQA Guidelines* Section 15064.3, subdivision (b)?

Impact TRA-2 THE HOUSING ELEMENT UPDATE WOULD RESULT IN A VMT BELOW THE SGVCOG NORTHEAST REGIONAL AVERAGE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Given that the primary change in land use with the Housing Element Update is the addition of new residential units in the city, the VMT analysis focuses on the residential home-based VMT per capita for each housing opportunity site. Table 4.6-2 shows the collective residential VMT per capita estimate for the proposed Housing Element Update. As shown therein, the housing opportunity sites proposed under the Housing Element Update are expected to generate 14.4 home-based VMT per capita, which is approximately 26 percent below the regional baseline of 19.5 home-based VMT per capita. Therefore, reasonably foreseeable development under the Housing Element Update would generate home-based VMT per capita that is more than 15 percent below the regional baseline. Therefore, impacts would be less than significant.

Table 4.6-2 Total Home-Based VMT for Proposed Housing Element Update

Housing Element Update Home-Based VMT per Capita	Regional Baseline Home-Based VMT per Capita (2018)	Percent Below to Regional VMT per Capita Baseline
14.4	19.5	26

Source: CR Associates 2021 (Appendix E)

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

Threshold 3: Would the Housing Element Update substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Impact TRA-3 THE HOUSING ELEMENT UPDATE WOULD NOT INTRODUCE HAZARDOUS ROAD DESIGN FEATURES OR INCOMPATIBLE USES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development under the Housing Element Update on the housing opportunity sites would largely be infill development on parcels with existing uses (e.g., parking lots, underutilized uses) and would not involve the development of any roadways that would introduce hazardous features. Vacant housing opportunity sites are located in urbanized areas with access to existing roadways. While the specific designs of projects that could be developed is not known at this time, each project would be reviewed by the City and required to be consistent with appropriate regulations and design standards set forth by applicable plans, programs, and policies. Goals and policies in the 2006 General Plan and the Village South Specific Plan encourage safe and convenient modes of transportation including walking and biking to increase connectivity among neighborhoods and adjacent cities. Finally, the Housing Element Update would promote development of residential and mixed-use projects that would be compatible with surrounding uses, including other residential and

mixed-use development. Projects developed under the Housing Element Update would not introduce incompatible agricultural, industrial, or other uses within the city.

During development, projects could include interim modifications to public rights-of-way, such as lane closures during construction or the addition of new driveways or pedestrian facilities. These features could affect transportation safety. Any modifications to public rights-of-way would be required to be consistent with appropriate regulations and design standards set forth by the City's applicable plans, programs, and policies such as Claremont Municipal Code Chapter 12.16, which indicates provisions for constructing driveways. With adherence to the City's existing goals, policies, and ordinances, projects implemented under the Housing Element Update would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

Threshold 4: Would the Housing Element Update result in inadequate emergency access?

Impact TRA-4 IMPLEMENTATION OF THE HOUSING ELEMENT UPDATE INVOLVES INFILL DEVELOPMENT IN AREAS CURRENTLY SERVED BY EMERGENCY ACCESS. ALTHOUGH DEVELOPMENT DENSITY WOULD INCREASE, ACCESS TO SITES WOULD NOT CHANGE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The housing opportunity sites proposed in the Housing Element Update are all situated in areas currently served by adequate emergency access, including roadways with multiple ingress and egress. The Safety Element Update included an assessment of access to existing neighborhoods and developed goals and policies to ensure adequate emergency access for existing and future development. These include goals and policies that instruct the City to identify areas with inadequate access/evacuation routes and to consider mitigation to address emergency access. Furthermore, additional goals and policies from the Safety Element Update are designed to ensure the City and the residents of Claremont are prepared for evacuation during natural and human-caused disasters. Specifically, policies in the Safety Element Update include designating and publicizing evacuation routes; regularly evaluating availability and demand of community evacuation centers; developing and employing alternative emergency access routes in neighborhoods with a single ingress/egress and developing evaluation alternatives for residents with mobility challenges.

Development facilitated by the Housing Element Update would be required to provide adequate accommodation of fire access to structure frontages and, depending on the size of the development, multiple access points to development on the housing opportunity sites, pursuant to 2019 California Building Code Requirements. Development that would not meet required standards and codes would not be permitted. Therefore, there would be adequate emergency service and access and the Housing Element Update would have a less than significant impact on emergency access.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

4.6.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative transportation impacts is the City of Claremont. Adjacent development considered part of the cumulative analysis includes buildout of the 2006 General Plan.

OPR provides the following guidance regarding cumulative impacts analysis and VMT:

> When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. 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 (OPR 2018).

As described above in Section 4.6.3, *Impact Analysis*, the Housing Element Update would result in less than significant impacts related to VMT (Impact TRA-2). Because the analysis for the project was based on VMT per capita, the significant impact implies that the project would not have a cumulatively considerable contribution to a significant cumulative impact.

Impact TRA-1 analyzes the project's compatibility with programs, plans, ordinances, and policies related to the circulation system. Cumulative development projects, like the Housing Element Update, would be required to comply with local regulations and policies. The Housing Element Update's incremental contribution to cumulative impacts would be less than significant.

As described in Impact TRA-3, any modifications to public rights-of-way would be consistent with appropriate regulations and design standards set forth by the City's applicable plans, programs, and policies. Similarly, cumulative development projects would also be required to comply with the City's regulations and policies, and the Housing Element Update's incremental contribution to cumulative impacts would be less than significant.

Impact TRA-4 discusses potential impacts from inadequate emergency access. As stated therein, the project would be required to meet all applicable state and local codes and ordinances related to fire protection, including Safety Element Update policies that address emergency access. Similarly, cumulative development projects would also be required to comply with local and statewide regulations. Therefore, because all impacts would incrementally contribute to transportation impacts (i.e., emergency access and compatibility with plans and programs) and VMT would be more than 15 percent below the regional baseline the Housing Element Update would not have a cumulatively considerable transportation impact.

4.7 Cultural and Tribal Cultural Resources

This section analyzes the potential impacts of the Housing Element Update on Cultural and Tribal Cultural Resources (TCR). This section includes a brief summary of cultural and TCR background information and a summary of consultation conducted by the City with local Native American groups.

4.7.1 Setting

Prehistoric Context

During the latter half of the twentieth century, many archaeologists developed chronological sequences to explain prehistoric cultural changes in all or portions of southern California (c.f., Moratto 1984; Jones and Klar 2007). Wallace (1955, 1978) devised a prehistoric chronology for the southern California coastal region based on early studies and focused on data synthesis associated with four distinct horizons: Early Man, Milling Stone, Intermediate, and Late Prehistoric. Although initially lacking the chronological precision of absolute dates (Moratto 1984), Wallace's (1955) synthesis has been modified and improved using thousands of radiocarbon dates obtained from southern California sites by researchers in recent decades (Koerper and Drover 1983; Koerper et al. 2002; Byrd and Raab 2007). The prehistoric chronological sequence for southern California presented below is a composite based on Wallace (1955, 1978) as well as later studies, including Koerper and Drover (1983).

Early Man Horizon (10,000 – 6000 BCE)

Numerous pre-8000 Before Common Era (BCE) sites have been identified along the mainland coast and Channel Islands of southern California (c.f., Moratto 1984; Erlandson 1991; Rick et al. 2001; Johnson et al. 2002; Jones and Klar 2007). The Arlington Springs site on Santa Rosa Island produced human femurs dated to approximately 13,000 years ago (Johnson et al. 2002; Arnold et al. 2004). On San Miguel Island, human occupation at Daisy Cave (CA-SMI-261) has been dated to nearly 13,000 years ago and included basketry greater than 12,000 years old, the earliest recorded on the Pacific Coast (Arnold et al. 2004).

Although few Clovis- or Folsom-style fluted points have been found in southern California (e.g., Erlandson et al. 1987; Dillon 2002), Early Man Horizon sites are generally associated with a greater emphasis on hunting than later horizons. Recent data indicate the Early Man economy was a diverse mixture of hunting and gathering, including a significant focus on aquatic resources in coastal areas (e.g., Jones et al. 2002) and on inland Pleistocene lakeshores (Moratto 1984). A warm and dry 3,000-year period called the Altithermal began around 6000 BCE. The conditions of the Altithermal are likely responsible for the change in human subsistence patterns during this period, including a greater emphasis on plant foods and small game.

Millingstone Horizon (6000 –3000 BCE)

Wallace (1955:219) defined the Milling Stone Horizon as "marked by extensive use of milling stones and mullers, a general lack of well-made projectile points and burials with rock cairns." The dominance of such artifact types indicates a subsistence strategy oriented around collecting plant foods and small animals. A broad spectrum of food resources was consumed, including small and large terrestrial mammals, sea mammals, birds, shellfish, and other littoral and estuarine species,

near-shore fishes, and seeds and other plant products (Kennett 2005). Variability in artifact collections over time and space indicates Milling Stone Horizon subsistence strategies adapted to environmental conditions (Jones 1996; Byrd and Raab 2007). Lithic artifacts associated with Milling Stone Horizon sites are dominated by locally available tool stone and, in addition to ground stone tools such as manos and metates, chopping, scraping, and cutting tools are very common. The mortar and pestle, associated with acorns or other foods processed through pounding, were first used during the Milling Stone Horizon and increased dramatically in later periods (Wallace 1955, 1978; Jones 1996).

Two types of artifacts considered diagnostic of the Milling Stone period are the cogged stone and discoidal, most of which have been found at sites dating between 4000 and 1000 BCE (Moratto 1984), though possibly as far back as 5500 BCE (Couch et al. 2009). The cogged stone is a ground stone object with gear-like teeth on the perimeter and is produced from a variety of materials. The function of cogged stones is unknown, though ritualistic or ceremonial uses have been postulated (Eberhart 1961). Similar to cogged stones, discoidals are found in the archaeological record subsequent to the introduction of the cogged stone. Cogged stones and discoidals were often purposefully buried, or "cached." Cogged stones have been collected in Los Angeles County, although their distribution appears to center on the Santa Ana River basin (Eberhart 1961).

Intermediate Horizon (3000 BCE – CE 500)

Wallace's Intermediate Horizon dates from approximately 3000 BCE – Common Era (CE) 500 and is characterized by a shift toward a hunting and maritime-based subsistence strategy, as well as greater use of plant foods. During the Intermediate Horizon, a noticeable trend occurred towards a greater adaptation to local resources including a broad variety of fish, land mammals, and sea mammals along the coast. Tool kits for hunting, fishing, and processing food and materials reflect this increased diversity, with flake scrapers, drills, various projectile points, and shell fishhooks being manufactured.

Mortars and pestles became more common during this transitional period, gradually replacing manos and metates as the dominant milling equipment. This change in milling stone technology is believed to signal a transition from the processing and consumption of hard seed resources to the increased reliance on acorns (Jones 1996). Mortuary practices during the Intermediate typically included fully flexed burials oriented toward the west (Wallace 1955).

Late Prehistoric Horizon (CE 500 – Historic Contact)

During Wallace's (1955, 1978) Late Prehistoric Horizon, the diversity of exploited plant food resources and land and sea mammal hunting increased even further than during the Intermediate Horizon. More classes of artifacts were observed during this period and high-quality exotic lithic materials were used for small, finely worked projectile points associated with the bow and arrow. Steatite containers were made for cooking and storage and an increased use of asphalt for waterproofing is noted. More artistic artifacts were recovered from Late Prehistoric sites and cremation became a common mortuary custom. Larger, more permanent villages supported an increased population size and social structure (Wallace 1955). This change in material culture, burial practices, and subsistence focus coincides with the westward migration of Uto-Aztecan language speakers from the Great Basin region to present day Los Angeles, Orange, and western Riverside counties (Sutton 2008; Potter and White 2009). This tradition manifested in the Los Angeles Basin and adjacent areas as the Angeles Pattern of the Del Rey Tradition, which ultimately led to the ethnographic Gabrieleño (Sutton 2008:36).

Tongva-Gabrieliño Ethnography

TCRs include ethnographic elements pertaining to Native American issues and values. The Claremont planning boundaries lies within an area traditionally occupied by the Tongva-Gabrieliño.

The name "Gabrieleño" denotes those people who were administered by the Spanish from the San Gabriel Mission. It includes people from the Gabrieleño area proper, as well as other social groups nearby (Kroeber 1925; Plate 57; Bean and Smith 1978:538). The term Gabrieleño was imposed upon the Tribe by Spanish Missionaries. Thus, some descendants have chosen to use their original name, Tongva (Welch 2006). This term is used in the remainder of this section to refer to the pre-contact inhabitants of the Los Angeles basin and their descendants. Archaeological evidence points to the Tongva arriving in the Los Angeles Basin sometime around 500 BCE, and the Tongva note their presence in the area going back thousands of years (Villa 2017). Today, the Tongva people are active in protecting their Tribal cultural resources in the greater Los Angeles Basin and three Channel Islands, present-day San Clemente, San Nicolas, and Santa Catalina.

The Tongva language belongs to the Takic branch of the Uto-Aztecan language family, which can be traced to the Great Basin region (Mithun 2001). This language family includes dialects spoken by the nearby Juaneño and Luiseño to the southeast, the Serrano and Cahuilla to the northeast, and the Tataviam to the northwest. Yet, it is considerably different from the Chumash people living to the northwest and the Diegueño (including Ipai, Tipai, and Kumeyaay) people to the south.

The Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast. A total tribal population is estimated to have been at least 5,000 in 1770 (Bean and Smith 1978:540), but recent ethnohistoric work suggests a number closer to 10,000 (O'Neil 2002). Political organization followed a patrilocal and patrilineal pattern. Typically, the oldest son would lead a family. Chieftainship was also passed down patrilineally. A *Chari*, or chief of a village or political grouping was separate from religious leadership (King 2011).

At the time of Spanish contact, the basis of Tongva religious life was the Chinigchinich cult, centered on the last of a series of heroic mythological figures. Chinigchinich gave instruction on laws and institutions, and taught people how to dance, the primary religious act for this society. He later withdrew into heaven, where he rewarded the faithful and punished those who disobeyed his laws (Kroeber 1925: 637–638). The Chinigchinich religion seems to have been relatively new when the Spanish arrived. It was spreading south into the Southern Takic groups as Christian missions were being built. Elements of Chinigchinich beliefs suggest it was a syncretic mixture of Christianity and native religious practices (McCawley 1996: 143-144).

Houses constructed by the Tongva were large, circular, domed structures made of willow poles, thatched with tule and could hold up to 50 people (Bean and Smith 1978). Other structures served as sweathouses, menstrual huts, ceremonial enclosures, and probable communal granaries. Cleared fields for races and games, such as lacrosse and pole throwing, were created adjacent to Tongva villages (McCawley 1996: 27).

The Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the Tribe exploited the mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like most Native Californians, acorns were the staple food. By the time of the early Intermediate Period, acorn processing was an established industry. Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Fresh water and saltwater fish, shellfish, birds, reptiles, insects, and large and small mammals were also consumed (Kroeber 1925:631–632; Bean and Smith 1978:546; McCawley 1996: 119–123, 128–131).

The Tongva used a wide variety of tools and implements to gather food resources. These included the bow and arrow, traps, digging sticks, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. The Tongva made oceangoing plank canoes (known as a ti'at) capable of holding six to 14 people and used for fishing, travel, and trade between the mainland and the Channel Islands. Tule reed canoes were employed for near-shore fishing (McCawley 1996: 117-127). Tongva people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels (Kroeber 1925:629; McCawley 1996: 129–138).

Deceased Tongva were either buried or cremated. Inhumation was more common on the Channel Islands and the neighboring mainland coast, and cremation was more predominate on the remainder of the coast and in the interior (Harrington 1942; McCawley 1996:157). At the behest of the Spanish missionaries, cremation essentially ceased during the post-Contact period (McCawley 1996:157).

Historical Background

The post-contact history of California is generally divided into three-time spans: the Spanish period (1769–1822), the Mexican period (1822–1848), and the American period (1848–present). Each of these periods is briefly described below.

Spanish Period (1769 – 1822)

From Spanish contact (voyages of Cabrillo in 1542 and Vizcaino in 1602), through the Mexican and American Periods, land use patterns changed little in the areas surrounding Claremont. Juan Bautista de Anza (1773-1775/1776) helped establish the Franciscan missions and Spanish settlements in the region and opened the door to future development.

Mexican Period (1822 – 1848)

During the Mexican Period, large land grants dominated the region. Prior to this time, the Spanish Crown permitted settlement and allotted certain land concessions, but the deed remained in their possession. These Spanish entitlements were permits that allowed people to graze the land. It was not until the Mexican Period, however, that the basic tenets of the Land Grant system and ultimately the land use-settlement pattern for the area changed.

American Period (1848 – Present)

By the 1840s-50s, cattlemen, sheepherders, squatters, and ranch owners were acquiring portions of former Mexican land grants in the region.

Claremont

In the late 1700s the King of Spain sent a party of missionaries to colonize California by creating missions up and down the coast (City of Claremont 2020). In 1771, Mission San Gabriel was founded in San Gabriel and the area of what is now Claremont was included in the mission lands. During the early 1800s most of what is now Claremont became part of Rancho San Jose. In the second half of the 1800s sections of the ranch were sold off and when the rail line was built through the area in 1887, town sites were laid out with the expectation that the railroad would create a population boom. The growth of Claremont was supported by the establishment of Pomona College, the first of

The Claremont Colleges, and the introduction of citrus growing. The Colleges have increased their presence in Claremont; however, the citrus orchards were replaced by the mid-20th Century with residential neighborhoods.

4.7.2 Regulatory Setting

This section includes a discussion of the applicable federal, state, and local laws, ordinances, regulations, and standards governing TCR.

Federal Regulations

National Historic Preservation Act (NHPA) of 1966 (16 U.S.C. Section 470 Et Seq.)

NHPA is a federal law created to avoid unnecessary harm to historic properties. The NHPA includes regulations that apply specifically to federal land-holding agencies, but also includes regulations (Section 106) that pertain to all projects funded, permitted, or approved by any federal agency that have the potential to affect cultural resources. Provisions of NHPA establish a National Register of Historic Places (maintained by the National Park Service), the Advisory Council on Historic Preservation, State Historic Preservation Office (SHPO), and federal grants-in-aid programs.

NATIONAL REGISTER OF HISTORIC PLACES

The NRHP was established by the National Historic Preservation Act NHPA of 1966 as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (CFR 36 CFR 60.2). The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history;

Criterion B: It is associated with the lives of persons who are significant in our past;

Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and/or

Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

Secretary of the Interior's Standards

The Secretary of the Interior is responsible for establishing professional standards and providing guidance related to the preservation and protection of all cultural resources listed in or eligible for listing in the NRHP.

American Indian Religious Freedom Act of 1978 (42 U.S.C. Sections 1996 and 1996a)

The American Indian Religious Freedom Act of 1978 and Native American Graves and Repatriation Act of 1990 (25 U.S.C. Sections 3001 et seq.) establishes that traditional religious practices and beliefs, sacred sites, and the use of sacred objects shall be protected and preserved.

Archaeological and Paleontological Salvage (23 USC 305)

Statute 23 USC 305 amends the Antiquities Act of 1906. Specifically, it states:

> Funds authorized to be appropriated to carry out this title to the extent approved as necessary, by the highway department of any State, may be used for archaeological and paleontological salvage in that state in compliance with the Act entitled "An Act for the preservation of American Antiquities," approved June 8, 1906 (PL 59-209; 16 USC 431-433), and State laws where applicable.

This statute allows funding for mitigation of paleontological resources recovered pursuant to federal aid highway projects, provided that "excavated objects and information are to be used for public purposes without private gain to any individual or organization" (Federal Register [FR] 46(19):9570).

State Regulations

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is a guide to cultural resources that must be considered when a government agency undertakes a discretionary action subject to CEQA. The CRHR helps government agencies identify, evaluate, and protect California's historical resources, and indicates which properties are to be protected from substantial adverse change (Pub. Resources Code, Section 5024.1(a)). The CRHR is administered through the State Office of Historic Preservation (SHPO) that is part of the California State Parks system.

A cultural resource is evaluated under four CRHR criteria to determine its historical significance. A resource must be significant at the local, state, or national level in accordance with one or more of the following criteria set forth in the State CEQA Guidelines at Section 15064.5(a)(3):

1) It is associated with events that have made a significant contribution to the broad pattern of California's history and cultural heritage;
2) It is associated with the lives of persons important in our past;
3) It 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; or
4) It has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time must have passed to allow a "scholarly perspective on the events or individuals associated with the resource." Fifty years is used as a general estimate of the time needed to understand the historical importance of a resource according to SHPO publications. The California Register also requires a resource to possess integrity, which is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Integrity is evaluated with regard to the retention of location,

design, setting, materials, workmanship, feeling, and association." Archaeological resources can sometimes qualify as "historical resources" [State CEQA Guidelines, Section 15064.5(c)(1)].

According to CEQA, all buildings constructed over 50 years ago and that possess architectural or historical significance may be considered potential historic resources. Most resources must meet the 50-year threshold for historic significance; however, resources less than 50 years in age may be eligible for listing on the CRHR if it can be demonstrated that sufficient time has passed to understand their historical importance.

In addition, if a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b], and [c]).

PRC, Section 21083.2(g) defines a unique archaeological resource as an 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:

1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or
2) Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Two other programs are administered by the state: California Historical Landmarks and California "Points of Historical Interest." California Historical Landmarks are buildings, sites, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value. California Points of Historical Interest are buildings, sites, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value.

Impacts to significant cultural resources that affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from 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 (CEQA Guidelines, Section 15064.5 [b][1], 2000). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register (CEQA Guidelines, Section 15064.5[b][2][A]).

Senate Bill 18

Enacted on March 1, 2005, Senate Bill (SB) 18 (California Government Code Sections 65352.3 and 65352.4) requires cities and counties to notify and consult with California Native American tribal groups and individuals regarding proposed local land use planning decisions for the purpose of protecting traditional tribal cultural places (sacred sites), prior to adopting or amending a General Plan or designating land as open space. Tribal groups or individuals have 90 days to request consultation following the initial contact.

Assembly Bill 52

California Assembly Bill (AB) 52 of 2014 was enacted in 2015, expanding the California Environmental Quality Act (CEQA) by defining a new resource category: "tribal cultural resources." AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resource Code [PRC] Section 21084.2). It further states the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and that are either:

a. 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)

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 PRC Section 5024.1.

In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments, and to respect the interests and roles of project proponents, it is the intent AB 52 to:

1. Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities.
2. Establish a new category of resources in CEQA called "tribal cultural resources" that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation.
3. Establish examples of mitigation measures for tribal cultural resources that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible.
4. Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated. Because CEQA calls for a sufficient degree of analysis, tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources.
5. In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, at the earliest possible point in CEQA environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decision making body of the lead agency.
6. Recognize the unique history of California Native American tribes and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to CEQA.

7. Ensure that local and tribal governments, public agencies, and project proponents have information available, early in CEQA environmental review process, for purposes of identifying and addressing potential adverse impacts to tribal cultural resources and to reduce the potential for delay and conflicts in the environmental review process.
8. Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources.
9. Establish that a substantial adverse change to a tribal cultural resource has a significant effect on the environment.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires lead agencies to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Local Regulation

City of Claremont Municipal Code

The City of Claremont Municipal Code (CMC), Chapter 16.3, Architectural Review, sets the intention that historically significant sites, properly preserved and restored as physical representations of Claremont's character, can enhance Claremont's historic and cultural heritage. Pursuant to Section 16.300.020 (F) of the CMC, the Register of Structures of Historical and Architectural Merit of the City of Claremont (Register) is a comprehensive historic resource inventory of sites and structures in various areas of the City to be maintained by the Architectural Commission. Section 16.300.030 of the CMC requires all development that modifies interior character-defining features on properties subject to a Historical Property Agreement (Mills Act) to be approved by the Architectural Commission.

In order to be listed on the Register, in addition to being approved by the Architectural Commission, the building, structure, or place must meet one or more of the following criteria:

1. Buildings, structures or places, including landscaping, are important key focal or pivotal points in the visual quality or character of an area, neighborhood or survey district
2. Structures are associated with historic figures
3. Structures represent an architectural type of period and/or represent the work of known architects, draftsmen, or builders
4. Structures illustrate the development of California locally or regionally
5. Buildings remain in good condition and illustrate a given period
6. Structures are unique in design or detail
7. Structures serve as examples of a period or style
8. Structures contribute to the architectural continuity of the street
9. Buildings appear to retain the integrity of their original design fabric.

City of Claremont General Plan Policies

The Land Use, Community Character, and Heritage Preservation Element of the 2006 General Plan includes specific policies intended to ensure that potential impacts to historical resources are addressed in conjunction with development of individual sites within the Plan Area. These policies include:

Policy 2-14.1 Continue to protect architectural, historical, open space, environmental, and archaeological resources throughout the City.

Policy 2-14.4 Continue to recognize the fragile nature of historic residential areas, and work to ensure the harmonious appearance of each historic area. Address the transitional areas between residential and commercial areas, residential and industrial areas and residential areas and The Claremont Colleges.

Policy 2-14.5 Continue to support retention and/or adaptive reuse of existing residential, commercial, and industrial buildings where possible, particularly structures listed on the Register of Structures of Historical and Architectural Merit of the City of Claremont.

Policy 2-14.6 Strive to prevent the demolition of structures listed on the Register of Historical and Architectural Merit of the City.

4.7.3 Regional Tribal Cultural Resources

The City of Claremont prepared and mailed AB 52/SB 18 notification letters on September 15, 2021 to tribes listed by the Native American Heritage Commission including: Santa Ynez Band of Chumash Indians, Fernandeno Tataviam Band of Mission Indians, Barbareno/Ventureno Band of Mission Indians, Kitanemuk & Yowlumne Tejon Indians, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Nation, San Manuel Band of Mission Indians, Kern Valley Indian Community, Soboba Band of Luiseno Indians, Gabrielino Band of Mission Indians, Gabrielino-Tongva Tribe, Puma Band of Luiseno Indians, San Fernando Band of Mission Indians, and Gabrielino/Tongva Indians of California Tribal Council. On October 12, 2021, the Santa Ynez Band of Chumash Indians responded to request consultation under AB 52 and SB 18. The Tribal Elders' Council did not request further consultation on the project but requested notification if supplementary literature reveals additional information or if the scope of the project changes.

4.7.4 Impact Analysis

Methodology and Significance Thresholds

The following thresholds of significance were developed based on the *CEQA Guidelines*, specifically, Appendix G. The Housing Element Update would have a significant impact with respect to cultural or tribal cultural resources if it would:

1) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?
2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?
3) Disturb any human remains, including those interred outside of formal cemeteries?
4) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k), or

b) 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 PRC 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.

Issues Not Evaluated Further

Archeological Resources (Threshold 2)

The Initial Study for the Housing Element Update determined that there is potential for grading and excavation associated with future development to disturb archeological resources (refer to Appendix A). Therefore, implementation of Mitigation Measure CR-1 is required Impacts were determined to be less than significant with mitigation incorporated. Thus, this impact is not further discussed in the EIR; however, this mitigation measure will be included as part of the Mitigation Monitoring and Reporting Program (MMRP) in the Final EIR.

Human Remains (Threshold 3)

The Initial Study for the Housing Element Update determined that, with adherence to State law (Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98) impacts to disturbance of human remains would be less than significant (refer to Appendix A). Thus, the threshold related to this subject is not evaluated further in this EIR.

Project Impacts and Mitigation Measures

Threshold 1:	Would the Housing Element Update cause a substantial adverse change in the significance of a historical resource pursuant to Section15064.5?

Impact TCR-1 DEVELOPMENT FACILITATED BY THE HOUSING ELEMENT UPDATE COULD ADVERSELY IMPACT HISTORICAL RESOURCES. MITIGATION MEASURE CR-1 WOULD BE REQUIRED TO REDUCE IMPACTS TO HISTORICAL RESOURCES. HOWEVER, IMPACTS WOULD STILL REMAIN SIGNIFICANT AND UNAVOIDABLE.

Based on *CEQA Guidelines* Section 15064.5, foreseeable development facilitated by the Housing Element Update would have a significant impact on historical resources if they would cause a substantial adverse change in the significance of a historical resource. Historical resources include properties eligible for listing on the NRHP, the CRHR, and local designation. In addition, as explained in Section 15064.5 of the *CEQA Guidelines*, "[s]ubstantial adverse change in the significance of an historical resource 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." Although there are no specific development projects associated with the Housing Element Update, implementation of the Housing Element Update would guide development in the Plan Area though the year 2029 and identifies 120 vacant and underutilized housing opportunity sites for development. Five NRHP-listed historic buildings and three historic districts, as shown in Table 4.7-1, are located within the City. Only one of these resources is on or adjacent to a housing opportunity site, the Atchison, Topeka, and Sante Fe Railroad Station, which

currently houses the Claremont Metrolink Station. The housing opportunity site at 100 West 1st street is fully adjacent to the NRHP historic building and contains a public parking facility, which would be rezoned to mixed-use and offer 30 housing units. In addition, many buildings on developed sites identified as housing opportunity sites in the Housing Element Update are over 50 years in age and are potentially eligible for listening on the NRHP, CRHR, or local designation on the Register. Therefore, development under the Housing Element could affect known or unknown historical resources.

Table 4.7-1 Historic Resources in Claremont

Site Name	Address or Extent	Site Use	Relation to Housing Opportunity Site
Atchison, Topeka, and Santa Fe Railroad Station	110 W. 1st St	Claremont Metrolink Station	Adjacent to Site 12 on 100 West 1st street, which is the current site of public parking facilities.
Peter Drucker House	636 Wellesley Drive	Museum	None
Padua Hills Theatre	4467 Via Padova	Theater	None
Pitzer House	4353 North Towne Avenue	Assisted living home	None
Helen Goodwin Renwick House	211 North College Avenue	Historic home next to Claremont Helen Renwick library	None
Intercultural Council Houses	Bounded by Blanchard Place, Claremont Boulevard, East 1st & Brooks Streets	12 detached single-family dwellings	None
Russian Village District	290 to 370 South Mills Ave and 480 Cucamonga Avenue	14 detached single-family dwellings and one multi-family dwelling	None
Scripps College for Women	Columbia and 10th Street	College	None

Source: National Register of Historic Places (National Park Service 2021) and California Office of Historic Preservation (Office of Historic Preservation 2021).

Similarly, the Housing Element Update identifies sites with buildings that are over 50 years of age and have potential to be historical resources as properties that are eligible for federal, state, or local designation. The neighborhood-specific zoning code would help to ensure that new development is consistent with the existing setting of the neighborhood. However, existing buildings could be demolished to accommodate higher density residential buildings, which has the potential to result in the demolition of unknown historical resources and result in significant adverse impacts to the environment. The General Plan Land Use, Community Character, and Heritage Preservation Element contains policies (2-14.1, 2-14.4, 2-14.5, and 2-14.6) related to protecting historical resources. Further, CMC Chapter 16.3 affords stronger protections for buildings listed on the Register. However, impacts on historical resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the individual resource and the characteristics of the proposed activity. Therefore, historical resource impacts would be potentially significant and Mitigation Measure CR-2 would be required.

Mitigation Measures

The following mitigation measure is required to reduce impacts to historic resources in Claremont. This would be implemented in conjunction with Mitigation Measure CR-1, which mitigates impacts to archeological resources, and is included in Appendix A of this Draft EIR and will be included in the MMRP of the Final EIR.

CR-2 Historical Resources Study Program

As a condition of approval and prior to issuance of construction permits, a historical resources evaluation shall be prepared and submitted to the City by the project applicant for future projects involving a property which includes buildings, structures, objects, sites, landscape/site plans, or other features that are 45 years of age or older. The study shall, at a minimum, be conducted by a qualified professional meeting the Secretary of the Interior's (SOI) Professional Qualifications Standard (PQS) for architectural history (NPS 1980). The study shall include a pedestrian survey of the project site and background research including a records search at the Northwest Information Center (NWIC), building permit research, and/or research with the local historical society(ies). The subject property(ies) and/or structures shall be evaluated for federal, state, and local designation on California Department of Parks and Recreation 523 series forms, included as an appendix to the study. If historical impacts are identified, the study shall include recommendations to avoid or reduce impacts on historical resources and the project sponsor shall implement the recommendations or conduct additional environmental review. These recommendations may include designing the project to comply with the Secretary of the Interior's Standards for the Treatment of Historic Property, or historic documentation prepared in accordance with Historic American Building Survey guidelines.

Significance After Mitigation

The implementation of Mitigation Measure CR-2 would reduce impacts on historical resources by requiring historical resource studies for projects within the City and the implementation of further requirements to avoid or reduce impacts on those resources on a project-by-project basis. However, projects facilitated by the Housing Element Update may still result in the demolition or alteration of a historical resource and therefore impacts to historical resources would be significant and unavoidable.

Threshold 2:	Would the Housing Element Update cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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)?
Threshold 3:	Would the Housing Element Update cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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?

Impact TCR-2 DEVELOPMENT FACILITATED BY THE HOUSING ELEMENT UPDATE COULD ADVERSELY IMPACT TRIBAL CULTURAL RESOURCES DURING GROUND DISTURBING ACTIVITIES. MITIGATION MEASURES TCR-1(A), TCR-1(B), TCR-1(C), TCR-1(D), AND TCR-1(E) WOULD BE REQUIRED TO REDUCE IMPACTS TO TRIBAL CULTURAL RESOURCES TO A LESS THAN SIGNIFICANT LEVEL.

Ground-disturbing activities on any site associated with buildout facilitated by the Housing Element Update could expose previously unidentified subsurface Tribal cultural resources. Furthermore, any undeveloped site or site located in or adjacent to an area of known cultural resource may possess previously unidentified tribal cultural resources on the surface. Given the highly developed nature of most sites associated with the Housing Element Update and prioritization of infill sites that were previously developed and disturbed, the likelihood of encountering intact tribal cultural resources is low to moderate. It is likely that previous grading, construction, and modern use of the sites would have either removed or destroyed tribal cultural resources within surficial soils. Nonetheless, there is the potential for tribal cultural resources to exist below the ground surface throughout the City, which could be disturbed by grading and excavation activities associated with new housing development. Additionally, there are vacant sites that may not have previously been disturbed and could contain intact tribal cultural resources. Therefore, mitigation would be required to reduce impacts to less than significant.

As part of the tribal cultural resource identification process under AB 52, the City of Claremont sent letters via certified mail to 19 Native American Tribes that requested to be informed through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with these tribes. The City received a reply from the Santa Ynez Band of Chumash Indians. The Tribal Elders' Council did not request further consultation on the project but requested notification if supplementary literature reveals additional information or if the scope of the project changes. To date, the City has not received any additional responses for consultation under AB 52 or SB 18. The window for AB 52 consultation has closed, but Native American Tribes have until December 14, 2021, 90 days after the consultation letter was sent on September 15, 2021, to respond under SB 18.

This impact analysis is part of a high-level, programmatic planning document. Adherence to the requirements of AB 52 or AB 168 would require tribal consultation with local California Native American Tribes prior to implementation of any project activities subject to CEQA. In compliance with AB 52 or AB 168, a determination of whether project-specific substantial adverse effects on tribal cultural resources would occur, along with identification of appropriate project-specific avoidance, minimization, or mitigation measures would be required. Due to the programmatic nature of the Housing Element Update, it is not possible to fully determine impacts, however no Tribal cultural resources were identified during consultation. Any future project implementation

would require project-specific tribal cultural resource identification and consultation, and the appropriate avoidance, minimization, or mitigation would be incorporated. In addition, because the Housing Element Update would amend the General Plan, Native American consultation on this project under Senate Bill 18 is ongoing and will conclude on December 14, 2021.

Mitigation Measures

The following mitigation measures would address potential impacts to previously unidentified tribal cultural resources.

TCR-1 Cultural Resource Record Search

The City shall comply with AB 52 and AB 168 as applicable, which may require formal tribal consultation on a project-by-project basis. If the City determines that a project may cause a substantial adverse change to a tribal cultural resource, they shall implement mitigation measures identified in the consultation process required under PRC Section 21080.3.2, or shall implement the following measures where feasible to avoid or minimize the project-specific significant adverse impacts:

- Avoidance and preservation of the resources in place, including, but not limited to: planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
- Protecting the cultural character and integrity of the resource.
- Protecting the traditional use of the resource.
- Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Native American monitoring by the appropriate tribe for all projects in areas identified as sensitive for potential tribal cultural resources and/or in the vicinity (within 100 feet) of known tribal cultural resources.
- If potential tribal cultural resources are encountered during ground-disturbing activities; work within 100 feet must halt and the appropriate tribal representative(s), the implementing agency, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service [NPS] 1983) must be contacted immediately to evaluate the find and determine the proper course of action.

Significance After Mitigation

Mitigation Measure TCR-1 would address potential impacts to previously unidentified tribal cultural resources by ensuring consultation with local California Native Americans on a project-by-project basis and requiring project-specific mitigation measures as requested by tribes, as required by AB 52 and/or AB 168. In summary, mitigation measure TCR-1 would reduce impacts to tribal cultural resources to a less than significant level.

4.7.5 Cumulative Impacts

The cumulative setting for tribal cultural and historical resource impacts is the Plan Area. Cumulative development under the Housing Element Update could possibly disturb areas that may contain historical or tribal cultural resources. While there is the potential for significant cumulative impacts to tribal cultural resources, it is anticipated that potential impacts associated with individual development projects would be subject to City policies and local and State regulations regarding the protection of such resources. With compliance to existing policies and regulations and mitigation measures, future development under the Housing Element Update would be required to avoid or mitigate the loss of tribal cultural resources. The impacts of the Housing Element Update on tribal cultural resources would be reduced to a level of less than significant with implementation of Mitigation Measures TCR-1 described under Impact TCR-1. However, even with implementation of Mitigation Measure CR-2, impacts to historical resources from development facilitated by the Housing Element Update would remain significant. Therefore, impacts to historic resources would be cumulatively considerable.

4.8 Utilities and Service Systems

This section assesses impacts to utilities and service systems, including water, wastewater, stormwater, electricity, natural gas, telecommunications, and solid waste services, associated with the implementation of the proposed Housing Element Update.

4.8.1 Setting

Water Supply

Golden State Water provides reliable, high-quality drinking water to approximately 11,000 customers in the Claremont Customer Service Area (CSA), which includes Claremont and portions of Montclair, Pomona, and Upland (Golden State 2021). Local water includes groundwater supplies that Golden State Water maintains, and the balance is imported from the Metropolitan Water District of Southern California (MWD) via the Three Valleys Municipal Water District.

MWD is responsible for implementing an Urban Water Management Plan (UWMP). The current 2020 UWMP includes an assessment of past and future water supplies and demands, evaluation of the future reliability of the region's water supplies over a 20-year planning horizon, and discussion of demand management measures (MWD 2021). MWD's supply capabilities are based on imported water from the Colorado River, the State Water Project, and storage facilities. The water service reliability assessment determined that MWD has supply capabilities sufficient to meet expected demands through 2045 under a single dry-year condition and a period of drought lasting five consecutive years.

Approximately 50 percent of the region's water supplies come from resources separately controlled or operated by local water agencies. These resources include water extracted from local groundwater basins, catchment of local surface water, and non-MWD imported water supplied through the Los Angeles Aqueduct (MWD 2021).

As part of the Water Conservation Act of 2009, MWD implemented water use reduction measures and sought to reduce water consumption from its current rate of 182 gallons per capita per day (GPCD) to 146 GPCD by 2020. The 2015 UWMP reported a water use reduction to 131 GPCD, 28 percent less than the baseline. Based on best available data, MWD estimates a 2019 per capita water use of 121 GPCD, exceeding the reduction target by over 18 percent for a total reduction of 38 percent over baseline (MWD 2021a).

Wastewater

Wastewater treatment for development facilitated by the Housing Element Update would be provided by existing infrastructure in Claremont. Wastewater generated within the Claremont city limits is collected and transmitted through the City sewer system to the Los Angeles County Sanitation District (LACSD) 21. The sewer system within Claremont consists of 122 miles of gravity piping (City of Claremont 2020). Wastewater generated in Claremont is ultimately treated at the Pomona Water Reclamation Plant (POWRP) in Pomona.

The POWRP has a designed capacity of 15 million gallons per day (mgd) and provides tertiary level treatment. The POWRP serves approximately 130,000 people (LACSD 2021a). The POWRP seeks to maximize water reuse and completed the San Jose Creek Water Reclamation Plan Flow Equalization Project in July 2020. The project consists of two 4-million-gallon underground tanks, a pump station,

and an odor control system (LACSDs 2021b). During high-flow periods in the mornings and evenings, the tanks store primary effluent (partially treated wastewater). During low-flow periods overnight, the stored water is fed into the secondary treatment step, which uses naturally occurring microorganisms for treatment. This system allows for more consistent flow and feeding of the microorganisms, which leads to better treatment. The system also makes more clean water available overnight when the demand for recycled water is highest.

MWD operates a distribution system that is flexible and adaptable, allowing delivery of supplies from a combination of statewide and regional sources to meet the demands throughout its service area (LACSD 2021b).

Stormwater

Stormwater is managed by a combination of drainage systems managed by the City and by the County which drain to the San Antonio Creek Channel. The Community Services Department and Engineering Division oversees stormwater infrastructure within the city.

Telecommunications, Electricity, and Natural Gas

Telecommunications services in Claremont are provided by private companies, including AT&T and Spectrum Cable, and Frontier Wireless. The telecommunications provider used by residents and businesses in Claremont is subject to the user's choice as the City has no jurisdiction over telecommunication franchises.

In 2019, the City of Claremont joined the Clean Power Alliance, a collection of municipalities, to offer clean renewable energy to Claremont residents and businesses through a partnership with Southern California Edison (City of Claremont 2021b). Clean Power Alliance is made up of 31 public agencies across Los Angeles and Ventura counties working together to bring clean energy choices to our communities. Clean Power Alliance serves over three million people and acquires green energy supplies from local and regional solar, wind, and water generators. Southern California Edison delivers the power, maintains the transmission lines, and reads the meter. All Clean Power Alliance customers receive low-carbon energy, with over one-third receiving power from 100 percent renewable energy sources (Clean Power Alliance 2021). Natural gas usage is reduced through the alliance but for customers within Claremont still requiring natural gas deliver, Southern California Gas is the provider of this service.

4.8.2 Regulatory Setting

The regulatory setting for utilities is provided below, organized by the topics addressed in this section, including water supply; wastewater; stormwater; solid waste; telecommunications, electricity, and natural gas.

a. Federal Regulations

Water

Clean Water Act

The federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary federal law that regulates water quality in the United States. It forms the basis for several State and local laws throughout the country. The Clean Water Act established the basic structure for

regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. Environmental Protection Agency the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the U.S. Environmental Protection Agency and USACE. At the state and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB).

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) regulates public water systems that supply drinking water pursuant to 42 United States Code Section 300(f) et seq.; 40 Code of Federal Regulations (CFR) Section 141 et seq. The principal objective of the federal SDWA is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the federal SDWA are to:

1. Ensure that water from the tap is potable
2. Prevent contamination of groundwater aquifers that are the main source of drinking water for a community
3. Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 CFR Section 144)
4. Regulate distribution systems

b. State

Water

Senate Bill 610

Senate Bill 610 (SB 610) amended California Water Code to require detailed analysis of water supply availability for certain types of development projects. This law requires cities and counties to develop water supply assessments (WSA) when considering approval of applicable development projects to determine whether projected water supplies can meet the project's anticipated water demand. Projects requiring the preparation of a WSA include the following:

- Residential developments of more than 500 dwelling units
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space
- Hotels or motels with more than 500 rooms
- 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
- Mixed-use projects that include one or more of the projects listed above

- Projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project

A General Plan Update (including a Housing Element Update) is not subject to preparation of a Water Supply Assessment because (1) it is not expressly listed as a project which is subject to a Water Supply Assessment under Water Code Section 10912; (2) General Plan law sets forth an alternative process for local governments to consult with water supply agencies during General Plan preparation (see Government Code Section 65352.5); and (3) the California Legislature envisioned the General Plan being considered during preparation of long-term Urban Water Management Plan preparation, to serve as the first tier of land use and water supply planning coordination, prior to consideration of individual development projects. Furthermore, the County of San Bernardino Superior Court rules in *Citizens for Responsible Equitable Environmental Development v. City of Chino* (2011) that a "General Plan is not the type of actual development project identified in Water Code 10912 triggering the WSA requirement." Therefore, the proposed Housing Element Update does not require preparation of a WSA pursuant to SB 610. Nevertheless, water supply availability is assessed under Impact UTIL-2.

Senate Bill 221

Whereas SB 610 requires a written assessment of water supply availability, SB 221 requires lead agencies to obtain an affirmative written verification of sufficient water supply prior to approval of certain specified subdivision projects. For this purpose, water suppliers may rely on an Urban Water Management Plan (UWMP) if the updates to the General Plan (including a Housing Element Update) is accounted for within the UWMP, a WSA or other acceptable information that constitutes "substantial evidence." "Sufficient water supply" is defined in SB 221 as the total water supplies available during normal, single-dry and multiple-dry water years within the 20-year (or greater) projection period that are available to meet the projected demand associated with the General Plan Update, in addition to existing and planned future uses. WSAs are required for residential projects of more than 500 units or a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space. Because the Housing Element Update is a plan and not a subdivision project, it does not require affirmative written verification of sufficient water supply. Nevertheless, water supply availability is assessed under Impact UTIL-2.

California Safe Drinking Water Act

The California Safe Drinking Water Act (SDWA) (Health & Safety Code Section 116270 et seq.; 22 Cal. Code Regs. Section 64400 et seq.) regulates drinking water more rigorously than the federal law. Like the Federal SDWA, California requires that primary and secondary maximum contaminant levels be established for pollutants in drinking water; however, some California maximum contaminant levels are more protective of health. The Act also requires the SWRCB to issue domestic water supply permits to public water systems.

Implementation of the federal SDWA is delegated to the State of California. The SWRCB enforces the federal and state SDWAs and regulates more than 7,500 public water systems across the state. The SWRCB's Division of Drinking Water oversees the State's comprehensive Drinking Water Program. The Drinking Water Program is the agency authorized to issue public water systems permits.

Sustainable Groundwater Management Act

In September 2014, the governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the DWR.

California Plumbing Code

The California Plumbing Code is codified in Title 24, California Code of Regulations, Part 5. The Plumbing Code contains regulations including, but not limited to, plumbing materials, fixtures, water heaters, water supply and distribution, ventilation, and drainage. More specifically, Part 5, Chapter 4, contains provisions requiring the installation of low flow fixtures and toilets. Existing development will also be required to reduce its wastewater generation by retrofitting existing structures with water efficient fixtures (SB 407 [2009] Civil Code Sections 1101.1 et seq.).

Urban Water Management Planning Act

In 1983, the California Legislature enacted the Urban Water Management Planning Act (Water Code, Section 10610 et seq.), which requires urban water suppliers to develop water management plans to actively pursue the efficient use of available supplies. Every five years, water suppliers are required to develop Urban Water Management Plans to identify short-term and long-term water demand management measures to meet growing water demands.

Stormwater

Cobey-Alquist Floodplain Management Act

The Cobey-Alquist Floodplain Management Act (Water Code Section 8400-8435) gives support to the National Flood Insurance Program by encouraging local governments to plan, adopt, and enforce land use regulations for floodplain management, to protect people and property from flooding hazards. The Act also identifies requirements that jurisdictions must meet to receive State financial assistance for flood control.

California Construction Stormwater Permit

The California Construction Stormwater Permit (Construction General Permit), adopted by the SWRCB, regulates construction activities that include soil disturbance of at least one acre of total land area. The Construction General Permit authorizes the discharge of stormwater to surface waters from construction activities. It prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance in excess of reportable quantities established at 40 CFR 117.3 or 40 CFR 302.4, unless a separate National Pollutant Discharge Elimination System (NPDES) Permit has been issued to regulate those discharges.

The Construction General Permit requires that all developers of land where construction activities will occur over more than one acre do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three Risk Levels established in the General Permit
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters

- Develop and implement a Stormwater Pollution Protection Plan which specifies Best Management Practices (BMP) that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards
- Perform inspections and maintenance of all BMPs

Typical BMPs contained in Stormwater Pollution Protection Plans are designed to minimize erosion during construction, stabilize construction areas, control sediment and pollutants from construction materials, and address post construction runoff. The Stormwater Pollution Protection Plan also includes a plan for inspection and maintenance of all BMPs, as well as procedures for altering or increasing BMPs based on changing project conditions.

Wastewater

Wastewater Treatment

Standards for wastewater treatment plant effluent are established using State and federal water quality regulations. After treatment, wastewater effluent is either disposed of or reused as recycled water. The RWQCBs set the specific requirements for community and individual wastewater treatment and disposal and reuse facilities through the issuance of Waste Discharge Requirements, required for wastewater treatment facilities under the California Water Code Section 13260.

The California Code of Regulations Title 22, Division 4, Chapter 3, Sections 60301 through 60355 are used to regulate recycled wastewater and are administered by the RWQCBs. Title 22 contains effluent requirements for four levels of wastewater treatment, from un-disinfected secondary recycled water to disinfected tertiary recycled water. Higher levels of treatment have higher effluent standards, allowing for a greater number of uses under Title 22, including irrigation of freeway landscaping, pasture for milk animals, parks and playgrounds, and vineyards and orchards for disinfected tertiary recycled water.

Regional and Local

County of Los Angeles M

Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit is the vehicle through which the Los Angeles RWQCB regulates discharges from medium and large MS4s. The permits are issued under the NPDES program. NPDES permitting is a national program overseen by the USEPA to address water pollution by regulating point sources that discharge pollutants to waters of the United States. It is part of the 1972 Clean Water Act and authorizes state governments to perform the permitting, administrative, and enforcement of the program through the RWQCBs. The permits require that new development and redevelopment projects to incorporate low-impact development (LID) techniques that include permeable surfaces, bioswales, and other design components that help water to percolate into the ground rather than run off into the stormwater system (gutters).

City of Claremont General Plan

The General Plan was adopted in 2006, and revised in October 2009, and is the primary mechanism for guiding future population growth and development in Claremont. It provides a guide for land use decision making. The General Plan's Conservation Element includes the following goals and policies applicable to utilities and public services:

Goal 5-4: Protect groundwater resources

Policy 5-4.1. Protect, preserve, and enhance the San Antonio Spreading Grounds and Thompson Creek Spreading Grounds as important open space resources for recharging groundwater basins.

Policy 5-4.2. Encourage use of drainage improvements designed, with native vegetation where possible, to retain or detain stormwater runoff, minimizing volume and pollutant concentrations.

Policy 5-4.3 Design sidewalks, roads, and driveways to minimize impervious surfaces

Goal 5-5: Maintain and enhance groundwater resources

Policy 5-5.1. Require all new development to connect to public sewers. Explore alternatives for connecting the existing development which is not currently connected to the sanitary sewer system.

Policy 5-5.2. Persuade water agencies that have wells in Claremont to develop programs that would pump water from high nitrate wells for irrigation use so the nitrates can be assimilated by vegetation, or if possible, that would blend the water for safe human consumption, so that over the long term the contaminated portions of the aquifer can be cleaned

Policy 5-5.4. Encourage the public to reduce the use of chemicals in maintenance of landscaping.

Goal 5-12: Conserve and properly manage natural resources for future generations

Policy 5-12.2. Consider the environmental impacts of proposed development of natural areas, recognizing the loss of natural resources is irreversible. The environmental analysis shall carefully weigh the costs and benefits of such development.

Policy 5-12.3. Encourage the reuse of already developed properties before developing natural areas.

Policy 5-12.4. Implement land use patterns and policies that incorporate smart growth practices, including placement of higher densities near transit centers, allowing mixed-use development, and encouraging and accommodating pedestrian movement.

Policy 5-12.5. Continue to promote the use of solar power and other energy conservation measures.

Goal 5-15: Achieve the highest level of water conservation possible.

Policy 5-15.1. Support water conservation through requirements for landscaping with drought-tolerant plants and efficient irrigation.

Policy 5-15.2. Educate the public about the importance of water conservation and avoiding wasteful water habits.

Policy 5-15.3. Work with the City water provider in exploring water conservation programs and encourage the water provider to offer incentives for water conservation.

Policy 5-15.4. Direct staff to work with Sanitation Districts of Los Angeles County to explore infrastructure improvements that could make it possible to use reclaimed water in Claremont for non-potable uses, such as landscape irrigation.

Policy 5-15.5. Explore with Three Valley Water District water recycling opportunities in Claremont.

Goal 5-16: Strive to achieve waste recycling levels that meet or exceed state mandates.

Policy 5-16.1. Promote reuse and recycling throughout the community.

Policy 5-16.2. Utilize source reduction, recycling, and other appropriate measures to reduce the amount of solid waste generated in Claremont that is disposed of in landfills.

Policy 5-16.3. Facilitate the maximum diversion from landfills of construction and demolition materials created in Claremont through recycling and reuse.

Policy 5-16.4. Achieve maximum waste recycling in all sectors of the community, including residential, commercial, industrial, institutional, and the construction industry.

Claremont Sustainable City Plan

The Sustainable City Plan establishes a framework in which the Claremont community can achieve its vision of becoming a sustainable city and enable all who live and work in Claremont to live in ways that allow them to meet their needs while preserving the ability of future generations to do the same.

Claremont Municipal Code

The Claremont Municipal Code (CMC) adopts the California Green Building Code (CALGreen). In 2007, these green building standards were developed to support the goals of California's landmark initiative AB 32, which established a comprehensive program of cost-effective reductions of greenhouse gases (GHG) to 1990 levels by 2020. CALGreen mandates that new development to be water efficient in design and to reduce waste in construction and operation, among other requirements.

4.8.3 Impact Analysis

The following thresholds of significance were developed based on the *CEQA Guidelines*, specifically, Appendix G. The Housing Element Update would have a significant impact with respect to utilities and service systems if it would:

1. 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
2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years
3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects' projected demand in addition to the provider's existing commitments
4. 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
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste

Issues Not Evaluated Further

Solid Waste

The Initial Study for the Housing Element Update (Appendix A) determined that development facilitated by the Housing Element Update would not increase the total amount of development and associated solid waste to more than double existing amounts, and would, therefore have a less than significant impact. Thus, the threshold related to this subject are not evaluated further.

The Initial Study for the Housing Element Update (Appendix A) determined that development facilitated by the Housing Element Update would comply with all applicable regulations that govern solid waste disposal and impacts would be less than significant. Thus, the threshold related to this subject are not evaluated further.

Project Impacts and Mitigation Measures

Threshold 1:	Would the Housing Element Update 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?
Threshold 3:	Would the Housing Element Update 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?

Impact UTIL-1 DEVELOPMENT FACILITATED THE HOUSING ELEMENT UPDATE MAY REQUIRE THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WATER, WASTEWATER TREATMENT, STORMWATER DRAINAGE, ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS FACILITIES IN CLAREMONT. WHILE NEW CONNECTIONS TO EXISTING UTILITY SERVICE SYSTEMS WOULD BE REQUIRED, SUCH CONNECTIONS WOULD NOT RESULT IN DISTURBANCE BEYOND INDIVIDUAL DEVELOPMENT SITES AND ADJACENT INFRASTRUCTURE CORRIDORS. IMPACTS WOULD BE LESS THAN SIGNIFICANT

Water

Claremont is served by existing Golden State Water and MWD potable water facilities. Reasonably foreseeable development facilitated by the Housing Element Update may require installation of additional water main lines, lateral connections, and hydrants within the Plan Area. Such facilities would be installed during individual project construction and within the disturbance area of such projects or the rights-of-way of previously disturbed roadways; therefore, the construction of these infrastructure improvements would not substantially increase the project's disturbance area or otherwise cause significant environmental effects beyond those identified throughout this EIR. As described in Impact UTIL-2, reasonably foreseeable development facilitated by the Housing Element Update would be served by existing and planned MWD supplies, which are not anticipated to require major MWD treatment or distribution facility improvements. Furthermore, reasonably foreseeable development would be subject to the City's 2006 General Plan policies related to the provision of adequate water services and facilities, such as Conservation Element Policies 5-4.1, 5-4.2, 5-4.3, 5.5-1, and 5.5-2, described above under local regulatory setting. Therefore, the Housing Element Update would not require or result in the relocation or construction of new or expanded

water facilities, the construction or relocation of which could cause significant environmental effects beyond those already identified throughout this EIR. Impacts would be less than significant.

Wastewater

As noted above, Claremont is served by the Los Angeles County Sanitation District, by means of the City's sewer system. Development facilitated by the Housing Element Update may require the installation of upsized sewer lines and additional lateral connections within Claremont. As with water facilities, sewer laterals and main extensions necessary to serve the future development would generally be installed within the already disturbed rights-of-way of existing roads or within the disturbance footprints of such projects. As such, the construction of these infrastructure improvements would not substantially increase a project's disturbance area or otherwise cause significant environmental effects beyond those identified throughout this EIR.

According to the City's 2015 Sanitary Sewage Management Plan, Claremont's physical sewer collection infrastructure consists of 2,966 miles of gravity sewer lines and other associated components (Claremont 2015). The sewage collected from the City's system is transported to a collection/interceptor main owned by the Sanitation Districts of Los Angeles County, District 21 and treated at the POWRP in Pomona. Located at 295 Humane Way in Pomona, the facility serves approximately 130,000 people and treats about 15 million gallons of wastewater per day, of which 8 million gallons per day are reused at over 190 sites (LACSD 2021b). This equates to an estimated 115.4 gallons per person per day. The facility recently increased its wastewater treatment capacity by adding two 4-million-gallon tanks designed to ensure future capacity. At full build out, the Housing Element Update would result in 8,331 additional residents in Claremont. This would result in an addition 961,269 gallons of wastewater that would need to be processed. The increased capacity of 8 million gallons with the new tanks at POWRP would ensure POWRP would have sufficient capacity to accommodate wastewater generated at new residential units that would result from implementation of the Housing Element Update.

Furthermore, applicants for projects facilitated by the Housing Element Update would be responsible for constructing on-site wastewater treatment conveyance systems and paying standard sewer connection fees, as necessary. Development facilitated by the Housing Element Update would also be required to comply with the with Goal 5.5, Policy 5.5-1 and Goal 5.14, Policy 5.14-1 and 5.14-3 from the 2006 General Plan, which require providing adequate wastewater collection, treatment, recycling, and disposal to serve existing and future needs in Claremont. The City's Community Development Department screens project proposals for the potential to create wastewater in excess of capacity of the sanitary sewer system and enforces building and construction standards. Therefore, the Housing Element Update would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects beyond those already identified throughout this EIR. Impacts would be less than significant.

Stormwater

Reasonably foreseeable development under the Housing Element Update would allow for the development of up to 2,805 housing units, which would potentially require new or modified stormwater drainage facilities due to the introduction of new impervious surfaces. Specific development under the Housing Element Update would primarily consist of infill development and development near transportation nodes, although some development could occur on vacant housing opportunity sites. Infill development on sites with existing development would not have a

substantial effect on stormwater runoff volumes due to the relatively minor change in impervious surface area compared with development on vacant sites. Development on vacant sites would have to adhere to the requirements discussed below that control the amount of impervious surface, including LID techniques that help to reduce runoff. As with water and wastewater treatment facilities, stormwater drainage infrastructure necessary to serve future development would generally be installed within the already disturbed rights-of-way of existing roads or within the disturbance footprints of such projects. As such, the construction of these infrastructure improvements would not substantially increase the project's disturbance area or otherwise cause significant environmental effects beyond those identified throughout this EIR.

The City is a permittee under the Los Angeles County MS4 Permit, which requires all new development and redevelopment projects to incorporate LID techniques and stormwater control measures as outlined under CMC Chapter 8.28.050, including stormwater retention and treatment features (City of Claremont n.d.). The LID plan applies to projects equal to or greater than one acre of disturbed area, parking lots, redevelopment projects greater than 5,000 ft, and projects with large, impervious surface areas (parking lots). The City's LID control measures aim to conserve natural areas, protect slopes and channels, provide storm drain system stenciling and signage, divert roof runoff to vegetated areas before discharge unless the diversion would result in slope instability, and direct surface flow to vegetated areas before discharge unless the diversion would result in slope instability.

Reasonably foreseeable development under the Housing Element Update would be required to adhere to existing regulations that instruct stormwater management, including management of rainfall run off by providing a means for stormwater to infiltrate into the ground as close to the source as practicable. In accordance with the MS4 permitting requirements, post-construction peak runoff must be maintained at or below pre-project levels.

The CMC Section 8.28.050 requires implementation of stormwater BMPs to control the volume, rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects as a requirement of the MS4 General Permit. The City incorporates such requirements in all land use entitlements and construction or building-related permits to be issued relative to such development or redevelopment. Furthermore, the City's LID ordinance outlined in CMC Section 8.28.050 aims to specifically reduce the amount of surface runoff and aid in groundwater recharge through techniques such as infiltration, evapotranspiration, bioretention and/or rainfall harvest and additional uses in accordance with the requirements set forth in the MS4 permit and the LID standards manual.

Finally, as much of the development facilitated by the Housing Element Update would involve infill development and redevelopment on parcels where surface lots currently exist, new development would facilitate greater infiltration of stormwater due to the LID requirements, which may have not been in place when the original development occurred. This would result in beneficial impacts to stormwater runoff.

With compliance to these regulations and requirements, the Housing Element Update would not require or result in the relocation or construction of new or expanded stormwater drainage facilities. Impacts would be less than significant.

Electricity and Natural Gas

The project would require connections to existing electrical transmission and distribution systems on site to serve development facilitated by the Housing Element Update. This service would be

provided in accordance with the rules and regulations of Southern California Edison, Southern California Gas Company, and other local utility providers, on file with and approved by California Public Utilities Commission. Based on the availability of existing electrical infrastructure, it is not anticipated that the construction of new electrical transmission and distribution lines would be required, and all sites would be able to connect to existing infrastructure. Therefore, there would be adequate electrical facilities to serve development facilitated by the project and impacts related to electricity would be less than significant.

Development facilitated by the project would conform to CALGreen building code requirements to reduce the use of fossil fuels. Furthermore, Clean Power Alliance, the power aggregate serving Claremont sources its energy from "clean" fuel sources, including solar, wind, and water. New development under the Housing Element Update would not connect to existing natural gas infrastructure as projects would be required to source 100 percent of energy from these sources. Therefore, new natural gas connections would not be needed for development facilitated under the Housing Element Update. Impacts related to electricity and natural gas transmission and distribution would be less than significant.

Telecommunications

Development under the Housing Element Update would require connections to existing adjacent utility infrastructure to meet the needs of site residents and tenants. Based on the availability of existing telecommunications infrastructure, construction of new telephone and cable lines would not be required, and all sites would be able to connect to existing infrastructure. Development facilitated by the Housing Element Update would be required to adhere to applicable laws and regulations related to the connection to existing telecommunication infrastructure. Therefore, there would be adequate telecommunications facilities to serve the development facilitated by the project and impacts related to telecommunications would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

Threshold 2:	Would the Housing Element Update have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTIL-2 POPULATION INCREASE ANTICIPATED BY IMPLEMENTATION OF THE HOUSING ELEMENT UPDATE COULD PLACE INCREASING DEMAND ON WATER SUPPLY IN NORMAL AND DROUGHT YEARS. WHILE PROJECTIONS CONSIDERED IN THE UWMP ARE LESS THAN THOSE AFFORDED BY IMPLEMENTATION OF THE HOUSING ELEMENT UPDATE, SUFFICIENT WATER SUPPLY EXISTS TO SERVE THE POPULATION DUE TO CONSERVATION EFFORTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The City of Claremont is served by the Golden State Water Company (GSWC) Claremont Water Service Area. GSWC supplies water from several sources, including:

- San Gabriel Valley Ground Water Basin adjudicated groundwater
- Purchased water from Upper San Gabriel Valley Municipal Water District
- Purchased recycled water from LACSD's San Jose Creek and Whittier Narrows Water Reclamation Plant
- Water delivered from the GSWC San Dimas service area.

- Emergency interties with neighboring agencies

GSWC is prepared for water shortages with MWD's existing potable water supply that includes groundwater storage and water imported from the statewide system and the Colorado River.

GSWC currently provides water services to 36,713 persons. The 2021 UWMP projects the service area to have a population of 37,933 by 2030, using the Los Angeles Department of Water and Power's Population Tool (GSWC 2021). The UWMP recognizes that increased population would have an impact on water demand.

Over the past 10 years, GSWC's water demand has averaged 9,811 acre-feet per year (AFY), with combined single-family and multi-family unit demand being 6,151 AFY (GSWC 2021). Notably, single-family residences use 88 percent more water (5,478 AFY) than multi-family residences (673 AFY). These combined water volume demands for single-family and multi-family residences is likely due to landscape watering, which GSWC and the City encourage residents to reduce through conservation measures. GSWC's water supply over the last 10 years for the Claremont Service System is depicted in Table 4.8-1.

Table 4.8-1 GSWC Historical Water Supply

Calendar Year	Total
2011	10,685
2012	11,309
2013	8,970
2014	11,052
2015	8,161
2016	8,831
2017	9,731
2018	9,980
2019	9,213
2020	10,175

Source: GSWC 2021

Recognizing that increased population equates to increased water use, GSWC enacts water conservation measures at various levels, depending on precipitation conditions, to ensure that sufficient water is available to meet demand.

GSWC also draws upon the supplies of MWD to make up its deficits. The larger water district relies heavily on water conservation measures and groundwater recharge to ensure its supply is sufficient to meet demand (MWD 2021). In its UWMP, MWD presents water supply and demand comparison scenarios for normal year supply and demand and single dry year and multiple dry years.

Table 4.8-2 and Table 4.8-3 show the MWD UWMP water demand and supply projections from 2020 to 2045 (MWD 2021).

Table 4.8-2 Single Dry Year Supply and Demand

	2025	2030	2035	2040	2045
Demand Totals	1,544,000	1,500,000	1,472,000	1,496,000	1,525,000
Supply Totals	2,772,000	2,761,000	2,760,000	2,760,000	2,757,000
Surplus	**1,228,000**	**1,261,000**	**1,287,000**	**1,264,000**	**1,232,000**

*Units are presented in acre feet (af) per calendar year.

Source: MWD 2021

Table 4.8-3 Multiple Dry Years Supply and Demand

	2025	2030	2035	2040	2045
Demand Totals	1,592,000	1,570,000	1,537,000	1,539,000	1,564,000
Supply Totals	2,178,800	2,219,000	2,241,000	2,263,000	2,239,000
Surplus	**586,800**	**649,000**	**704,000**	**724,000**	**675,000**

*Units are presented in acre feet (af) per calendar year.

Source: MWD 2021

In single and multiple dry year scenarios, current water supplies could potentially be insufficient to meet demand from the estimated population of 44,811 as projected by the Housing Element Update. Projections used in the MPWD UWMP are 18.1 percent lower than the estimated population under Housing Element Update. Although the Housing Element Update would facilitate development beyond what is forecast in both the 2006 General Plan and SCAG's 2020 RTP/SCS, it would bring the forecasts for the 2006 General Plan and the RTP/SCS into consistency since the next iteration of the RTP/SCS will be updated to reflect new forecasts for each city in the region.

In 2020, MWD served more than 22 million persons in a 38,155 square mile area that includes Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura Counties (MWD 2021). Increased demand from population growth was flat in the period from 2016 to 2020. In 2020, about 96 percent of retail water demands were for municipal (residential and business) and industrial (manufacturing) purposes. About four percent were allocated to agricultural uses, the demand from which has declined due to urbanization and market factor, including the price of water.

The California Code of Regulations Title 24, Part 11 (CALGreen) requires a 20 percent reduction in residential indoor water use that would lower potential water demand. According to information MWD provides about retail water demand within its district, per capita demand has decreased below 1990 levels as of last reporting in 2020, despite a 25 percent increase district-wide in population.

The Housing Element Update would generate both construction-related and operational water demand. The following subsections include discussions of both sources of water demand.

Construction Demand

Water would be required for temporary construction activities in the Plan Area, including dust suppression, grading and grubbing, compaction, construction equipment wheel washing, and concrete mixing and casting. Water consumption by construction workers and cleaning of portable toilets on individual project sites may also account for a small portion of overall construction water demand.

Watering for dust suppression would create the largest water demand during construction. Pursuant to the requirements of South Coast Air Quality Management District (SCAQMD) Rule 403 as described in Section 4.2, *Air Quality*, all disturbed unpaved roads and disturbed areas on each project site would be watered to reduce fugitive dust generation from construction activities. Demolition, site preparation, and grading are the activities anticipated to result in the greatest dust generation and, therefore, the greatest construction-related water demand. Water demand for dust suppression is highly dependent on several site-specific variables, including soil properties, antecedent moisture conditions, and other climatic factors. A 2017 analysis prepared by SCAQMD estimated water demand associated with Rule 403 dust suppression requirements for construction sites in SCAQMD jurisdiction at approximately 1,000 gallons per acre per day (SCAQMD 2017). A conservative estimate of a project site of up to 23 acres of land (assuming multiple, small sites being developed at the same time) was used to estimate the amount of water that could be necessary at any one time for dust control over the course of demolition, site preparation, and grading activities for any given development phase based on a theoretical CalEEMod modeling run. Table 4.8-4 shows estimated construction water demand associated with each phase of development.

Table 4.8-4 Anticipated Construction Water Demand

Construction Phase	Duration of Phase[1]	Projected Construction Water Demand (gallons)[2]	Projected Construction Water Demand (AF) over 8-year Planning Horizon
Demolition	100 days	2,300,000	7.1
Site Preparation	60 days	1,380,000	4.2
Grading	155 days	3,565,000	10.9
Total	**315 days**	**7,245,000**	**22.2**

AF = acre-feet

1 Based on demolition, site preparation, and grading activity duration in construction schedule provided by CalEEMod run.

2 Assumes up to 23 acres requiring site watering during any given day and a 1,000-gallon per acre per day watering rate (SCAQMD 2017).

Source: CalEEMod outputs (Appendix D), SCAQMD 2017

Note: Totals may not sum precisely due to rounding.

Construction water demand would account for approximately 22.2 AF over the approximately eight-year buildout period, or approximately 2.8 AFY, which would represent less than one percent of GSWC's annual potable water supply as of 2020. Construction water demand would be temporary and therefore would not result in a long-term water supply demand. Furthermore, GSWC and MWD provide non-potable water for use as dust suppression during construction activities; therefore, the actual demand on potable water supplies would be even lower than estimated in Table 4.8-4. Given the temporary and minimal nature of construction water demand, impacts related to construction water consumption would be less than significant.

Operational Demand

Reasonably foreseeable development under the Housing Element Update would result in increased demand for potable water supplies for drinking; use by appliances and fixtures including toilets, showers, bathtubs, sinks, washing machines, and dishwashers; and landscape irrigation. Based on current usage, water demand is approximately 0.81 AFY per housing unit. The Housing Element Update would facilitate development of up to 2,805 additional residential units, which would

equate to approximately 2,272 AFY of additional demand. This represents an increase of nearly 35 percent over 2019 water usage. However, because the Housing Element Update would implement largely multi-family units, water demand would be less than development of single-family homes.

As discussed above, GSWC anticipates that additional demand will result in a decreased capacity. MWD has estimated water supply availability for normal, single-dry, and multiple-dry year scenarios from 2025 through 2045 in its 2020 UWMP. For all years and all scenarios, MWD anticipates meeting forecast demand, with a surplus based on existing and future demand. The surplus could accommodate the increased demand if water conservation measures continue to reduce consumption at the pace MWD describes, which is a reduction of about 10 GPCD per year.

Compliance with 2006 General Plan Conservation Element Policies 5-15.1, 5-15.2, 5-15.3, 5-15.4, 5-15.5 would further expand water conservation programs and reduce per capita water use. Furthermore, enforcement of the water conservation measures codified in Chapter 8.30 et seq. of the CMC would ensure projects developed under the Housing Element Update would comply with conservation provisions. Therefore, while the development facilitated by the Housing Element Update would result in additional population beyond the projected population within the MWD UWMP, compliance with 2006 General Plan policies and the CMC would reduce per capita water use to be within the targeted 146 GPCD. Therefore, sufficient water supplies would be available to serve development anticipated by the Housing Element Update during normal, dry, and multiple dry years. Impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation would be required.

4.8.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3].).

Water

The geographic scope for cumulative water supply impacts is the water district service area. This would include Los Angeles, Orange, San Diego, Riverside, San Bernardino, and Ventura Counties. This geographic scope is appropriate because MWD is responsible for supplying potable water to all residential, commercial, industrial, and fire protection uses within its service area. Development considered part of the cumulative analysis includes buildout of the City of Claremont 2006 General Plan and other local General Plans.

Cumulative development within the MWD service area will continue to increase demands on water supplies. There would be sufficient existing water supplies to accommodate anticipated cumulative development and achieve full buildout of the housing opportunity sites for other nearby cities under normal and dry year conditions by relying on the estimated surplus and implementation of ongoing conservation measures. Therefore, the Housing Element Update would not have a cumulatively considerable contribution to a significant cumulative impact regarding water supply services.

Wastewater

The geographic scope for cumulative wastewater impacts includes the LACSD service territory because wastewater conveyance and treatment for Claremont beyond the city limits is conducted by SVCW. As discussed above under Impact UTIL-1, new wastewater service connections would be installed as needed, on a project-specific basis; this would occur for non-residential developments within the cumulative scenario as it would for residential developments under the Housing Element Update. LACSD and the City of Claremont conduct repairs and upgrades to the existing wastewater conveyance system throughout the city on an as needed basis, and would continue to do so for both residential developments under the Housing Element Update as well as non-residential projects in the cumulative scenario.

Additionally, as POWRP seeks to maximize water reuse through the San Jose Creek Water Reclamation Plan Flow Equalization Project, which retains and processes up to eight million gallons of wastewater that is then made available for non-potable uses within the district, development facilitated by the project would be within the LACSD POWRP treatment plant capacity. Therefore, potential cumulative impacts associated with water conveyance and treatment would be less than significant.

Electricity and Natural Gas

The geographic scope for cumulative electricity and natural gas impacts is the Southern California Edison and Southern California Gas service area. This geographic scope is appropriate because the local providers are responsible for transmitting electricity and natural gas to all land uses within their service areas, including those that would occur on the housing opportunity sites. Development considered part of the cumulative analysis includes buildout of local General Plans.

Southern California Edison and Southern California Gas are subject to the requirements set forth and/or enforced by the CPUC. The need for electric and natural gas infrastructure would be addressed on a case-by-case basis for each cumulative project, and would be subject to CPUC requirements, similar to those applicable to the Housing Element Update. Therefore, cumulative impacts related to electric power and natural gas transmission facilities would be less than significant. Therefore, the Housing Element Update would not have a cumulatively considerable contribution to a cumulative impact regarding electricity and natural gas.

Telecommunication

The geographic scope for cumulative telecommunications impacts is the telecommunication provider service area. This geographic scope is appropriate because local providers are responsible to provide adequate telecommunication infrastructure to all land uses within its service area, including the housing opportunity sites. Development considered part of the cumulative analysis includes buildout of the 2006 General Plan.

As discussed above under Impact UTIL-1, project implementation requires connections to existing utility infrastructure to meet the needs of site residents and tenants. Cumulative development would increase demand for telecommunications infrastructure in the city. However, cumulative projects would each be required to provide adequate telecommunications infrastructure on a project-by-project basis and would be subject to the same requirements as the Housing Element Update. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant. The Housing Element Update would not have a cumulatively considerable contribution to a cumulative impact regarding telecommunication services.

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5 Other CEQA Required Discussions

This section discusses growth-inducing impacts, irreversible environmental impacts, and energy impacts resulting from the Housing Element Update.

5.1 Growth Inducement

Section 15126.2(e) of the *CEQA Guidelines* requires consideration of growth inducing impacts of a proposed project. Growth inducing impacts are characteristics of a project that could "foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." According to the *CEQA Guidelines*, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant). In addition, as set forth in the *CEQA Guidelines*, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Generally, a project may result in growth inducing effects if it involves one of the following:

- The removal of a regulatory obstacle to growth (e.g., an annexation or up-zoning), thus indirectly inducing population and/or employment growth
- Extension of infrastructure (sewer, water, etc.) to an area currently undeveloped and/or lacking adequate infrastructure, thus removing an obstacle to growth; and/or

The *CEQA Guidelines* state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

Therefore, the Housing Element Update's growth inducing effect is considered a significant environmental impact only if one of the above listed effects results in a significant physical effect in one or more of the issue areas analyzed in Section 4 of this EIR.

5.1.1 Population Growth

As discussed in Section 4.5, *Population and Housing*, the Housing Element Update would facilitate development of new housing units in already urbanized areas of the Plan Area. The Housing Element Update would accommodate up to 2,805 new residential units to meet the City's Regional Housing Needs Assessment (RHNA), which is determined by the Southern California Association of Governments (SCAG) to quantify the need for housing within each jurisdiction based on anticipated growth. New residential units developed under the Housing Element Update could directly increase the population of the city if they were occupied by people currently residing in other cities or regions.

The purpose of the Housing Element Update is to address the City's fair share of the regional housing need and specific State statutory requirements. As of March 2021, SCAG determined a final RHNA allocation of 1,711 units for the City, of which 866 must be affordable to lower-income households. To meet the objectives of the RHNA and provide sufficient capacity for housing development, the Housing Element Update specifies sites for residential development, identifies rezoning of sites to increase permitted residential densities to meet affordability requirements, creates an Affordable Housing Overlay (AHO) Zone, and continues implementation of the Accessory Dwelling Unit (ADU) program.

Therefore, the Housing Element Update would align with SCAG's RHNA determination and the State statutory requirements, which are established based on anticipated growth within the city.

As discussed in Section 4.5, *Population and Housing*, the population growth under the Housing Element Update would exceed SCAG's population growth forecast by approximately 16.7 percent and the housing growth forecast under the Housing Element Update would exceed SCAG's forecast by approximately 15.9 percent. However, the Housing Element Update would be consistent with State requirements for the RHNA. Although the Housing Element Update would facilitate development beyond what is forecast in both the 2006 General Plan and SCAG's 2020 RTP/SCS, it would bring the forecasts for the City's 2006 General Plan and the RTP/SCS into consistency since the RTP/SCS will be updated during the next cycle to reflect new forecasts for each city in the region. The additional units under the Housing Element Update would further assist in addressing the existing crisis and meeting the housing needs of the city. Furthermore, the Housing Element Update would first be submitted to the Department of Housing and Community Development (HCD) for review and approval to ensure that it would adequately address the housing needs and demands of the city. Approval by the HCD would ensure that population and housing growth under the Housing Element Update would not be substantial or unplanned.

The increase in affordable housing units would provide housing opportunities in proximity to jobs for those employed in the city that meet these household income categories. Affordable housing units would provide opportunities for a better balance of jobs and housing that reduces regional vehicle miles traveled (VMT) and associated impacts related to transportation, air quality, and greenhouse gas emissions.

Additionally, future housing development facilitated by the Housing Element Update is intended to be dispersed throughout the community to create managed levels of growth in specific areas. The types of housing units anticipated under the Housing Element Update would generally fall into the following categories of development projects: multi-family residential and/or mixed-use development on vacant sites, redevelopment of existing nonresidential and residential sites that would allow residential use or higher density residential use, and ADUs. The housing opportunity sites would be in areas with existing services and infrastructure and the Housing Element Update does not propose new roads or infrastructure extensions. Therefore, the Housing Element Update would not induce substantial unplanned population growth in Claremont by identifying future actions to increase capacity for the future development of new dwelling units, as necessary to meet State housing law requirements.

5.1.2 Economic Growth

Implementation of the Housing Element Update would generate temporary employment opportunities during construction of individual buildings and projects. Because construction workers would be encouraged to be drawn from the existing regional work force, construction of development facilitated by the Housing Element Update would not be considered growth-inducing.

As discussed in Section 4.5, *Population and Housing*, the majority of those employed in the city commute from other jurisdictions. Affordable housing units would provide opportunities for a better balance of jobs and housing that reduces regional VMT, and associated impacts related to transportation, air quality, and GHG emissions.

5.1.3 Removal of Obstacles to Growth

The city is primarily urbanized and contains developed communities with existing serving infrastructure, including roads, water supply, sewers, and storm drains. The city's existing roadway network would accommodate reasonably foreseeable development under the Housing Element Update. In the event that roadway upgrades are required to serve specific future development, such upgrades would likely be minor (e.g., lane reconfiguration or restriping) and are not anticipated to include the construction of new roads. Although new residential development under the Housing Element Update may require minor utility upgrades or expansion (e.g., water line connections, site drainage design) on a project-by-project basis, such upgrades would be intended to accommodate the growth planned under the Housing Element Update within the city and would not induce growth outside of the city. As discussed in Section 4.8, *Utilities and Service Systems*, such upgrades would likely occur within existing utility easements and would not result in new areas of disturbance. Furthermore, existing wastewater treatment plants serving the city have adequate capacity to treat project-generated sewage and the treatment requirements of the Pomona Water Reclamation Plant would not be exceeded. Therefore, the Housing Element Update would not necessitate construction of a new wastewater treatment facility. Generally, the Housing Element Update is specifically intended to concentrate new housing development in areas that are already served by infrastructure in order to ensure that infrastructure is utilized efficiently and in a manner that reduces the environmental impacts of development.

Concentrating development in the urbanized areas of the Plan Area where existing transportation centers occur would generally avoid impacts to sensitive environmental conditions, such as cultural, biological, and paleontological resources, and minimize impacts since new development built to current standards would generally improve some existing conditions, such storm water runoff, surface water quality and reduce the potential for substantial seismic damage. The Housing Element Update would not result in unplanned growth, but rather would ensure that projected growth is accommodated. The Housing Element Update is anticipated to satisfy the anticipated population growth in the region in an efficient manner consistent with State, regional, and City policies. Therefore, the Housing Element Update would aim to efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality.

5.2 Irreversible Environmental Effects

Section 15126.2(b) of the *CEQA Guidelines* requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Cultural Resource impacts from the potential demolition or alteration of historical resources) are considered significant and unavoidable; that is, feasible mitigation is not available to reduce impacts related to historical resources to a less-than-significant level.

5.3 Significant and Irreversible Environmental Changes

Section 15126.2(d) of the *CEQA Guidelines* requires a discussion of any significant irreversible environmental changes that would be caused by the proposed Housing Element Update. Specifically, Section 15126.2(d) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement

which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The project involves the wasteful use of resources.

Resources that would be consumed as a result of construction and operation of reasonably foreseeable development under the Housing Element Update include water, electricity, natural gas, and fossil fuels. However, as discussed in Section 4.8, *Utilities and Services Systems*, and in the *Energy* section of the Initial Study (Appendix A), the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources.

Construction activities related to the reasonably expected and foreseeable development would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment. However, as discussed in the *Energy* section of the Initial Study, use of such resources by construction activities associated with residential development under the Housing Element Update would not be unusual as compared to other construction projects and would not substantially affect the availability of such resources.

With respect to operational activities, compliance with all applicable energy and building codes would ensure that natural resources are conserved or recycled to the maximum extent feasible. New development under the Housing Element Update would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations), and the Claremont Green Building Standards Code (CMC Title 15, Chapter 22). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures.

The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. New developments would also be required to comply with the Claremont Green Building

Standards Code in accordance with the Claremont Municipal Code Chapter 15, Section 22.010, that adopts the California Green Building Standards Code. While consumption of natural resources in the city would increase with implementation of the Housing Element Update due to development and associated population increases, it is also likely that in response to GHG reduction mandates, new technologies or systems will emerge, or will become more cost-effective or user-friendly, that will further reduce the city's reliance upon nonrenewable natural resources. Therefore, the Housing Element Update would not occur in a wasteful or inefficient manner use of natural resources.

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6 Alternatives

As required by Section 15126.6 of the *CEQA Guidelines*, this environmental impact report (EIR) examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives (stated in Section 2.0 of this EIR) but would avoid or substantially lessen the significant adverse impacts.

As discussed in Section 2.0, *Project Description*, the objectives for the Housing Element Update, are as follows:

- Meet State required RHNA for 6th RHNA planning cycle of 2021-2029
- Bring the General Plan into conformance with recently enacted State laws
- Identify future housing sites with a collective capacity to meet the City's RHNA, including the requisite buffer capacity

Included in this analysis are three alternatives, including the CEQA-required "no project" alternative, that involve changes to the project that may reduce the project-related environmental impacts as identified in this EIR. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the Housing Element Update.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project (continuation of the current Housing Element)
- Alternative 2: Increased Mixed-Use Overlay
- Alternative 3: Reduced Residential Units

As required by CEQA, this section includes a discussion of the "environmentally superior alternative" among those studied (see Section 6.3).

Section 15126.6(a) of the *CEQA Guidelines* states the following:

> An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

The City of Claremont, in its role as lead agency, has determined that the alternatives analyzed in this section of the EIR represent a reasonable range of alternatives to the Housing Element Update.

Table 6-1 provides a summary comparison of the proposed Housing Element Update and each of the alternatives considered. Detailed descriptions of the alternatives are included in the impact

analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 6.1 through Section 6.3 of this EIR.

Table 6-1 Comparison of Project Alternative Buildout Scenarios

	Proposed Housing Element Update	Alternative 1: No Project[1]	Alternative 2: Increased Mixed-Use Overlay	Alternative 3: Reduced Residential Units
Total Allowable Dwelling Units Under Alternative (Number of Units)	3,097	0	5,808	2,375
Change in Population Potential (Number of Residents)[2]	+8,113	+0	+15,624	+6,389
Total Population Under Alternative (Number of Residents)[3]	45,597	37,266	52,890	43,655

[1] The number of units calculated for the No Project Alternative are the difference between the 2017-2021 Housing Element projections (12,531 units; 11,620 units existed in 2017 and the Housing Element projected to add 911 units) and the number of existing units the Plan Area (12,511). Considering that the previous Housing Element's projections have been met, the alternative would allow zero new units.

[2] Calculations based on 2.69 people per dwelling unit (City of Claremont 2021) except for the No Project Alternative. The population and housing methodology for the 2006 General Plan is included in the General Plan EIR (City of Claremont 2015).

[3] Existing Plan Area population of 37,266 (see Section 4.4, *Population and Housing*, for details). Total population is existing plus population from the Housing Element.

6.1 Alternative 1: No Project Alternative

6.1.1 Description

The "No Project" alternative involves continued implementation of the City's current Housing Element. This alternative assumes that the City's existing Housing Element policies would continue to facilitate development in accordance with existing land use designations. Alternative 1 would continue to facilitate development in the same pattern as is currently seen in the City.

Under Alternative 1, no net new residential development would occur beyond projected growth since housing projections have already been met. Therefore, Alternative 1 would fail to meet California General Plan law, such as the requirement to adopt an updated Housing Element for the 2021-2029 planning period, meet Regional Housing Needs Allocations, and update a Safety Element consistent with State regulations.

6.1.2 Impact Analysis

No new housing opportunity sites would be developed under Alternative 1, resulting in less intense development and operational density than proposed under the Housing Element Update. Less intensity and density would result in fewer potential environmental impacts related to both construction and operation, particularly for aesthetics, air quality, biological resources, greenhouse gases, population and housing, transportation, tribal cultural and cultural resources, and utilities and service systems than the Housing Element Update. Regional VMT, however, would increase due to the need for employees to commute into the Plan Area from other areas with more housing opportunities, particularly affordable housing. Further, according to the Transportation Impact Study prepared by CR Associates (Appendix D), Alternative 1 would result in a VMT per capita of 16.7 which would result in an exceedance of 85 percent of the regional average of 19.5. Thus Alternative 1 would have a significant VMT impact.

Alternative 1 would result in no new residential units, which would be inconsistent with the RHNA goals for the City. Alternative 1 would result in no net increase in population or housing due to no net new residential development. No new population and housing would reduce the demand for public services, parks and recreation facilities, energy, water, and wastewater treatment compared to the Housing Element Update. Overall, impacts would generally be less than under the Housing Element Update, except for transportation, though the reduced density would not result in as many affordable units and would not meet the project objectives and be inconsistent with California law.

6.2 Alternative 2: Increased Mixed-Use Overlay

6.2.1 Description

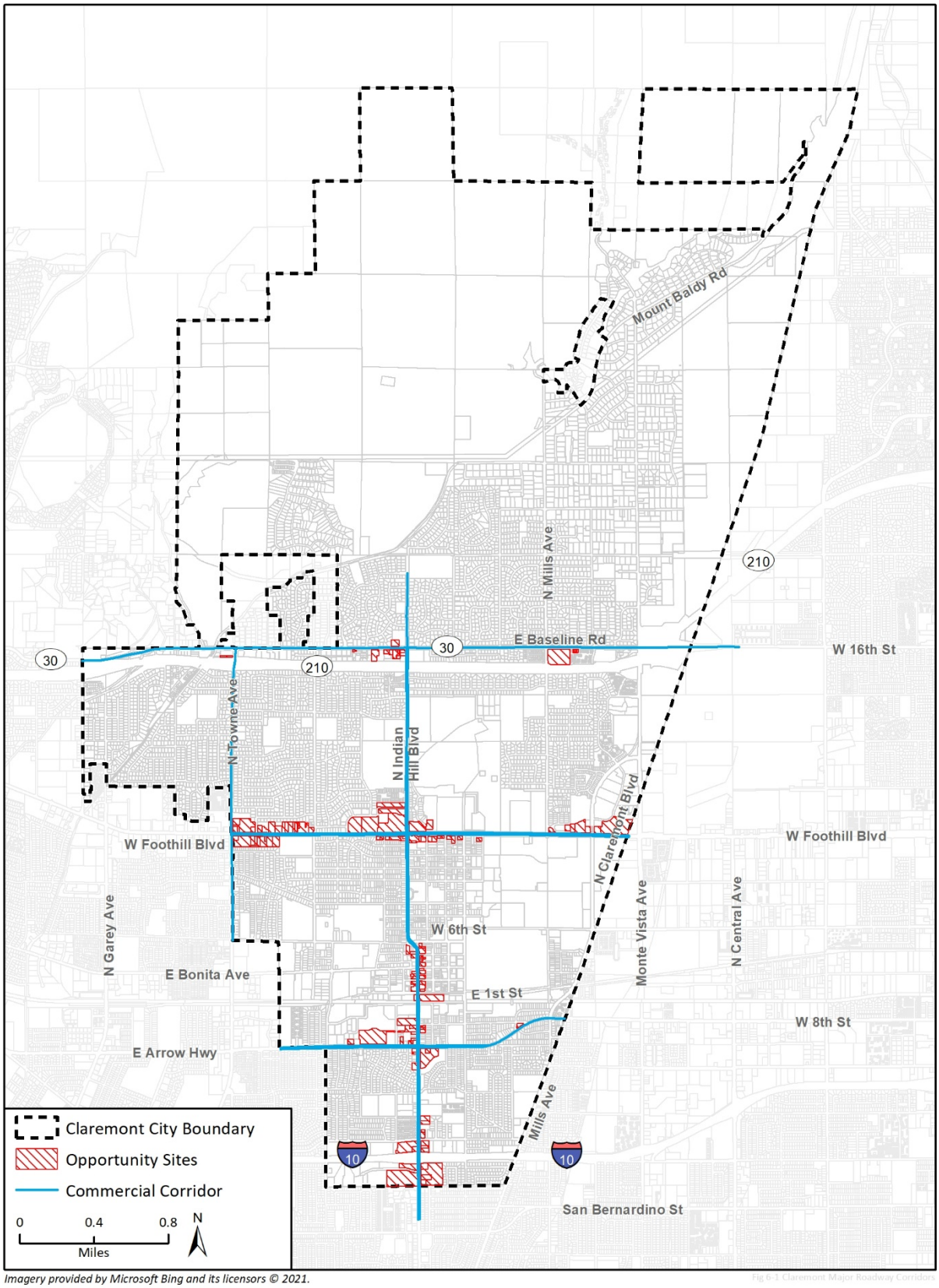
Alternative 2 would include the Mixed-Use Overlay (MUO) zone on all parcels zoned commercial along major transportation corridors applied at 30 dwelling units per acre (du/a). Major corridors include Baseline Road, Foothill Boulevard, Arrow Highway, Towne Avenue, and Indian Hill Boulevard, as shown in Figure 6-1. The allowable development of additional units in the MUO under this Alternative would be 2,711 units. Therefore, Alternative 2 would have a total of 61 new housing opportunity sites and 5,808 new residential units, which is 2,711 more than the Housing Element Update. Alternative 2 would meet the City's RHNA allocation.

6.2.2 Impact Analysis

a. Aesthetics

Under Alternative 2, development facilitated by the Housing Element would result in a greater number of housing units as analyzed under the proposed Housing Element Update. Including an MUO zone on all parcels currently zoned commercial along major transportation corridors would result in potentially larger massing and building heights than the Housing Element Update along the major transportation corridors. Overall, building massing would be similar to massing under the Housing Element Update because some sites would have 57 dwelling units per acre. Development and redevelopment that would occur under Alternative 2, would be similar to the Housing Element Update, would be governed by 2006 General Plan policies and the regulations in the Development Code that concern aesthetics. Mitigation Measure AES-1 would still be required on Site 32 but would not be applied to any housing opportunity sites introduced under Alternative 2, because the maximum allowable du/a would be 30. Buildings constructed at 30 du/a would be unlikely to require building heights that could impact scenic vistas or resources. Impacts on scenic vistas, scenic resources, visual character or quality, and light and glare would be the same as under the Housing Element Update, and impacts would be less than significant with mitigation, same as the Housing Element Update.

Figure 6-1 Claremont Major Roadway Corridors



Imagery provided by Microsoft Bing and its licensors © 2021.

b. Air Quality

Under Alternative 2, a greater number of residential units would be developed as compared to the Housing Element Update. A greater number of units would result in a larger population increase than would be facilitated by the Housing Element Update. However, similar to the Housing Element Update, Alternative 2 would promote infill development and require adherence to 2006 General Plan policies that reduce VMT when evaluating new development projects. This would promote reductions in VMT and associated air pollutant emissions, which would be consistent with one of the overarching purposes of the Air Quality Management Plan (AQMP) to reduce mobile source emissions. Construction and operational air quality emissions from 2,711 additional residential units would increase compared to the Housing Element Update. However, Alternative 2 would provide mixed-use housing along major transportation corridors, which would situate residents closer to goods, services, and jobs. Residences in the vicinity to goods, services, and jobs would lessen the reliance of residents on vehicles to travel to those destinations and enable walking and bicycling due to the proximity. Fewer vehicle trips would result in fewer air pollutant emissions under this alternative.

Similar to the Housing Element Update, Alternative 2 would not include substantial toxic air contaminants (TAC) sources and would be consistent with California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) guidelines. Alternative 2 would not result in the exposure of off-site sensitive receptors to significant amounts of carcinogenic or TACs. Overall, air quality impacts under Alternative 2 would be slightly higher than under the Housing Element Update due to the increased number of allowable residential units and associated residents, but impacts would remain less than significant.

c. Biological Resources

Alternative 2 would include an additional 2,711 units as compared to the Housing Element Update, which would require more development. Although most of the City is built out and heavily urbanized there is potential for slightly greater impacts to biological resources if landscaped or other small natural areas are disturbed during construction or operation associated with Alternative 2. Similar to the Housing Element Update, buildout under Alternative 2 would be required to adhere to 2006 General Plan policies, City development requirements, federal and State regulations related to biological resources, similar to the Housing Element Update. Development under Alternative 2 would also be required to implement Mitigation Measures BIO-1 through BIO-7 proposed in this EIR to reduce impacts to biological resources to a less than significant level. Biological resource impacts would be slightly greater as compared to the Housing Element Update and would remain less than significant with mitigation incorporated.

d. Greenhouse Gas Emissions

Alternative 2 would include an additional 2,711 units as compared to the Housing Element Update, which would result in a larger anticipated population increase than analyzed under the Housing Element Update. Construction and operational GHG emissions from development of the additional 2,711 housing opportunity sites would increase compared to the Housing Element Update. However, Alternative 2 would provide mixed-use housing along major transportation corridors, which would situate residents closer to goods, services, and jobs. Residences in the vicinity to goods, services, and jobs would lessen the reliance of residents on vehicles to travel to those destinations and enable walking and bicycling due to the proximity. Fewer vehicle trips would result in reduced GHG emissions. Similar to the Housing Element Update, Alternative 2 would be consistent with 2006

General Plan policies, the 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and applicable State regulation, such as SB 32. Still, overall GHG emissions and impacts would be slightly higher compared to the Housing Element Update due to additional residential units but would remain less than significant.

e. Population and Housing

Alternative 2 would result in potential development at 61 additional housing opportunity sites compared with the Housing Element Update, which would facilitate the construction of up to 5,808 residential units. These 5,808 units would accommodate approximately 15,624 new residents, bringing Claremont's population to 52,890, as shown in Table 6-1, approximately 17 percent more than would be facilitated with the Housing Element Update. Alternative 2 would be consistent with housing policies and RHNA goals for the City. However, similar to the Housing Element Update, Alternative 2 would be greater than the SCAG 2020 RTP/SCS population forecasts. Alternative 2, similar to the Housing Element Update, would update the 2006 General Plan, which would be incorporated into SCAG's next RTP/SCS forecast. Although Alternative 2 would result in an increase in population, it would not result in substantial unplanned population considering future updated SCAG RTP/SCS projections that would be made in accordance with the update, nor would it result in displacement considering the new housing that would be constructed. Overall, population and housing impacts under Alternative 2 would be greater than the Housing Element Update due to the increased number of possible residential units. However, impacts would remain less than significant.

f. Transportation

Alternative 2 would result in potential development at 61 additional housing opportunity sites compared with the Housing Element Update. Development under Alternative 2 would not exceed the threshold of 15 percent below the baseline VMT per capita, similar to the project. Alternative 2 includes all of the same housing opportunity sites as considered under the Housing Element Update plus additional housing opportunity sites along major transportation corridors. Infill development along major transportation corridors and with a MUO could reduce VMT per capita, considering proximity to goods, services, and jobs. Therefore, impacts would remain less than significant, similar to the Housing Element Update. Potential impacts to bicycle, pedestrian, and transit facilities, geometric hazards and traffic safety impacts would also be less than significant, like the Housing Element Update, due to adherence to 2006 General Plan Policies and Claremont Municipal Code. Overall, traffic impacts under Alternative 2 would be similar to the Housing Element Update and remain less than significant.

g. Tribal Cultural and Cultural Resources

Alternative 2 would include an additional 2,711 units as compared to the Housing Element Update. Although most of the City is built out and heavily urbanized additional development would require ground disturbing activities at greater depths than previously disturbed land uses and would thus result in the potential for greater impacts to tribal cultural and cultural resources. Development accommodated by Alternative 2 would be required to adhere to 2006 General Plan policies, City development requirements, federal and State regulations related to tribal cultural, historic, and archaeological resources. Mitigation Measures CR-1, CR-2, and TCR-1(a) through TCR-1(e) proposed in this EIR to reduce impacts to cultural, historic, and tribal cultural resources would be required under Alternative 2. Development under Alternative 2 would occur at more housing opportunity sites with buildings potentially eligible for listing as a historic resource or require grading and

excavation at greater depths that could unearth cultural or Tribal cultural resources. Impacts would remain less than significant with mitigation incorporated for tribal cultural resources and significant and unavoidable for historical resources.

h. Utilities and Service Systems

Alternative 2 would result in potential development at 61 additional housing opportunity sites compared to the Housing Element Update. Alternative 2 would thus require an increase in the consumption of water, wastewater, stormwater, electricity, natural gas, and telecommunications services as compared to the Housing Element Update. Similarly, Alternative 3 would likely result in additional infrastructure installation and extensions. However, residential units under this alternative would be developed at housing opportunity sites with or adjacent to existing infrastructure and would not result in significant impacts due to installation. Potential impacts to utilities and service systems would be assessed upon development review for individual projects facilitated by Alternative 2. Because Alternative 2 would update the 2006 General Plan, the Three Valleys Municipal Water District (TVMWD) would incorporate the increased population and housing forecast from Alternative 2 into its future water supply planning efforts, such as future updates to the Urban Water Management Plan, to account for the increased water demand. Furthermore, reasonably foreseeable development under Alternative 2 would be subject to the City's 2006 General Plan Policies related to coordinating development review with the TVMWD to ensure the availability of water supplies and minimizing domestic water use, similar to the Housing Element Update. Overall, utilities and service system impacts under Alternative 2 would be slightly greater than the Housing Element Update but would remain less than significant.

6.3 Alternative 3: Reduced Units

6.3.1 Description

Alternative 3, Reduced Units, would reduce the number of housing units planned for in the Housing Element Update from 3,097 to 2,375 units. Alternative 3 includes all of the same housing opportunity sites as the Housing Element Update, but with updated du/a so that no site would exceed 30 du/a. Alternative 3 would meet the City's RHNA allocation but would reduce the overall number of residential units by approximately 23 percent. All project objectives would be fulfilled under the Reduced Units Alternative, including providing a reasonable unit buffer.

6.3.2 Impact Analysis

a. Aesthetics

Alternative 3 would result in fewer housing units as compared to the Housing Element Update. Lowering du/a to 30 on all housing opportunity sites proposed in the Housing Element Update would result in lower massing and building heights on the housing opportunity sites than the Housing Element Update. Development and redevelopment that would occur under Alternative 3 would be similar to the Housing Element Update and would continue to be governed by 2006 General Plan policies and regulations in the City's Development Code that concern aesthetics. Mitigation Measure AES-1 would no longer be required on Site 32, considering that maximum allowable du/a would be 30 and that buildings constructed at that level would not require building heights that could impact scenic vistas or resources. Impacts on scenic vistas, scenic resources, visual character or quality, and light and glare would have overall lower massing and building

heights, and impacts would be reduced to less than significant. This would be a reduced impact than the Housing Element Update, as impacts would be less than significant rather than less than significant with mitigation.

b. Air Quality

Under Alternative 3, fewer residential units would be developed, which would result in a smaller anticipated population increase than buildout of the Housing Element Update. Like the Housing Element Update, Alternative 3 would promote infill development, because the housing opportunity sites would remain the same, and require the use of VMT standards when evaluating new development projects. Alternative 3 would thus promote reductions in VMT and associated air pollutant emissions, which would be consistent with one of the overarching purposes of the AQMP to reduce mobile source emissions. The construction and operational air quality emissions from the decreased residential units would decrease compared to the Housing Element Update.

Similar to the Housing Element Update, development under Alternative 3 would not include substantial TAC sources and would be consistent with CARB and SCAQMD guidelines, and it would not result in the exposure of off-site sensitive receptors to significant amounts of carcinogenic or TACs. Overall, air quality impacts under Alternative 3 would be lower than the Housing Element Update due to the decreased number of allowable residential units and associated residents. Impacts would remain less than significant.

c. Biological Resources

Alternative 2 would include fewer units than the Housing Element Update, which would require less development and fewer impacts to biological resources. Under Alternative 3 buildout of the Housing Element would be required to adhere to 2006 General Plan policies, City development requirements, federal and State regulations, similar to the Housing Element Update. Development would also be required to implement Mitigation Measures BIO-1 through BIO-7 proposed in this EIR to reduce impacts to biological resources to a less than significant level. Development under Alternative 3 would occur at the same housing opportunity sites analyzed under the Housing Element Update. Biological resource impacts would be similar to the Housing Element Update and would be less than significant with mitigation incorporated.

d. Greenhouse Gas Emissions

Under Alternative 3, fewer residential units would be developed, which would result in a smaller anticipated population increase than analyzed under the Housing Element Update. However, similar to the Housing Element Update, Alternative 3 would promote infill development along major transportation corridors because the housing opportunity sites would be the same as the Housing Element Update. The construction and operational GHG emissions would be reduced, compared to the Housing Element Update. Like the Housing Element Update, Alternative 3 would be consistent with 2006 General Plan policies, the 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and applicable State regulation, such as SB 32. GHG emissions impacts would be slightly lower as compared to the Housing Element Update due to the decreased construction of new residential units and associated residents and would remain less than significant.

e. Population and Housing

Alternative 3 would result in development on the same housing opportunity sites, but with a lower density than under the Housing Element Update. The 2,375 units under Alternative 3 would accommodate approximately 6,389 new residents, bringing Claremont's population to 43,655, as shown in Table 6-1. This would be approximately 4 percent fewer residents than buildout associated with the Housing Element Update. Alternative 3 would be consistent with housing policies and RHNA goals for the City. However, the population projected under Alternative 3 would be greater than the SCAG 2020 RTP/SCS population forecasts, similar to the Housing Element Update. Alternative 3, like the Housing Element Update, would update the 2006 General Plan, which would be incorporated into SCAG's next RTP/SCS forecast. Although Alternative 3 would result in an increase in population, it would not result in substantial unplanned population considering future updated SCAG RTP/SCS projections that would be made in accordance with the update, nor would it result in displacement considering the new housing that would be built. Overall, population and housing impacts under Alternative 3 would be lesser than the Housing Element Update due to the decreased number of possible residential units and impacts would remain less than significant.

f. Transportation

Alternative 3 would result in potential development at the same housing opportunity sites, but with a lower density than the Housing Element Update. Similar to impacts analyzed in the EIR, development under Alternative 3 would not exceed the threshold of 15 percent below the SGVCOG baseline VMT per capita, considering that it includes all of the same housing opportunity sites as considered under the Housing Element Update. Further, reduced units overall would result in fewer vehicle trips. Potential impacts to bicycle, pedestrian, and transit facilities, and potential geometric hazards and traffic safety would be less than significant, due to adherence with General Plan policies and Claremont Municipal Code, the same as the Housing Element Update. Overall, although VMT would decrease under Alternative 3 traffic impacts would remain significant and unavoidable.

g. Tribal Cultural and Cultural Resources

Alternative 3 would include fewer units (2,375 units) as compared to the Housing Element Update (3,097 units), which would require less development and therefore result in fewer impacts to tribal cultural and cultural resources. Development accommodated by Alternative 3, would be required to adhere to 2006 General Plan policies, City development requirements, and federal and State regulations related to tribal cultural, historic, and archaeological resources. Mitigation Measures CR-1, CR-2, and TCR-1(a) through TCR-1(e) proposed in this EIR to reduce impacts to cultural, historic, and tribal cultural resources would still be required under this Alternative. Development under Alternative 3 would occur at the same housing opportunity sites with buildings potentially eligible for listing as a historic resource or require grading and excavation that could unearth cultural or tribal cultural resources. However, Alternative 3 would require less ground disturbance since housing opportunity sites would be developed with a lower intensity. Therefore, Alternative 3 would have slightly lower likelihood of potential impacts as under the Housing Element Update, and potential impacts would also be less than significant with mitigation incorporated for Tribal cultural resources and significant and unavoidable for historical resources.

h. Utilities and Service Systems

Alternative 3 would result in development at the same housing opportunity sites, but with a lower density than under the Housing Element Update. Alternative 3 would thus require less consumption

of water, wastewater, stormwater, electricity, natural gas, and telecommunications services than the Housing Element Update. Infrastructure installation and extensions would be similar to the Housing Element Update since the housing opportunity sites would remain the same. Similar to the Housing Element Update most residential units would be developed at housing opportunity sites with existing infrastructure and would not result in significant installation impacts The TVMWD would incorporate the increased population and housing forecast from Alternative 3 into its future water supply planning efforts, such as future updates to the Urban Water Management Plan, to account for the increased water demand. Furthermore, reasonably foreseeable development under Alternative 3 would be subject to the 2006 General Plan policies related to coordinating development review with the TVMWD to ensure the availability of water supplies and minimizing domestic water use, similar to the Housing Element Update. Overall, utilities and service system impacts under Alternative 3 would be slightly lower than the Housing Element Update but would remain less than significant.

6.4 Environmentally Superior Alternative

CEQA requires identification of the environmentally superior alternative among the alternatives to the proposed project. The environmentally superior alternative must be an alternative that reduces some of the Housing Element Update's environmental impacts, regardless of the financial costs associated. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as the environmentally superior alternative may not be that which best meets the goals or needs of the proposed project. Table 6-2 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the Housing Element Update for each of the issue areas studied.

Based on the analysis of alternatives in this section, the No Project Alternative is the environmentally superior alternative as it would lessen the severity of most impacts of the Housing Element Update. Only transportation impacts would remain significant. Because the No Project Alternative would not generate new population within the Plan Area above existing buildout projections, impacts related to aesthetics, air quality, biological resources, greenhouse gases, population and housing, transportation, tribal cultural and cultural resources, and utilities and service systems would be reduced compared to the Housing Element Update. However, this alternative would not meet the project objectives, as it would not increase the opportunities or encourage the development of housing in the City, and it would not update the Housing Element to be consistent with State law.

If the No Project Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (*CEQA Guidelines* Section 15126.6[e]). Of the other alternatives evaluated in this EIR, Alternative 3 (Reduced Units) would be environmentally superior. Because this alternative would result in development at the same housing opportunity sites but with a lower density and thus lower increased population, impacts to aesthetics, air quality, greenhouse gases, population and housing, tribal cultural and cultural resources, and utilities and system services would also be reduced compared to the Housing Element Update and would have fewer overall impacts than Alternative 2. Furthermore, this alternative would achieve the project objectives similar to the proposed Housing Element Update, as it would accommodate an increased number of affordable housing development opportunities and meet RHNA targets.

Table 6-2 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project	Alternative 2: Increased Mixed-Use Overlay	Alternative 3: Reduced Units
Aesthetics	Less than significant with mitigation	+	=	+
Air Quality	Less than significant	+	-	+
Biological Resources	Less than significant with mitigation	+	=	=
Greenhouse Gases	Less than significant	+	-	+
Population and Housing	Less than significant	+	-	+
Transportation	Significant and unavoidable	-	=	=
Cultural and Tribal Cultural Resources	Significant and unavoidable	+	-	+
Utilities and Service Systems	Less than Significant	+	-	+

+ Superior to the proposed project (reduced level of impact)

- Inferior to the proposed project (increased level of impact)

= Similar level of impact to the proposed project

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7 References

7.1 Bibliography

Executive Summary

California, State of. 2018. Government Code Section 65863. Amended by SB 1333 2018. Available at: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65863.

Environmental Setting

Claremont, City of. 2006. The City of Claremont General Plan. Adopted November 14, 2006. Revised October 13, 2009. https://www.ci.claremont.ca.us/living/general-plan-1708 (accessed September 2021).

_____. 2021. Facts and Figures. https://www.ci.claremont.ca.us/about-us/city-profile/facts-and-figures (accessed September 2021).

Southern California Association of Governments (SCAG). 2021. About us. Available at: https://scag.ca.gov/about-us (accessed May 2021).

Project Description

Claremont, City of. 2021. Draft Housing Element Update. Claremont, CA. November 2021.

Aesthetics

California Department of Transportation. 2019. State Designated Scenic Highways. [tabular dataset]. Sacramento, CA. July 2019.

Claremont, City of. 2006. The City of Claremont General Plan. Adopted November 14, 2006. Revised October 13, 2009. https://www.ci.claremont.ca.us/living/general-plan-1708 (accessed September 2021).

_____. 2021a. Village South Specific Plan. Claremont, CA. June 2021.

_____. 2021b. Village South Specific Plan. Claremont, CA. June 2021. https://www.ci.claremont.ca.us/home/showpublisheddocument/16708/637595182618970000 (accessed December 2021).

Air Quality

Brief for San Joaquin Valley Unified Air Pollution Control District as Amicus Curiae Supporting Respondents, Sierra Club, Revive the San Joaquin, and League of Women Voters Fresno v. County of Fresno and Friant Ranch, L.P. (2018), 6 Cal.5th 502, Case No. S219783.

California Air Resources Board (CARB). 2005. Air Quality and Land Use Handbook: A Community Health Perspective. https://www.arb.ca.gov/ch/handbook.pdf (accessed September 2021).

_____. 2016. Ambient Air Quality Standards. Last modified: May 4, 2016. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf (accessed September 2021).

_____. 2019. “California Ambient Air Quality Standards.” https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards (accessed September 2021).

_____. 2021a. “Inhalable Particulate Matter and Health (PM2.5 and PM10). https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health (accessed August 2021).

_____. 2021b. “Overview: Diesel Exhaust & Health.” https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health (accessed August 2021).

_____. 2021c. “National Ambient Air Quality Standards.” https://ww2.arb.ca.gov/resources/national-ambient-air-quality-standards (accessed August 2021).

_____. 2021d. “Summaries of Historical Area Designations for State Standards.” https://ww2.arb.ca.gov/our-work/programs/state-and-federal-area-designations/state-area-designations/summary-tables (accessed August 2021).

_____. 2021e. Top 4 Summary. https://www.arb.ca.gov/adam/topfour/topfour1.php (accessed August 2021).

California Department of Finance (DOF). 2021. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark. May 2021. http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/ (accessed September 2021).

Claremont, City of. 2006. The City of Claremont General Plan. November. https://www.ci.claremont.ca.us/home/showpublisheddocument/15340/637353406507200000 (accessed August 2021).

Iowa State University. 2021. “Iowa Environmental Mesonet - Cable Airport – Wind Roses.” Last modified: February 23, 2021. https://mesonet.agron.iastate.edu/sites/windrose.phtml?station=CCB&network=CA_ASOS (accessed August 2021).

National Highway Traffic Safety Administration. 2021. “Fact Sheet: SAFE Vehicles Rule.” https://www.nhtsa.gov/corporate-average-fuel-economy/safe-fact-sheet (accessed August 2021).

South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. November 1993.

_____. 2005. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. May 6, 2005. http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf (accessed August 2021).

_____. 2008. Final Localized Significance Threshold Methodology. July 2008. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed September 2021).

_____. 2009. Appendix C – Mass Rate LST Look-up Tables. Last modified: October 21, 2009. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2 (accessed September 2021).

_____. 2016. “National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin.” February 2016. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf (accessed August 2021).

_____. 2017. Final 2016 Air Quality Management Plan (AQMP). March 3, 2017. https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp (accessed August 2021).

_____. 2019. “South Coast AQMD Air Quality Significance Thresholds.” Last modified: April 2019. http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf (accessed September 2021).

Southern California Association of Governments (SCAG). 2016. 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – Demographics and Growth Forecast Appendix. April 7, 2016.

U.S. Environmental Protection Agency (U.S. EPA). 2013. *Policy Assessment for the Review of the Lead National Ambient Air Quality Standards, External Review Draft*. https://www3.epa.gov/ttn/naaqs/standards/pb/data/010913_pb-draft-pa.pdf (accessed September 2021).

_____. 2016. “NAAQS Table.” https://www.epa.gov/criteria-air-pollutants/naaqs-table (accessed August 2021).

_____. 2018. “Process of Reviewing the National Ambient Air Quality Standards.” Last modified: July 10, 2018. https://www.epa.gov/criteria-air-pollutants/process-reviewing-national-ambient-air-quality-standards (accessed August 2021).

_____. 2021a. “Criteria Air Pollutants.” Last modified: March 22, 2021. https://www.epa.gov/criteria-air-pollutants (accessed August 2021).

_____. 2021b. Outdoor Air Quality Data – Monitor Values Report.” https://www.epa.gov/outdoor-air-quality-data/monitor-values-report (accessed August 2021).

Western Regional Climate Center. 2016a. Covina City Station YRD FC387B, California – Period of Record Monthly Climate Summary. https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca2090 (accessed August 2021).

_____. 2016b. Yorba Linda Station, California – Period of Record Monthly Climate Summary. https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca9847 (accessed August 2021).

Biological Resources

California Department of Fish and Wildlife (CDFW). 2019. California Natural Community Conservation Plans. April 2019. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline (accessed June 2021).

_____.2020. California Sensitive Natural Communities.https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline. (accessed June 2021).

_____. 2021. California Natural Diversity Database (CNDDB) - Rarefind 5. https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data (accessed November 2021).

California Native Plant Society, Rare Plant Program. 2021. Inventory of Rare and Endangered Plants of California (online edition, v9-01 1.0). Website https://www.rareplants.cnps.org (accessed November 2021).

Los Angeles County. 2009. Regional Habitat Linkages and Wildlife Corridors Map. https://planning.lacounty.gov/sea/regional_habitat_linkages_and_wildlife_corridors/ (accessed November 2021).

_____. 2015. Significant Ecological Areas and Coastal Resources Areas Policy Map. Department of Regional Planning. February 2015. https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf (accessed November 2021).

United States Fish and Wildlife Service (USFWS). 2021a. Information for Planning and Conservation (IPaC) [online]. https://ecos.fws.gov/ipac/ (accessed November 2021).

_____. 2021b. Environmental Conservation Online System, Critical Habitat for Threatened and Endangered Species [online mapper]. https://ecos.fws.gov/ecp/report/table/critical-habitat.html (accessed November 2021).

_____. 2021c. National Wetlands Inventory Mapper [online]. https://www.fws.gov/wetlands/data/Mapper.html (accessed November 2021).

United States Geological Survey (USGS). 2021. National Hydrography Dataset [online map]. Available at: https://apps.nationalmap.gov/viewer/ (accessed November 2021).

Greenhouse Gas Emissions

Bay Area Air Quality Management District. 2017. *California Environmental Quality Act Air Quality Guidelines*. May 2017. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en (accessed August 2021).

California Air Pollution Control Officers Association (CAPCOA). CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA). January 2008.

_____. 2021. California Emissions Estimator Model User Guide: Version 2020.4.0. Prepared by BREEZE Software, A Division of Trinity Consultants in collaboration with South Coast Air Quality Management District and the California Air Districts.

California Air Resources Board (CARB). 2008. Climate Change Scoping Plan. Sacramento, CA. December 2008. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2008-scoping-plan-documents (accessed August 2021).

_____. 2011. Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Public Hearing to Consider the "LEV III" Amendments to the California Greenhouse Gas and Criteria Pollutant Exhaust and Evaporative Emission Standards and Test Procedures and to the On-Board Diagnostic System Requirements for Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles, and to the Evaporative Emission Requirements for Heavy-Duty Vehicles. December 7, 2011. http://www.arb.ca.gov/regact/2012/leviiighg2012/levisor.pdf (accessed August 2021).

_____. 2014. AB 32 Scoping Plan Website. Updated June 2014. http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm (accessed August 2021).

_____. 2017. California's 2017 Climate Change Scoping Plan. December 14, 2017. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf (accessed August 2021).

_____. 2020a. "Current California Greenhouse Gas Emission Inventory – 2000-2018 GHG Inventory (2020 Edition). https://ww2.arb.ca.gov/ghg-inventory-data (accessed August 2021).

_____. 2020b. EMFAC Off-Model Adjustment Factors for Carbon Dioxide (CO2) Emissions to Account for the SAFE Vehicles Rule Part One and the Final SAFE Rule. June 26, 2020. https://ww3.arb.ca.gov/msei/emfac_off_model_co2_adjustment_factors_06262020-final.pdf?utm_medium=email&utm_source=govdelivery (accessed August 2021).

_____. 2021. California Greenhouse Gas Emissions for 2000 to 2019. July. https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2019/ghg_inventory_trends_00-19.pdf (accessed November 2021).

California Climate Change Center. 2006. Climate Scenarios for California.

California Department of Finance. 2021a. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark. May 2021. http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/ (accessed September 2021).

_____. 2021b. "P1: State Population Projections (2010-2060). March 5, 2021. http://www.dof.ca.gov/forecasting/demographics/projections/ (accessed September 2021).

California Department of Food and Agriculture. 2021. "California Agricultural Statistics Review 2019-2020." https://www.cdfa.ca.gov/statistics/ (accessed August 2021).

California Department of Water Resources. 2018. Indicators of Climate Change in California. May 2018. https://oehha.ca.gov/media/downloads/climate-change/report/2018caindicatorsreportmay2018.pdf (accessed August 2021).

California Energy Commission. 2019. "2019 Building Energy Efficiency Standards." March 2018.

California Natural Resources Agency. 2009. 2009 California Climate Adaptation Strategy. March 2009. http://resources.ca.gov/docs/climate/Statewide_Adaptation_Strategy.pdf (accessed August 2021).

Claremont, City of. 2006. The City of Claremont General Plan. Adopted November 14, 2006. Revised October 13, 2009. https://www.ci.claremont.ca.us/living/general-plan-1708 (accessed September 2021).

_____. 2021a. *Sustainable City Plan*. Adopted April 13, 2021. https://www.ci.claremont.ca.us/home/showpublisheddocument/16287/637540783026300000 (accessed August 2021).

_____. 2021b. Clean Power Alliance. https://www.ci.claremont.ca.us/living/clean-power-alliance (accessed October 2021).

_____. 2021c. Village South Specific Plan. Claremont, CA. June 2021. https://www.ci.claremont.ca.us/home/showpublisheddocument/16708/637595182618970000 (accessed December 2021).

Forster, P., V. Ramaswamy, P. Artaxo, T. Berntsen, R. Betts, D.W. Fahey, J. Haywood, J. Lean, D.C. Lowe, G. Myhre, J. Nganga, R. Prinn, G. Raga, M. Schulz and R. Van Dorland. 2007. Changes in Atmospheric Constituents and in Radiative Forcing. Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M.Tignor and H.L. Miller (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. https://www.ipcc.ch/site/assets/uploads/2018/02/ar4-wg1-chapter2-1.pdf

Intergovernmental Panel on Climate Change (IPCC). 2007. Summary for Policymakers. In: Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change.

_____. 2021. Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu and B. Zhou (eds.)] Cambridge University Press. https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf (accessed November 2021).

Los Angeles County Sanitation Districts. 2021. “Pomona Water Reclamation Plant.” https://www.lacsd.org/services/wastewater-sewage/facilities/pomona-water-reclamation-plant (accessed August 2021).

National Aeronautics and Space Administration. 2021. “Global Climate Change – Vital Signs of the Planet – Sea Level.” https://climate.nasa.gov/vital-signs/sea-level/ (accessed August 2021).

National Highway Traffic Safety Administration. 2020. “Fact Sheet: SAFE Vehicles Rule.” https://www.nhtsa.gov/corporate-average-fuel-economy/safe-fact-sheet (accessed August 2021).

National Oceanic and Atmospheric Administration. 2021. “Global Climate Report for Annual 2020.” State of the Climate. January 2021. https://www.ncdc.noaa.gov/sotc/global/202013 (accessed August 2021).

Parmesan, C. August 2006. Ecological and Evolutionary Responses to Recent Climate Change.

South Coast Air Quality Management District (SCAQMD). 2008. *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. October 2008. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf (accessed August 2021).

Southern California Association of Governments (SCAG). 2020. *Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy)*. https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx (accessed October 2021).

State of California. 2018. California’s Fourth Climate Change Assessment Statewide Summary Report. August 27, 2018. http://www.climateassessment.ca.gov/state/ (accessed August 2021).

United States Environmental Protection Agency (U.S. EPA). 2021a. Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gases. Last updated April 2021. https://www.epa.gov/climate-indicators/climate-change-indicators-atmospheric-concentrations-greenhouse-gases (accessed November 2021).

_____. 2021b. Climate Change Indicators: Global Greenhouse Gas Emissions. Last updated April 2021. https://www.epa.gov/climate-indicators/climate-change-indicators-global-greenhouse-gas-emissions (accessed November 2021).

_____. 2021c. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2019. April 2021. https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2019 (accessed August 2021).

World Meteorological Organization. 2013. A summary of current and climate change findings and figures: a WMO information note. March 2013. https://library.wmo.int/opac/index.php?lvl=notice_display&id=15892#.Wt9-Z8gvzIU (accessed October 2021).

_____. 2020. "Greenhouse Gases." https://public.wmo.int/en/our-mandate/focus-areas/environment/greenhouse%20gases (accessed August 2021).

Population and Housing

California Department of Finance (DOF). 2021. E-5 Population and Housing Estimates for Cities, Counties, and the State. https://www.dof.ca.gov/forecasting/demographics/ (accessed August 2021).

California Department of Housing and Community Development (HCD). 2021. Regional Housing Needs Allocation and Housing Elements. https://www.hcd.ca.gov/community-development/housing-element/index.shtml (accessed August 2021).

Claremont, City of. 2006. The City of Claremont General Plan. Adopted November 14, 2006. Revised October 13, 2009. https://www.ci.claremont.ca.us/living/general-plan-1708 (accessed September 2021).

_____. 2019. Claremont Housing Element Update 2018-2021. https://www.ci.claremont.ca.us/home/showpublisheddocument/13561/637018930164570000 (accessed August 2021).

_____. 2021. Draft City of Claremont Housing Element Update 2021-2029.

Southern California Association of Governments (SCAG). 2019. Profile of the City of Claremont. May 2019. https://scag.ca.gov/sites/main/files/file-attachments/claremont_localprofile.pdf?1605664074 (accessed August 2021).

_____. 2020a. Demographics and Growth Forecast Technical Report. September 3, 2020. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579#:~:text=Slow%20growth%20is%20expected%20to,region%20for%20the%20foreseeable%20future.&text=In%20the%20SCAG%20region%2C%20a,residents%20between%202020%20and%202045 (accessed August 2021).

_____. 2020b. SCAG Pre-Certified Local Housing Data. August 2020. https://scag.ca.gov/sites/main/files/file-attachments/claremont_he_0920.pdf?1603168649 (accessed August 2021).

_____. 2020c. SCAG Final RHNA Methodology. March 5, 2020. https://scag.ca.gov/sites/main/files/file-attachments/scag-final-rhna-methodology-030520.pdf?1602189316 (accessed August 2021).

_____. 2021. SCAG 6th Cycle Final RHNA Allocation Plan. March 4, 2021. https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-proposed-final-allocation-plan.pdf?1614023284 (accessed August 2021).

United States Census. 2000. Summary Population and Housing Characteristics, California: 2000. https://www.census.gov/prod/cen2000/phc-1-6.pdf (accessed August 2021).

_____. 2018. On the Map Tool: https://onthemap.ces.census.gov/ (accessed August 2021).

_____. 2019a. ACS Demographics and Housing Estimates: Los Angeles County. https://data.census.gov/cedsci/profile?g=1600000US0613756. (accessed August 2021).

_____. 2019b. Table DP03. Selected Economic Characteristics: Claremont City. https://data.census.gov/cedsci/table?q=DP03&g=1600000US0613756&tid=ACSDP5Y2019.DP03&hidePreview=true (accessed August 2021).

_____. 2021a. Quickfacts: Claremont City. https://www.census.gov/quickfacts/claremontcitycalifornia (accessed August 2021).

_____. 2021b. Quickfacts: Los Angeles County. https://www.census.gov/quickfacts/losangelescountycalifornia (accessed August 2021).

United States Department of Housing and Urban Development (HUD). 2014. Rental Burdens: Rethinking Affordability Measures. September 22, 2014. https://www.huduser.gov/portal/pdredge/pdr_edge_featd_article_092214.html#:~:text=HUD%20defines%20cost%2Dburdened%20families,of%20one's%20income%20on%20rent (accessed August 2021).

Transportation

Claremont, City of. 2020. City of Claremont Draft Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment. August 2020.

Office of Planning and Research (OPR). 2018. Technical Advisory on Evaluating Transportation impacts in CEQA. April 2018. https://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Tribal Cultural Resources

Arnold, Jeanne E., Michael R. Walsh and Sandra E. Hollimon. 2004. “The Archaeology of California.” *Journal of Archaeological Research* 12(1):1-73.

Bean, Lowell John and Charles R. Smith 1978. Gabrielino. In California, edited by Robert F. Heizer, pp. 538-549. Handbook of North American Indians, Vol. 8, W.C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

Byrd, Brian F. and L. Mark Raab. 2007. "Prehistory of the Southern Bight: Models for a New Millennium in California Prehistory" in *Colonization, Culture, and Complexity: California's Chaotic Prehistory*. T.L. Jones and K.A. Klar, eds. Pp. 215-228. Lanham, Maryland: AltaMira Press.

California Office of Historic Parks (OHP). 2021. California Historical Landmarks by County: Los Angeles. https://ohp.parks.ca.gov/?page_id=21427 (accessed November 2021).

Claremont, City of. 2020. Village South Specific Plan Draft Environmental Impact Report. December 2020. https://www.ci.claremont.ca.us/home/showpublisheddocument/15678/637426255077270000 (accessed November 2021).

Couch, Jeffrey S., Joanne S. Couch and Nancy Anastasia Wiley. 2009. "Saved by the Well: The Keystone Cache at CA-ORA-83, the Cogged Stone Site." *Proceedings of the Society for California Archaeology* 21:147-156.

Dillon, Brian D. 2002. "California Paleo-Indians: Lack of Evidence, or Evidence of a Lack?" in *Essays in California Archaeology: A Memorial to Franklin Fenenga*. W. J. Wallace and F. A. Riddell, eds. Pp. 110–128. Paper No. 60. University of California Archaeological Research Facility, Berkeley.

Eberhart, Hal. 1961. "The Cogged Stones of Southern California." *American Antiquity* 26(3):361-370.

Erlandson, Jon M. 1991. "Early Maritime Adaptations on the Northern Channel Islands in Hunter-Gatherers of Early Holocene Coastal California" in *Hunter-Gatherers of Early Holocene Coastal California Volume 1: Perspectives in California Archaeology*. Jon M. Erlandson and R. Colten, eds. Pp. 101-111. Los Angeles, California: UCLA Institute of Archaeology Press.

Erlandson, Jon M., Theodore Cooley and Richard Carrico. 1987. A Fluted Projectile Point Fragment from the Southern California Coast: Chronology and Context at CA-SBA-1951. *Journal of California and Great Basin Anthropology* 9(1):120-128.

Harrington, John P. 1942. Cultural Element Distributions: XIX Central California Coast. University of California Anthropological Records 7(1):1-46.

Johnson, John R., Thomas W. Stafford, Jr., Henry O. Ajie and Don P. Morris. 2002. "Arlington Springs Revisited" in *Proceedings of the Fifth California Islands Symposium*. D. Browne, K. Mitchell and H. Chaney, eds. Pp. 541–545. Santa Barbara, California: Santa Barbara Museum of Natural History.

Jones, Terry L. 1996. "Mortars, Pestles, and Division of Labor in Prehistoric California: A View from Big Sur." *American Antiquity* 61(2):243-264.

Jones, Terry L. and Kathryn A. Klar. 2007. *California Prehistory: Colonization, Culture, and Complexity*. Lanham, Maryland: AltaMira Press.

Jones, Terry L., Richard T. Fitzgerald, Douglas J. Kennett, Charles Miksicek, John L. Fagan, John Sharp and Jon M. Erlandson. 2002. "The Cross Creek Site (CA-SLO-1797) and Its Implications for New World Colonization." *American Antiquity* 67(2):213–230.

Kennett, Douglas J. 2005. *The Island Chumash: Behavioral Ecology of a Maritime Society*. Berkeley, California: University of California Press.

King, Chester. 2011. Overview of the History of American Indians in the Santa Monica Mountains. Topanga Anthropological Consultants. Prepared for the National Park Service Pacific West Region. Topanga, California

Koerper, Henry C., and Christopher E. Drover. 1983. "Chronology Building for Coastal Orange County: The Case from CA-ORA-119-A." *Pacific Coast Archaeological Society Quarterly* 19(2):1–34.

Koerper, Henry C., Roger D. Mason, and Mark L. Peterson. 2002. "Complexity, Demography, and Change in Late Holocene Orange County" in *Catalysts to Complexity: Late Holocene Societies of the California Coast. Volume 6: Perspectives in California Archaeology*. Jon M. Erlandson and Terry L. Jones, eds. Pp. 63–81. Los Angeles, California: Cotsen Institute of Archaeology, University of California, Los Angeles.

Kroeber, Alfred J. 1925. Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78. Originally published 1925, Smithsonian Printing Office, Washington, D.C. Unabridged reprint 1976, Dover Publications, Inc. New York.

McCawley, William 1996. The First Angelinos: The Gabrielino Indians of Los Angeles. Malki Museum/ Ballena Press Cooperative Publication, Banning or Novato, California.

Moratto, Michael J. 1984. *California Archaeology*. Orlando, Florida: Academic Press, Inc

National Park Service (NPS). 1980. National Register of Historic Places Nomination Form for the Stephen Porcella House/Fashion Shop. http://focus.nps.gov/GetAsset?assetID=49254fe0-2d21-41a5-ac63-ab77deadc5e7.

_____. 2021. National Register Database and Research. https://www.nps.gov/subjects/nationalregister/database-research.htm#table (accessed November 2021).

O'Neil, Stephen. 2002. The Acjachemen in the Franciscan Mission System: Demographic Collapse and Social Change. Master's thesis, Department of Anthropology, California State University, Fullerton.

Potter, Amiee B. and P. Scott White. 2009. "The Mitochondrial DNA Affinities of Prehistoric People of San Clemente Island: An Analysis of Ancient DNA." *Journal of California and Great Basin Anthropology* 29(2):163-182.

Rick, Torben C., Jon M. Erlandson, and René Vellanoweth. 2001. "Paleocoastal Marine Fishing on the Pacific Coast of the Americas: Perspectives from Daisy Cave, California." *American Antiquity* 66(4):595–613.

Sutton, Mark Q. 2008. "The Del Rey Tradition and its Place in the Prehistory of Southern California." *Pacific Coast Archaeological Society Quarterly* 44(2):1-54.

Villa, Sam. 2017. Tongva People: Introduction. Tongvapeople.org. Electronic document. Accessed October 22, 2021.

Wallace, William. 1955. "Suggested Chronology for Southern California Coastal Archaeology." *Southwestern Journal of Anthropology* 11(3):214-230.

_____. 1978. "Post-Pleistocene Archaeology, 9000 to 2000 B.C. in California" in *Volume 8: Handbook of North American Indians*. Robert F. Heizer, ed. and William C. Sturtevant, general ed. Pp. 505-508. Washington D.C.: Smithsonian Institution Scholarly Press.

Welch, Rosanne. 2006. A Brief History of the Tongva Tribe: The Native Inhabitants of the Lands of Puente Hills Preserve. Department of History, Claremont Graduate University, Claremont, California.

Utilities and Service Systems

Clean Power Alliance. 2021. "Power for Good." [web page]. https://cleanpoweralliance.org/ (accessed November 2021).

Golden State Water Company. 2021. "Claremont." [web site]. https://www.gswater.com/claremont (accessed November 2021).

Los Angeles County Sanitation Districts (LACSD). 2021. 2020 Annual Report. Los Angeles, CA.

_____. 2021b. https://www.app.lacsd.org/facilities/?tab=0&number=23

Metropolitan Water District of Southern California (MWD). 2021a. 2020 Urban Water Management Plan. Los Angeles, CA. June 2021.

_____. 2021b. "Population growth versus total retail demand, Metropolitan's service area 1990-2020." [info graphic]. https://www.mwdh2o.com/planning-for-tomorrow/how-we-plan/integrated-resource-plan/ (accessed November 2020).

South Coast Air Quality Management District (SCAQMD 2017).

Other CEQA Related Discussions

Southern California Association of Governments (SCAG). 2016. 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). April 7, 2016.

U.S. Census Bureau. 2020. American Community Survey (ACS) and Puerto Rico Community Survey (PRCS), 5-Year Estimates. Persons Per household, 2014-2018. https://www.census.gov/quickfacts/fact/table/venturacountycalifornia/HSD310218#HSD310218 (accessed November 2020).

7.2 List of Preparers

This EIR was prepared by the City of Claremont, with the assistance of Rincon Consultants, Inc. Consultant staff involved in the preparation of the EIR are listed below.

RINCON CONSULTANTS, INC.

Matt Maddox, AICP, Principal
Kari Zajac, MESM, Senior Environmental Planner
April Durham, PhD, Environmental Planner and Project Manager
Jesse Voremberg, MS, Associate Environmental Planner
David Brodeur, MS, Environmental Planning Intern
Craig Lawrence, Senior Biologist
Beth Wilson, Biologist
Hannah Haas, MA, RPA, Senior Archaeologist
Emily Gaston, GIS Analyst

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Appendix A

Notice of Preparation and Initial Study

Community Development Department
Planning Division
207 Harvard Avenue North
Claremont, California 91711
T: 909-399-5470

www.ci.claremonet.ca.us

Notice of Preparation

DATE: September 17, 2021

TO: RESPONSIBLE AND TRUSTEE AGENCIES AND INTERESTED PARTIES

SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HOUSING ELEMENT UPDATE

NOTICE IS HEREBY GIVEN that the City of Claremont will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the Housing Element Update of the General Plan, as described below. The City is also considering updates to the Safety Element concurrently with the Housing Element. This Notice of Preparation (NOP) has been issued to provide an opportunity for responsible and trustee agencies and interested parties to submit comments on the scope of the EIR, relative to the attached project summary. Agencies should comment on such information as it relates to their statutory responsibilities in connection with the Housing Element Update. The City made the determination to prepare an EIR following preliminary review of the project. The City has also prepared an Initial Study for the Housing Element Update EIR. This NOP is being circulated pursuant to Public Resources Code Section 21153(a) and CEQA Guidelines Sectino15082 and the Initial Study is available for review along with the NOP on the City's website: https://www.ci.claremont.ca.us/living/draft-housing-element.

Project Name: City of Claremont Housing Element Update

Project Location: City of Claremont (citywide) in the County of Los Angeles (see Figure 1 attached).

Public Comment Period: The City of Claremont welcomes and will consider all written comments regardingpotential environmental impacts of the project and issues to be addressed in the Draft EIR.The public review period begins on September 17, 2021, and ends on October 22, 2021 at5:00 p.m. Please direct your comments to:

Mail: Brad Johnson, Director of Community Development
Community Development Department
207 Harvard Avenue, Claremont, California 91711

Email: bjohnson@ci.claremont.ca.us

Please include your name, phone number and email or postal address.

Scoping Meeting: The City of Claremont will host a scoping meeting to solicit input on the content of the environmental analysis that will be included in the Draft EIR.

Date and Time: September 29, 2021 at 6:00 p.m. via Zoom

Participants using a phone line:

- Phone Numbers: (213) 338-8477 or (669) 900-6833
- Webinar ID: 976 5866 5890

Participants using a computer, tablet or smartphone:

- Access the webinar at this link: https://zoom.us/j/97658665890

The City of Claremont, in compliance with the Americans with Disabilities Act, requests individuals who require special accommodations to access, attend and/or participate in the City meeting due to disability, to please contact the City Clerk's Office, (909) 399-5463, at least one business day prior to the scheduled meeting to ensure that we may assist you.

Consulting Firm Retained to Prepare Draft EIR

Firm Name: Rincon Consultants, Inc.

Address: 706 South Hill Street, Suite 1200, Los Angeles, California 90014

Contact: Kari Zajac, MESM, Senior Environmental Planner

Date: September 17, 2021 **Signature:**

Brad Johnson

Title: Director of Community Development, City of Claremont

Phone: (909) 399-5342

Project Summary

Project Description

The project would amend the City of Claremont General Plan by replacing the current Housing Element with the proposed 2021-2029 Housing Element and updating the Safety Element of the General Plan to reflect recent changes in State law. The City's General Plan was last updated in July 2012 and program Environmental Impact Report (EIR) for the General Plan was completed in October 2006. The Housing Element was last updated in July 2019.

Housing Element Update

The City of Claremont, along with all cities and counties in California, is mandated by California State law to prepare a Housing Element update for State certification every eight years. The Housing Element is a state-mandated part of the City's General Plan and includes goals, policies, programs and objectives to further the development, improvement and preservation of housing in Claremont in a manner that is aligned with community desires, as well as regional growth objectives and State law. Local governments must adequately plan to meet the existing and projected housing needs of all economic segments of the community. Specifically, State Government Code Section 65583 requires the Housing Element to identify and analyze existing and projected housing needs, and establish goals, policies, and actions to address these housing needs, including adequate provisioning of affordable and special-needs housing (e.g., agricultural workers, homeless people, seniors, single-parent households, large families, and persons with disabilities). State law requires local jurisdictions to identify available sites that have the appropriate land use and zoning to accommodate estimated housing growth projections.

In July 2019, the City of Claremont General Plan was updated to incorporate the 2018-2021 Housing Element (for the fifth cycle). It included the provision of sufficient land for the construction of the housing units that the City of Claremont must accommodate according to the Regional Housing Needs Allocation (RHNA) by 2021. The 2018-2021 allocation equaled 373 new housing units. The RHNA quantifies the need for housing in every region throughout the state and is determined by the California Department of Housing and Community Development. The RHNA is mandated by state law and is meant to inform the local planning process by addressing existing and future housing need resulting from estimated growth in population, employment, and households. The Southern California Association of Governments (SCAG) is responsible for allocating the RHNA to each city and county in its region, which includes Claremont.

In March 2021, the California Department of Housing and Community Development (HCD) issued its final Regional Housing Need Determination to SCAG, stating that the minimum regional housing need for the SCAG region is 1.34 million new housing units. HCD then directed SCAG to develop a methodology to allocate all 1.34 million units throughout the region, based on statutory guidelines for housing needs and development.

SCAG developed a methodology and distributed a draft RHNA allocation to all the cities and counties in its region, including the City of Claremont, for the 2021-2029 Housing Element planning period (the sixth cycle).

The City's total draft RHNA for the 2021-2029 planning period is 1,711 units, allocated to specific income groups as shown in Table 1.

Table 1 City of Claremont Regional Housing Needs Allocation (Draft)

	Income Category (% of Los Angeles County Area Median Income)				
	Very Low (31-50%)	Low (51-80%)	Moderate (81-120%)	Above Moderate (120% or more)	Total RHNA
Housing units needed	556	310	297	548	1,711

In addition to the RHNA for Claremont HCD requires local jurisdictions to identify enough future housing sites in the inventory to not only cover the jurisdiction's 6th Cycle RHNA, but to also provide for an additional buffer capacity above the RHNA. The buffer capacity is required to accommodate realistic production rates of affordable housing units; plus having the buffer can allow for instances when a smaller residential project may have to be considered for a given property. The 20 percent buffer would increase the RHNA to 2,236 units. In addition to the buffer units, the City has also included 559 residual units.

One of the important steps in the Housing Element update process is to identify sites that can accommodate the housing units assigned to Claremont per the above RHNA allocation table, at all income levels. Site selection is conducted based on an analysis of site-specific constraints, including zoning, access to utilities, location, development potential, density and whether or not the site is identified in a previous Housing Element. In order to count toward the RHNA allocation, sites must be in a zoning category that meets a minimum residential density standard, have a minimum lot size, and are either vacant or underutilized. Underutilized sites are sites that have not been developed to the maximum capacity allowed by the zoning category and thus provide the potential for more residential homes on a site. When a local jurisdiction cannot demonstrate that there are enough vacant or underutilized sites to adequately meet their RHNA allocation, a 'rezoning program' must be put into place. A rezoning program ensures that there are enough sites with sufficient densities to address the housing need identified through the RHNA.

The Housing Element Update will also address any changes that have occurred since adoption of the current Housing Element. These changes include updated demographic information, housing needs data, and analysis of any potential housing constraints. The Housing Element map of available housing sites will be updated to identify sites that could accommodate the City's RHNA allocation for the 2021–2029 planning period.

For more information on the Housing Element update, please go to:
https://www.ci.claremont.ca.us/living/draft-housing-element

Safety Element

The Safety Element is also part of the City of Claremont General Plan and will be updated to include new information about natural and human-related hazards. The Safety Element currently includes policies to address the following types of hazards: geology and seismicity, stormwater management and flooding, fire hazards, radon gas, hazardous materials, and disaster response. The Safety Element update will focus on ensuring alignment with other City plans and addressing new state requirements pertaining to climate change, wildfire risk, and evacuation routes for residential neighborhoods.

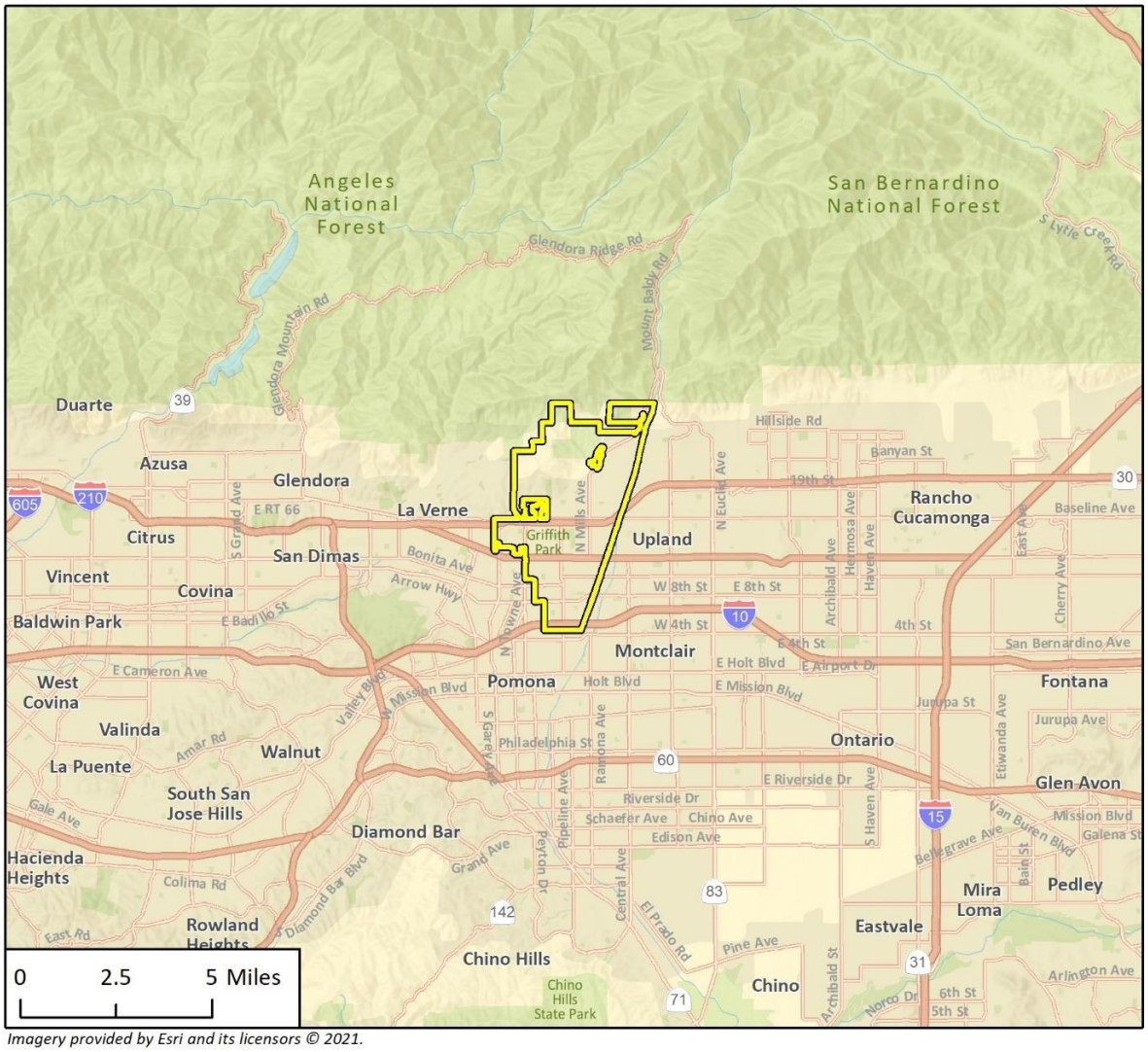
Potential Environmental Effects

An Initial Study was prepared for the Housing Element Update and is available for review and comment along with the NOP on the City's website: https://www.ci.claremont.ca.us/living/draft-housing-element.

The Initial Study found that the project would have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated for all environmental issue areas evaluated under CEQA except for Aesthetics, Air Quality, Greenhouse Gas Emissions, Population and Housing, Transportation, Tribal Cultural Resources, and Utilities and Services Systems. The Draft EIR will further evaluate those impacts' constraints of the project site and potential project impacts related to those hazards. The Draft EIR will propose mitigation

to avoid and/or reduce impacts deemed potentially significant, identify reasonable alternatives, and compare the environmental impacts of the alternatives to the impacts of the Housing Element Update. The Draft EIR will also discuss the cumulative impacts of the Housing Element Update in combination with other closely related past, present, and reasonably foreseeable probable future projects in the area (14 CCR 15130). Comments provided in response to the NOP and during the ensuing analyses may identify additional environmental topics to be evaluated.

Figure 1 City of Claremont Vicinity Map



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Plan Area

N

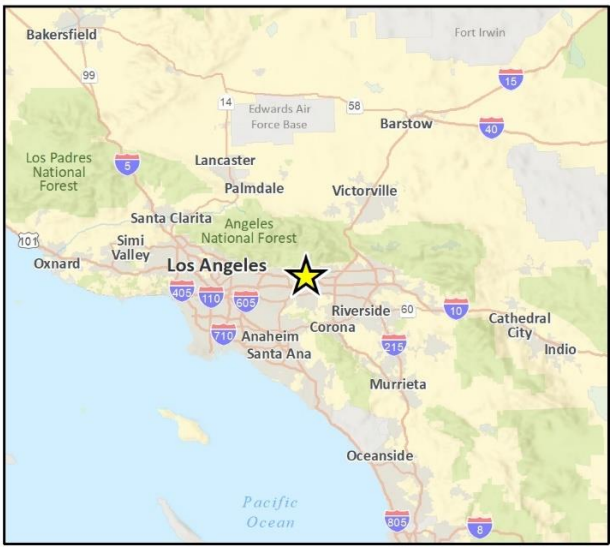

Fig 1 Regional Location

City of Claremont Housing Element Update

Initial Study

prepared by

City of Claremont
Community Development Department
207 Harvard Avenue North
Claremont, California 91711
Contact: Brad Johnson, Community Development Director

prepared with the assistance of

Rincon Consultants, Inc.
706 South Hill Street, Suite 1200
Los Angeles, California 90014

November 2021

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
rinconconsultants.com

City of Claremont Housing Element Update

Initial Study

prepared by

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November 2021

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Initial Study

1. Project Title

City of Claremont Housing Element Update

2. Lead Agency Name and Address

City of Claremont
Community Development Department
207 Harvard Avenue North
Claremont, California 91711

3. Contact Person and Phone Number

Brad Johnson, Community Development Director
909-399-5342

4. Project Location

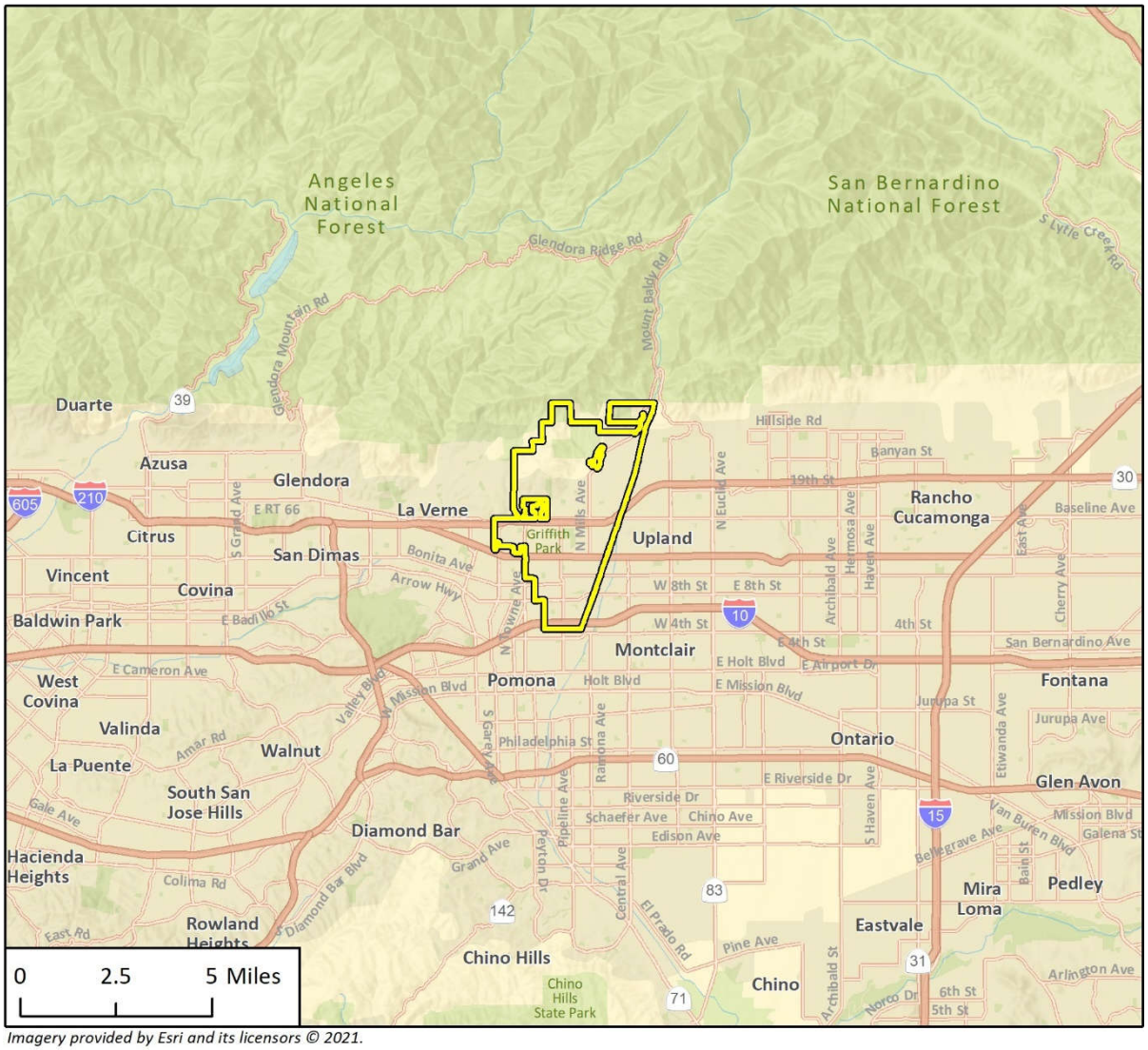
Claremont is located in Southern California in the San Gabriel Valley within the eastern portion of Los Angeles County. The City is bordered by the cities of Upland, Pomona, La Verne, and Montclair, as well as the County of San Bernardino (Figure 1). Three highways transverse Claremont from east to west, Interstate 10 (I-10), State Route (SR) 66, and SR 210. The City is located approximately 40 miles east of the Pacific Ocean and approximately 25 miles east of Downtown Los Angeles.

The Housing and Safety Element updates address lands within the City's limits and well as within the City's Sphere of Influence (SOI), which includes portions of unincorporated Los Angeles County (Plan Area). Please refer to Figure 2 for a depiction of the Plan Area.

5. Project Sponsor's Name and Address

City of Claremont
Community Development Department
207 Harvard Avenue North
Claremont, California 91711

Figure 1 Regional Location



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Plan Area

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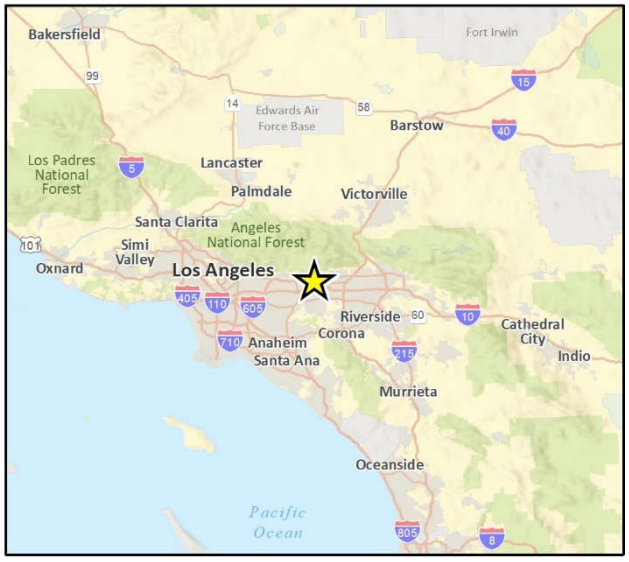
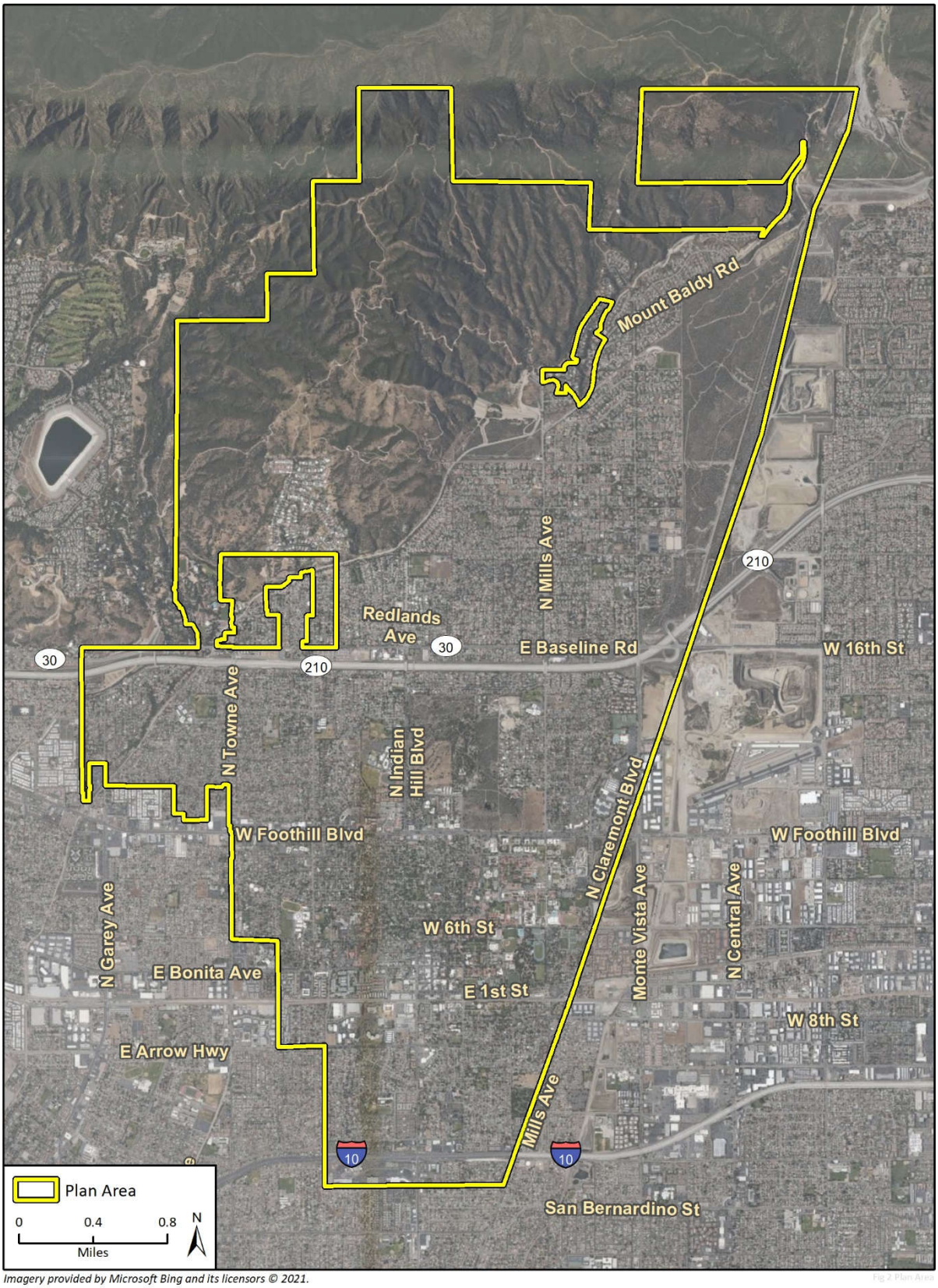


Figure 2 Plan Area



6. Description of Project

The project, herein referred to as the "Housing Element Update," would amend the City of Claremont General Plan by replacing the current Housing Element with the proposed 2021-2029 Housing Element and updating the Safety Element of the General Plan to reflect recent changes in State law. The City's General Plan was last updated in July 2012 and a program Environmental Impact Report (EIR) for the General Plan was completed in October 2006. The General Plan and environmental documents are available for download on the City of Claremont, General Plan and Land Use Map website.[1]

7. Project Characteristics

Housing Element Update

The Housing Element is one of the State-mandated elements of the General Plan. The fifth cycle Housing Element was approved in July 2019 and outlines the City's housing goals from 2018 through 2021. The Housing Element identifies the City's housing conditions and needs, and establishes the goals, objectives, and policies that comprise the City's housing strategy to accommodate projected housing needs, including the provision of adequate housing for low-income households and for special-needs populations (e.g., unhoused people, seniors, single-parent households, large families, and persons with disabilities).

The 2021-2029 Housing Element would bring the element into compliance with State legislation passed since adoption of the 2018-2021 Housing Element and with the current Southern California Association of Governments' (SCAG's) Regional Housing Needs Assessment (RHNA). On March 4, 2021, the SCAG Regional Council adopted the 6th Cycle Final RHNA, which includes a "fair share" allocation for meeting regional housing needs for each community in the SCAG region.

State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). The 2021-2029 Housing Element identifies sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups defined under state law (California Government Code Section 65583), analyzes governmental constraints to housing maintenance, improvement, and development, addresses conservation and improvement of the condition of existing affordable housing stock, and outlines policies that promote housing opportunities for all persons. The project involves an update the City of Claremont Housing Element as part of the sixth cycle planning period, which spans 2021 through 2029.

The 2021-2029 Housing Element includes the following components, as required by State law

- An assessment of the City's population, household, and housing stock characteristics, existing and future housing needs by household types, and special needs populations.
- An analysis of resources and constraints related to housing production and preservation, including governmental regulations, infrastructure requirements and market conditions such as land, construction, and labor costs as well as restricted financing availability.
- Identification of the City's quantified objectives for the 2021-2029 RHNA and inventory of sites determined to be suitable for housing.

1 https://www.ci.claremont.ca.us/living/general-plan-1708

- Opportunities for Conservation in Residential Development: State housing element law requires cities to identify opportunities for energy conservation in residential development.
- Review of the 2018-2021 Housing Element to identify progress and evaluate the effectiveness of previous policies and programs.
- A Housing Plan to address the City's identified housing needs, including housing goals, policies, and programs to facilitate the 2021 Housing Element Update (6th Cycle).

Regional Housing Needs Allocation

The Housing Element must address the City's fair share of the regional housing need and specific state statutory requirements and must reflect the vision and priorities of the local community. As of March 2021, SCAG determined a final RHNA allocation of 1,711 units for the City, of which 886 must be affordable to lower-income households. The City's final allocation may be subject to minor change by recent State legislation.

The RHNA reflects the California Department of Housing and Community Development's determination of the projected housing needs in a region, broken down by income level. Table 1 shows the RHNA for income groups in Claremont during the 2021-2029 planning period, as determined by SCAG.

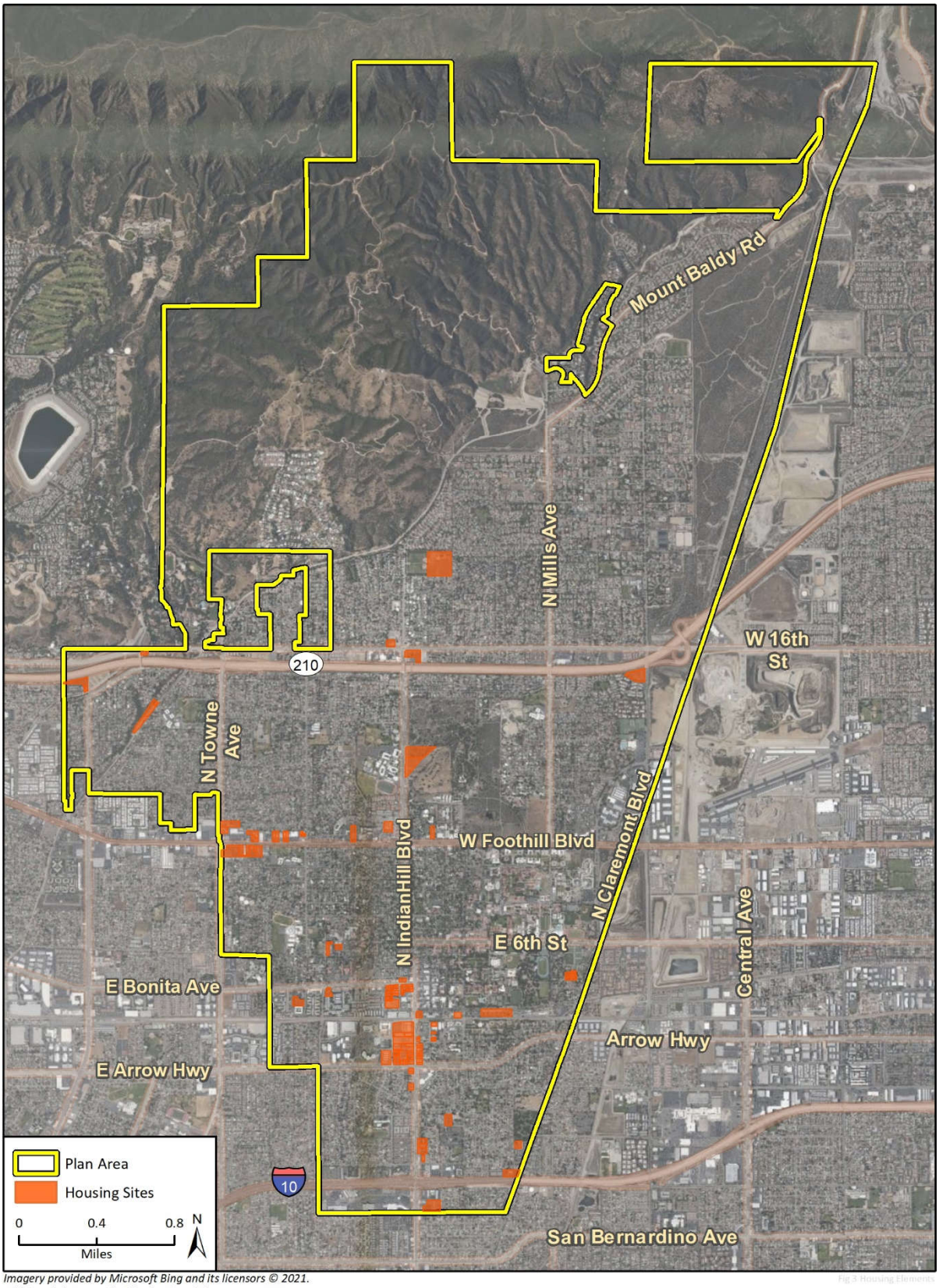
Table 1 2021-2029 Regional Housing Need Allocation

Income Group	Claremont Unit Needs	Percentage City Units
Very low (≤ 50% AMI)	556	33%
Low (> 50-80% AMI)	310	18%
Moderate (>80-120% AMI)	297	17%
Above Moderate (>120% AMI)	548	32%
Totals	**1,711**	**100%**

AMI = Area Median Income (established annually by the Department of Housing and Urban Development)
Source: SCAG 2020

HCD requires local jurisdictions to identify enough future housing sites in the inventory to not only cover the jurisdiction's 6th Cycle RHNA, but to also provide for an additional buffer capacity above the RHNA. The buffer capacity is required to accommodate realistic production rates of affordable housing units; plus having the buffer can allow for instances when a smaller residential project may have to be considered for a given property. The "No Net Loss" Law (Government Code Section 65863) requires maintenance of sufficient sites to meet the RHNA for all income levels throughout the planning period. The recommendation from HCD is to adopt a housing site inventory with a buffer of at least 20 percent over the allocated RHNA. Table 2 details the 20 percent buffer for Claremont. In addition to the buffer units, the City has also included 620 residual units. Housing inventory opportunity sites are show in Figure 3.

Figure 3 Housing Inventory Opportunity Sites



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Additional data provided by the City of Claremont, 2021.

Table 2 2021-2029 Regional Housing Need Allocation with Buffer

Income Group	Buffer Units	Residual Units
Low (<80% AMI)[1]	1,143	287
Moderate (>80-120% AMI)	468	118
Above Moderate (>120% AMI)	863	217
Totals	**2,477**	**620**

AMI = Area Median Income (established annually by the Department of Housing and Urban Development)
[1] Includes Very Low income group
Source: See Appendix A

Meeting the Regional Housing Needs Assessment Objectives

To meet the objectives of the RHNA and provide sufficient capacity for housing development, the Housing Element specifies sites for residential development, identifies rezoning of sites to increase permitted residential densities to meet affordability requirements and continues implementation of the Accessory Dwelling Unit (ADU) program. However, the Housing Element in and of itself does not develop housing – it is a plan. The Housing Element assumes that less than the total 3,0973,097 units would realistically be developed based on previous development history in the City. However, for the purposes of CEQA analysis, this Initial Study assesses a higher range of development potential, considered the "worst case scenario," to fully analyze potential impacts if development occurs at a rate higher than it has historically.

Appendix A includes the list of opportunity sites in the city and the allowable densities, zoning changes, and number of potential units that could be accommodated in Claremont at each identified housing site. The net increase of units presented in Appendix A, 3,097 units, is the realistic upper end of the permitted density range. The development and redevelopment of sites zoned mixed-use may include commercial uses.

Safety Element Update

Approved in 2019, Assembly Bill (AB) 747 requires each jurisdiction to review and update as necessary the Safety Element of its General Plan to identify evacuation routes and capacity, safety, and viability under a range of emergency scenarios. This information must be included by January 1, 2022, or upon approval of the next update to the Local Hazard Mitigation Plan. Also approved in 2019, Senate Bill (SB) 99 requires jurisdictions, upon the next revision of the Housing Element on or after January 1, 2020, to review and update the safety element to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. The proposed Safety Element Update addresses the requirements of these bills.

Proposed areas of the Safety Element to be updated include fire hazards, stormwater management, and emergency response and preparedness, especially as they relate to the City's projected climate change exposure and vulnerability. The Safety Element would be updated to ensure alignment with other City plans such as the City of Claremont 2015 Hazards Mitigation Plan[2] and addressing new state requirements pertaining to climate change, wildfire risk, and evacuation routes for residential neighborhoods.

[2] The City has released the July 2021 Local Hazard Mitigation Plan. The Plan will go to City Council in August 2021 for approval. This study uses the 2015 Hazard Mitigation Plan since the 2021 version has not yet been adopted.

Updates to Chapter 6: Public Safety and Noise Element, would focus on managing wildfire risk and adapting to climate change (pursuant to Assembly Bill 379). New policies in the Public Safety and Noise Element would focus on incorporating policies organized by CAL FIRE through land use standards, ordinances, plans, and programs related to wildfire mitigation activities, emergency services, evacuation, and re-development following a wildfire. New policies related to climate change would include improving collaboration with key agencies, increased use of natural infrastructure, and early warning systems for hazards such as earthquakes, flood, and wildfire.

7.1 Relationship to Other General Plan Elements

The Claremont General Plan was updated in its entirety and adopted in 2006 and is comprised of the following chapters: Introduction; Land Use, Community Character, and Heritage Preservation; Economic Development/Fiscal; Community Mobility; Open Space, Parkland, Conservation, and Air Quality; Public Safety and Noise; Human Services, Recreational Programs and Community Facilities; Housing, and Governance. California Government Code Section 65583 (c) requires the Housing Element to maintain internal consistency with all of the other General Plan Elements. At this time, the Housing Element is being updated in conformance with the 2021-2029 update cycle for jurisdictions in the Southern California Association of Governments (SCAG) region in addition to the California Government Code requirements. The Housing Element builds upon the other General Plan elements and is entirely consistent with the policies set forth by the General Plan. As portions of the General Plan are amended in the future, the Plan (including the Housing Element) will be reviewed to ensure that internal consistency is maintained.

8. Discretionary Action

Implementation of the 2021-2029 Housing Element would require the following discretionary actions by the City of Claremont Planning Commission and/or City Council:

- Approval of the final environmental analysis
- Approval of the 2021-2029 Housing Element and Safety Element

The California Department of Housing and Community Development (HCD) reviews and determines whether the proposed Housing Element complies with State law. Aside from HCD, no other approvals by outside public agencies are required.

9. Location of Prior Environmental Document(s)

A copy of the General Plan EIR is available to request online through the Office of Planning and Research (OPR) webpage: https://ceqanet.opr.ca.gov/2005111115/2

10. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

As of the date of this document no Native American tribes have requested consultation for the Housing Element Update pursuant to Public Resources Code Section 21080.3.1. In addition, because the Housing Element Update would amend the General Plan, Native American consultation on this project under Senate Bill (SB) 18 was conducted. Consultation letters were sent to tribes on September 15, 2021. To date no requests for consultation have been received.

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Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

■	Aesthetics	□	Agriculture and Forestry Resources	■	Air Quality
■	Biological Resources	■	Cultural Resources	□	Energy
■	Geology/Soils	■	Greenhouse Gas Emissions	■	Hazards & Hazardous Materials
□	Hydrology/Water Quality	□	Land Use/Planning	□	Mineral Resources
■	Noise	■	Population/Housing	□	Public Services
□	Recreation	■	Transportation	■	Tribal Cultural Resources
■	Utilities/Service Systems	■	Wildfire	■	Mandatory Findings of Significance

Determination

Based on this initial evaluation:

□ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

□ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

□ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

■ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	Date
Printed Name	Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	■	□	□	□
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	□	□	□	■
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 a 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?	■	□	□	□
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	□	□	■	□

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

The Claremont General Plan does not identify any designated scenic vistas. However, the San Gabriel Mountains lie just north of the City and are visible throughout the City. Reasonably foreseeable development under the Housing Element Update could have the potential to block views of the San Gabriel Mountains; therefore, this impact is potentially significant and will be discussed in the EIR.

POTENTIALLY 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?

There are no officially designated state scenic highways in Claremont. The nearest eligible state scenic highway is 25 miles east of the City (State Route 210 at State Route 134) (Caltrans 2019). The City of Claremont is not visible from an officially-designated or eligible state scenic highway;

therefore, the Housing Element Update would have no impact on scenic resources within a state scenic highway. This impact will not be further discussed in the EIR.

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 a 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?

The City of Claremont is in an urbanized area.[3] Development facilitated by the Housing Element Update would encourage future development in previously developed infill sites. Potential rezones and land use changes under the Housing Element Update could facilitate new development and allow for higher densities than what currently exists in some areas, which could alter the visual character of portions of City, including changes to building heights and massing. However, new construction associated with reasonably foreseeable new development under the Housing Element Update would be subject to the City's development standards, such as floor area ratio (FAR), building heights and setbacks, and transitional height requirements for properties abutting residential zones. The Claremont Municipal Code Chapter 16, outlines development requirements to protect important site, neighborhood, or community characteristics that require particular attention in project planning. While new development would be consistent with applicable zoning and other regulations multi-story buildings on vacant sites or sites with single story structures may impact scenic quality in Claremont. Therefore, this impact is potentially significant and will be discussed in the EIR.

POTENTIALLY SIGNIFICANT IMPACT

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

The City of Claremont is in an urbanized area with existing sources of light and glare. Development facilitated by the Housing Element Update would primarily consist of infill development in urbanized areas with existing sources of light and glare.

It could be reasonably anticipated that illumination from new development (security lighting, parking lot lighting, ornamental lighting, pedestrian scale lights, lighting from ground floor storefronts and signs) would increase overall lighting levels in areas where increased development is expected to occur as the result of implementation of the project. In addition, it could be anticipated that future development under the Housing Element Update, particularly development projects of substantial scale, would result in the introduction of lighting in areas where currently lighting levels are low or where lighting levels along sidewalks is interrupted by darkened or shadowed areas. However, all development would be required to comply with Section 16.154.030 of the Claremont Municipal Code, which requires limiting light and glare. Specifically, outdoor lighting fixtures are required to be designed, installed, and maintained to direct light only onto the property on which the light source is located. All outdoor lighting fixtures are also required to have prismatic diffusing lenses and/or appropriate shielding so the light source is not directly visible from the public right-of-

3 *CEQA Guidelines* Section 21071 defines "urbanized area" as an incorporated city that has a population of less than 100,000 persons if the population of that city (Claremont) and not more than two contiguous incorporated cities (Pomona) combined equals at least 100,000 persons. The City of Claremont has a population of approximately 36,000 persons, and the City of Pomona, which has a shared boundary with Claremont, has a population of approximately 152,000 persons.

way or abutting residential properties. Section 16.154.030(C) of the Claremont Municipal Code provides requirements for lighting for single family residential development and according to Section 16.154.030(D) multi-family developments are required to design and install lighting so that direct rays of light are directed downward into the interior of the lot. Therefore, while new development would be added to the City, development would be required to comply with lighting guidelines in the City's Municipal Code. Impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The City of Claremont contains land designated as Urban and Built-Up Land, Grazing Land, and Other Land (Department of Conservation [DOC] 2016). No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is designated within the City boundaries. Therefore, no impact from the conversion of farmland would occur as a result of the Housing Element Update. This impact will not be discussed in the EIR.

NO IMPACT

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

While the City of Claremont contains land designated for wilderness park and park conservation land uses, no agricultural, forest, or timberland land uses are designated within the City (City of Claremont 2014a). Similarly, the City contains land zoned for park and hillside uses, but no agricultural, forest, or timberland zoning districts are designated within the City (City of Claremont 2014b). Additionally, there is no Williamson Act contracted land in the City (DOC 2017). Therefore, no impact from the conflicts with or conversion of agricultural, forest, or timberland land uses or zoning districts or Williamson act contracts would occur as a result of the project. This impact will not be discussed in the EIR.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct 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?	□	□	■	□

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

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?

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Claremont is located in the South Coast Air Basin (the Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The local air quality management agency is required to monitor air pollutant levels to ensure that applicable air quality standards are met, and, if they are not met, to develop strategies to meet the standards. The SCAQMD has adopted an Air Quality Management Plan (AQMP) that provides a strategy for the attainment of State and federal air quality standards. Emissions generated by development facilitated by the Housing Element Update would include temporary construction emissions and long-term operational emissions.

Construction activities such as the operation of construction vehicles and equipment over unpaved areas, grading, trenching, and disturbance of stockpiled soils have the potential to generate fugitive dust (PM_{10}) through the exposure of soil to wind erosion and dust entrainment. In addition, exhaust emissions associated with heavy construction equipment would potentially degrade air quality. Construction emissions could exceed SCAQMD significance thresholds.

Long-term emissions associated with operational impacts would include emissions from vehicle trips, natural gas and electricity use, landscape maintenance equipment, and consumer products and architectural coating associated with development within the City. Emissions could exceed SCAQMD significance thresholds. Long-term vehicular emissions could also result in elevated concentrations of carbon monoxide (CO) at congested intersections in the vicinity of the City.

Certain population groups, such as children, the elderly, and people with health problems, are considered particularly sensitive to air pollution. Sensitive receptors include land uses that are more likely to be used by these population groups. Sensitive receptors include health care facilities, retirement homes, school and playground facilities, and residential areas.

Impacts related to both temporary construction-related air pollutant emissions and long-term emissions may be potentially significant and will be analyzed further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

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

The occurrence and severity of potential odor impacts depends on a number of factors, including the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of the 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.

The Housing Element Update would facilitate the creation of additional housing units in an urbanized area with existing residential and commercial uses. Construction activities for reasonably foreseeable new development under the Housing Element Update may produce temporary odors. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, and architectural coatings. Such odors would disperse rapidly from the individual project sites, generally occur at magnitudes that would not affect substantial numbers of people and would be limited to the construction period. Furthermore, construction would be required to comply with SCAQMD Rule 402, which regulates nuisance odors. Accordingly, the construction of future development under the Housing Element Update is not anticipated to create objectionable odors affecting a substantial number of people and impacts would be less than significant.

SCAQMD's *CEQA Air Quality Handbook* (1993) identifies land uses associated with odor complaints as agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Residential uses are not identified on this list. Reasonably foreseeable development under the Housing Element Update would be residential and commercial mixed-use development, which is not considered a major generating source of odor and would not create objectionable odors to surrounding sensitive land uses. Therefore, potential impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. 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 Wildlife or U.S. Fish and Wildlife Service?	■	□	□	□
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	■	□	□	□
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	■	□	□	□
d. 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?	■	□	□	□
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	■	□	□	□
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	□	□	□	■

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 Wildlife 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, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

c. Would the project have a substantial adverse effect on state or federally protected wetlands (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?

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Housing Element Update would prioritize development of new residences on infill sites in areas previously developed in the central and southern portions of the city, with few housing opportunity sites in the north. Proposed housing opportunity sites located in the northern portion of the City adjacent to hillside open space areas may support habitat for special-status species, nesting birds, or species may be present. According to the US Fish and Wildlife Service National Wetland Inventory there are freshwater forested/shrub and wetland habitat; freshwater pond; and freshwater emergent wetland in the southern developed portion of Claremont where buildout of the Housing Element Update would occur (USFWS 2021c). Development on these housing opportunity sites has the potential to impact special status species, habitats, such as wetlands and riparian habitat, and nesting birds. Additionally, development facilitated by the Housing Element Update could impact defined significant ecological areas, wildlife corridors, or heritage and protected trees, as defined by the Chapter 12 of the CMC. Therefore, these impacts will be analyzed further in an EIR

POTENTIALLY 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?

The project is not located within any approved local, regional, or state Habitat Conservation Plan or Natural Community Conservation Plan (CDFW 2019). Therefore, no impact would occur. This impact will not be discussed in the EIR.

NO IMPACT

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5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	■	□	□	□
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	□	■	□	□
c. Disturb any human remains, including those interred outside of formal cemeteries?	□	□	■	□

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

In Claremont, there are five buildings and three historic districts listed in the National Register of Historic Places (National Park Service 2021). There is one California Historical Landmark in the city: Pomona Water Powerplant on Camp Baldy Road in San Antonio Canyon (Office of Historic Preservation 2021).

The Housing Element Update would prioritize the development of new housing on previously developed or vacant infill sites. Some of these infill sites may contain historic structures or resources, eligible for listing in the California Register of Historic Resources, the demolition or alteration of which could constitute a significant impact. Additionally, 110 West 1st Street, adjacent to one of the housing opportunity sites, is the Atchison, Topeka, and Santa Fe Railroad station and considered a historic building as of July 1982. Housing opportunity sites near the Claremont Packing House and the garden apartment development at the southwest corner of Bonita Avenue and Indian Hill Boulevard may also impact historic structures. Therefore, reasonably foreseeable future development under the Housing Element Update has the potential to impact historical resources and this issue will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The Housing Element Update would prioritize the development of new housing within areas that have previously been developed and disturbed. Therefore, it is likely that on future development sites identified in the Housing Element Update prior grading, construction, and modern use of the sites would have either removed or destroyed archaeological resources within surficial soils. Nonetheless, there is the potential for archaeological resources to exist below the ground surface throughout the City, which could be disturbed by grading and excavation activities associated with

new development. Therefore, Mitigation Measure CR-1 is required to ensure that future development on sites identified for development would preserve unidentified archaeological resources. This would reduce potential impacts to a less than significant level. This impact will not be further discussed in the EIR however, this mitigation measure will be included as part of the Mitigation Monitoring and Reporting Program (MMRP) in the Final EIR.

Mitigation Measures

CR-1 Cultural Resources Study Implementation Program

All projects proposed under the Housing Element Update shall investigate the potential to disturb archaeological resources. If preliminary reconnaissance suggests that cultural resources may exist, a Phase I cultural resources study shall be performed by a qualified professional meeting the Secretary of the Interior's (SOI) Professional Qualification Standard (PQS) for archaeology (NPS 1983). A Phase I cultural resources study shall include a pedestrian survey of the project site and sufficient background research and, as necessary, field sampling to determine whether archaeological resources may be present. Archival research shall include a records search at the South Central Coastal Information Center (SCCIC), located at California State University, Fullerton and a Sacred Lands File (SLF) search with the Native American Heritage Commission (NAHC). The Phase I technical report documenting the study shall include recommendations to avoid or reduce impacts on archaeological resources. These recommendations shall be implemented and incorporated in the project.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Development facilitated by the Housing Element Update would result in ground disturbance during construction of new development throughout the city. The discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner would notify the Native American Heritage Commission, which would determine and notify a most likely descendant (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. With adherence to State law, impacts related to the discovery of human remains would be less than significant.

LESS THAN SIGNIFICANT IMPACT

6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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?	☐	☐	■	☐

California is one of the lowest per capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate. In 2018, California consumed 681 million barrels of petroleum, 2,137 billion cubic feet of natural gas, and one million short tons of coal in 2018 (United States Energy Information Administration [EIA] 2020). The single largest end-use sector for energy consumption in California is transportation (39.8 percent), followed by industry (23.7 percent), commercial (18.9 percent), and residential (17.7 percent) (EIA 2020).

Most of California's electricity is generated in-state with approximately 30 percent imported from the northwest and southwest in 2018. In addition, approximately 30 percent of California's electricity supply comes from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (California Energy Commission 2019). Adopted on September 10, 2018, Senate Bill (SB) 100 accelerates the State's Renewables Portfolio Standards Program by requiring electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

To reduce statewide vehicle emissions, California requires all motorists use California Reformulated Gasoline, which is sourced almost exclusively from in-state refineries. Gasoline is the most used transportation fuel in California with 15.6 billion gallons sold in 2018 and is used by light-duty cars, pickup trucks, and sport utility vehicles (California Department of Tax and Fee Administration 2019). Diesel is the second most used fuel in California with 4.2 billion gallons sold in 2015 and is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles (California Energy Commission 2016).

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

The Housing Element Update would prioritize the development of new housing within urbanized and previously developed areas. Reasonably foreseeable new development under the Housing Element Update would consume energy during construction and operation through the use of petroleum fuel, natural gas, and electricity, as further addressed below.

Construction

Energy use during construction associated with reasonably foreseeable new development under the Housing Element Update would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. In addition, temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during the construction of individual projects would be temporary in nature, and equipment used would be typical of construction projects in the region. In addition, construction contractors would be required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities associated with reasonably foreseeable new development under the Housing Element Update would be required to utilize fuel-efficient equipment consistent with State and federal regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, individual projects would be required to comply with construction waste management practices to divert 80 percent of construction and demolition debris.

These practices would result in efficient use of energy during construction of future development under the Housing Element Update. Furthermore, in the interest of both environmental awareness and cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, future construction activities associated with reasonably foreseeable new development under the Housing Element Update would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Operation

Long-term operation of new residences developed in accordance with the Housing Element Update would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. As previously discussed, the Housing Element Update includes new development in underutilized infill parcels in the areas of Claremont that are already served by energy providers. Electricity service in the City is provided by Southern California Edison. Southern California Gas Company (SoCal Gas) provides natural gas services to residents and businesses in the City.

New development under the Housing Element Update would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations), and the City's Green Building Standards Code (WHMC Chapter 13.24). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from

landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. Additionally, Claremont has joined the Clean Power Alliance, a collection of municipalities, to offer clean renewable energy to Claremont residences and businesses through a partnership with Southern California Edison. As of May 2019 Clean Power Alliance became the new electricity provider for residences and businesses in Claremont, while Southern California Edison continues to deliver the power to residences and businesses (City of Claremont 2021a).

In addition, the Housing Element Update would prioritize developing new residential units in close proximity to existing commercial/retail and recreational land uses, which would reduce trip distances and encourage the use of alternative modes of transportation such as bicycling and walking. These factors would minimize the potential of the Housing Element Update to result in the wasteful or unnecessary consumption of vehicle fuels. As a result, operation of new development under the Housing Element Update would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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

In 2008, the City of Claremont adopted a Sustainable City Plan that was last updated in April 2021 to direct the City toward sustainability. One of the goals of the Sustainable City Plan is resource conservation, including energy conservation (City of Claremont 2021b). The Sustainable City Plan includes goals to reduce reliance on natural gas and promote energy conservation. Energy goals include promoting local installation of solar energy systems, seeking innovative lighting technologies, and promoting energy efficiency and conservation technologies (i.e., energy efficient appliances and low emitting vehicles) to reduce use of nonrenewable resources.

Development facilitated by the Housing Element Update would be required to comply with regulatory standards and local measures, which would ensure that the Housing Element Update would not conflict with renewable energy and energy efficiency plans adopted by the City. As such, the Housing Element Update would not conflict with or obstruct a plan for renewable energy or energy efficiency, and impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	☐	☐	■	☐
2. Strong seismic ground shaking?	☐	☐	■	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	■	☐
4. Landslides?	☐	☐	■	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
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 direct or indirect risks to life or property?	☐	☐	■	☐
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?	☐	■	☐	☐

a.1. Would the project 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?

Claremont is located in a seismically active region of southern California. Moderate to strong earthquakes can occur on numerous local faults. Southern California faults are classified as "active," "potentially active," or "inactive." Faults from past geologic periods of mountain building that do not display any evidence of recent offset are considered "potentially active" or "inactive." Faults that have historically produced earthquakes or show evidence of movement in the past 11,000 years are known as "active faults."

The Indian Hill, San Antonio, San Jose, and Sierra Madre Faults are located in the City; however, these faults have not shown movement in at least 130,000 years, and are not considered to be active faults (USGS 2021a). The nearest Alquist-Priolo fault is the Cucamonga Fault mapped approximately 0.9 mile east of the City's northeastern boundary (DOC 2021). Therefore, reasonably foreseeable residential development from buildout under the Housing Element Update would not occur in areas with the potential for ground rupture and associated risk of loss, injury, or death. Nothing can ensure that structures do not fail under seismic stress. However, proper engineering, including compliance with the California Building Code (CBC), the City of Claremont Municipal Code, and new policies to the City's Public Safety and Noise Element, would minimize the risk to life and property.

The CBC is the regulatory tool that includes building code standards to address geologic and seismic hazards. Approximately one-third of the text in the CBC has been tailored for California earthquake conditions. Claremont, along with all of Southern California, is in Seismic Zone 4, the area of greatest risk and subject the strictest building standards, which would reduce impacts from nearby faults. All development under the Housing Element Update would be required to comply with applicable provisions of the most current edition of the CBC at the time of construction. The the City's adopted building codes, Chapter 15.04 of the Claremont Municipal Code, would also apply to proposed residential development under the Housing Element Update. Development would also be required to comply with Claremont General Plan policies including Policy 6-4.1 to enforce the most recent building codes governing seismic safety and structural design and Policy 6-4.2 to support efforts to identify location, potential activity, and dangers associated with earthquakes and implement recommendations contained in geotechnical reports.

Additionally, new policies to the City's Public Safety and Noise Element would include adoption of early warning systems for hazards, including earthquakes. Potential projects facilitated by the Housing Element Update would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas that could create unstable seismic conditions or stresses in the Earth's crust. As such, reasonably foreseeable development from the Housing Element Update would not directly or indirectly cause or increase potential substantial adverse effects involving the rupture of a known earthquake fault. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The Indian Hill, San Antonio, San Jose, Sierra Madre, and Stoddard Canyon Faults are located in the City; however, these faults have not shown movement in at least 130,000 years, and are not considered to be active faults (USGS 2021a). The nearby Cucamonga Fault would be capable of producing strong seismic ground shaking in the City in the event of an earthquake. In addition, the City is located in the highly seismic Southern California region. Reasonably foreseeable development projects within the City may be subject to ground shaking in the event of an earthquake originating along one of the faults designated as active or potentially active in the vicinity of Claremont.

However, this hazard is common throughout California and the proposed development under the Housing Element Update would pose no greater risk to public safety or destruction of property than is already present for the region. Development in the City is required to adhere to the International Building Code (IBC) CBC. The IBC and CBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking. Additionally, as described under item a.1, development under the Housing Element Update would also be required to comply with the Claremont General Plan. Specifically, Policies 6-4.1 and 6-4.2 that would reduce impacts from seismic Groundshaking. The impact to people, buildings, or structures on potential project sites from strong seismic ground shaking would be reduced by the required conformance with applicable building codes, adherence to General Plan policies, and accepted engineering practices. Impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction is a phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

According to the DOC Earthquake Zones of Required Investigation map, portions of the City are at risk of seismically induced liquefaction (DOC 2021). The two mapped liquefaction areas in the City are located west of the Claremont Colleges and south of West Foothill Boulevard, and the southwest-northeast trending area at the base of the foothills in the northern portion of the City between SR 210 and south of the San Antonio Channel and Dam. Proposed housing opportunity sites are not located in any of these areas of seismically induced liquefaction. Further, as mentioned above, development in the City is required to adhere to the IBC and CBC. Compliance with City and State building codes would reduce seismic ground shaking impacts with current engineering practices and the project would not exacerbate liquefaction potential at any of the proposed housing sites. As such, the Housing Element Update would not directly or indirectly cause substantial adverse effects from liquefaction risk and impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The geologic character of an area determines its potential for landslides. Steep slopes, the extent of erosion, and the rock composition of a hillside all contribute to the potential for slope failure and

landslide events. In order to fail, unstable slopes need to be disturbed; common triggering mechanisms of slope failure include undercutting slopes by erosion or grading, saturation of marginally stable slopes by rainfall or irrigation; and, shaking of marginally stable slopes during earthquakes. The topography of the City of Claremont includes generally flat areas in the southern portion of the City, with foothills of the San Gabriel Mountains in the northern portion of the City. According to the DOC Earthquake Zones of Required investigation map, the northern part of the City associated with the San Gabriel Mountains is located in a landslide zone.

The identified housing opportunity sites are located in the southern portion of the City and outside mapped landslide zones. The area subject to earthquake-induced landslides is limited to the northern hilly areas the City, and the Housing Element does not identify any housing opportunity sites in or near a mapped landslide area. Therefore, impacts related to landslides would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

Soil erosion or the loss of topsoil may occur when soils are disturbed but not secured or restored, such that wind or rain events may mobilize disturbed soils, resulting in their transport off site. The identified housing opportunity sites are located primarily on previously disturbed, infill areas. Ground-disturbing activities associated with the construction of new development under the Housing Element Update would have the potential to result in the removal and erosion of topsoil during grading and excavation. Construction activities that disturb one or more acres of land are subject to the National Pollutant Discharge Elimination System (NPDES) General Construction Permit process, which would require development of a Stormwater Pollution Prevention Plan (SWPPP) that outlines project-specific BMPs to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants from construction into stormwater. Typical BMPs include, but are not limited to, installation of silt fences, erosion control blankets, and anti-tracking pads at site exits to prevent off-site transport of soil material.

Because the Housing Element Update would prioritize new housing in areas that are already built out or surrounded by existing development, the potential for erosion would primarily be limited to temporary effects of possible topsoil loss at future project construction sites. The Claremont Municipal Code Chapter 8.28 requires BMPs for stormwater and runoff pollution control, which would apply to both construction and operational activities in the City. Section 8.28.040 of the Claremont Municipal Code contains specific stormwater runoff controls required for construction activities. Construction activities would also be required to comply with CBC Chapter 70 standards, which are designed to ensure implementation of appropriate measures during grading and construction to control erosion and storm water pollution.

Therefore, erosion from demolition and construction activities associated with reasonably foreseeable development under the Housing Element Update would be controlled through implementation of the requirements and BMPs contained in existing regulations, including the NPDES Construction General Permit and Claremont Municipal Code. Furthermore, BMPs for post-construction erosion and sediment control would remain in effect, which would improve future erosion conditions. Compliance with the regulations discussed above would reduce the risk of soil erosion from construction activities such that there would be minimal change in risk compared to current conditions with existing development and impacts would be less than significant. This impact will not be discussed in the EIR.

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?

Impacts related to landslides and liquefaction are addressed under *criteria a.3* and *a.4*; therefore, this discussion focuses on impacts related to unstable soils as a result of lateral spreading, subsidence or collapse. Lateral spreading occurs as a result of liquefaction; accordingly, liquefaction-prone areas would also be susceptible to lateral spreading. Subsidence occurs at great depths below the surface when subsurface pressure is reduced by the withdrawal of fluids (e.g., groundwater, natural gas, or oil) resulting in sinking of the ground. All or portions of the City may be susceptible to subsidence from groundwater withdrawal.

The Housing Element Update would prioritize new housing in areas that are already built out or surrounded by existing development, which may contain underlying unstable soils. Because reasonably foreseeable development under the Housing Element Update would primarily involve infill development, development facilitated by the Housing Element Update would not affect existing conditions related to unstable soils, unless improperly constructed. Future development would be required to comply with the CBC's minimum standards for structural design and site development. The CBC provides standards for excavation, grading, and earthwork construction; fills and embankments; expansive soils; foundation investigations; and liquefaction potential and soils strength loss. Thus, CBC-required incorporation of soil treatment programs (replacement, grouting, compaction, drainage control, etc.) in the excavation and construction plans can achieve an acceptable degree of soil stability to address site-specific soil conditions. Adherence to these requirements would achieve accepted safety standards relative to unstable geologic units or soils. In addition, although reasonably foreseeable development under the project would potentially be subject to these hazards, it would not increase the potential for lateral spreading, subsidence, or collapse. Therefore, impacts would be less than significant. This impact will not be discussed in the EIR.

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?

Soils that volumetrically increase (swell) or expand when exposed to water and contract when dry (shrink) are considered expansive soils. A soil's potential to shrink and swell depends on the amount and types of clay in the soil. Highly expansive soils can cause structural damage to foundations and roads without proper structural engineering and are generally less suitable or desirable for development than non-expansive soils because of the necessity for detailed geologic investigations and costlier grading applications.

The Housing Element Update would prioritize new housing in areas that are already built out or surrounded by existing development that may contain underlying expansive soils. Because reasonably foreseeable development under the Housing Element Update would primarily involve infill development, development under the project would not substantially increase the potential exposure to or extent of expansive soils within the City. The CBC, which is based on the IBC, has been modified for California conditions with numerous more detailed and/or more stringent regulations. If expansive soils are detected on site, the CBC requires the preparation of a soil investigation prior to construction and incorporation of appropriate corrective actions to prevent

structural damage, to be determined on a project-by-project basis. Consequently, there would be minimal change in the exposure of people or structures to risks associated with expansive soils and impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

e. Would the project 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?

The City does not allow new development to dispose of wastewater via septic systems, except when granted as an exception for new construction by the City's Planning Commission as described in Section 13.02.040 of the Claremont Municipal Code. Reasonably foreseeable development under the Housing Element Update would connect to the City's existing wastewater collection and treatment system. Therefore, there would be no impact related to the use of septic tanks or alternative wastewater disposal systems. This impact will not be discussed in the EIR.

NO IMPACT

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological sensitivity refers to the potential for a geologic unit to produce scientifically significant fossils. Direct impacts to paleontological resources occur when earthwork activities, such as grading or trenching, cut into the geologic deposits (formations) within which fossils are buried and physically destroy the fossils. Since fossils are the remains of prehistoric animal and plant life, they are considered to be nonrenewable. The geologic features in Claremont include Pre-Mesozoic to Cretaceous plutonic igneous rocks of the Peninsular Ranges Batholith; Paleozoic metamorphic rocks; Late Cenozoic terrestrial, marine, and volcanic deposits; and widespread Quaternary alluvial fan and valley deposits. While the Quaternary alluvial fan and valley deposits are not old enough to contain a paleontological resource or unique geological feature, other geological features in Claremont may support paleontological resources.

The Housing Element Update would prioritize the development of new residential development on infill sites in the City that have previously been developed and disturbed or are surrounded by existing development. Nonetheless, there is the potential for paleontological resources to exist below the ground surface throughout the City. Ground-disturbing activities in geologic units with moderate to high paleontological sensitivity have the potential to damage or destroy paleontological resources that may be present. Such resources could be disturbed by grading and excavation activities associated with new development. Therefore, Mitigation Measure GEO-1 is required to ensure that future development on sites identified for development would preserve paleontological resources. This would reduce potential impacts to a less than significant level. This impact will not be further discussed in the EIR however, this mitigation measure will be included as part of the Mitigation Monitoring and Reporting Program (MMRP) in the Final EIR.

Mitigation Measures

GEO-1 Paleontological Resources Studies

Avoidance and/or mitigation for potential impacts to paleontological resources shall be required for development under the Housing Element Update in Claremont that occurs within high sensitivity

geologic units, whether they are mapped at the surface or occur at the subsurface. When paleontological resources are uncovered during site excavation, grading, or construction activities, work on the site shall be suspended until the significance of the fossils can be determined by a qualified paleontologist. If significant resources are determined to exist, the paleontologist shall make recommendations for protection or recovery of the resource.

The City shall require the following specific measures for projects that could disturb geologic units with high paleontological sensitivity:

> **Retain a Qualified Paleontologist to Prepare a PMMP.** Prior to initial ground disturbance, the project applicant shall retain a Qualified Paleontologist, as defined by the Society of Vertebrate Paleontology (2010), to direct all mitigation measures related to paleontological resources and design a Paleontological Mitigation and Monitoring Program (PMMP) for the project. The PMMP shall include measures for a preconstruction survey, a training program for construction personnel, paleontological monitoring, fossil salvage, curation, and final reporting, as applicable.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	■	□	□	□
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	■	□	□	□

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

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Reasonably foreseeable new development facilitated by the Housing Element Update would generate greenhouse gas (GHG) emissions during construction through the use of petroleum-fueled construction equipment and worker vehicle trips to and from construction sites. Operation of new housing units under the Housing Element Update would generate GHG emissions through the use of electricity and natural gas, vehicle trips of occupants, waste generation, water use, and wastewater generation.

Emissions could potentially conflict with local and regional plans adopted for the purpose of reducing GHG emissions, including the regional Sustainable Communities Strategy (SCS), the Claremont Sustainability City Plan (SCP), and the goals and policies of the Open Space, Parkland, Conservation, and Air Quality Element in the Claremont General Plan. Impacts related to GHG emissions would be potentially significant and will be analyzed further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

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9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 0.25 mile of an existing or proposed school?	☐	☐	■	☐
d. Be located on a site that is included on a list of hazardous material 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?	☐	■	☐	☐
e. For a project located in 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 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?	☐	☐	■	☐

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The Housing Element Update would facilitate development on urban infill sites. Construction associated with reasonably foreseeable future development under the Housing Element Update would involve the use of potentially hazardous materials, such as vehicle fuels and fluids, that could be released should a leak or spill occur. However, contractors would be required to implement standard construction BMPs for the use and handling of such materials to avoid or reduce the potential for such conditions to occur. Any use of potentially hazardous materials during construction of future development in accordance with the Housing Element Update would be required to comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials. Likewise, the transport, use, and storage of hazardous materials during future construction would be required to comply with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22.

Housing is not a land use typically associated with the use, transportation, storage, or generation of significant quantities of hazardous materials. Operation of new housing developed under the Housing Element Update would likely involve an incremental increase in the use of common household hazardous materials, such as cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in regular property and landscaping maintenance. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. Therefore, upon compliance with all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, potential impacts associated with the routine transport, use, or disposal of hazardous materials during construction and operation of development under the project would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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?

d. Would the project be located on a site that is included on a list of hazardous material 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?

Per Government Code Section 65962.5, the following lists were searched for listed properties in the City of Claremont:

- Hazardous Waste and Substances site “Cortese” list (65962.5[a]) (Department of Toxic Substances Control [DTSC] 2021)
- GeoTracker: List of LUST Sites (65962.5[c][1]) (State Water Resources Control Board [SWRCB] 2021)
- List of solid waste disposal sites identified by the Water Board (65962.5[c][2]) (California Environmental Protection Agency [CalEPA] 2021a)
- List of “active” Cease and Desist Order and Cleanup Abatement Order sites (65962.5[c][3]) (CalEPA 2021b)

There are no sites in the City listed on the "Cortese" list (DTSC 2021), list of solid waste disposal sites (CalEPA 2021a), or list of "active" Cease and Desist Order and Cleanup Abatement Order site databases (CalEPA 2021b). There are 26 total leaking underground storage tank (LUST) listings on 23 different sites within the City; however, all are listed as "Completed – Case Closed", indicating that remediation and correction of the LUST has occurred (SWRCB 2021). Additionally, only four of these sites are identified housing opportunity sites per the proposed Housing Element Update:

- 191 S. Indian Hill Boulevard
- 267 S. Indian Hill Boulevard
- 431 Baseline Road
- 1030 W. Foothill Boulevard

As described under *criterion a*, above, the transport, use, and storage of hazardous materials during the construction of future development under the Housing Element Update would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22. However, there is the potential for future construction to involve the demolition or alteration of structures that may contain asbestos and/or lead-based paint (LBP), which could pose hazards to receptors at adjacent land uses. Therefore, Mitigation Measure HAZ-1 is required to ensure that the demolition of structures built prior to 1978 (when lead-based paint and asbestos were banned from use in new construction) occurs once any lead-based paint or asbestos-containing materials are removed and abated. This would reduce potential impacts to a less than significant level.

Furthermore, because the Housing Element Update would facilitate development on infill sites within urban areas, there is the potential for future development to occur on project sites where hazardous materials were once used or stored and have the potential to contain contaminated soils from LUSTs, the disturbance of which could pose hazards to receptors at adjacent land uses. Therefore, Mitigation Measure HAZ-2 is required to ensure that future development on sites identified on a database compiled pursuant to Government Code Section 65962.5 does not occur until soil sampling and remediation occurs. This would reduce potential impacts to a less than significant level. This impact will not be discussed in the EIR; however, this mitigation measure will be included as part of the MMRP in the Final EIR.

Mitigation Measures

HAZ-1 Lead-Based Paint and Asbestos Remediation

For projects that would result in the demolition of a building or structure originally constructed prior to 1978, any suspect lead-based paint shall be sampled prior to any renovations or demolition activities. Any identified lead-based paint located within buildings scheduled for renovation or demolition, or noted to be damaged, shall be abated by a licensed lead-based paint abatement contractor, and disposed of according to all state and local regulations.

For projects that would result in the demolition of a building or structure originally constructed prior to 1978, any suspect asbestos-containing materials (ACMs) shall be sampled and analyzed for asbestos content prior to any disturbance. Prior to the issuance of the demolition permit, the applicant shall provide a letter from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If additional ACMs are found to be present, a qualified asbestos abatement

consultant shall abate the buildings in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other State and federal rules and regulations.

HAZ-2 Soil Sampling and Remediation

Before the issuance of a grading permit on the sites listed below, soil samples shall be collected in the vicinity of the former or existing underground storage tanks. A geophysical survey shall also be completed to determine if the tanks are still present on the property, if there is no record of removal available.

- 191 S. Indian Hill Boulevard
- 267 S. Indian Hill Boulevard
- 431 Baseline Road
- 1030 W. Foothill Boulevard

If contamination exceeding regulatory action levels is found, appropriate remediation shall be undertaken prior to issuance of grading permits for the contaminated area. Any remedial activity shall be performed by qualified and licensed professionals and conducted to the satisfaction of the appropriate regulatory oversight agency (for example, the City or County Health Department, Department of Conservation, Regional Water Quality Control Board, or Department of Toxic Substances Control).

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The Claremont Unified School District (CUSD) contains 11 schools, including two high schools, one intermediate school, seven elementary schools, and one adult school. Additional private schools are also located in the City. Several proposed housing inventory sites are located within 0.25 mile of a school. As under *criterion a*, above, the transport, use, and storage of hazardous materials during the construction of future development under the Housing Element Update would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22. Additionally, as described under *criterion a*, residential and mixed-use development proposed under the Housing Element Update would not involve the use or transport of large quantities of hazardous materials. Therefore, development facilitated by the Housing Element Update would result in less than significant impacts on nearby schools. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The City of Claremont is located within two miles of the Cable Airport (located east of the City) and Brackett Field Airport (located west of the City). Both are public-use airports. A portion of the City of Claremont is located within the Cable Airport Land Use Compatibility Plan's mapped Airport Influence Area (City of Upland 2015). Similarly, a portion of the City is located within the Brackett Field Airport Land Use Compatibility Plan's mapped Airport Influence Area, Zone E (Los Angeles

County Airport Land Use Commission 2015). However, the portions of Claremont located within the two airport compatibility zones do not include any parcels proposed for future residential development as part of the Housing Element Update. Thus, the Housing Element Update would not result in a safety hazard for people residing or working in the City, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City of Claremont 2015 Local Hazards Mitigation Plan[1] (LHMP) documents the City's mitigation planning process, identifies local hazards, and includes emergency response for natural disasters in Claremont. The LHMP includes a hazard specific analysis of five hazards (earthquake, flood, wildfire, landslide, and windstorm) and planning and mitigation strategies to reduce potential hazards (City of Claremont 2015). Claremont is currently updating the LHMP to ensure the City properly assesses hazards and their impacts to the community. Reasonably foreseeable development under the Housing Element Update would be required to comply with applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the City police department and fire departments. Additionally, new and revised policies to the City's Public Safety and Noise Element would relate to emergency response and evacuation. Specifically, new and revised policies would ensure emergency service providers have sufficient access for existing and new development and establish standards for evacuation. The Housing Element Update would therefore improve emergency response and evacuation within the City.

Construction activities associated with reasonably foreseeable new development under the Housing Element Update could interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within rights-of-way, due to temporary construction barricades or other obstructions that could impede emergency access. However, temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process, which requires a traffic control plan subject review and approval by the City Engineer. Development and implementation of these plans for all construction activity would minimize potential impacts associated with the impairment or physically interference with adopted emergency response or evacuation procedures.

In addition, residential housing development density in accordance with the Housing Element Update could result in additional traffic on area roadways. However, the goals and policies of the City's LHMP promote reduced traffic during emergency response, including Policy 6-9.4 to strive for the smooth and efficient movement of traffic throughout the community and Policy 6-10-3 to implement a reverse 911 system to facilitate orderly evacuation in case of an emergency.

As part of standard development procedures, any project plan would be submitted for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with existing City regulations. Furthermore, the Housing Element Update would not introduce any features or policies that would preclude implementation of or alter these policies or procedures. Therefore, impacts related to emergency response plans and emergency evacuation plans would be less than significant.

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?

As further discussed in Section 20, *Wildfire*, the northern portion of City is located in a Very High Fire Hazard Severity Zone (FHSZ) (CAL FIRE 2011). Proposed housing inventory sites are not located in the northern portion of the City in or near a Very High FHSZ. Reasonably foreseeable housing developed under the Housing Element Update would be required to be constructed according to the Uniform Building Code requirements for fire-protection and would be subject to review and approval by the Los Angeles County Fire Department (LACFD). Wildfire impacts are further discussed under Section 20, *Wildfire*. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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; or	☐	☐	■	☐
(iv) Impede or redirect flood flows?	☐	☐	■	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	■	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	■	☐

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The Housing Element Update would facilitate new development on infill sites within the City. Construction of reasonably foreseeable new development under the Housing Element Update could potentially impact surface or ground water quality due to erosion resulting from exposed soils and the generation of water pollutants, including trash, construction materials, and equipment fluids.

Claremont is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB), which is responsible for the preparation and implementation of the water quality control plan for the Los Angeles Region. Chapter 8.28 of the Claremont Municipal Code, *Stormwater and Runoff Pollution Control,* requires BMPs for stormwater and runoff pollution control, which would apply to both construction and operational activities in the City. Pursuant to Section 8.28.040(C) construction sites less than one acre shall submit an erosion and sediment control plan to ensure discharge of pollutants would not impact water quality standards. In addition, regulations under the Federal Clean Water Act require compliance with the National Pollutant Discharge Elimination System (NPDES) storm water permit for projects disturbing more than one acre during construction. Operators of a construction site would be responsible for preparing and implementing a SWPPP that outlines project specific BMPs to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants in stormwater. Typical BMPs include covering stockpiled soils, installation of silt fences and erosion control blankets, and proper handling and disposal of wastes. Compliance with these regulatory requirements would minimize impacts to water quality during the construction of future development under the Housing Element Update.

Compliance with federal, State, and local regulations would reduce impacts resulting from reasonably foreseeable new development under the Housing Element Update to a less than significant level. Furthermore, the Housing Element Update would not introduce any features that would preclude implementation of or alter these policies and procedures in any way. Therefore, development facilitated by the Housing Element Update would not violate any water quality standards or waste discharge requirements, and impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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?

Development facilitated by the Housing Element Update would utilize water for construction, operations, and landscape maintenance. The City is in the jurisdiction of Golden State Water Company (GSW), and water supply requirements for development facilitated by the Housing Element Update would be met by GSW. GSW's sources of water include local groundwater (60 percent of total supply), and water purchased from the Metropolitan Water District of Southern California (MWD). Because a portion of GSW's water supply is from groundwater resources, groundwater could potentially be a source in supplying water to future development facilitated by the Housing Element Update. While reasonably foreseeable residential development under the Housing Element Update could increase demand for GSW water by increasing residential density, this demand would be met in a number of ways other than increasing groundwater withdrawal, such as increasing the amount of water purchased from MWD, implementing water conservation measures, increasing use of recycled water, and/or implementing groundwater recharge projects. Therefore, the Housing Element Update would only require a portion of groundwater supply.

Future housing development would not substantially increase the amount of impervious surface in the City because the Housing Element Update prioritizes new development on infill areas that are already urbanized and largely covered with impervious surfaces. Therefore, the Housing Element Update would not interfere substantially with groundwater recharge. Development facilitated by the Housing Element Update may provide some benefits to groundwater recharge by replacing older development with new development subject to open space, landscaping, and stormwater BMP requirements that would increase the amount pervious surfaces and on-site stormwater detention associated with new development.

Potential construction activities associated with future development under the Housing Element Update, such as excavation for subterranean parking lots and foundation-laying for multi-story buildings, could potentially extend into the underlying groundwater table. Construction activities overlying areas with shallower groundwater depth could expose groundwater resources to contamination. However, the risk of groundwater contamination during construction is minimal and would most likely occur due to spills or leaks from equipment or materials used in construction. Developers of individual project sites one acre or more in size are also required to prepare a SWPPP, which includes BMPs to prevent contamination of stormwater and runoff during construction. Typical construction BMPs to prevent stormwater contamination would also prevent contamination of groundwater resources, as exemplified by the following BMPs:

- Construction equipment and vehicles shall be properly maintained.
- All materials shall be properly stored and transported.
- Fuels will be stored in secure areas.

Development under the Housing Element Update would also be required to comply with Section 8.28.040 of the Claremont Municipal Code related to runoff and contamination during construction activity. Pursuant to Section 8.28.040(C) construction sites less than one acre shall submit an erosion and sediment control plan to ensure discharge of pollutants would not impact the underlying water table.

With implementation of appropriate construction BMPs and compliance with the Claremont Municipal Code, the impact of reasonably foreseeable development under the project on groundwater resources would be minimized and impacts to groundwater supplies and sustainable groundwater management would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

c.(i) 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 result in substantial erosion or siltation on- or off-site?

c.(ii) 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

c.(iii) 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 that would 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?

The Housing Element Update would prioritize new development on infill sites within the City. Under existing conditions, the majority of infill sites prioritized for new housing development are almost entirely paved and/or developed with structures. Therefore, reasonably foreseeable new residential development under the Housing Element Update would not be anticipated to substantially alter drainage patterns. Vacant sites would be developed under the Housing Element Update and would be required to maintain existing drainage patters per the Claremont Municipal Code, such as Section 17.016 Required Subdivision Improvements and Section 16.206.030 Storm Drain Fees for new developments to maintain storm drains. Consequently, growth under the Housing Element Update would not alter the drainage pattern of the City to an extent that would result in substantial erosion, siltation, or flooding on- or off-site.

Although implementation of the project would increase the residential density of the City, it is not expected to result in substantial additional sources of polluted runoff. The proposed project would only expand capacity for residential uses, which are not associated with high levels of stormwater pollution. Examples of contaminants associated with these uses include garbage, leaked vehicle fuels, and household products.

As discussed under *criterion a* of this section, future construction activities would be required to include BMPs to prevent stormwater contamination and reduce runoff, pursuant to Chapter 8.28 of the Claremont Municipal Code, and potentially the NPDES General Construction Permit depending on the size of future development projects. BMPs would be required to reduce polluted runoff from future project sites by retaining, treating, or infiltrating polluted runoff on site, and integrate post-construction BMPs into the site's overall drainage system. These construction and erosion control practices would reduce the potential for adverse effects caused by excavation and general construction. Therefore, future development facilitated would not introduce substantial additional sources of polluted runoff.

Because implementation of the project would not substantially alter the existing drainage pattern and development and construction of future projects would be required to implement stormwater BMPs, future development under the proposed project would not generate a substantial increase in runoff that would result in substantial erosion, siltation, flooding on- or off-site, or increased polluted runoff. Impacts related to drainage and runoff would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

c.(iv) 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?

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps (FIRMs), the City does not contain any Special Flood Hazard Areas (SFHA) subject to 100-year and 500-year floods. The entirety of the City is mapped in Flood Zone X, which are areas determined to be outside of the 500-year flood zone and protected by levees from a 100-year flood (FEMA 2008). The project would facilitate development on infill sites in urban areas most of which are almost entirely paved and/or developed with structures. Therefore, reasonably foreseeable new residential development under the project would not be anticipated to substantially alter drainage patterns. Consequently, buildout under the Housing Element Housing Element Update would not alter the

drainage pattern of the City to an extent that would redirect or impede flood flows. Therefore, implementation of the project would not impede or redirect flood flows and impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Seiches are large waves generated by ground shaking effects within enclosed bodies of water. The nearest body of water capable of seiche is the Live Oak Reservoir located 0.4 mile west of the northwestern City Boundary. However, if this reservoir were to seiche, inundation of surrounding areas would not include any portion of the City of Claremont (DWR 2021).

Tsunamis are tidal waves generated by fault displacement or major ground movement. Since the City of Claremont is landlocked and is located 34 miles from the Pacific Ocean, tsunamis are not considered a hazard.

As discussed under *criterion c(iv)* above, none of the City lies in a flood hazard zone subject to the 100-year or 500-year flood. However, the City is located west of the San Antonio dam. In the event of dam failure, some areas of the City could be subject to flooding and associated hazards. Based on the U.S. Army Corps of Engineers (USACE) Dam Safety Program the San Antonio Dam was rated a Dam Safety Action (DSAC) II rating. A DSAC II rating is given to dams where failure could begin during normal operations or be initiated as the consequence of an event. As a results of the DSAC II rating the USACE has developed a plan to implement risk reduction measures, which hare being implemented. Dams are continually monitored by various government agencies (such as the State of California Division of Safety of Dams and the USACE) to guard against the threat of dam failure. The Division of Safety of Dams requires annual inspection of dam facilities to detect and repair any identified deficiencies. The Housing Element Update would not directly or indirectly affect a dam's propensity to fail, and the existing level of hazard from dam failure would not change upon implementation of the Housing Element Update. In the unlikely event of a dam failure, the emergency response plans applicable to the City would go into effect and evacuation and emergency response procedures would be implemented.

Reasonably foreseeable development under the Housing Element Update would be concentrated on urban infill sites and would not substantially alter the overall development patterns in the City. The Housing Element Update would increase development capacity, thereby potentially increasing the number of people and structures exposed to potential flooding. However, this condition already exists, and the Housing Element Update would not cause or accelerate existing flood hazards. Further, future residential developments under the Housing Element Update would not involve the storage or use of significant quantities of hazardous materials. Therefore, risks related to the release of hazardous materials due to inundation are minimal and the project would have less than significant impacts. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The City of Claremont is underlain by the San Gabriel Valley and Upper Santa Ana Valley Groundwater Basins. The San Gabriel Valley Groundwater Basin is within the jurisdiction of the Three Valley's Municipal Water District and Six Basins Watermaster or both. A Groundwater

Sustainability Plan is currently being drafted for the underlying groundwater basins with an estimated completion date of January 2022. The Upper Santa Ana Valley Groundwater Basin is under the jurisdiction of the Chino Basin San Bernardino County Fringe Areas Groundwater Sustainability Agency, which also has not yet adopted a Groundwater Sustainability Plan. The Six Basins prepared the Strategic Plan, a long-term regional plan to increase groundwater recharge, increase water storage, and decrease the reliance on State supplied water. Implantation of the Housing Element Update would not hinder strategic projects, such as facility improvements and operational changes, of the Strategic Plan. Therefore, the Housing Element Update would not conflict with any adopted groundwater management plan.

Potential water quality and groundwater impacts associated with the Housing Element Housing Element Update are discussed above under *criteria a* and *b.* The Housing Element Update would not contain any policies or potential development that would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Furthermore, future development under the Housing Element Housing Element Update would be required to comply with the existing regulations discussed under *criteria a* and *b* of this section, including during construction and operation, and would not otherwise substantially degrade water quality. Impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
b. 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?	☐	☐	■	☐

a. Would the project physically divide an established community?

Implementation of the project would prioritize the development on infill sites within areas of the City. Reasonably foreseeable development under the proposed project would occur in an already urbanized area and would not involve the construction of new roads, railroads, or other features that may physically divide established communities in the City. Additionally, goals, policies, and objectives under the Housing Element Update would put a greater emphasis on preventing displacement and promoting housing stability to maintain and preserve the quality of the City's existing neighborhoods. Consequently, there would be no impact associated with the physical division of an established community. This impact will not be discussed in the EIR.

NO 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?

The Housing Element Update examines the City's housing needs, as they exist today, and projects need for future residential development. The Housing Element, as part of the Housing Element Update, focuses on addressing the City's housing needs by providing goals, policies and programs associated with fair housing, the prevention of displacement, promoting housing stability, and the prevention of homelessness. The Housing Element Update includes actions the City is undertaking to achieve its housing RHNA targets and also would implement SCAG's land use goals and policies by primarily placing new development in areas with access to transit and services, thus minimizing vehicle trips and GHG emissions.

Upon its adoption by the City, the Housing Element Update would serve as a comprehensive statement of the City's housing policies and as a specific guide for program actions to be taken in support of those policies. As a part of the General Plan, project development with adherence to the Housing Element Update would comply with the City's General Plan.

This Housing Element Update is strictly a policy document that encourages housing development in infill areas. Adoption of the Housing Element Update would not grant entitlements for any project and future development proposals that are intended to assist in meeting the City's projected housing need would be reviewed by the City for consistency with all adopted local and State laws, regulations, standards and policies. Impacts related to conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The Claremont Pit, located along the City's eastern boundary between East Foothill Boulevard, Claremont Boulevard, 6th Street, and Monte Vista Avenue, is a past producer of sand and gravel for construction purposes (USGS 2021b). There are additional pits located north of Foothill Boulevard along Monte Vista Avenue and north of Base Line Road at the eastern edge of Claremont. There is also an unknown clay resource located in the southern portion of Sycamore Canyon Park, which is not actively mined and limited information is available (USGS 2021b). Although Holiday Rock and others are planning to apply for additional mining applications to expand the pits and create new pits no currently active mineral resource extraction sites are located in the City. Therefore, no impact from the loss of availability of a mineral resource would occur as a result of the project. This impact will not be discussed in the EIR.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. 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. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
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?	☐	☐	■	☐

Overview of Noise and Vibration

Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

HUMAN PERCEPTION OF SOUND

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3 dB decrease (Caltrans 2013).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5 times the sound energy) (Caltrans 2013).

SOUND PROPAGATION AND SHIELDING

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in the noise level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line), the path the sound will travel, site conditions, and obstructions.

Sound levels are described as either a "sound power level" or a "sound pressure level," which are two distinct characteristics of sound. Both share the same unit of measurement, the dB. However, sound power (expressed as L_{pw}) is the energy converted into sound by the source. As sound energy travels through the air, it creates a sound wave that exerts pressure on receivers, such as an eardrum or microphone, which is the sound pressure level. Sound measurement instruments only measure sound pressure, and noise level limits are typically expressed as sound pressure levels.

Noise levels from a point source (e.g., construction, industrial machinery, air conditioning units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce exposure to noise as well. The FHWA's guidance indicates that modern building construction generally provides an exterior-to-interior noise level reduction of 10 dBA with open windows and an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows (FHWA 2011).

DESCRIPTORS

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. The noise descriptors used for this study are the equivalent noise level (L_{eq}), Day-Night Average Level (DNL; may also be symbolized as L_{dn}), and the community noise equivalent level (CNEL; may also be symbolized as L_{den}).

L_{eq} is one of the most frequently used noise metrics; it considers both duration and sound power level. The L_{eq} is defined as the single steady-state A-weighted sound level equal to the average sound energy over a time period. When no time period is specified, a 1-hour period is assumed. The L_{max} is the highest noise level within the sampling period, and the L_{min} is the lowest noise level within the measuring period. Normal conversational levels are in the 60 to 65-dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (DNL or L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.). Community noise can also be measured using Community Noise Equivalent Level (CNEL or L_{DEN}), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013).[4] The relationship between the peak-hour L_{eq} value and the L_{DN}/CNEL depends on the distribution of noise during the day, evening, and night; however noise levels described by L_{DN} and CNEL usually differ by 1 dBA or less. Quiet suburban areas typically have CNEL noise levels in the range of 40 to 50 CNEL, while areas near arterial streets are in the 50 to 60+ CNEL range (FTA 2018).

Groundborne Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent buildings or structures and vibration energy may propagate through the buildings or structures. Vibration may be felt, may manifest as an audible low-frequency rumbling noise (referred to as groundborne noise), and may cause windows, items on shelves, and pictures on walls to rattle. Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants at vibration-sensitive land uses and may cause structural damage.

Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean squared (RMS) vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used as it corresponds to the stresses that are experienced by buildings (Caltrans 2020).

High levels of groundborne vibration may cause damage to nearby buildings or structures; at lower levels, groundborne vibration may cause minor cosmetic (i.e., non-structural damage) such as cracks. These vibration levels are nearly exclusively associated with high impact activities such as blasting, pile-driving, vibratory compaction, demolition, drilling, or excavation. The American Association of State Highway and Transportation Officials (AASHTO) has determined vibration levels with potential to damage nearby buildings and structures; these levels are identified in Table 3.

Table 3 AASHTO Maximum Vibration Levels for Preventing Damage

Type of Situation	Limiting Velocity (in/sec)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2–0.3
Residential buildings in good repair with gypsum board walls	0.4–0.5
Engineered structures, without plaster	1.0–1.5

Source: Caltrans 2020

[4] Because DNL and CNEL are typically used to assess human exposure to noise, the use of A-weighted sound pressure level (dBA) is implicit. Therefore, when expressing noise levels in terms of DNL or CNEL, the dBA unit is not included.

Numerous studies have been conducted to characterize the human response to vibration. The vibration annoyance potential criteria recommended for use by Caltrans, which are based on the general human response to different levels of groundborne vibration velocity levels, are described in Table 4.

Table 4 Vibration Annoyance Potential Criteria

	Vibration Level (in/sec PPV)	
Human Response	Transient Sources	Continuous/ Frequent Intermittent Sources[1]
Severe	2.0	0.4
Strongly perceptible	0.9	0.10
Distinctly perceptible	0.25	0.04
Barely perceptible	0.04	0.01

in/sec = inches per second; PPV = peak particle velocity

Source: Caltrans 2020

[1] Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

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?

Construction Noise

The Housing Element Update would facilitate new development in the City, the construction of which could generate temporary noise levels in excess of the standards in the City of Claremont Municipal Code Section 16.154.020(D) and the Public Safety and Noise Element of the Claremont General Plan. In addition, according to the City's Municipal Code Section 16.154.020(F)(4), construction noise is exempted during weekdays and Saturdays between 7:00 a.m. and 8:00 p.m., excluding national holidays. And construction noise levels, as measured on residential properties, should not exceed 65 dBA for a cumulative period of more than 15 minutes in any one hour, 70 dBA for a cumulative period of more than 10 minutes in any one hour, 79 dBA for a cumulative period of more than 5 minutes in any one hour, or 80 dBA at any time.

Noise from construction facilitated by the Housing Element Update would create temporary noise level increases on and adjacent to individual construction sites. Since there are no specific plans or time scales for development facilitated by the Housing Element Update, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects. However, sites adjacent to areas where most future development is anticipated to occur would be exposed to the highest levels of construction noise for the longest duration.

Table 5 illustrates typical noise levels associated with construction equipment. At a distance of 50 feet from the construction site, noise levels similar to those shown in Table 5 would be expected to occur during individual development projects, depending on the types of constructing equipment used. Noise would typically drop off at a rate of about 6 dBA per doubling of distance for stationary equipment. Therefore, noise levels would be about 6 dBA lower than shown in the table at 100 feet from the noise source and 12 dBA lower at a distance of 200 feet from the noise source.

Table 5 Typical Noise Levels from Equipment at Construction Sites

Equipment	Typical Noise Level (dBA)		
	50 feet from Source	100 feet from Source	200 feet from Source
Air Compressor	80	74	68
Backhoe	80	74	68
Concrete Mixer	85	79	73
Dozer	85	79	73
Grader	83	77	71
Paver	85	79	73
Pile-driver (impact)	101	95	89
Saw	76	70	64
Scraper	85	79	73
Truck	84	78	72

Source: FTA 2018

As shown in Table 5, noise levels from construction activity could approach 101 dBA L_{eq} at adjacent land uses located approximatley 50 feet away. Construction noise would exceed noise standards included in Section 16.154.020(D) and 16.154.020(F) of the Claremont Municipal Code and may temporarily disturb people at neighboring properties. Therefore, Mitigation Measure N-1 is required to ensure that temporary noise from future development facilitated by the Housing Element Update would not exceed City noise standards. This would reduce potential impacts to a less than significant level. This impact will not be discussed in the EIR.

Operational Noise

The operation of new development facilitated by the Housing Element Update has the potential to generate vehicle trips to and from individual projects and include operational noise sources including, but not limited to, heating, ventilation and air conditioning (HVAC) equipment and hauling/delivery vehicles.

Delivery trucks are assumed to generate a noise level of 68 dBA L_{max} at 30 feet from the source (Charles M. Salter Associates, Inc. 2017). However, noise from delivery and loading trucks would be temporary and intermittent noise and would be limited to five minutes per the California Code of Regulations Section 2485. Additionally, the Claremont Municipal Code states that no person shall cause the loading, unloading, opening, closing or other handling of boxes, crates, containers, building materials, garbage cans, or similar objects between the hours of 10:00 p.m. and 7:00 a.m. the following day in such a manner as to cause a noise disturbance across a residential real property boundary.

HVAC equipment can range from 60 to 70 dBA L_{eq} at 15 feet from the source (Illingworth & Rodkin 2009). Noise from HVAC equipment at residential, mixed-use, and industrial sites would be significant if noise exceeded the City's maximum allowable exterior noise levels at receiving land uses, as specified in Section 16.154.020(D) of the Claremont Municipal Code with a 5 dBA increase allowed per Section 16.154.020(H)(1). HVAC equipment would be as close at 15 feet to sensitive receivers, including other residences, and could thus exceed City noise standards. Basing on a 6 dBA reduction in noise for a doubling of distance, sensitive receivers within 85 feet of mechanical equipment, such as HVAC, would be exposed to noise exceeding City standards. Therefore,

Mitigation Measure N-2 is required to ensure that operational noise from future development facilitated by the Housing Element Update would not exceed City noise standards. This would reduce potential impacts to a less than significant level. This impact will not be further discussed in the EIR; however, these mitigation measures will be included as part of the MMRP in the Final EIR.

Mitigation Measures

N-1 Construction Noise Reduction Measures

The following measures to minimize exposure to construction noise shall be included as standard conditions of approval for applicable projects involving construction:

1 *Mufflers*. During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.

2 *Stationary Equipment*. All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receptors.

3 *Equipment Staging Areas*. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receptors.

4 *Smart Back-up Alarms*. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.

5 *Grading Activities*. If feasible, schedule grading activities so as to avoid operating numerous pieces of heavy-duty off-road construction equipment (e.g., backhoes, dozers, excavators, loaders, rollers, etc.) simultaneously in close proximity to the boundary of properties of off-site noise sensitive receptors.

6 *Impact Tools*. All impact tools shall be shroud or shielded to reduce construction noise.

7 *Temporary Barriers*. Where feasible, temporary barriers, including but not limited to, sound blankets on existing fences and walls, or freestanding portable sound walls, shall be placed as close to the noise source or as close to the receiver as possible and break the line of sight between the source and receiver where modeled levels exceed applicable standards. Noise barriers may include, but is not necessarily limited to, using appropriately thick wooden panel walls (at least 0.5-inches think). Such barriers shall reduce construction noise by 5 to 10 dB at nearby noise-sensitive receiver locations. Alternatively, field-erected noise curtain assemblies could be installed around specific equipment sites or zones of anticipated mobile or stationary activity. The barrier material is assumed to be solid and dense enough to demonstrate acoustical transmission loss that is at least 10 dB or greater than the estimated noise reduction effect. These suggested barrier types do not represent the only ways to achieve the indicated noise reduction in dB; they represent examples of how such noise attenuation might be attained by this measure.

8 *Noise Disturbance Coordinator*. Provide a sign that includes a 24-hour telephone number for project information, and a procedure where a field engineer/construction manager will respond to and investigate noise complaints and take corrective action if necessary, in a timely manner. The sign shall have a minimum dimension of 48 inches wide by 24 inches high. The sign shall be placed 5 feet above ground level. The noise coordinator's name and telephone number shall be

posted on the sign at two locations around the project site. The noise coordinator information will be posted at all project entrances. The noise coordinator will be responsible for handling and distributing construction schedules to the neighbors.

N-2 Acoustical Impact Study

New development that would include the use of HVAC or other mechanical equipment within 85 feet of sensitive receivers shall prepare an acoustical impact study. The study shall be prepared by a qualified acoustical consultant in accordance with the City of Claremont noise standards and shall include an analysis of operational noise sources from the project. All recommendations included in the Acoustical Impact Study shall be incorporated into project design.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activity can result in varying degrees of ground vibration depending on the equipment and methods employed. Development proposed under the Housing Element Update would not result in operational vibration. Therefore, this analysis focuses on vibration during construction. Operation of construction equipment causes vibrations that spread through the ground and diminish in strength with distance.

The Housing Element Update would facilitate the construction of residential units in the City. Certain types of construction equipment that would potentially be utilized during construction activities facilitated by the proposed Housing Element Update, such as vibratory rollers, bulldozers, jackhammers, and loaded trucks can generate high levels of groundborne vibration. Construction vibration impacts are assessed for individual pieces of construction equipment in accordance with City standards. Per Section 16.154.020(J) of the Claremont Municipal Code, it is unlawful to create, maintain, or cause ground vibration that is perceptible without instruments at any point on an affected property adjoining the property on which vibration occurs. The perception threshold designated by the City is 0.5 in/sec PPV. Due to site constraints and worker safety limitations, individual pieces of vibratory construction equipment typically do not operate in close proximity to each other such that any single off-site structure would experience substantial levels of vibration from multiple pieces of construction equipment. Therefore, the additive impacts of multiple pieces of vibratory construction equipment operating simultaneously are not evaluated.

Reasonably foreseeable development under the Housing Element Update may result in excessive short- and/or long-term ground borne vibration or noise from construction or operation activities if located adjacent to sensitive receivers, such as residences, hospitals, schools, libraries, churches, or fragile buildings where vibration damage can occur. Per Section 16.154.020(J) of the Claremont Municipal Code it is unlawful to create, maintain, or cause ground vibration that is perceptible without instruments at any point on an affected property adjoining the property on which vibration occurs. The perception threshold designated by the City is 0.5 in/sec PPV.

The greatest vibratory source during construction within the project vicinity would be a vibratory roller. Neither blasting nor pile driving would be required for construction of projects under the General Plan Update. Construction vibration estimates are based on vibration levels reported by Caltrans and the FTA (Caltrans 2013b, FTA 2018). Table 6 shows typical vibration levels for various pieces of construction equipment used in the assessment of construction vibration (FTA 2018).

Vibration-generating construction equipment would occasionally pass-by off-site structures within 25 to 50 feet.[5] As shown in Table 6, vibration levels from individual pieces of construction equipment would not exceed City standards at distances of 25 and 50 feet. As a result, impacts would be less than significant.

Table 6 Vibration Levels Measured during Construction Activities

Equipment	25 Feet	50 Feet
Jackhammer	0.04	0.02
Large Bulldozer	0.09	0.04
Small Bulldozer	< 0.01	< 0.01
Vibratory Roller	0.21	0.10
Loaded trucks	0.08	0.04

in/sec = inches per second' PPV = peak particle velocity

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?

The City of Claremont is located within two miles of the Cable Airport (located east of the City) and Brackett Field Airport (located west of the City). Both are public-use airports. A portion of the City is located within the Brackett Field Airport Land Use Compatibility Plan's mapped Airport Influence Area, Zone E (Los Angeles County Airport Land Use Commission 2015). However, no portion of the City of Claremont is mapped within an airport noise contour for the Brackett Field Airport; therefore, buildout under the Housing Element Update would not expose people residing or working in the City to excessive aircraft noise from the Brackett Field Airport.

A portion of the City of Claremont is located within the Cable Airport Land Use Compatibility Plan's mapped Airport Influence Area (City of Upland 2015). Parcels in the City are mapped within Zones B1, B2, B3, C3, D, and E of the Cable Airport Land Use Compatibility Plan, corresponding to potential noise levels of above 65 dB CNEL, above 60 dB CNEL, above 55 dB CNEL, above 60 dB CNEL, above 55 dBA CNEL, and below 55 dB CNEL, respectively (City of Upland 2015). None of the parcels proposed for residential development as part of the Housing Element Update are located within the mapped zones for the Cable Airport. Therefore, buildout under the Housing Element Update would not expose people residing or working in the City to excessive aircraft noise from the Cable Airport. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

5 Due to safety limitations and site constraints, it is not anticipated that vibration-generating equipment would operate within 25 feet of of-site structures.

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	■	□	□	□
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	□	□	■	□

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)?

The Housing Element Update would emphasize the creation of new residential units within urban infill areas of Claremont, which could increase development density throughout the City. The Housing Element Update could potentially accommodate up to 3,097 new residential units. However, the Housing Element Update in and of itself does not develop residential units because it is a plan. The Housing Element assumes that up to 3,097 residential units would realistically be developed based on previous development history in the City. However, for the purposes of CEQA analysis, the population and housing analysis assesses a higher range of development potential, considered the "worst case scenario," to fully analyze potential impacts if development occurs at a rate higher than it has historically.

The City of Claremont has a 2020 population of 35,807 with an average household size of 2.56 (DOF 2021). Based on the average household size of 2.56, the potential increase of 3,097 residential units would generate a population increase of approximately 7,929 residents. Therefore, the Housing Element Update has the potential to increase the City's total population to 43,736 persons or an approximately 22 percent increase in population, which exceeds the SCAG regional 2030 forecasts of 37,905 persons (SCAG 2020). Implementation of the Housing Element Update has potential to contribute to population growth in the City. Impacts related to population growth are potentially significant and will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Reasonably foreseeable development facilitated by the Housing Element Update would involve new development and redevelopment projects on infill sites. Redevelopment projects in particular may potentially result in the displacement of some existing housing units and residents. However, goals, policies, and objectives included the Housing Element aim to prevent displacement and promote housing stability. In addition, the Housing Element Update would provide additional opportunities for housing by expanding areas where housing is allowed. The Housing Element Update is forecast to result in the increase of 3,097 residential units, and it is anticipated that any replacement housing need created by displacement of existing housing would be more than offset through implementation of the Housing Element Update. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

15 Public Services

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or 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:				
	1 Fire protection?	☐	☐	■	☐
	2 Police protection?	☐	☐	■	☐
	3 Schools?	☐	☐	■	☐
	4 Parks?	☐	☐	■	☐
	5 Other public facilities?	☐	☐	■	☐

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Fire protection in the City is provided by the Los Angeles County Fire Department (LACFD). The LACFD, in conjunction with the Los Angeles County Board of Supervisors, reviews site plans, construction plans, and architectural plans prior to occupancy to ensure the required fire protection safety features, including building sprinklers and emergency access, are implemented. Development with modern materials and in accordance with current standards, inclusive of fire-resistant materials, fire alarms and detection systems, automatic fire sprinklers, would enhance fire safety and would support fire protection services (Title 24, Cal. Code Regs. Part 9). The Los Angeles County Fire Department Station #101 located at 606 W. Bonita Avenue, Station #102 located at 2040 N. Summer Avenue, and Station #62 located at 3701 Mills Avenue all serve the City.

The Housing Element Update would not expand the LACFD service area but would facilitate additional structures and population within the existing service area. As described in Section 14, *Population and Housing*, the Housing Element Update would facilitate the development of approximately 3,097 residential units in the Plan Area. The additional housing units would result in approximately 7,929 additional persons to the Plan Area and to the LACFD district. However, the

Housing Element Update in and of itself does not develop residential units because it is a plan. The Housing Element assumes that up to 3,097 residential units would realistically be developed. This public services analysis considers the "worst case scenario," to fully analyze potential impacts if development occurs at a rate higher than it has historically.

New structures facilitated by the Housing Element Update would be in the existing service area of LACFD and would not require expansion of the service area or for the LACFD to respond to calls in a new or more distance area. Population growth accommodated under the Housing Element Update may contribute to a cumulative need for additional fire protection, but would not, by itself, necessitate the need for substantial new fire protection facilities. The population growth accommodated under the Housing Element Update would be minor compared to the existing service population of the LACFD (less than one percent of the existing service population) and would not require the construction of new or expanded fire protection facilities (Appendix B). However, future development under the Housing Element Update would be required to adhere to access and water system requirements at the time of construction, as shown in Appendix B.

Planning for new or physically altered LACFD stations is based on an assessment of the cumulative need for new facilities. The incremental contribution to demand for increased LACFD protection services from implementation of the Housing Element Update would be offset by payment of proportionate property taxes and sales taxes to the City of Claremont by developers and the addition of new residents. Additionally, pursuant to the LACFD Development Fee Program, individual projects would be required to pay all necessary fees to the LACFD to offset impacts on fire protection services. Revenue generated from the Development Fee Program, as well a percentage of property taxes would be put towards improvement and maintenance of existing facilities and the hiring of additional personnel as needed.

Water service for domestic use and fire flows is provided by the Golden State Water Company. The local water main system is a combined domestic and fire protection water grid system that provides adequate water pressure and volume to Claremont for purposes of fire suppression and domestic water use (Golden State Water Company 2021). The required fire flow for a future project is based on the project's total square footage, type of construction, and if an automatic fire sprinkler system would be installed. The LACFD does not readily maintain information regarding the number of gallons per minute for each fire hydrant. A fire flow test must be conducted by the Golden State Water Company in conjunction with the City and a project applicant prior to operation of a future project. All development plans are reviewed by the LACFD prior to construction to ensure that adequate fire flows are maintained and that an adequate number of fire hydrants are provided in the appropriate locations in compliance with the California Fire Code.

Additionally, all new development that would occur under the Housing Element Update would be required to comply with all applicable federal, State, and local regulations governing the provision of fire protection services, including adequate fire access, fire flows, and number of hydrants, such as the 2016 California Fire Code and 2019 California Building Code. The 2016 California Fire Code contains project-specific requirements such as construction standards in new structures and remodels, road widths and configurations designed to accommodate the passage of fire trucks and engines, and requirements for minimum fire flow rates for water mains. The 2019 California Building Code requirements for construction, access, water mains, fire flows, and hydrants, and would be subject to review and approval. Impacts would be less than significant and will not be discussed further in the EIR.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Law enforcement services in Claremont are provided by the Claremont Police Department (CPD). Protection services include emergency and non-emergency police response, routine police patrols, investigative services, traffic enforcement, traffic investigation, parking regulation, vehicle auction, and victim services. The CPD is located at 570 W. Bonita Avenue and has a total staffing of 38 officers, 3 reserve officers, 23 fully time professional employees, 8 part-time employees, and over 30 volunteers (CPD 2021a).

Police protection services are not "facility-driven," meaning such services are not as reliant on facilities in order to effectively patrol a beat. An expansion of, or intensification of development within a beat does not necessarily result in the need for additional facilities if police officers and patrol vehicles are equipped with adequate telecommunications equipment in order to communicate with police headquarters. However, if the geographical area of a beat is expanded, population increases, or intensification/redevelopment of an existing beat results in the need for new police officers, new or expanded facilities may be needed.

The Housing Element Update would not expand the CPD service area but would facilitate additional structures and population within the existing service area. As described in Section 14, *Population and Housing*, the Housing Element Update would facilitate the development of approximately 3,097 residential units in the Plan Area. The additional housing units would result in approximately 7,929 additional persons to the Plan Area and CPD service area. However, the Housing Element Update in and of itself does not develop residential units because it is a plan. The Housing Element assumes that up to 3,097 residential units would realistically be developed. This public services analysis considers the "worst case scenario," to fully analyze potential impacts if development occurs at a rate higher than it has historically.

New structures facilitated by the Housing Element Update would be in the existing service area of CPD and would not require expansion of the service area or for the CPD to respond to calls in a new or more distance area. Population growth accommodated under the Housing Element Update may contribute to a cumulative need for additional police protection, but would not, by itself, necessitate the need for substantial new police protection facilities.

Planning for new or physically altered CPD stations is based on an assessment of the cumulative need for new facilities. The contribution to demand for increased CPD protection services from implementation of the Housing Element Update would be offset by payment of proportionate property taxes and sales taxes to the City of Claremont by developers and the addition of new residents. The Housing Element Update's contribution to demand for new police protection services would be offset by payment of proportionate property taxes, sales taxes, and/or development impact fees that would result from increased development and population growth. Taxes to the City's General Fund would support the City's budget for police protection services. Additionally, the Claremont City Council authorized the collection of fees from users of certain non-essential police services that are not directly related with the protection of life and property. The fees are designated to provide cost recovery and support polices services (CPD 2021b). New residents from buildout of the Housing Element Update would be required to pay these fees that would support police services throughout the City.

New or expanded police protection facilities needed to accommodate future growth in CPD's service area would be speculative at this time. Future proposals, if warranted, would undergo environmental review under CEQA. Therefore, the Housing Element Update would not result in significant environmental impacts associated with the need for the provision of new or physically altered police protection facilities, and impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Claremont Unified School District (CUSD) provides elementary, middle, and high school education services to students living within the City of Claremont. The district includes eight elementary schools, one middle school, and two high schools. In addition, the District maintains one adult school (CUSD 2021). As discussed in Section 14, *Population and Housing*, the net increase of 3,097 residential units would generate an increase of approximately 7,929 new residents, a portion of which would include school-aged children. CUSD schools are currently experiencing low levels of registration of local students. To make up for lower numbers of local students, the CUSD has been accepting a large number of inter-district transfer (IDT) students (students from nearby cities). This allows the CUSD to keep all of its local schools open and maintain a higher level of classes and extracurricular programs. It also provides the CUSD with a buffer to admit more local students, should the number of local students increase. As local student enrollment increases, fewer IDT students will be admitted. Additionally, buildout of the Housing Element Update would occur over a multi-year period, thus the projected student growth would be gradual and students are allowed to attend any CUSD school with available capacity. As such, the projected number of students would not result in any school operating above design capacity.

Additionally, applicants for new residential projects that would serve an increase in the resident population of Claremont would be required to pay school impact fees which, pursuant to Section 65995 (3) (h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), are "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." With payment of mandatory school impact fees by developers in the city, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Claremont has 152.7 acres of existing parks and 1,733 acres of wilderness parks (City of Claremont 2021). City parks include mini parks and pocket parks, neighborhood parks, community parks, and sports parks. The Claremont City Council adopted a park dedication standard of 4.0 acres of parkland per 1,000 residents. As discussed in Section 14, *Population and Housing*, the Housing Element Update would increase City population by 7,929 persons which, in turn, could increase demand for City parkland resources. Buildout of the Housing Element Update would thus increase

total City population to 43,736 persons. Assuming approximately 1,886 acres of parkland in Claremont there would be over four acres of parkland per Claremont resident, thus meeting the City's park dedication standard. Additionally, the City also imposes a Parkland development impact fee of $4,400 per new residential unit to build new parks or make significant capital improvements to existing parks to maintain and extend this park system as new homes are constructed. With payment of mandatory impact fees by developers in the city, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Buildout of the Housing Element Update would result in residential development within urban infill areas of the City, which could increase demand for other public facilities, such as libraries. Impacts related to increased demand for other public facilities such as stormwater, wastewater, and utility facilities are discussed in Section 19, *Utilities and Service Systems*. New development can affect the need for new or physically altered libraries when residential dwelling units are constructed, and demand increases beyond existing capacity. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the City, necessitating a new or physically altered library, the construction of which would have significant physical impacts on the environment

The Claremont Helen Renwick Library located at 208 N. Harvard Ave is operated by the Los Angeles County Library. Potential future residents would likely use the Claremont library, potentially increasing the number of library facility users. In addition, there are three university libraries operated by the Claremont Colleges that are open to the public. They include the Claremont Colleges Library at 800 N. Dartmouth Avenue, Ella Strong Denison Library at 1090 N. Columbia Avenue, and Norman F Sprague Memorial Library at 301 E 12th Street. Increased demand would be manageable given the abundance of libraries that would continue to accommodate the needs of the residents. According to the Los Angeles Public Library, 75 percent of Los Angeles County residents visit the library less than once a month, and 18 percent have not visited a public library more than once in the last five years. LAPL improved access to its digital content in response to COVID-19, and users visited LAPL.org over 11.4 million times to access that content (Los Angeles Public Library 2021). Thus, an increase in potential residents from reasonably foreseeable new development projects under the Housing Element Update is unlikely to result in a substantial increase in annual visits to library facilities.

Implementation of the Housing Element Update is not expected to cause an exceedance of capacity at existing facilities or to generate a substantial demand for the community branch libraries serving the City, and it is unlikely that expansion or construction of new library facilities would be required. Since the Housing Element Update would not affect the need for new or physically altered public facilities, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	■	☐
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?	☐	☐	■	☐

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?

Claremont has 152.7 acres of existing parks and 1,733 acres of wilderness parks (City of Claremont 2021). The Claremont City Council adopted a park dedication standard of 4.0 acres of parkland per 1,000 residents. As discussed in Section 14, *Population and Housing*, the Housing Element Update would increase City population by 7,929 persons which, in turn, could increase demand for City parkland resources. Buildout of the Housing Element Update would thus increase total City population to 43,736 persons. Assuming approximately 1,886 acres of parkland in Claremont there would be over four acres of parkland per Claremont resident, thus meeting the City's park dedication standard. Additionally, the City also imposes a Parkland development impact fee of $4,400 per new residential unit to build new parks or make significant capital improvements to existing parks to maintain and extend this park system as new homes are constructed. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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?

The Housing Element Update is a policy document that encourages housing opportunities in infill areas and future development proposals that are intended to assist in meeting the City's projected housing need. The Housing Element Update would not include the construction of recreational facilities and would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, any direct or indirect impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 use (e.g., farm equipment)?	■	□	□	□
d. Result in inadequate emergency access?	■	□	□	□

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

d. Would the project result in inadequate emergency access?

The Housing Element Update would emphasize the creation of new housing units within urban infill areas of the City, which may allow for development of currently undeveloped parcels and for alteration, intensification, or redistribution of existing residential land uses. This could result in increased traffic compared to existing conditions. Trips generated as a result of increased density or new development under the Housing Element Update have the potential to increase vehicle miles traveled (VMT) within Claremont. The Housing Element Update may also conflict with applicable plans and policies addressing the circulation system. Potential impacts related to *CEQA Guidelines* Section 15064 pertaining to VMT and compliance with plans and policies that establish measures of effective performance of the circulation system will be discussed in an EIR, as well as other transportation related issues, such as traffic hazards, incompatible uses, and emergency access.

POTENTIALLY SIGNIFICANT IMPACT

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18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or 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:				
a. 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)?	■	□	□	□
b. 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	■	□	□	□

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is 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?

The Housing Element Update would prioritize the development of new housing on infill sites in areas that have previously been developed and disturbed. It is likely that previous grading, construction, and modern use of the sites would have either removed or destroyed tribal cultural resources within surficial soils. Nonetheless, there is the potential for tribal cultural resources to exist below the ground surface throughout the City, which could be disturbed by grading and excavation activities associated with new housing development.

Consistent with Assembly Bill 52 and SB 18, the City must consult with traditionally and culturally affiliated Native American tribes to determine if the Housing Element Update would result in a substantial adverse change in the significance of a tribal cultural resource. In addition, because the Housing Element Update would amend the General Plan, Native American consultation on this project under Senate Bill 18 will be conducted. This impact is potentially significant and will be discussed in the EIR.

POTENTIALLY SIGNIFICANT IMPACT

19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. 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?	■	□	□	□
b. 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. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	□	□	■	□

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?

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?

Reasonably foreseeable development under the Housing Element Update would occur in urban areas that are served by existing utilities infrastructure, including wastewater, stormwater drainage, electrical power, natural gas, and telecommunications facilities.

Wastewater Generation

Wastewater treatment for development facilitated by the Housing Element Update would be provided by existing infrastructure within the City. The City of Claremont collects wastewater generated within its boundaries and transmits it through its sewer system to the Los Angeles County Sanitation District 21. The sewer system within the City consists of 122 miles of gravity piping (City of Claremont 2020). Wastewater generated in the City is ultimately treated at the Pomona Water Reclamation Plan (POWRP) in the City of Pomona. New infill development would be located in an urban area that is served by existing wastewater infrastructure.

Development facilitated by the Housing Element Update would need to connect to the existing sewer system throughout the City. Any improvements and connections for future development would be reviewed by both the city of Claremont and Los Angeles County Sanitation District. The Los Angeles County Sanitation District prepares an Integrated Regional Water Management Plan (IRWMP) to guide the development and management of its facilities. The Pomona Water Reclamation Plant, which serves the City, currently has several million gallons per day of unused wastewater capacity (Los Angeles County Sanitation District 2021). However, increased development density has the potential to impact the capacities of local utilities infrastructure, which may require the expansion or construction of wastewater treatment facilities. Therefore, this issue will be studied further in an EIR.

Stormwater

Claremont is an urbanized City that is currently developed and served by existing stormwater infrastructure. The Housing Element Update would facilitate development of residential units within urban infill areas of the City that are already developed or vacant and surrounded by development. Future development under the Housing Element Update would be required to comply with the Low Impact Development requirements identified in the City's Developer's Stormwater Compliance Guide for Development and Construction Projects. The Compliance Guide assists developers in complying with the requirements of the City's Development Planning and Construction Programs to reduce stormwater affects. Project implementation consistent with the Compliance Guide would result in properly managed stormflow and implementation of BMPs designed to capture and retain stormwater on a site. Stormwater impacts would be less than significant.

Electricity, Natural Gas, and Telecommunications

Electricity in Claremont is provided to the City by Southern California Edison and natural gas service is provided by Southern California Gas Company. Telecommunications services would be provided by EarthLink, Spectrum, Frontier, or other providers, at the discretion of future tenants. Telecommunications are generally available in the project area, and facility upgrades would not likely be necessary.

Operation and occupancy of new development under the Housing Element Update would result in energy demand from new buildings and transportation fuel from new vehicle trips. It is anticipated that the Housing Element Update would increase demand for electricity, natural gas, and transportation fuel compared to existing conditions. However, as discussed in Section 6, *Energy*, increased development density would not impact the capacities of local utilities infrastructure or require the expansion or construction of new facilities. Therefore, impacts would be less than significant.

POTENTIALLY 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?

Golden State Water Company (GCWC) provides water services to Claremont and obtains water supply for the City through purchases from Three Valley's Municipal Water District (TVMWD) and City of Upland, and local groundwater from the Six Basins and Chino Basin. TVMWD and the City of Upland obtain imported water from the Metropolitan Water District of Southern California and pump local groundwater. GSWC's 2015 Urban Water Management Plan for Claremont demonstrates the reliability of water supplies to meet projected annual water demands for the Claremont System during a normal, a single dry year, and multiple dry years through 2040. However, development associated with the Housing Element Update would exceed SCAG's population projections for Claremont and thus may require more water than analyzed as part of the 2015 Urban Water Management Plan. This issue will be studied further in an EIR.

POTENTIALLY 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?

The City of Claremont collects, transports, and disposes of solid waste for all residential and commercial uses in the City. Solid waste is taken to regional landfills, such as the Mid-Valley Landfill, which is permitted to accept up to 7,500 tons of solid waste per day and has a remaining capacity of 61,219,377 cubic yards (CalRecycle 2021). The landfill is anticipated to have adequate capacity to accommodate regional waste disposal needs through 2045 (CalRecycle 2021). In 2019, Mid Valley Sanitary Landfill received an average of 3,575 tons per day (County of Los Angeles 2020), or approximately 47 percent of total allowable throughput.

The Housing Element Update would facilitate development in the city, but would not increase the total amount of development (and therefore generated solid waste) to more than double of the existing amount of development and generated solid waste. Therefore, development facilitated by the Housing Element Update would not result in solid waste throughput at the Mid-Valley Landfill that would exceed the maximum allowable throughput. Impacts would be less than significant and will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

A significant impact could occur if the Housing Element Update would conflict with any statutes and regulations governing solid waste. In compliance with State legislation, any development project facilitated by the Housing Element Update would be required to implement a Solid Waste Diversion Program and divert at least 75 percent of the solid waste generated from the applicable landfill site. Reasonably foreseeable development under the Housing Element Update would comply with federal, State, and local statutes and regulations related to solid waste, such as the California Waste Integrated Waste Management Act (AB 939), the Solid Waste Integrated Resources Plan, and the City's recycling program. Since any new development projects under the Housing Element Update would comply with applicable federal, State, and local regulations involving solid waste, impacts related to conflict with statutes and regulations governing solid waste would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	■	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	■	☐
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	■	☐

The northern portion of the City is located in a Very High Fire Hazard Severity Zone (FHSZ), in areas associated with the hillsides and mountains located north of the City (CAL FIRE 2011).

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Most of Claremont is located in a highly urbanized area surrounded by developed areas to the south, east, and west. The northern portion and some western portions of the City are located in a Very High Fire Hazard Severity Zone (VHFHSZ) in Claremont's Local Responsibility Areas (LRA). Portions of the City identified as a VHFHSZ are associated with the hillsides and mountains located north of the City (CAL FIRE 2011). None of the housing opportunities identified in the Housing Element Update fall within a VHFHSZ. However, several sites are within close proximity to a VHFHSZ, including one parcel within 900 feet, and seven parcels within approximately 1,000 feet of a VHFHSZ.

As discussed in Section 9, *Hazards and Hazardous Materials*, construction activities associated with reasonably foreseeable new development under the Housing Element Update could interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within rights-of-way. However, temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process, which requires a traffic control plan subject to City review and approval. Implementation of these plans would ensure that future development under the Housing Element Update would not impair or physically interfere with adopted emergency response or evacuation procedures.

Increased housing development density under the Housing Element Update could result in additional traffic on area roadways. However, in the event of a wildfire, implementation of the County's Emergency Response Plan would coordinate all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient organization capable of managing emergency evacuation for affected areas. Claremont's Police Department and LACPD would be responsible for ensuring that future development does not impair adopted emergency response or evacuation plans. As part of standard development procedures, future residential development plans would be submitted for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with existing City regulations.

New and revised policies to the City's Public Safety and Noise Element would focus on reducing wildfire risk in Claremont. Specifically, policies would promote effective wildfire mitigation activities such as brush clearing, defensible spaces, landscape design, and fire breaks that would allow for increased emergency vehicle access. Policies would also ensure emergency service providers have sufficient access to existing and new development and minimum standards for evacuation. These policies would further reduce impacts from wildfire and emergency evacuation. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

As mentioned above under *Impact a.* the City of Claremont contains VHFHSZs and LRAs within the City limits. Portions of the City subject to wildland fire risk in VHFHSZs are subject to comply with California building codes and Claremont's LHMP. The Housing Element Update would focus on creating new residential development on urban infill sites and in areas that were previously developed or disturbed or are vacant and surrounded by existing development. Wildfire risks to occupants would be reduced through conformance with the 2019 California Fire Code that

establishes provisions for fire safety related to construction, maintenance and design of buildings and land uses through CCR Title 24. In the event that future development under the Housing Element Update occurs in areas with elevated fire risks, development would be required to comply with the vegetation management, building materials, and emergency access requirements per the Claremont Municipal Code Chapter 15.04.30. Furthermore, new residential developed in accordance with the Housing Element Update would be required to be constructed according to the Uniform Building Code requirements for fire-protection and would be subject to review and approval by the LACFD.

The Housing Element Update includes development of new housing units on urban infill sites and in areas that were previously developed or are vacant and surrounded by existing development. As such, the Housing Element Update would not encourage development in the low-density residential areas subject to wildfire risk in the northern and western portions of the City. Reasonably foreseeable development under the Housing Element Update would occur in areas that are well-served by existing roadways and utilities infrastructure. New infrastructure would not be necessary.

Given that Claremont contains a VHFHSZ and LRA within its city limits, new development would be required to comply with fire safety provisions established by the 2019 California Fire Code. Additionally, development proposed under the Housing Element Update would not occur in a VHFHSZ or LRA. New and revised policies to the City's Public Safety and Noise Element would focus on reducing wildfire risk in Claremont. Specifically, policies would promote effective wildfire mitigation activities such as brush clearing, defensible spaces, landscape design, and fire breaks. Policies would also include new and re-development standards following a wildfire event, including retrofitting of existing structures to prevent wildfire damage. These policies would further reduce impacts from wildfire. Therefore, future development under the Housing Element Update would not pose a substantial risk to people or structures due to wildland fires. Furthermore, reasonably foreseeable development under the Housing Element Update would not be anticipated to require additional roads, fuel breaks, emergency water sources, power lines, or other utilities that would exacerbate fire risk. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	■	□	□	□
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	■	□	□	□
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	■	□	□	□

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Reasonably foreseeable development under the Housing Element Update may involve alteration, intensification, and redistribution of land uses in the City of Claremont. As discussed in Section 4, *Biological Resources*, proposed changes could have the potential to have a substantial adverse effect on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations. However, implementation of Mitigation Measures BIO-1 and BIO-2 to protect special status species and nesting birds would reduce impacts. As discussed in Section 5, *Cultural Resources*, Section 7, *Geology and Soils*, and Section 18, *Tribal Cultural Resources*,

development under the Housing Element Update have the potential to impact historical, archaeological, paleontological, and tribal cultural resources. However, Mitigation Measure CUL-1 would reduce impacts to archaeological and historic resources. Since the Housing Element Update has the potential to degrade the quality of the environment, potential paleontological and tribal cultural resources, this impact is potentially significant and will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

As discussed in Sections 1 through 20, implementation of the Housing Element Update could result in significant impacts to aesthetics, air quality, geology and soils, GHG emissions, population and housing, transportation, tribal cultural resources, and utilities and service systems. Potential cumulative impacts in these issue areas, for which potentially significant impacts have been identified, will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise. As discussed in Section 3, *Air Quality*, operation of reasonably foreseeable new developments under the Housing Element Update could potentially generate criteria pollutant emissions exceeding the SCAQMD regional thresholds for operation and construction activities under the Housing Element Update may expose sensitive receptors in the City to substantial pollutant concentrations. As discussed in Section 9, *Hazards and Hazardous Materials*, there is the potential for future construction to involve the demolition or alteration of structures that may contain asbestos and/or lead based paint, and residential construction under the Housing Element Update could lead to a significant hazard to the public or environment by exposing future residents to potential on-site contamination if not properly identified. However, Mitigation Measures HAZ-1 and HAZ-2 would reduce impacts to less than significant. As discussed in Section 13, *Noise*, construction of developments under the Housing Element Update could generate temporary noise levels in excess of allowable City standards, if located nearby. However, implementation of Mitigation Measure N-1 would reduce construction noise levels below applicable thresholds. Therefore, since implementation of the Housing Element Update could potentially have harmful environmental effects from air quality that could affect humans either directly or indirectly, impacts would be potentially significant and these issues will be discussed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

References

Bibliography

Cable Airport Comprehensive Airport Land Use Plan. 1981. Adopted December 9, 1981. https://www.ci.claremont.ca.us/home/showpublisheddocument/14663/637235921966030000. (accessed June 2021).

CAL FIRE. 2011. Fire Hazard Severity Maps. https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/. (accessed July 2021).

California Department of Conservation (DOC). 2016. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed June 2021).

_____. 2017. State of California Williamson Act Contract Land. https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf (accessed June 2021).

_____. 2021. Earthquake Zones of Required Investigation. https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed June 2021).

California Department of Finance (DOF). 2021. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark. May 2021. https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/ (accessed June 2021).

California Department of Fish and Wildlife (CDFW). 2019. California Natural Community Conservation Plans. April 2019. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline (accessed June 2021).

California Department of Fish and Wildlife (DWF). 2020. California Sensitive Natural Communities.https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline. (accessed June 2021).

California Department of Forestry and Fire Protection (CAL FIRE). 2011. Very High Fire Hazard Severity Zones in LRA: Claremont. September 2011. https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/ (accessed June 2021).

California Department of Resources Recycling and Recover (CalRecycle). 2021. SWIS Facilty/Site Activity Details: Mid-Valley Sanitary Landfill (36-AA-0055). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1880?siteID=2662 (accessed June 2021).

California Department of Tax and Fee Administration. 2019. “Net Taxable Gasoline Gallons.” https://www.cdtfa.ca.gov/taxes-and-fees/MVF-10-Year-Report.pdf . (accessed June 2021).

California Department of Toxic Substances Control (DTSC). 2021. EnviroStor: Hazardous Waste and Substances Site List. https://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST (accessed June 2021).

California Department of Transportation (Caltrans). 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol. (CT-HWANP-RT-13-069.25.2) September. http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf

California Department of Transportation (Caltrans). 2019. Scenic Highway System Lists. August 2019. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways (accessed June 2021).

California Department of Water Resources (DWR). 2021. Dam Breach Inundation Map Wed Publisher. https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2 (accessed June 2021).

California Energy Commission (CEC). 2016. Diesel Fuel Data, Facts, and Statistics. https://www.energy.ca.gov/almanac/transportation_data/diesel.html. (accessed June 2021).

California Environmental Protection Agency (CalEPA). 2021a. List of solid waste disposal sites identified by Water Board. https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5c/ (accessed June 2021).

_____. 2021b. List of “active” CDO and CAO. https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5c/ (accessed June 2021).

California Office of Historic Parks (OHP). 2021. California Historical Landmarks by County: Los Angeles. https://ohp.parks.ca.gov/?page_id=21427 (accessed June 2021).

Charles M. Salter Associates Inc. 2017. Midpoint at 237 Loading Dock Noise Study. https://www.sanjoseca.gov/DocumentCenter/View/28907. (accessed June 2021).

Claremont, City of. 2014a. Figure 2-3 Land Use Plan. Last updated February 11, 2014. https://www.ci.claremont.ca.us/home/showdocument?id=1524 (accessed June 2021).

_____. 2014b. City of Claremont Zoning Map. Adopted February 25, 2014. https://www.ci.claremont.ca.us/home/showpublisheddocument/1526/635883852966700000 (accessed June 2021).

_____. 2020. City of Claremont Sanitary Sewer Management Plan. June 2020. https://www.ci.claremont.ca.us/home/showpublisheddocument?id=14867 (accessed June 2021).

Claremont, City of. 2015. City of Claremont 2015 Natural Hazards Mitigation Plan. January 20, 2015. https://www.ci.claremont.ca.us/home/showpublisheddocument/8037/636283002868400000. (accessed June 2021).

Claremont, City of. 2021. City Parks. https://www.ci.claremont.ca.us/government/departments-divisions/human-services/parks (accessed July 2021).

Claremont, City of. 2021a. Clean Power Alliance. ci.claremont.ca.us/living/clean-power-alliance. (accessed June 2021).

Claremont, City of. 2021b. Sustainable City Plan City of Claremont. Updated April 13, 2021. Adopted October 28, 2008. https://www.ci.claremont.ca.us/home/showpublisheddocument/16287/637540783026300000

Claremont Police Department. 2021a. About the Police Department. https://www.ci.claremont.ca.us/government/departments-divisions/police-department/about-us. (accessed July 2021).

_____. 2021b. Police Service Fees. https://www.ci.claremont.ca.us/government/departments-divisions/police-department/department-services/police-service-fees. (accessed July 2021).

Claremont Unified School District. 2018. Schools. https://www.cusd.claremont.edu/cusdschool (accessed July 2021).

Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Maps 06037C1475F, 06037C1750F, 06037C1725F. Effective September 26, 2008. https://msc.fema.gov/portal/home. (accessed June 2021).

Federal Highway Administration (FHWA). 2011. *Highway Traffic Noise: Analysis and Abatement Guidance.* December 2011. https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/revguidance.pdf

Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

_____. 2020. Transportation and Construction Vibration Guidance Manual (CT-HWANP-RT-20-365.01.01). April. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf

Golden State Water Company. 2021. Claremont. https://www.gswater.com/claremont (accessed July 2021).

Illingworth & Rodkin, Inc. 2009. *Wal-Mart Expansion, Williamson Ranch Plaza (Antioch, California) Environmental Noise Assessment.* http://www.ci.antioch.ca.us/CityGov/CommDev/PlanningDivision/docs/Walmart/DEIR-VOLII-APPENDICES-C-H/Appendix%20G%20Noise%20Assessment.pdf. (accessed June 2021).

Los Angeles County. 2009. Regional Habitat Linkages and Wildlife Corridors Map. https://planning.lacounty.gov/sea/regional_habitat_linkages_and_wildlife_corridors/

Los Angeles County. 2015. Significant Ecological Areas and Coastal Resources Areas Policy Map. Department of Regional Planning. February 2015. https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf

Los Angeles, County of. 2020. Integrated Waste Management Plan. September 2020. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF (accessed June 2021).

Los Angeles County Airport Land Use Commission. 2015. Brackett Field Airport Land Use Compatibility Plan. Adopted December 9, 2015. https://planning.lacounty.gov/brackett/documents (accessed June 2021).

Los Angeles County Sanitation District. 2021. Pomona Water Reclamation Plant. https://www.lacsd.org/services/wastewatersewage/facilities/pomonawrp.asp (accessed July 2021).

Los Angeles County Sensitive Species Working Group. 2009. Los Angeles County's Sensitive Bird Species. Western Tanager 75(3): 1-16. January-February 2009

Los Angeles Public Library. 2021. Los Angeles Public Library by the Numbers: Fiscal Year 2019-2020. https://www.lapl.org/about-lapl/press/library-facts (accessed July 2021).

National Parks Service (NPS). 2021. National Register Database and Research. https://www.nps.gov/subjects/nationalregister/database-research.htm#table (accessed June 2021).

National Wetlands Inventory (NWI). 2020. US Fish and Wildlife Services NWI Mapper. https://www.fws.gov/wetlands/data/mapper.html. (accessed June 2021).

Society of Vertebrate Paleontology. 2010. Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee. 11pp.

Southern California Association of Governments (SCAG). 2020. Demographics and Growth Forecast. Technical Report. Adopted September 2020.

State Water Resources Control Board (SWRCB). 2021. GeoTracker Database. https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search (accessed June 2021).

United States Energy Information Administration (EIA). 2020. "California - Profile Overview." Last modified: January 16, 2020. https://www.eia.gov/state/?sid=CA. (accessed June 2021).

_____. 2019. "2018 Total System Electric Generation." https://www.energy.ca.gov/almanac/electricity_data/total_system_power.html. (accessed June 2021)

United States Geological Survey (USGS). 2021a. U.S. Quaternary Faults. https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf (accessed June 2021).

_____. 2021b. Mineral Resource Data System (MRDS): Claremont Pit. https://mrdata.usgs.gov/mrds/show-mrds.php?dep_id=10261007 (accessed June 2021).

Upland, City of. 2015. Cable Airport Land Use Compatibility Plan. Adopted September 14, 2015. https://www.uplandca.gov/cable-airport-land-use-comp-plan (accessed June 2021).

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Appendix A

Housing Opportunity Sites Table

RHNA 6th Cycle Site ID	APN	Site address	UseType	Lot Acerage	Year Built	Existing Land Use	GP Land Use	Current Zone Code	Current Zone Description	Current Zone Dwellings Per Acre	Proposed Zone Code	Proposed Zone Description	Proposed Zone DUA	Proposed Zone DUA Adjusted	Lot Acres Adjusted	Dwelling Units	Income Level Supported	Lower Income Units	Moderate Income Units	Above Moderate Income Units
1	8315-013-016	735 S Mills Ave	Institutional	1.88	1962	Religious Facilities		CP	Commercial Professional	21	MFR 30/acre	MFR 30/acre	30	–	1.88	**56**	Lower Income	29	10	18
2	8315-029-011	616 Sycamore Ave	Institutional	0.92	1958	Religious Facilities		RS 8,000	Residential Single-Family Min Lot Size 8,000 sq ft	13	RM 2,000	Residential Multi-Family Min Lot Size 2,000 sq ft	21	–	0.92	**19**	Moderate Income	–	8	11
3	8315-009-037	630 S Indian Hill Blvd	Commercial	0.63	1945	General Office Use		CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	–	0.63	**18**	Lower Income	9	3	6
3	8315-009-036	600 S Indian Hill Blvd	Commercial	0.81	1979	General Office Use		CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	–	0.81	**24**	Lower Income	12	4	8
3	8315-009-043	638 S Indian Hill Blvd	Institutional	1.31	1948	Public Facilities	OP	CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	–	1.31	**39**	Lower Income	20	7	12
4	8315-008-051	509 S College Ave	Institutional	2.67	1959	Religious Facilities	CH	RS 8,000	Residential Single-Family Min Lot Size 8,000 sq ft	13	RM 4000	Residential Multi-Family Min Lot/Unit Area 4,000 sq ft	10.89	–	1.37	**14**	Above Moderate Income	–	–	14
5	8316-001-010	395 S Indian Hill Blvd	Commercial	0.57	1990	General Office Use	OP	CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	–	0.57	**17**	Lower Income	8	3	6
6	8316-001-005	323 S Indian Hill Blvd	Commercial	0.16	1981	General Office Use	OP	CP	Commercial Professional	21	MU 60/acre	MU 60/acre	60	–	0.16	**9**	Lower Income	5	2	3
6	8316-001-004	424 W Arrow Hwy	Commercial	0.28	1941	Retail Stores and Commercial Services	OP	CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	–	0.28	**8**	Lower Income	4	1	3
7	8313-007-009	525 W Arrow Hwy Bldg 1	Industrial	2.22	1978	Industrial	BP	B-IP	Business - Industrial Park	0	MU 30/acre	MU 30/acre	30	–	2.22	**66**	Lower Income	34	11	21
8	8313-025-013	254 S Indian Hill Blvd	Residential	0.18	1953	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.18	**10**	Lower Income	5	2	3
8	8313-025-019	–	Commercial	0.18	–	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.18	**10**	Lower Income	5	2	3
8	8313-025-012	258 S Indian Hill Blvd	Residential	0.37	–	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.37	**21**	Lower Income	11	4	7
8	8313-025-014	250 S Indian Hill Blvd	Residential	0.19	1953	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.19	**10**	Lower Income	5	2	3
8	8313-025-023	220 S Indian Hill Blvd	Commercial	0.37	1979	General Office Use	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.37	**21**	Lower Income	11	4	7
8	8313-025-015	240 S Indian Hill Blvd	Residential	0.18	1948	Single Family Residential	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.18	**10**	Lower Income	5	2	3
8	8313-025-011	313 W Arrow Hwy	Residential	0.22	–	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.22	**12**	Lower Income	6	2	4
8	8313-025-020	212 S Indian Hill Blvd	Commercial	0.19	1975	General Office Use	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.19	**10**	Lower Income	5	2	3
8	8313-025-016	230 S Indian Hill Blvd	Residential	0.18	1952	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.18	**10**	Lower Income	5	2	3
9	8313-024-008	194 S Indian Hill Blvd	Residential	0.18	1930			CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.18	**10**	Lower Income	5	2	3
9	8313-024-009	188 S Indian Hill Blvd	Residential	0.12	1917	Single Family Residential	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.12	**6**	Lower Income	3	1	2
10	8313-008-003	177 S Indian Hill Blvd	Industrial	0.55	1956			B-IP	Business - Industrial Park	0	VSSP	Village South Specific Plan	57	–	0.55	**31**	Lower Income	16	5	10
10	8313-008-006	232 Bucknell Ave	Residential	0.19	1920	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.19	**11**	Lower Income	6	2	4
10	8313-008-014	445 W Arrow Hwy	Residential	0.14	1932	Single Family Residential	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.14	**8**	Lower Income	4	1	3

RHNA 6th Cycle Site ID	APN	Site address	UseType	Lot Acerage	Year Built	Existing Land Use	GP Land Use	Current Zone Code	Current Zone Description	Current Zone Dwellings Per Acre	Proposed Zone Code	Proposed Zone Description	Proposed Zone DUA	Proposed Zone DUA Adjusted	Lot Acres Adjusted	Dwelling Units	Income Level Supported	Lower Income Units	Moderate Income Units	Above Moderate Income Units
10	8313-008-009	260 Bucknell Ave	Residential	0.22	1947	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.22	**12**	Lower Income	6	2	4
10	8313-008-010	471 W Arrow Hwy	Residential	0.20	1930	Single Family Residential	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.20	**11**	Lower Income	6	2	4
10	8313-008-028	121 S Indian Hill Blvd	Industrial	3.66	1928	Manufacturing, Assembly, and Industrial Services	BP	B-IP	Business - Industrial Park	0	VSSP	Village South Specific Plan	57	–	3.66	**208**	Lower Income	106	35	67
10	8313-008-025	205 S Indian Hill Blvd	Commercial	1.17	1964	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	–	1.17	**66**	Lower Income	34	11	21
10	8313-008-004	191 S Indian Hill Blvd	Commercial	2.45	1959	Retail Stores and Commercial Services	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	–	2.45	**139**	Lower Income	71	24	44
10	8313-008-019	259 S Indian Hill Blvd	Commercial	0.24	1945	Retail Stores and Commercial Services	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	–	0.24	**13**	Lower Income	7	2	4
10	8313-008-020	267 S Indian Hill Blvd	Commercial	0.33	1974	Retail Stores and Commercial Services	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	–	0.33	**18**	Lower Income	9	3	6
10	8313-008-011	469 W Arrow Hwy	Commercial	0.42	-	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.42	**23**	Lower Income	12	4	7
10	8313-008-031	433 W Arrow Hwy	Commercial	0.21	1931	Major Medical Health Care Facilities	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.21	**12**	Lower Income	6	2	4
10	8313-008-027	–	Commercial	0.16	–	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.16	**9**	Lower Income	5	2	3
10	8313-008-024	203 S Indian Hill Blvd	Commercial	0.46	1971	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	–	0.46	**26**	Lower Income	13	4	8
10	8313-008-021	–	Commercial	0.19	–	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	–	0.19	**10**	Lower Income	5	2	3
10	8313-008-015	449 W Arrow Hwy	Residential	0.19	1940	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.19	**10**	Lower Income	5	2	3
10	8313-008-900	451 W Arrow Hwy	Residential	1.41	–	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	1.41	**80**	Lower Income	41	14	26
10	8313-008-018	253 S Indian Hill Blvd	Residential	0.24	1925	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	–	0.24	**13**	Lower Income	7	2	4
10	8313-008-023	180 Bucknell Ave	Industrial	0.73	1956	Manufacturing, Assembly, and Industrial Services	BP	B-IP	Business - Industrial Park	0	VSSP	Village South Specific Plan	57	–	0.73	**41**	Lower Income	21	7	13
10	8313-008-007	244 Bucknell Ave	Residential	0.15	1958	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	–	0.15	**8**	Lower Income	4	1	3
10	8313-008-026	204 Bucknell Ave	Industrial	0.82	1959	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	–	0.82	**46**	Lower Income	23	8	15
10	8313-008-017	241 S Indian Hill Blvd	Residential	0.24	1949	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	–	0.24	**13**	Lower Income	7	2	4
10	8313-008-016	233 S Indian Hill Blvd	Commercial	0.25	1922	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	–	0.25	**14**	Lower Income	7	2	4
11	8313-023-012	189 El Camino Way	Residential	0.16	1954			RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sq ft	21	MFR 60/acre	MFR 60/acre	60	45	0.16	**7**	Lower Income	4	1	2
11	8313-023-015	165 El Camino Way	Residential	0.17	1956			RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sq ft	21	MFR 60/acre	MFR 60/acre	60	45	0.17	**7**	Lower Income	4	1	2
11	8313-023-021	150 Olive St	Commercial	0.59	1967			MU2	Mixed Use 2 - College Avenue/South Village Transit-Oriented Mixed Use District	21	MFR 60/acre	MFR 60/acre	60	45	0.59	**26**	Lower Income	13	4	8

RHNA 6th Cycle Site ID	APN	Site address	UseType	Lot Acerage	Year Built	Existing Land Use	GP Land Use	Current Zone Code	Current Zone Description	Current Zone Dwellings Per Acre	Proposed Zone Code	Proposed Zone Description	Proposed Zone DUA	Proposed Zone DUA Adjusted	Lot Acres Adjusted	Dwelling Units	Income Level Supported	Lower Income Units	Moderate Income Units	Above Moderate Income Units
11	8313-023-023	195 El Camino Way	Residential	0.17	1954	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	R22	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sq ft	21	MFR 60/acre	MFR 60/acre	60	45	0.17	**7**	Lower Income	4	1	2
11	8313-023-019	108 Olive St	Industrial	0.40	1960	General Office Use	MU	MU2	Mixed Use 2 - College Avenue/South Village Transit-Oriented Mixed Use District	21	MFR 60/acre	MFR 60/acre	60	45	0.40	**17**	Lower Income	9	3	5
12	8313-021-011	100 W 1st St	Commercial	0.68	1981	Public Parking Facilities	CV	CV	Commercial Village	0	MU 60/acre	MU 60/acre	60	45	0.68	**30**	Lower Income	15	5	10
13	8313-021-007	250 W 1st St	Commercial	2.80	1981	General Office Use	CV	CV	Commercial Village	0	MU 60/acre	MU 60/acre	60	45	0.64	**29**	Lower Income	15	5	9
14	8314-017-900	–	Government	6.13	–	Airports	MU	MU2	Mixed Use 2 - College Avenue/South Village Transit-Oriented Mixed Use District	54	MFR 60/acre	MFR 60/acre	60	45	4.08	**183**	Lower Income	93	31	59
15	8313-006-036	830 W Bonita Ave	Institutional	3.19	1970	Religious Facilities	R15	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sq ft	21	MU 30/acre	MU 30/acre	30	–	1.43	**42**	Lower Income	21	7	13
16	8313-006-003	660 W Bonita Ave	Residential	8.39	1963	Low-Rise Apartments, Condominiums, and Townhouses	R15	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sq ft	21	MFR 60/acre	MFR 60/acre	60	45	0.82	**36**	Lower Income	18	6	12
17	8313-011-004	524 W Bonita Ave	Residential	0.18	1992			SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.18	**3**	Moderate Income	–	1	2
17	8313-011-006	538 W Bonita Ave	Residential	0.17	1959			SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.17	**3**	Moderate Income	–	1	2
17	8313-011-019	140 Cornell Ave	Residential	0.20	1961			SP8	Specific Plan Area 8 - Village Expansion	21	RMX	MX	60	–	0.20	**11**	Lower Income	6	2	4
17	8313-011-001	245 Oberlin Ave	Residential	0.19	1954			SP8	Specific Plan Area 8 - Village Expansion	62	RMX	RMX	20	–	0.19	**3**	Moderate Income	–	1	2
17	8313-011-031	201 Oberlin Ave	Residential	0.20	1906	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.20	**4**	Moderate Income	–	2	2
17	8313-011-016	127 Oberlin Ave	Commercial	1.66	–			SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	–	1.66	**99**	Lower Income	50	17	32
17	8313-011-021	150 Cornell Ave	Residential	0.21	–			SP8	Specific Plan Area 8 - Village Expansion	21	RMX	MX	60	–	0.21	**12**	Lower Income	6	2	4
17	8313-011-018	136 Cornell Ave	Residential	0.10	1930	Single Family Residential	CV	SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	–	0.10	**6**	Lower Income	3	1	2
17	8313-011-017	130 Cornell Ave	Residential	0.10	1922	Single Family Residential	CV	SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	–	0.10	**6**	Lower Income	3	1	2
17	8313-011-007	550 W Bonita Ave	Residential	0.26	1934	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.26	**5**	Moderate Income	–	2	3
17	8313-011-026	214 Cornell Ave	Residential	0.32	1930	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.32	**6**	Moderate Income	–	3	3
17	8313-011-024	205 Oberlin Ave	Residential	0.31	1964	Low-Rise Apartments, Condominiums, and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.31	**6**	Moderate Income	–	3	3
17	8313-011-002	516 W Bonita Ave	Residential	0.13	1932	Single Family Residential	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.13	**2**	Moderate Income	–	1	1
17	8313-011-020	148 Cornell Ave	Residential	0.21	1907	Single Family Residential	CV	SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	–	0.21	**12**	Lower Income	6	2	4
17	8313-011-005	528 W Bonita Ave	Residential	0.18	1959	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.18	**3**	Moderate Income	–	1	2

RHNA 6th Cycle Site ID	APN	Site address	UseType	Lot Acerage	Year Built	Existing Land Use	GP Land Use	Current Zone Code	Current Zone Description	Current Zone Dwellings Per Acre	Proposed Zone Code	Proposed Zone Description	Proposed Zone DUA	Proposed Zone DUA Adjusted	Lot Acres Adjusted	Dwelling Units	Income Level Supported	Lower Income Units	Moderate Income Units	Above Moderate Income Units
18	8313-012-007	244 Oberlin Ave	Residential	0.09	1924			SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.09	**1**	Moderate Income	–	0	1
18	8313-012-019	216 Oberlin Ave	Residential	0.09	1910			SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.09	**1**	Moderate Income	–	0	1
18	8313-012-038	–	Government	0.05	-			SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.05	-	Moderate Income	–	–	–
18	8313-012-018	210 Oberlin Ave	Residential	0.09	1930			SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.09	**1**	Moderate Income	–	0	1
18	8313-012-006	490 W Bonita Ave	Residential	0.10	1925			SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.10	**2**	Moderate Income	–	1	1
18	8313-012-004	219 N Indian Hill Blvd	Commercial	0.25	1966			SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.25	**4**	Moderate Income	–	2	2
18	8313-012-003	432 W Bonita Ave	Commercial	0.18	1969	Public Parking Facilities	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.18	**3**	Moderate Income	–	1	2
18	8313-012-023	440 W Bonita Ave	Residential	0.44	1924	Low-Rise Apartments, Condominiums, and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.44	**8**	Moderate Income	–	3	5
18	8313-012-001	408 W Bonita Ave	Residential	0.23	1908	Low-Rise Apartments, Condominiums, and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.23	**4**	Moderate Income	–	2	2
18	8313-012-002	231 N Indian Hill Blvd	Commercial	0.23	1969	General Office Use	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	–	0.23	**4**	Moderate Income	–	2	2
19	8313-013-800	–	Government	0.44	–			RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sq ft	21	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sq ft	30	–	0.44	**13**	Lower Income	7	2	4
20	8314-010-012	–	Residential	0.17	–			AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	–	0.17	**1**	Above Moderate Income	–	–	1
20	8314-010-011	242 Brooks Ave	Residential	0.17	1948			AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	–	0.17	**1**	Above Moderate Income	–	–	1
20	8314-010-013	–	Residential	0.35	-			AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	–	0.35	**2**	Above Moderate Income	–	–	2
20	8314-010-009	230 Brooks Ave	Residential	0.34	1947			AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	–	0.34	**2**	Above Moderate Income	–	–	2
20	8314-010-010	236 Brooks Ave	Residential	0.34	1912	Single Family Residential	R15	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	–	0.34	**2**	Above Moderate Income	–	–	2
20	8314-010-015	–	Residential	0.17	–	Vacant Undifferentiated	R15	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	–	0.17	**1**	Above Moderate Income	–	–	1
21	8310-019-015	701 Harrison Ave	Institutional	1.24	1970	Religious Facilities	CH	IR	Institution Residential	0	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sq ft	30	–	0.57	**17**	Lower Income	9	3	5
22	8310-019-013	731 Harrison Ave	Residential	0.55	–			IR	Institution Residential	0	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sq ft	30	–	0.55	**16**	Lower Income	8	3	5
22	8310-019-016	–	Residential	0.23	–	Vacant Undifferentiated	CH	IR	Institution Residential	0	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sq ft	30	–	0.23	**6**	Lower Income	3	1	2
23	8311-001-016	1030 W Foothill Blvd	Commercial	3.28	1972			MU3	Mixed Use 3	15	MU3	Mixed Use 3	40	–	3.28	**131**	Lower Income	65	22	43
23	8311-006-021	984 W Foothill Blvd	Commercial	1.00	1950			MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	1.00	**15**	Moderate Income	–	6	9
23	8311-006-002	970 W Foothill Blvd	Commercial	0.20	1977			MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	0.20	**3**	Moderate Income	–	1	2
23	8311-001-020	1020 W Foothill Blvd	Commercial	0.67	1978	General Office Use	MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	0.68	**10**	Moderate Income	–	4	6

RHNA 6th Cycle Site ID	APN	Site address	UseType	Lot Acerage	Year Built	Existing Land Use	GP Land Use	Current Zone Code	Current Zone Description	Current Zone Dwellings Per Acre	Proposed Zone Code	Proposed Zone Description	Proposed Zone DUA	Proposed Zone DUA Adjusted	Lot Acres Adjusted	Dwelling Units	Income Level Supported	Lower Income Units	Moderate Income Units	Above Moderate Income Units
23	8311-006-013	956 W Foothill Blvd	Commercial	1.14	1968	Retail Stores and Commercial Services	MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	1.14	**17**	Moderate Income	–	7	10
23	8311-006-022	994 W Foothill Blvd	Commercial	0.60	1950	Retail Centers (Non-Strip With Contiguous Interconnected Off-Street Parking)	MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	0.60	**8**	Moderate Income	–	3	5
24	8306-016-038	211 W Foothill Blvd	Institutional	6.97	1962			CP	Commercial Professional	21	RS 10,000	Residential Single-Family Min Lot Size 10,000 sq ft	4	–	0.86	**3**	Above Moderate Income	–	-	3
25	8303-024-015	817 W Foothill Blvd	Commercial	0.10	1963			MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	0.27	**3**	Moderate Income	–	1	2
25	8303-024-016	831 W Foothill Blvd	Commercial	0.12	1963			MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	0.12	**1**	Moderate Income	–	0	1
26	8303-024-018	863 W Foothill Blvd	Commercial	0.45	1972			MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	0.45	**6**	Moderate Income	–	3	3
26	8303-024-019	855 W Foothill Blvd	Commercial	0.49	1964	Retail Centers (Non-Strip With Contiguous Interconnected Off-Street Parking)	MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	0.49	**7**	Moderate Income	–	3	4
27	8303-025-022	915 W Foothill Blvd	Commercial	0.65	1976			MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	0.65	**9**	Moderate Income	–	4	5
27	8303-025-015	921 W Foothill Blvd	Commercial	0.59	1970			MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	0.59	**8**	Moderate Income	–	3	5
28	8303-025-017	981 W Foothill Blvd	Commercial	0.58	1978			MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	0.58	**8**	Moderate Income	–	3	5
28	8303-025-018	985 W Foothill Blvd	Commercial	1.01	1973			MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	–	1.01	**15**	Moderate Income	–	6	9
29	8305-016-007	601 W Foothill Blvd	Commercial	3.75	1976			SP10	Specific Plan Area 10	21	MU 30/acre	MU 30/acre	30	–	1.30	**39**	Lower Income	20	7	12
30	8305-020-002	–	Commercial	7.63	1972	Retail Centers (Non-Strip With Contiguous Interconnected Off-Street Parking)	MU	SP9	Specific Plan Area 9 - Old School House/Claremont Inn	0	MU 30/acre	MU 30/acre	30	–	1.52	**45**	Lower Income	23	8	14
31	8303-026-011	1364 N Towne Ave	Institutional	1.89	1964			RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sq ft	21	MFR 30/acre	MFR 30/acre	30	–	1.89	**56**	Lower Income	29	10	18
31	8303-026-012	1350 N Towne Ave	Commercial	0.76	1965			MU3	Mixed Use 3	37	MU3	Mixed Use 3	15	–	0.76	**11**	Moderate Income	-	5	6
32	8306-008-023	1550 N Indian Hill Blvd	Institutional	2.97	1959	Vacant	INST N	IE	Institution Educational	0	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sq ft	30	–	2.98	**89**	Lower Income	45	15	28
32	8306-008-022	1575 N College Ave	Institutional	4.37	1951			IE	Institution Educational	0	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sq ft	30	–	4.37	**131**	Lower Income	67	22	42
33	8302-018-028	–	Residential	1.37	–			RS 10,000	Residential Single-Family Min Lot Size 10,000 sq ft	4	RS 10,000	RS 10,000	4	–	0.78	**3**	Above Moderate Income	–	–	3
33	8302-018-027	–	Residential	1.43	–			RS 10,000	Residential Single-Family Min Lot Size 10,000 sq ft	4	RS 10,000	RS 10,000	4	–	0.68	**2**	Above Moderate Income	–	–	2
33	8302-021-053	–	Residential	0.37	–			RS 10,000	Residential Single-Family Min Lot Size 10,000 sq ft	4	RS 10,000	RS 10,000	4	–	0.27	**1**	Above Moderate Income	–	–	1

RHNA 6th Cycle Site ID	APN	Site address	UseType	Lot Acerage	Year Built	Existing Land Use	GP Land Use	Current Zone Code	Current Zone Description	Current Zone Dwellings Per Acre	Proposed Zone Code	Proposed Zone Description	Proposed Zone DUA	Proposed Zone DUA Adjusted	Lot Acres Adjusted	Dwelling Units	Income Level Supported	Lower Income Units	Moderate Income Units	Above Moderate Income Units
34	8307-002-041	–	Residential	3.16	–	0	OS	RS 10,000	Residential Single-Family Min Lot Size 10,000 sq ft	4	RM 3000	Residential Multi-Family Min Lot/Unit Area 3,000 sq ft	15	–	3.16	**47**	Moderate Income	–	20	27
35	8302-032-025	–	Residential	0.18	–			SP5	Specific Plan Area 5 - Williams Ave	0	MFR 30/acre	MFR 30/acre	30	–	0.18	**5**	Lower Income	3	1	2
35	8302-032-900	–	Residential	2.14	–			P/RC	Park / Resource Conservation	0	MFR 30/acre	MFR 30/acre	30	–	2.14	**64**	Lower Income	33	11	20
36	8670-008-025	2050 N Indian Hill Blvd	Institutional	3.27	1955	Religious Facilities	CH	RS 10,000	Residential Single-Family Min Lot Size 10,000 sq ft	4	MFR 30/acre	MFR 30/acre	30	–	2.25	**67**	Lower Income	34	11	21
37	8302-014-016	–	Residential	0.46	–			RS 10,000	Residential Single-Family Min Lot Size 10,000 sq ft	4	MFR 30/acre	MFR 30/acre	30	–	0.46	**13**	Lower Income	7	2	4
38	8670-010-025	431 W Baseline Rd	Commercial	0.97	1965			CP	Commercial Professional	21	MFR 30/acre	MFR 30/acre	30	–	0.97	**28**	Lower Income	14	5	9
39	8670-003-900	2475 Forbes Ave	Institutional	9.67	–	Open Space and Recreation	PR	P	Public	0	MFR 30/acre	MFR 30/acre	30	–	9.67	**290**	Lower Income	145	49	96
40	8322-006-006	840 S Indian Hill Blvd	Commercial	2.85	1975	Hotels and Motels	AC	CF	Freeway Commercial	0	MFR 30/acre	MFR 30/acre	30	–	2.85	**85**	Lower Income	43	14	27
														Total Units		**3,097**		**1,430**	**586**	**1,080**
														RHNA Allocation		**1,711**		**871**	**297**	**548**
														No Net Loss Buffer (20%)		**2,477**		**1,143**	**468**	**863**
														Residual		**620**		**287**	**118**	**217**

Appendix B

County of Los Angeles Fire Department Letter

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

July 27, 2021

Melissa Fajardo, Environmental Planner
Rincon Consultants
Planning Department
250 E. 1st Street, Suite 1400
Los Angeles, CA 90012

Dear Ms. Fajardo:

REQUEST FOR FIRE SERVICES INFORMATION, "CLAREMONT HOUSING ELEMENT," ASSUMES THAT LESS THAN THE TOTAL 2,638 UNITS WOULD REALISTICALLY BE DEVELOPED BASED ON PREVIOUS DEVELOPMENT HISTORY IN THE CITY, WHICH WOULD INCREASE THE CITY'S POPULATION UP TO 6,700 RESIDENTS, CLAREMONT, FFER 2021007380

The Request for Fire Service Information has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We have no comments.

For any questions regarding this response, please contact Kien Chin, Planning Analyst at (323) 881-2404 or Kien.Chin@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

The Land Development Unit is reviewing the proposed "GENERAL PLAN UPDATE AND HOUSING ELEMENT" Project for access and water system requirements. The Land Development Unit's comments are only preliminary requirements. Specific fire and life safety

requirements will be addressed during the review for building and fire plan check phases. There may be additional requirements during this time.

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

ACCESS REQUIREMENTS:

The proposed development will require multiple ingress/egress access for the circulation of traffic and emergency response issues.

1. All on-site Fire Department vehicular access roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.

    a. The Fire Apparatus Access Road shall be cross-hatch on the site plan with the width clearly noted on the plan.

2. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

3. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.

4. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official.

5. Single-Family Detached Homes shall provide a minimum unobstructed width of 20 feet, exclusive of shoulders, except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building.

6. Attached Multi-Family Units: Where the highest roof surface exceeds 30 feet. For buildings where the vertical distance between the access roadway and the highest roof surface exceeds 30 feet, an approved Fire Apparatus Access Roadway with a minimum width of 28 feet, exclusive of shoulders, shall be provided in the immediate vicinity of the building or portion thereof. This roadway shall have an unobstructed clearance of clear to the sky. 503.2.1.2.2.

7. Proximity to Building. At least one required access route meeting this condition shall be located such that the edge of the Fire Apparatus Access Roadway, not including shoulder, that is closest to the building being served, is between 10 feet and 30 feet, from the building, as determined by the fire code official, and shall be positioned

parallel to one entire side of the building. The side of the building on which the Fire Apparatus Access Road is positioned shall be approved by the fire code official. 503.2.1.2.2.1.

8. If the Fire Apparatus Access Road is separated by island, provide a minimum unobstructed width of 20 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building.

9. Dead-end Fire Apparatus Access Roads in excess of 150 feet in-length shall be provided with an approved Fire Department turnaround. Include the dimensions of the turnaround, with the orientation of the turnaround shall be properly placed in the direction of travel of the access roadway.

10. Fire Department Access Roads shall be provided with a 32-foot centerline turning radius.

11. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000 lbs. and shall be surfaced with all-weather driving capabilities. Fire Apparatus Access Roads having a grade of 10 percent or greater shall have a paved or concrete surface.

12. A minimum 5-foot wide approved firefighter access walkway leading from the Fire Department Access Road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes.

13. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Fire Code Section 503.2.1 shall be maintained at all times.

WATER SYSTEM REQUIREMENTS:

1. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal and shall be installed in accordance with the County of Los Angeles Fire Code.

2. The development may require fire flows up to 4,000 gallons per minute at 20 pounds per square inch residual pressure for up to a four-hour duration. Final fire flows will be based on the size of buildings, the installation of an automatic fire sprinkler system, and type(s) of construction used.

3. All required public fire hydrants shall be installed and tested prior to beginning of construction.

4. The fire hydrant spacing shall be every 300 feet for both the public and the on-site hydrants. The fire hydrants shall meet the following requirements:

   a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.

   b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.

For any questions regarding the report, please contact FPEA Claudia Soiza at (323) 890-4243 or Claudia.soiza@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Nicholas Alegria at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac

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Attorney At Law

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VIA E-MAIL

September 29, 2021

Brad Johnson
Director of Community Development
City of Claremont
207 Harvard Avenue
Claremont, CA 91711
Em: bjohnson@ci.claremont.ca.us

RE: City of Claremont's 6th Cycle RHNA Housing Element Update.

Dear Brad Johnson,

On behalf of the Southwest Regional Council of Carpenters ("**Commenter**" or "**Carpenter**"), my Office is submitting these comments on the City of Claremont's ("**City**") Notice of Preparation of a Draft Environmental Impact Report for the Housing Element Update for the 6th Cycle RHNA Housing Element Update for the September 29, 2021 NOP Scoping Meeting ("**Project**").

The Southwest Carpenters is a labor union representing 50,000 union carpenters in six states and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest Carpenters live, work and recreate in the City and surrounding communities and would be directly affected by the Project's environmental impacts.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenters incorporates by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected to the Project's environmental documentation may assert any issue timely raised by other parties).

Moreover, Commenter requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act ("**CEQA**"), Cal Public Resources Code ("**PRC**") § 21000 *et seq*, and the California Planning and Zoning Law ("**Planning and Zoning Law**"), Cal. Gov't Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

The City should require the use of a local skilled and trained workforce to benefit the community's economic development and environment. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

> [A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

> . . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.[1]

Local skilled and trained workforce requirements and policies have significant environmental benefits since they improve an area's jobs-housing balance, decreasing the amount of and length of job commutes and their associated greenhouse gas emissions. Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the "[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component" can result in air pollutant reductions.[2]

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to "promote local hiring . . . to help achieve a more positive jobs-housing balance, and reduce regional commuting, gas consumption, and greenhouse gas emissions."[3]

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[1] California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* *https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf*

[2] South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10

[3] City of Hayward (2014) Hayward 2040 General Plan Policy Document at p. 3-99, *available at* https://www.hayward-ca.gov/sites/default/files/documents/General_Plan_FINAL.pdf.

In fact, the City of Hayward has gone as far as to adopt a Skilled Labor Force policy into its Downtown Specific Plan and municipal code, requiring developments in its Downtown area to requiring that the City "c]ontribute to the stabilization of regional construction markets by spurring applicants of housing and nonresidential developments to require contractors to utilize apprentices from state-approved, joint labor-management training programs, . . ."[4] In addition, the City of Hayward requires all projects 30,000 square feet or larger to "utilize apprentices from state-approved, joint labor-management training programs."[5]

Locating jobs closer to residential areas can have significant environmental benefits. . As the California Planning Roundtable noted in 2008:

> People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.[6]

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.[7] Some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing." The

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[4] City of Hayward (2019) Hayward Downtown Specific Plan at p. 5-24, *available at* https://www.hayward-ca.gov/sites/default/files/Hayward%20Downtown%20Specific%20Plan.pdf.

[5] City of Hayward Municipal Code, Chapter 10, § 28.5.3.020(C).

[6] California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf

[7] Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, *available at* http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf.

> city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts.

Sincerely,

Mitchell M. Tsai
Attorneys for Southwest Regional
Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Paul E. Rosenfeld, PhD
(310) 795-2335
prosenfeld@swape.com

March 8, 2021

Mitchell M. Tsai
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

Soil Water Air Protection Enterprise ("SWAPE") is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas ("GHG") emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model ("CalEEMod") is a "statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects."[1] CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.[2]

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[3]

[1] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[2] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[3] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled ("VMT") associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.[4]

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

> "$VMT_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$
>
> Where:
>
> n = Number of land uses being modeled."[5]

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

> "$\text{Emissions}_{pollutant} = VMT * EF_{running,pollutant}$
>
> Where:
>
> $\text{Emissions}_{pollutant}$ = emissions from vehicle running for each pollutant
>
> VMT = vehicle miles traveled
>
> $EF_{running,pollutant}$ = emission factor for running emissions."[6]

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[7] In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence.[8] The default number of construction-related worker trips is calculated by multiplying the

[4] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.
[5] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.
[6] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[7] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[8] CalEEMod User Guide, *available at:* http://www.caleemod.com/, p. 1, 9.

number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.[9] Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively."[10] Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.[11] The operational home-to-work vehicle trip lengths are:

> "[B]ased on the *location* and *urbanization* selected on the project characteristic screen. These values were *supplied by the air districts or use a default average for the state*. Each district (or county) also assigns trip lengths for urban and rural settings" (emphasis added). [12]

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).[13]

Worker Trip Length by Air Basin		
Air Basin	**Rural (miles)**	**Urban (miles)**
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	**16.47**	**11.17**
Minimum	**10.80**	**10.80**
Maximum	**19.80**	**14.70**
Range	**9.00**	**3.90**

[9] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[10] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[11] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.
[12] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.
[13] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8-miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7-miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan ("Project") located in the City of Claremont ("City"). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.[14] In an effort to evaluate the potential for a local hire provision to reduce the Project's construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO_2e)	3,623
Amortized Construction GHG Emissions (MT CO_2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized Construction GHG Emissions (MT CO_2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project's urbanization level and location.

[14] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

EXHIBIT B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs,* vs. United States Metals Refining Company et. al. *Defendant.*
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs,* vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" *Defendant.*
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case: No 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No 1923
Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs,* vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al.,, et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

EXHIBIT C

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

Addressing the Claremont Housing Element

People say “don’t change Claremont” and as my husband Bob likes to say “Claremont has changed a lot “ in his 74 years here. The thing we don’t want to change is the thoughtful way change comes about. There have been some unfavorable changes, like tearing down houses on Harvard above 6th St or 7th and Yale and replacing them with condos that are nice to live in but absolutely were not designed to fit into the neighborhood. This is one example of why Claremont Heritage came about. Citizens said we can’t let THAT happen again.

*This Housing Element Scoping seems like something Claremont is being forced into by the State. It is time for Claremont and other cities to push back at ‘requirements’ coming from people that don’t know our towns. We really don’t want to be like bigger cities with high rise housing that overtakes surrounding suburban neighborhoods.

*Claremont can come up with solutions, add more housing and even require enough parking for the units being built. Has the State decided we will have enough water for all of the required units in Southern California?

*One way of adding housing is by counting the ADU’s that are all over town and more being built all the time. Most are low income housing because of the size and occupants (Parents, kids, students etc.)

*Before Covid, the Community issues Committee of the Chamber, studied ways to expand low income housing. We gathered information from several housing non -profits. One of those whose mission it is to expand lower income housing throughout a community called United Dwelling. They champion several ways of increasing low income housing. One way is to help turn a garage into an apartment, working with homeowners. They help fund the build and the homeowner receives under market rate rent from the low income tenants that the homeowner approves. This non profit would be a great partner for Claremonters. This is a way to expand low income housing all over town but in a thoughtful way for the neighborhoods.

* Looking at all the sites for housing opportunities, some seen rather ‘far out’ suggestions Others are probably good potential sites. One that caught my eye is site #23 (Marie Callender’s land) I can see commercial use facing Foothill and a lovely low income housing development behind the commercial. The Courier Place, Jamboree Housing, is a good example of a well managed, beautiful, low income project next to transportation and a school. The site #23 has those same attributes but is even closer to grocery stores and other necessary amenities.
I bet we could get creative and create partnerships to make such a needed housing development blossom.

Thoughtful, creative planning is what we expect from our City leaders and staff.
Thank you, Sonja Stump

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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

October 20, 2021

Brad Johnson
City of Claremont
207 Harvard Avenue
Claremont, CA 91711
BJohnson@ci.claremont.ca.us

Subject: Notice of Preparation of a Programmatic Environmental Impact Report for the City of Claremont Housing Element Update, SCH #2021090340, Los Angeles County

Dear Mr. Johnson:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of a Programmatic Environmental Impact Report (PEIR) from the City of Claremont (City; Lead Agency) for the City of Claremont Housing Element Update (Project). Supporting documents include an Initial Study. Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq*.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

Objective: The Project would amend the City's General Plan by replacing the current Housing Element with the proposed 2021-2029 Housing Element and updating the Safety Element of the General Plan.

- **Housing Element.** The Housing Element is mandated by State law and is updated every eight years. State law requires the Housing Element to identify and analyze existing and projected housing needs, and establish goals, policies, and actions to address those housing needs. The Housing Element includes goals, policies, programs, and objectives to further the development, improvement, and preservation of housing in a manner that is aligned with community desires, regional growth objectives, and State law. The 2021-2029 Regional Housing Needs Allocation (RHNA) to the City is 1,711 units. A total of 2,236 total units would be needed to account for an additional 20 percent buffer capacity above the RHNA. State law requires local jurisdictions to identify available sites that have the appropriate land use and zoning to accommodate the housing units assigned to the City. Site selection is conducted based on an analysis of site-specific constraints, including zoning, access to utilities, location, development potential, density and whether the site is identified in a previous Housing Element.

- **Safety Element.** The Safety Element would be updated to include new information about natural and human-related hazards. The Safety Element currently includes policies to address the following types of hazards: geology and seismicity; stormwater management and flooding; fire hazards; radon gas; hazardous materials; and disaster response. The Safety Element update would focus on ensuring alignment with other City plans and addressing new State requirements pertaining to climate change, wildfire risk, and evacuation routes for residential neighborhoods.

Location: The Project is within the City's limits and the City's sphere of influence, which includes portions of unincorporated Los Angeles County (Plan Area). The City is in the San Gabriel Valley within the eastern portion of Los Angeles County. The City is bordered by the cities of Upland, Pomona, La Verne, and Montclair, as well as the County of San Bernardino.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The PEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151].

Specific Comments

1. Jurisdictional Waters. Figure 3 in the Initial Study shows a Housing Inventory Opportunity Site on the western side of the Plan Area across from Summer Avenue/Clemson Avenue/Summer Elementary School. This opportunity site may be adjacent to Thompson Wash and riparian vegetation surrounding Thompson Wash. According to U.S. Fish and Wildlife Service's (USFWS) National Wetland Inventory, Thomson Wash is classified as a

1.48-acre Riverine habitat (USFWS 2021). Surrounding Thompson Wash is potentially riparian vegetation that the USFWS National Wetland Inventory classifies as Forested/Shrub Riparian (USFWS 2021).

a) Potential Impact. Housing developed as part of the Project at opportunity sites adjacent to Thompson Wash could impact streams and riparian vegetation. Streams could be channelized or diverted underground. Riparian vegetation could be removed or degraded through habitat modification (e.g., loss of water source, encroachment by development, edge effects leading to introduction of non-native plants).

b) Stream Delineation and Impact Assessment. CDFW recommends the PEIR provide a stream delineation and analysis of impacts on any river, stream, or lake[1]. The delineation should be conducted pursuant to the USFWS wetland definition adopted by CDFW (Cowardin et al. 1979). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.

c) Avoidance and Setbacks. CDFW recommends the Project avoid impacting streams and associated vegetation by avoiding opportunity sites that are adjacent to streams. Herbaceous and vegetation adjacent to streams protects the physical and ecological integrity of these water features and maintains natural sedimentation processes. Where development may occur near a stream but may avoid impacts on streams, the PEIR should provide minimum standards for effective unobstructed vegetated buffers and setbacks adjoining streams and associated vegetation for all development facilitated by the Project. The buffer and setback distance should be increased at a project-level as needed. The PEIR should provide justification for the effectiveness of chosen buffer and setback distances to avoid impacts on the stream and associated vegetation.

d) Mitigation. If avoidance is not feasible, the PEIR should include measures where future housing development facilitated by the Project provides the following:
   i. A stream delineation and analysis of impacts;
   ii. A Lake and Streambed Alteration (LSA) Notification to CDFW pursuant to Fish and Game Code Section 1600 et seq. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream or use material from a streambed. For any such activities, the project applicant (or "entity") must notify CDFW[2]. Please visit CDFW's Lake and Streambed Alteration Program webpage for more information (CDFW 2021a).

[1] Please note that "any river, stream, or lake" includes those that are dry for periods of time as well as those that flow year-round.
[2] CDFW's issuance of a LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (lead agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

2. Disclosure. According to the Initial Study, impacts on biological resources "will not be discussed in the EIR" because mitigation proposed in the Initial Study would reduce impacts to less than significant. CDFW recommends the PEIR provide a discussion of the Project's impact on biological resources that takes into account the Project's potential impacts on streams (see Comment #1). An environmental document should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).

3. Development and Conservation. To accommodate increased housing needs, the City is expected to build more units in the coming years. CDFW recommends the City maximize development where it already exists to protect natural lands from development and habitat loss. CDFW recommends the City consider regional and State-wide natural resource conservation strategies outlined in the following reports: Safeguarding California Plan: 2018 Update (CNRA 2018); California State Wildlife Action Plan: A Conservation Legacy for Californians (CDFW 2015); and, California 2030 Natural and Working Lands Climate Change Implementation Plan: January 2019 Draft (CalEPA et al. 2019).

General Comments

1) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document "shall describe feasible measures which could mitigate for impacts below a significant level under CEQA."

   a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). A public agency "shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures" (Pub. Resources Code, § 21081.6). CDFW recommends that the City provide mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.

   b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by a project as proposed, an environmental document should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, an environmental document should provide an adequate, complete, and detailed disclosure about a project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

2) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to a project site and where a project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. An impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to California Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. An environmental document should include the following information:

   a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. An environmental document should include measures to fully avoid and otherwise protect Sensitive Natural Communities. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the Vegetation Classification and Mapping Program - Natural Communities webpage (CDFW 2021b);

   b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). Adjoining habitat areas should be included where a project's construction and activities could lead to direct or indirect impacts off site;

   c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a project site and within the neighboring vicinity. The Manual of California Vegetation (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where a project's construction and activities could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;

   d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a project. CDFW's California Natural Diversity Database (CNDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFW 2021c). An assessment should include a nine-quadrangle search of the CNDDB to determine a list of species potentially present at a project site. A lack of records in the CNDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in the project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];

   e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species within a project site and area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code,

§§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of a project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's Survey and Monitoring Protocols and Guidelines for established survey protocol for select species (CDFW 2021d). Acceptable species-specific survey procedures may be developed in consultation with CDFW and USFWS; and,

f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of a proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases.

3) Biological Direct, Indirect, and Cumulative Impacts. The PEIR should provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The PEIR should address the following:

a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully analyzed and discussed in the PEIR;

b) A discussion of both the short-term and long-term effects of the Project to species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted [CEQA Guidelines, § 15126.2(a)];

c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;

d) A discussion of Project-related changes on drainage patterns; the volume, velocity, and frequency of existing and post-project surface flows, polluted runoff, soil erosion and/or sedimentation in streams and water bodies, and post-project fate of runoff from the project site. The discussion should also address the potential water extraction activities and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included;

e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the PEIR; and,

f) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities. If the City determines that the Project would not have a cumulative impact, the PEIR should indicate why the cumulative impact is not significant. The City's determination be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].

4) Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, CDFW recommends the following information be included in the PEIR:

a) A complete discussion of the purpose and need for, and description of the proposed Project;

b) Pursuant to CEQA Guidelines section 15126.6(a), an environmental document "shall describe a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project." CEQA Guidelines section 15126.6(f)(2) states if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include reasons in the environmental document; and,

c) A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. CDFW recommends the City consider configuring the Project's potential development footprint in such a way as to fully avoid impacts to sensitive and special status plants and wildlife species, habitat, and sensitive vegetation communities. CDFW also recommends the City consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future development. As a general rule, CDFW recommends reducing or clustering the development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The EIR "shall" include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).

d) Where the Project may impact aquatic and riparian resources, CDFW recommends the City consider alternatives that would fully avoid impacts to such resources. CDFW also recommends alternatives that would allow not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and vegetation communities. Project-related designs should consider elevated crossings to avoid channelizing or narrowing of streams. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the stream to alter its course of flow.

5) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting CNDDB Field Survey Forms (CDFW 2021e). The City should ensure data collected for the preparation of environmental documents be properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.

6) Use of Native Plants and Trees. CDFW strongly recommends avoiding non-native, invasive plants for landscaping and restoration, particularly any species listed as 'Moderate' or 'High' by the California Invasive Plant Council (Cal-IPC 2021). CDFW supports the use of native species found in naturally occurring vegetation communities within or adjacent to a project site. Where a project may need to replant trees, CDFW supports planting species of trees and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds.

7) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity and development will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a Consistency Determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

8) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of removing an individual from a project site and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.

9) Compensatory Mitigation. An environmental document should include mitigation measures for adverse project-related direct or indirect impacts to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project-related impacts. For unavoidable impacts, on-site habitat restoration or

enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

10) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, an environmental document should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

Conclusion

We appreciate the opportunity to comment on the NOP for the City of Claremont Housing Element Update to assist the City in identifying and mitigating for the Project's potential impacts on biological resources. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist (Specialist), at (562) 619-2230 or Ruby.Kwan-Davis@wildlife.ca.gov

Sincerely,

DocuSigned by:
B6E58CFE24724F5...

Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW
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References:

[Cal-IPC] California Invasive Plant Council. 2021. The Cal-IPC Inventory. Available from: https://www.cal-ipc.org/plants/inventory/

[CDFWa] California Department of Fish and Wildlife. 2021. Lake and Streambed Alteration Program. Available from: https://wildlife.ca.gov/Conservation/LSA

[CDFWb] California Department of Fish and Wildlife. 2021. Natural Communities. Accessed at: https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities.

[CDFWc] California Department of Fish and Wildlife. 2021. California Natural Diversity Database. Available from: https://wildlife.ca.gov/Data/CNDDB

[CDFWd] California Department of Fish and Wildlife. 2021. Survey and Monitoring Protocols and Guidelines. Available from: https://wildlife.ca.gov/conservation/survey-protocols

[CDFWe] California Department of Fish and Wildlife. 2021. Submitting Data to the CNDDB. Available from: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data

[CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Accessed at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline

[CDFW] California Department of Fish and Wildlife. 2015. SWAP Final 2015 Document. Available from: https://wildlife.ca.gov/SWAP/Final

[Cal EPA] California Environmental Protection Agency, California Natural Resources agency, California Department of Food and Agriculture, California Air Resources Board, and California Strategic Growth Council. 2019. Draft California 2030 Natural and Working Lands Climate Change Implementation Plan. Available from: https://ww2.arb.ca.gov/resources/documents/nwl-implementation-draft

[CNRA] California Natural Resources Agency. 2018. Safeguarding California Plan: 2018 Update. California's Climate Adaptation Strategy. Available from: https://files.resources.ca.gov/climate/safeguarding/

Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe. 1979. Classification of wetlands and deepwater habitats of the United States. U.S. Fish and Wildlife Service. FWS/OBS-79/31. Washington, DC.

Sawyer, J. O., Keeler-Wolf, T., and J.M. Evens. 2009. A Manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.

[USFWS] United States Fish and Wildlife Service. 2021. Wetlands Mapper. [Accessed 12 October 2021]. Available from: https://www.fws.gov/wetlands/data/mapper.html.

From: Jim Keith <jim.keith9@verizon.net>
Sent: Wednesday, October 20, 2021 10:22 AM
To: Housing Element <housingelement@ci.claremont.ca.us>; Brad Johnson <bjohnson@ci.claremont.ca.us>
Subject: Violation of the VSSP In the Housing Element Proposed On 9/29/21

One of the questions asked by the consultants at the public Scoping Meeting for the Housing Element on September 29th was:

- Does the Housing Element "Align with other city plans"?

As I stated in public comment at that meeting, the answer is "No". The proposed housing element violates the new Village South Specific Plan (VSSP), which was unanimously approved by the City Council on July 27th. That was just eleven weeks prior to the Scoping Meeting. That VSSP plan contains restrictions on building height and massing in the "Neighborhood-Scale Overlay" areas of Village South. That area and those restrictions are shown in Section 3.6 (pages #88 and #89) of the VSSP. Those pages are attached to this email.

The draft Housing Element now proposed densities of 57 units/acre on all properties that line Indian Hill Blvd. and Arrow Highway that are within Blocks E, F, G, and H of the Specific Plan. It is impossible to create that density of 57 units/acre within the building height limitations and placement shown in Figure 3.6-111 in the attachment. If the public wants to visualize what the proposed 57 units/acre would look like, they can see the four-story buildings that are being constructed in Pomona near the corner of Bonita and Garey. They will be shocked that the City of Claremont is again proposing that type of density along the sides of Indian Hill and Arrow Highway, in violation of the approved VSSP.

The staff is well aware of the height limitations on buildings along these major roads through Village South and northwards to the rest of the Village. They did special sight-line studies, and made sure that the tall buildings in Village South in the north-west corner would not be seen while driving into Claremont. The idea that 4 to 5 story buildings are now being proposed in the Housing Element to line both sides of the Indian Hill approach to the Village is frankly astounding, and is a repudiation of over four years of work by community members, consultants, and staff that led to creating an attractive Village South approach that is consistent with the scale of other portions of the village.

I ask that the consultants determine the maximum number of units/acre that are consistent with the 2 to 3 story building height limitations shown in Figure 3.6-111. The overall unit density must also take into account room for parking in a nearby property as well, whereas the plan shows 57 units/acre on all properties. Based on the list of properties on pages 103, 104, and 105 of the Housing Element proposal, the density will have to be cut for all of the nine properties in Area 8, both of the properties in Area 9, and the 75-foot-deep portion of properties in sections E and F of Area 10.

This is a major issue. The proposed Housing Element must be corrected before the plan is brought to the Planning Commission.

- Jim Keith

From: jpjaffe@aol.com
To: bjohnson@ci.claremont.ca.us <bjohnson@ci.claremont.ca.us>
Sent: Wed, Sep 8, 2021 4:51 pm
Subject: update

Hi, Brad-
I hope this finds you well!
Please, I hope you will take a moment to update me regarding the items below-- and anything else new that I should know.

Where we left off is, soon after the Commons appeal to the City Council last May, we discussed (again) my requests:

1. That Claremont initiate adoption of an airport land use compatibility plan. The 2015 Cable Airport Land Use Compatibility Plan fully studied and included Claremont in every way necessary-- except that Claremont is not in Upland's or San Bernardino County's jurisdiction.

Bruce Durbin, Supervising Regional Planner for the LACounty Airport Land Use Commission, stated at a City of Claremont public hearing that LA County could adopt the existing 2015 Cable Airport Land Use Compatibility Plan for the LA County portion of the Cable Airport Influence Area.

2. Confirmation that meanwhile, given Bruce Durbin's statement at the public hearing, Claremont and the LACo ALUC would now find that "The commission is making substantial progress toward the completion of the airport land use compatibility plan." (per PUC Section 21675.1 (c)(1).

This would mean that, until adoption of an airport land use compatibility plan for Claremont, for projects submitted in Claremont's Cable Airport Influence Area, there would be full LA County ALUC Commission review, hearing, and recommendation-- and subsequent required findings and 2/3 Council majority.

3. Full inclusion of the PUC aeronautic code constraints for the Cable Airport Influence Area in the revised Housing Element and in the revised Public Safety and Noise Element.

4. Joint effort by Claremont and Upland to pursue appropriate and coordinated development of the undeveloped site in the Cable Airport Influence Area. It had been suggested as beginning with a meeting of the two cities' Community Development Directors and mayors.

I sincerely appreciate your attention to my concerns, knowing how busy you are with pressing projects. I will be speaking with the mayor, too, which I will do best if I am properly informed.

Thank you, as always, for your kind service, and wishing you well! -- Jennifer Jaffe

From: Bob Gerecke <gerecke@surfside.net>
Sent: Wednesday, October 6, 2021 8:29 PM
To: Brad Johnson <bjohnson@ci.claremont.ca.us>; Housing Element <housingelement@ci.claremont.ca.us>
Cc: Sal Medina <smedina@ci.claremont.ca.us>
Subject: HOUSING ELEMENT - GENERAL COMMENT

The draft Housing Element is on the wrong track in two respects.

First, it emphasizes the construction of large developments, each with hundreds of units, which will change the character and ambience of our city and will separate the developments' occupants into their own cocoons. Neighbors in nearby single-family homes will resent these hulks and, by association, possibly the people who live there. If so, the feeling will be mutual. This will be a socially unhealthy environment.

Second, it concentrates most of these large buildings around our Village. This will make the Village less charming and attractive to out-of-town shoppers and diners, on whom we depend for business and tax revenues. Customers choose Claremont because it's different. If it feels less different, it will be less desirable to them. Some will go elsewhere to spend their money, and our loss of them probably won't be offset by repetitive spending from residents in the developments. We already expect competition from more than a million square feet of commercial development planned in North Montclair, and the competing old-fashioned downtowns of La Verne and Upland aren't far away, either. We can't afford to risk degrading the image of our Village.

I grew up in a small New Jersey suburb. Duplexes, triplexes and quadplexes were scattered among the single-family homes. With affordably small units, these plexes didn't loom over their neighborhoods. The largest were no larger than many of our City's homes. Their residents were part of their neighborhoods, as sociable as it was in their personality to be. This remains my image of how a small town can supply affordable housing without losing its soul.

Bob Gerecke

Hi, Brad,

The Housing and Safety Elements should both incorporate the Cable Airport Land Use Compatibility Plan, as it pertains to both. The California Airport Land Use Planning Handbook recommends that cities adopt airport land use compatibility plans for nearby airports, and the Cable Plan specifically requested that Claremont do so for Cable. They both offered incorporation in the city's General Plan as an easy method.

Take care.

Bob Gerecke

The concentration of large buildings around our traditional small-town Village shopping district will degrade its **AESTHETICS** by changing its character from suburban to a motley mix of urban with suburban and by partially blocking the views in several directions, thereby creating a sense of being closed in rather than open.

The concentration of hundreds of housing units within a small area of our town will impact the **AIR QUALITY** of that area because of the increased vehicular traffic from owned and ride-hailed vehicles, especially the latter, which make more trips (i.e., before and after the actual transport) than owned vehicles do. Parking insufficiency planned because of nearby public transit will cause a shift from owned to ride-hailed vehicles which make more trips, thereby increasing **GREENHOUSE GAS EMISSIONS**.

Construction of multiple buildings on contaminated land south of the RR tracks will release **HAZARDOUS MATERIALS**.

The cluster of large buildings around the Village will directly induce substantial **POPULATION** growth in this limited area.

The population cluster around the Village will overload its tiny nearby **RECREATION** areas and create a demand for additional recreation spaces.

It will also increase **TRAFFIC**, causing congestion and parking overload in and around the Village. Enforced use of ride-hailing services will double the amount of traffic that would have been experienced from owned vehicles. Emergency vehicles will be impeded.

The proposed concentration of population will overload the **UTILITIES AND SERVICE SYSTEMS** in the immediate area.

All of these impacts can be mitigated by spreading our housing more widely around our city. Similar adverse impacts can be avoided throughout our city by building small developments rather than large ones.

Bob Gerecke

Appendix B

Claremont Housing Opportunity Sites

Site ID	APN	Site Address	APN / Site Address	UseType	Year Built	Existing Land Use	General Plan Land Use	Current Zoning	Current Zone Description	Current Zone Dwellings Per Acre	Proposed Zone Code	Proposed Zone Description	Proposed Density (DU/Acre)	Lot Acerage	Lot Acres Adjusted	Anticipated Dwelling Units	Income Level Supported	Lower Income Units	Moderate Income Units	Above Moderate Income Units	*Dwelling Unit Total (QC)*	*Delta (QC)*	Status
1	8315-013-016	735 S MILLS AVE	8315-013-016 735 S MILLS AVE	Institutional	1962	Religious Facilities	CH	CP	Commercial Professional	21	MFR 30/acre	MFR 30/acre	30	1.88	1.88	**56**	Lower Income	29	10	18	*56*	-	Non-Vacant
2	8315-029-011	616 SYCAMORE AVE	8315-029-011 616 SYCAMORE AVE	Institutional	1958	Religious Facilities	CH	RS 8,000	Residential Single-Family Min Lot Size 8,000 sqft	13	RM 2,000	Residential Multi-Family Min Lot Size 2,000 sqft	21	0.92	0.92	**19**	Moderate Income	-	8	11	*19*	-	Non-Vacant
3	8315-009-037	630 S INDIAN HILL BLVD	8315-009-037 630 S INDIAN HILL BLVD	Commercial	1945	General Office Use	OP	CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	0.63	0.63	**18**	Lower Income	9	3	6	*18*	-	Non-Vacant
3	8315-009-036	600 S INDIAN HILL BLVD	8315-009-036 600 S INDIAN HILL BLVD	Commercial	1979	General Office Use	OP	CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	0.81	0.81	**24**	Lower Income	12	4	8	*24*	-	Non-Vacant
3	8315-009-043	638 S INDIAN HILL BLVD	8315-009-043 638 S INDIAN HILL BLVD	Institutional	1948	Public Facilities	OP	CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	1.31	1.31	**39**	Lower Income	20	7	12	*39*	-	Non-Vacant
4	8315-008-051	509 S COLLEGE AVE	8315-008-051 509 S COLLEGE AVE	Institutional	1959	Religious Facilities	CH	RS 8,000	Residential Single-Family Min Lot Size 8,000 sqft	13	RM 4000	Residential Multi-Family Min Lot/Unit Area 4,000 sqft	10.89	2.67	1.37	**14**	Above Moderate Income	-	-	14	*14*	-	Non-Vacant
6	8316-001-005	323 S INDIAN HILL BLVD	8316-001-005 323 S INDIAN HILL BLVD	Commercial	1981	General Office Use	OP	CP	Commercial Professional	21	MU 60/acre	MU 60/acre	60	0.16	0.16	**9**	Lower Income	5	2	3	*9*	-	Non-Vacant
6	8316-001-004	424 W ARROW HWY	8316-001-004 424 W ARROW HWY	Commercial	1941	Retail Stores and Commercial Services	OP	CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	0.28	0.28	**8**	Lower Income	4	1	3	*16*	-	Non-Vacant
7	8313-007-009	525 W ARROW HWY BLDG 1	8313-007-009 525 W ARROW HWY BLDG 1	Industrial	1978	Industrial	BP	B-IP	Business - Industrial Park	0	MU 30/acre	MU 30/acre	30	2.22	2.22	**66**	Lower Income	34	11	21	*66*	-	Non-Vacant
8	8313-025-013	254 S INDIAN HILL BLVD	8313-025-013 254 S INDIAN HILL BLVD	Residential	1953	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.18	0.18	**10**	Lower Income	5	2	3	*10*	-	Non-Vacant
8	8313-025-019	-	8313-025-019 -	Commercial	-	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.18	0.18	**10**	Lower Income	5	2	3	*10*	-	Vacant
8	8313-025-012	258 S INDIAN HILL BLVD	8313-025-012 258 S INDIAN HILL BLVD	Residential	-	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.37	0.37	**21**	Lower Income	11	4	7	*21*	-	Vacant
8	8313-025-014	250 S INDIAN HILL BLVD	8313-025-014 250 S INDIAN HILL BLVD	Residential	1953	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.19	0.19	**10**	Lower Income	5	2	3	*10*	-	Non-Vacant
8	8313-025-023	220 S INDIAN HILL BLVD	8313-025-023 220 S INDIAN HILL BLVD	Commercial	1979	General Office Use	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.37	0.37	**21**	Lower Income	11	4	7	*21*	-	Non-Vacant
8	8313-025-015	240 S INDIAN HILL BLVD	8313-025-015 240 S INDIAN HILL BLVD	Residential	1948	Single Family Residential	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.18	0.18	**10**	Lower Income	5	2	3	*10*	-	Non-Vacant
8	8313-025-011	313 W ARROW HWY	8313-025-011 313 W ARROW HWY	Residential	-	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.22	0.22	**12**	Lower Income	6	2	4	*12*	-	Vacant
8	8313-025-020	212 S INDIAN HILL BLVD	8313-025-020 212 S INDIAN HILL BLVD	Commercial	1975	General Office Use	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.19	0.19	**10**	Lower Income	5	2	3	*10*	-	Non-Vacant
8	8313-025-016	230 S INDIAN HILL BLVD	8313-025-016 230 S INDIAN HILL BLVD	Residential	1952	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.18	0.18	**10**	Lower Income	5	2	3	*10*	-	Non-Vacant
9	8313-024-008	194 S INDIAN HILL BLVD	8313-024-008 194 S INDIAN HILL BLVD	Residential	1930		OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.18	0.18	**10**	Lower Income	5	2	3	*10*	-	Non-Vacant
9	8313-024-009	188 S INDIAN HILL BLVD	8313-024-009 188 S INDIAN HILL BLVD	Residential	1917	Single Family Residential	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.12	0.12	**6**	Lower Income	3	1	2	*6*	-	Non-Vacant
10	8313-008-003	177 S INDIAN HILL BLVD	8313-008-003 177 S INDIAN HILL BLVD	Industrial	1956		BP	B-IP	Business - Industrial Park	0	VSSP	Village South Specific Plan	57	0.55	0.55	**31**	Lower Income	16	5	10	*31*	-	Non-Vacant
10	8313-008-006	232 BUCKNELL AVE	8313-008-006 232 BUCKNELL AVE	Residential	1920	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.19	0.19	**11**	Lower Income	6	2	4	*11*	-	Vacant
10	8313-008-014	445 W ARROW HWY	8313-008-014 445 W ARROW HWY	Residential	1932	Single Family Residential	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.14	0.14	**8**	Lower Income	4	1	3	*8*	-	Non-Vacant
10	8313-008-009	260 BUCKNELL AVE	8313-008-009 260 BUCKNELL AVE	Residential	1947	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.22	0.22	**12**	Lower Income	6	2	4	*12*	-	Non-Vacant
10	8313-008-010	471 W ARROW HWY	8313-008-010 471 W ARROW HWY	Residential	1930	Single Family Residential	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.20	0.20	**11**	Lower Income	6	2	4	*11*	-	Non-Vacant
10	8313-008-028	121 S INDIAN HILL BLVD	8313-008-028 121 S INDIAN HILL BLVD	Industrial	1928	Manufacturing, Assembly, and Industrial Services	BP	B-IP	Business - Industrial Park	0	VSSP	Village South Specific Plan	57	3.66	3.66	**208**	Lower Income	106	35	67	*208*	-	Non-Vacant
10	8313-008-025	205 S INDIAN HILL BLVD	8313-008-025 205 S INDIAN HILL BLVD	Commercial	1964	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	1.17	1.17	**66**	Lower Income	34	11	21	*66*	-	Vacant
10	8313-008-004	191 S INDIAN HILL BLVD	8313-008-004 191 S INDIAN HILL BLVD	Commercial	1959	Retail Stores and Commercial Services	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	2.45	2.45	**139**	Lower Income	71	24	44	*139*	-	Non-Vacant
10	8313-008-019	259 S INDIAN HILL BLVD	8313-008-019 259 S INDIAN HILL BLVD	Commercial	1945	Retail Stores and Commercial Services	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	0.24	0.24	**13**	Lower Income	7	2	4	*13*	-	Non-Vacant
10	8313-008-020	267 S INDIAN HILL BLVD	8313-008-020 267 S INDIAN HILL BLVD	Commercial	1974	Retail Stores and Commercial Services	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	0.33	0.33	**18**	Lower Income	9	3	6	*18*	-	Non-Vacant
10	8313-008-011	469 W ARROW HWY	8313-008-011 469 W ARROW HWY	Commercial	-	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.42	0.42	**23**	Lower Income	12	4	7	*23*	-	Vacant
10	8313-008-031	433 W ARROW HWY	8313-008-031 433 W ARROW HWY	Commercial	1931	Major Medical Health Care Facilities	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.21	0.21	**12**	Lower Income	6	2	4	*12*	-	Non-Vacant
10	8313-008-027	-	8313-008-027 -	Commercial	-	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.16	0.16	**9**	Lower Income	5	2	3	*9*	-	Vacant
10	8313-008-024	203 S INDIAN HILL BLVD	8313-008-024 203 S INDIAN HILL BLVD	Commercial	1971	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	0.46	0.46	**26**	Lower Income	13	4	8	*26*	-	Vacant
10	8313-008-021	-	8313-008-021 -	Commercial	-	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	0.19	0.19	**10**	Lower Income	5	2	3	*10*	-	Vacant
10	8313-008-015	449 W ARROW HWY	8313-008-015 449 W ARROW HWY	Residential	1940	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.19	0.19	**10**	Lower Income	5	2	3	*10*	-	Non-Vacant
10	8313-008-900	451 W ARROW HWY	8313-008-900 451 W ARROW HWY	Residential	-	Vacant Undifferentiated	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	1.41	1.41	**80**	Lower Income	41	14	26	*80*	-	Vacant
10	8313-008-018	253 S INDIAN HILL BLVD	8313-008-018 253 S INDIAN HILL BLVD	Residential	1925	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	0.24	0.24	**13**	Lower Income	7	2	4	*13*	-	Vacant
10	8313-008-023	180 BUCKNELL AVE	8313-008-023 180 BUCKNELL AVE	Industrial	1956	Manufacturing, Assembly, and Industrial Services	BP	B-IP	Business - Industrial Park	0	VSSP	Village South Specific Plan	57	0.73	0.73	**41**	Lower Income	21	7	13	*41*	-	Non-Vacant
10	8313-008-007	244 BUCKNELL AVE	8313-008-007 244 BUCKNELL AVE	Residential	1958	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	OP	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	0.15	0.15	**8**	Lower Income	4	1	3	*8*	-	Non-Vacant
10	8313-008-026	204 BUCKNELL AVE	8313-008-026 204 BUCKNELL AVE	Industrial	1959	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	0.82	0.82	**46**	Lower Income	23	8	15	*46*	-	Vacant
10	8313-008-017	241 S INDIAN HILL BLVD	8313-008-017 241 S INDIAN HILL BLVD	Residential	1949	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	0.24	0.24	**13**	Lower Income	7	2	4	*13*	-	Vacant
10	8313-008-016	233 S INDIAN HILL BLVD	8313-008-016 233 S INDIAN HILL BLVD	Commercial	1922	Vacant Undifferentiated	C	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	0.25	0.25	**14**	Lower Income	7	2	4	*14*	-	Vacant
11	8313-023-012	189 EL CAMINO WAY	8313-023-012 189 EL CAMINO WAY	Residential	1954		R22	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 60/acre	MFR 60/acre	60	0.16	0.16	**7**	Lower Income	4	1	2	*7*	-	Non-Vacant
11	8313-023-015	165 EL CAMINO WAY	8313-023-015 165 EL CAMINO WAY	Residential	1956		R22	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 60/acre	MFR 60/acre	60	0.17	0.17	**7**	Lower Income	4	1	2	*7*	-	Non-Vacant
11	8313-023-023	195 EL CAMINO WAY	8313-023-023 195 EL CAMINO WAY	Residential	1954	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	R22	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 60/acre	MFR 60/acre	60	0.17	0.17	**7**	Lower Income	4	1	2	*7*	-	Non-Vacant
11	8313-023-019	108 OLIVE ST	8313-023-019 108 OLIVE ST	Industrial	1960	General Office Use	MU	MU2	Mixed Use 2 - College Avenue/South Village Transit-Oriented Mixed Use District	21	MFR 60/acre	MFR 60/acre	60	0.40	0.40	**17**	Lower Income	9	3	5	*17*	-	Non-Vacant

12	8313-021-011	100 W 1ST ST	8313-021-011 100 W 1ST ST	Commercial	1981	Public Parking Facilities	CV	CV	Commercial Village	0	MU 60/acre	MU 60/acre	60	0.68	0.68	**30**	Lower Income	15	5	10	*30*	-	Non-Vacant
13	8313-021-007	250 W 1ST ST	8313-021-007 250 W 1ST ST	Commercial	1981	General Office Use	CV	CV	Commercial Village	0	MU 60/acre	MU 60/acre	60	2.80	0.64	**29**	Lower Income	15	5	9	*29*	-	Non-Vacant
14	8314-017-900	-	8314-017-900 -	Government	-	Airports	MU	MU2	Mixed Use 2 - College Avenue/South Village Transit-Oriented Mixed Use District	54	MFR 60/acre	MFR 60/acre	60	6.13	4.08	**183**	Lower Income	93	31	59	*183*	-	Non-Vacant
15	8313-006-036	830 W BONITA AVE	8313-006-036 830 W BONITA AVE	Institutional	1970	Religious Facilities	R15	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MU 30/acre	MU 30/acre	30	3.19	1.43	**42**	Lower Income	21	7	13	*42*	-	Non-Vacant
16	8313-006-003	660 W BONITA AVE	8313-006-003 660 W BONITA AVE	Residential	1963	Low-Rise Apartments, Condominiums, and Townhouses	R15	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 60/acre	MFR 60/acre	60	8.39	0.82	**36**	Lower Income	18	6	12	*36*	-	Non-Vacant
17	8313-011-004	524 W BONITA AVE	8313-011-004 524 W BONITA AVE	Residential	1992		CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.18	0.18	**3**	Moderate Income	-	1	2	*3*	-	Non-Vacant
17	8313-011-006	538 W BONITA AVE	8313-011-006 538 W BONITA AVE	Residential	1959		CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.17	0.17	**3**	Moderate Income	-	1	2	*3*	-	Non-Vacant
17	8313-011-019	140 CORNELL AVE	8313-011-019 140 CORNELL AVE	Residential	1961		CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	MX	60	0.20	0.20	**11**	Lower Income	6	2	4	*11*	-	Non-Vacant
17	8313-011-001	245 OBERLIN AVE	8313-011-001 245 OBERLIN AVE	Residential	1954		CV	SP8	Specific Plan Area 8 - Village Expansion	62	RMX	RMX	20	0.19	0.19	**3**	Moderate Income	-	1	2	*3*	-	Non-Vacant
17	8313-011-016	127 OBERLIN AVE	8313-011-016 127 OBERLIN AVE	Commercial	-		CV	SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	1.66	1.66	**99**	Lower Income	50	17	32	*99*	-	Vacant
17	8313-011-021	150 CORNELL AVE	8313-011-021 150 CORNELL AVE	Residential	-		CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	MX	60	0.21	0.21	**12**	Lower Income	6	2	4	*12*	-	Vacant
17	8313-011-018	136 CORNELL AVE	8313-011-018 136 CORNELL AVE	Residential	1930	Single Family Residential	CV	SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	0.10	0.10	**6**	Lower Income	3	1	2	*6*	-	Non-Vacant
17	8313-011-017	130 CORNELL AVE	8313-011-017 130 CORNELL AVE	Residential	1922	Single Family Residential	CV	SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	0.10	0.10	**6**	Lower Income	3	1	2	*6*	-	Non-Vacant
17	8313-011-007	550 W BONITA AVE	8313-011-007 550 W BONITA AVE	Residential	1934	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.26	0.26	**5**	Moderate Income	-	2	3	*5*	-	Non-Vacant
17	8313-011-026	214 CORNELL AVE	8313-011-026 214 CORNELL AVE	Residential	1930	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.32	0.32	**6**	Moderate Income	-	3	3	*6*	-	Non-Vacant
17	8313-011-024	205 OBERLIN AVE	8313-011-024 205 OBERLIN AVE	Residential	1964	Low-Rise Apartments, Condominiums, and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.31	0.31	**6**	Moderate Income	-	3	3	*6*	-	Non-Vacant
17	8313-011-002	516 W BONITA AVE	8313-011-002 516 W BONITA AVE	Residential	1932	Single Family Residential	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.13	0.13	**2**	Moderate Income	-	1	1	*2*	-	Non-Vacant
17	8313-011-020	148 CORNELL AVE	8313-011-020 148 CORNELL AVE	Residential	1907	Single Family Residential	CV	SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	0.21	0.21	**12**	Lower Income	6	2	4	*12*	-	Non-Vacant
17	8313-011-005	528 W BONITA AVE	8313-011-005 528 W BONITA AVE	Residential	1959	Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.18	0.18	**3**	Moderate Income	-	1	2	*3*	-	Non-Vacant
18	8313-012-019	216 OBERLIN AVE	8313-012-019 216 OBERLIN AVE	Residential	1910		CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.09	0.09	**1**	Moderate Income	-	0	1	*1*	-	Non-Vacant
18	8313-012-038	-	8313-012-038 -	Government	-		CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.05	0.05	**-**	Moderate Income	-	-	-	-	-	Vacant
18	8313-012-018	210 OBERLIN AVE	8313-012-018 210 OBERLIN AVE	Residential	1930		CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.09	0.09	**1**	Moderate Income	-	0	1	*1*	-	Non-Vacant
18	8313-012-004	219 N INDIAN HILL BLVD	8313-012-004 219 N INDIAN HILL BLVD	Commercial	1966		CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.25	0.25	**4**	Moderate Income	-	2	2	*4*	-	Non-Vacant
18	8313-012-003	432 W BONITA AVE	8313-012-003 432 W BONITA AVE	Commercial	1969	Public Parking Facilities	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.18	0.18	**3**	Moderate Income	-	1	2	*3*	-	Non-Vacant
18	8313-012-001	408 W BONITA AVE	8313-012-001 408 W BONITA AVE	Residential	1908	Low-Rise Apartments, Condominiums, and Townhouses	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.23	0.23	**4**	Moderate Income	-	2	2	*4*	-	Non-Vacant
18	8313-012-002	231 N INDIAN HILL BLVD	8313-012-002 231 N INDIAN HILL BLVD	Commercial	1969	General Office Use	CV	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	0.23	0.23	**4**	Moderate Income	-	2	2	*4*	-	Non-Vacant
19	8313-013-800	-	8313-013-800 -	Government	-		R15	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sqft	30	0.44	0.44	**13**	Lower Income	7	2	4	*13*	-	Non-Vacant
20	8314-010-012	-	8314-010-012 -	Residential	-		R15	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	0.17	0.17	**1**	Above Moderate Income	-	-	1	*1*	-	Vacant
20	8314-010-011	242 BROOKS AVE	8314-010-011 242 BROOKS AVE	Residential	1948		R15	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	0.17	0.17	**1**	Above Moderate Income	-	-	1	*1*	-	Non-Vacant
20	8314-010-013	-	8314-010-013 -	Residential	-		R15	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	0.35	0.35	**2**	Above Moderate Income	-	-	2	*2*	-	Vacant
20	8314-010-009	230 BROOKS AVE	8314-010-009 230 BROOKS AVE	Residential	1947		R15	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	0.34	0.34	**2**	Above Moderate Income	-	-	2	*2*	-	Non-Vacant
20	8314-010-010	236 BROOKS AVE	8314-010-010 236 BROOKS AVE	Residential	1912	Single Family Residential	R15	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	0.34	0.34	**2**	Above Moderate Income	-	-	2	*2*	-	Non-Vacant
20	8314-010-015	-	8314-010-015 -	Residential	-	Vacant Undifferentiated	R15	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	0.17	0.17	**1**	Above Moderate Income	-	-	1	*1*	-	Vacant
21	8310-019-015	701 HARRISON AVE	8310-019-015 701 HARRISON AVE	Institutional	1970	Religious Facilities	CH	IR	Institution Residential	0	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sqft	30	1.24	0.57	**17**	Lower Income	9	3	5	*17*	-	Non-Vacant
22	8310-019-013	731 HARRISON AVE	8310-019-013 731 HARRISON AVE	Residential	-		CH	IR	Institution Residential	0	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sqft	30	0.55	0.55	**16**	Lower Income	8	3	5	*16*	-	Vacant
22	8310-019-016	-	8310-019-016 -	Residential	-	Vacant Undifferentiated	CH	IR	Institution Residential	0	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sqft	30	0.23	0.23	**6**	Lower Income	3	1	2	*6*	-	Vacant
23	8311-001-016	1030 W FOOTHILL BLVD	8311-001-016 1030 W FOOTHILL BLVD	Commercial	1972		MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	40	3.28	3.28	**131**	Lower Income	65	22	43	*49*	-	Non-Vacant
23	8311-006-021	984 W FOOTHILL BLVD	8311-006-021 984 W FOOTHILL BLVD	Commercial	1950		MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	1.00	1.00	**15**	Moderate Income	-	6	9	*15*	-	Non-Vacant
23	8311-006-002	970 W FOOTHILL BLVD	8311-006-002 970 W FOOTHILL BLVD	Commercial	1977		MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	0.20	0.20	**3**	Moderate Income	-	1	2	*3*	-	Non-Vacant
23	8311-001-020	1020 W FOOTHILL BLVD	8311-001-020 1020 W FOOTHILL BLVD	Commercial	1978	General Office Use	MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	0.67	0.68	**10**	Moderate Income	-	4	6	*10*	-	Non-Vacant
23	8311-006-013	956 W FOOTHILL BLVD	8311-006-013 956 W FOOTHILL BLVD	Commercial	1968	Retail Stores and Commercial Services	MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	1.14	1.14	**17**	Moderate Income	-	7	10	*17*	-	Non-Vacant
23	8311-006-022	994 W FOOTHILL BLVD	8311-006-022 994 W FOOTHILL BLVD	Commercial	1950	Retail Centers (Non-Strip With Contiguous Interconnected Off-Street Parking)	MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	0.60	0.60	**8**	Moderate Income	-	3	5	*8*	-	Non-Vacant
24	8306-016-038	211 W FOOTHILL BLVD	8306-016-038 211 W FOOTHILL BLVD	Institutional	1962		CH	CP	Commercial Professional	21	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	6.97	0.86	**3**	Above Moderate Income	-	-	3	*3*	-	Non-Vacant
25	8303-024-015	817 W FOOTHILL BLVD	8303-024-015 817 W FOOTHILL BLVD	Commercial	1963		MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	0.10	0.27	**3**	Moderate Income	-	1	2	*3*	-	Non-Vacant
25	8303-024-016	831 W FOOTHILL BLVD	8303-024-016 831 W FOOTHILL BLVD	Commercial	1963		MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	0.12	0.12	**1**	Moderate Income	-	0	1	*1*	-	Non-Vacant
26	8303-024-018	863 W FOOTHILL BLVD	8303-024-018 863 W FOOTHILL BLVD	Commercial	1972		MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	0.45	0.45	**6**	Moderate Income	-	3	3	*6*	-	Non-Vacant
26	8303-024-019	855 W FOOTHILL BLVD	8303-024-019 855 W FOOTHILL BLVD	Commercial	1964	Retail Centers (Non-Strip With Contiguous Interconnected Off-Street Parking)	MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	0.49	0.49	**7**	Moderate Income	-	3	4	*7*	-	Non-Vacant

27	8303-025-022	915 W FOOTHILL BLVD	8303-025-022 915 W FOOTHILL BLVD	Commercial	1976		MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	0.65	0.65	**9**	Moderate Income	-	4	5	*9*	-	Non-Vacant
27	8303-025-015	921 W FOOTHILL BLVD	8303-025-015 921 W FOOTHILL BLVD	Commercial	1970		MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	0.59	0.59	**8**	Moderate Income	-	3	5	*8*	-	Non-Vacant
28	8303-025-017	981 W FOOTHILL BLVD	8303-025-017 981 W FOOTHILL BLVD	Commercial	1978		MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	0.58	0.58	**8**	Moderate Income	-	3	5	*8*	-	Non-Vacant
28	8303-025-018	985 W FOOTHILL BLVD	8303-025-018 985 W FOOTHILL BLVD	Commercial	1973		MU	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	1.01	1.01	**15**	Moderate Income	-	6	9	*15*	-	Non-Vacant
29	8305-016-007	601 W FOOTHILL BLVD	8305-016-007 601 W FOOTHILL BLVD	Commercial	1976		MU	SP10	Specific Plan Area 10	21	MU 30/acre	MU 30/acre	30	3.75	1.30	**39**	Lower Income	20	7	12	*39*	-	Non-Vacant
30	8305-020-002	-	8305-020-002 -	Commercial	1972	Retail Centers (Non-Strip With Contiguous Interconnected Off-Street Parking)	MU	SP9	Specific Plan Area 9 - Old School House/Claremont Inn	0	MU 30/acre	MU 30/acre	30	7.63	1.52	**45**	Lower Income	23	8	14	*45*	-	Non-Vacant
31	8303-026-011	1364 N TOWNE AVE	8303-026-011 1364 N TOWNE AVE	Institutional	1964		CH	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 30/acre	MFR 30/acre	30	1.89	1.89	**56**	Lower Income	29	10	18	*56*	-	Non-Vacant
31	8303-026-012	1350 N TOWNE AVE	8303-026-012 1350 N TOWNE AVE	Commercial	1965		MU	MU3	Mixed Use 3	37	MU3	Mixed Use 3	15	0.76	0.76	**11**	Moderate Income	-	5	6	*11*	-	Non-Vacant
32	8306-008-023	1550 N INDIAN HILL BLVD	8306-008-023 1550 N INDIAN HILL BLVD	Institutional	1959	Vacant	INSTN	IE	Institution Educational	0	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sqft	30	2.97	2.98	**89**	Lower Income	45	15	28	*89*	-	Vacant
32	8306-008-022	1575 N COLLEGE AVE	8306-008-022 1575 N COLLEGE AVE	Institutional	1951		INSTN	IE	Institution Educational	0	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sqft	30	4.37	4.37	**131**	Lower Income	67	22	42	*131*	-	Non-Vacant
33	8302-018-028	-	8302-018-028 -	Residential	-		PR	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	RS 10,000	RS 10,000	4	1.37	0.78	**3**	Above Moderate Income	-	-	3	*3*	-	Vacant
33	8302-018-027	-	8302-018-027 -	Residential	-		PR	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	RS 10,000	RS 10,000	4	1.43	0.68	**2**	Above Moderate Income	-	-	2	*2*	-	Vacant
33	8302-021-053	-	8302-021-053 -	Residential	-		PR	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	RS 10,000	RS 10,000	4	0.37	0.27	**1**	Above Moderate Income	-	-	1	*1*	-	Vacant
34	8307-002-041	-	8307-002-041 -	Residential	-	0	OS	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	RM 3000	Residential Multi-Family Min Lot/Unit Area 3,000 sqft	15	3.16	3.16	**47**	Moderate Income	-	20	27	*47*	-	Non-vacant
35	8302-032-025	-	8302-032-025 -	Residential	-		OS	SP5	Specific Plan Area 5 - Williams Ave	0	MFR 30/acre	MFR 30/acre	30	0.18	0.18	**5**	Lower Income	3	1	2	*5*	-	Non-Vacant
35	8302-032-900	-	8302-032-900 -	Residential	-		OS	P/RC	Park / Resource Conservation	0	MFR 30/acre	MFR 30/acre	30	2.14	2.14	**64**	Lower Income	33	11	20	*64*	-	Non-vacant
36	8670-008-025	2050 N INDIAN HILL BLVD	8670-008-025 2050 N INDIAN HILL BLVD	Institutional	1955	Religious Facilities	CH	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	MFR 30/acre	MFR 30/acre	30	3.27	2.25	**67**	Lower Income	34	11	21	*67*	-	Non-Vacant
37	8302-014-016	-	8302-014-016 -	Residential	-		P	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	MFR 30/acre	MFR 30/acre	30	0.46	0.46	**13**	Lower Income	7	2	4	*13*	-	Non-vacant
38	8670-010-025	431 W BASELINE RD	8670-010-025 431 W BASELINE RD	Commercial	1965		OP	CP	Commercial Professional	21	MFR 30/acre	MFR 30/acre	30	0.97	0.97	**28**	Lower Income	14	5	9	*28*	-	Non-Vacant
39	8670-003-900	2475 FORBES AVE	8670-003-900 2475 FORBES AVE	Institutional	-	Open Space and Recreation	PR	P	Public	0	MFR 30/acre	MFR 30/acre	30	9.67	9.67	**56**	Lower Income	28	10	18	*67*	*(12)*	Non-Vacant
40	8322-006-006	840 S INDIAN HILL BLVD	8322-006-006 840 S INDIAN HILL BLVD	Commercial	1975	Hotels and Motels	AC	CF	Freeway Commercial	0	MFR 30/acre	MFR 30/acre	30	2.85	2.85	**85**	Lower Income	43	14	27	*85*	-	-

Appendix C

Special-Status Species Tables

Special-Status Species with the Potential to Occur in the Regional Vicinity of the City

Scientific Name Common Name	Status	Habitat Requirements
Plants and Lichens		
Abronia villosa var. aurita chaparral sand-verbena	None/None G5T2?/S2 1B.1	Annual herb. Blooms Jan-Sept. Occurs in chaparral, coastal scrub. Sandy areas of the South Coast and Sonoran Desert Floristic Provinces. 80-1600m (260-5250ft).
Arctostaphylos glandulosa ssp. gabrielensis San Gabriel manzanita	None/None G5T3/S3 1B.2	Chaparral. Rocky outcrops; can be dominant shrub where it occurs. 595-1500m. Blooms Mar.
Astragalus brauntonii Braunton's milk-vetch	FE/None G2/S2 1B.1	Perennial herb. Blooms January to August. Closed-cone coniferous forest, chaparral, coast scrub, valley and foothill grassland. Recent burns or disturbed areas; in saline, somewhat alkaline soils high in Ca, Mg, with some K. Soil specialist; requires shallow soils to defeat pocket gophers and open areas, preferably on hilltops, saddles or bowls between hills. 200-650 m (655-2130 ft)
Atriplex coulteri Coulter's saltbush	None/None G3/S1S2 1B.2	Coastal bluff scrub, Coastal dunes, Coastal scrub, Valley and foothill grassland. alkaline or clay. 3-460 m. perennial herb. Blooms Mar-Oct
Berberis nevinii Nevin's barberry	FE/SE G1/S1 1B.1	Chaparral, Cismontane woodland, Coastal scrub, Riparian scrub. Gravelly (sometimes), Sandy (sometimes) 70-825m. Blooms (Feb)Mar-Jun.
Brodiaea filifolia thread-leaved brodiaea	FT/SE G2/S2 1B.1	Chaparral, Cismontane woodland, Coastal scrub, Playas, Valley and foothill grassland, Vernal pools. Clay (often) 25-1120m. Blooms Mar-Jun.
Calochortus clavatus var. *gracilis* slender mariposa lily	None/None G4T2T3/S2 S3 1B.2	Perennial bulbiferous herb. Blooms March to June. Chaparral, coastal scrub. Shaded foothill canyons; often on grassy slopes within other habitat. 420-760 m (1380-2495 ft)
Calochortus weedii var. *intermedius* intermediate mariposa lily	None/None G3G4T2/S3 1B.2	Chaparral, Coastal scrub, Valley and foothill grassland. Rocky 105-855m. Blooms May-Jul.
Calystegia felix lucky morning-glory	None/None G1Q/S1 1B.1	Meadows and seeps, Riparian scrub. Sometimes alkaline, alluvial. 30-215m. Blooms Mar-Sep.
Calystegia sepium ssp. *binghamiae* Santa Barbara morning-glory	None/None G5TXQ/SX 1A	Marshes and swamps. 5-5m. Blooms Aug.
Castilleja gleasoni Mt. Gleason paintbrush	None/SR G2/S2 1B.2	Chaparral, Lower montane coniferous forest, Pinyon and juniper woodland. Granitic 1160-2170m. Blooms May-Jun(Sep).
Centromadia pungens ssp. *laevis* smooth tarplant	None/None G3G4T2/S2 1B.1	Chenopod scrub, Meadows and seeps, Playas, Riparian woodland, Valley and foothill grassland. Alkaline 0-640m. Blooms Apr-Sep.
Chorizanthe parryi var. *parryi* Parry's spineflower	None/None G3T2/S2 1B.1	Chaparral, Cismontane woodland, Coastal scrub, Valley and foothill grassland. sandy or rocky, openings. 275-1220 m. annual herb. Blooms Apr-Jun
Cladium californicum California saw-grass	None/None G4/S2 2B.2	Marshes and swamps, Meadows and seeps. Freshwater or alkaline moist habitats. - 60-1600m. Blooms Jun-Sep.

Scientific Name Common Name	Status	Habitat Requirements
Claytonia peirsonii ssp. *peirsonii* Peirson's spring beauty	None/None G2G3T2/S2 1B.2	Subalpine coniferous forest, Upper montane coniferous forest. Granitic, Metamorphic, Scree, Talus 1510-2745m. Blooms (Mar)May-Jun.
Dodecahema leptoceras slender-horned spineflower	FE/SE G1/S1 1B.1	Chaparral, Cismontane woodland, Coastal scrub (alluvial fan). sandy. 200-760 m. annual herb. Blooms Apr-Jun
Dudleya densiflora San Gabriel Mountains dudleya	None/None G2/S2 1B.1	Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Riparian woodland. In crevices and on decomposed granite on cliffs and canyon walls. 244-610m. Blooms Mar-Jul.
Dudleya multicaulis many-stemmed dudleya	None/None G2/S2 1B.2	Chaparral, Coastal scrub, Valley and foothill grassland. In heavy, often clayey soils or grassy slopes. 15-790m. Blooms Apr-Jul.
Eriastrum densifolium ssp. *sanctorum* Santa Ana River woollystar	FE/SE G4T1/S1 1B.1	Chaparral, Coastal scrub. In sandy soils on river floodplains or terraced fluvial deposits. 91-610m. Blooms Apr-Sep.
Eriogonum microthecum var. *johnstonii* Johnston's buckwheat	None/None G5T2/S2 1B.3	Subalpine coniferous forest, Upper montane coniferous forest. Slopes and ridges on granite or limestone. 1829-2926m. Blooms Jul-Sep.
Fimbristylis thermalis hot springs fimbristylis	None/None G4/S1S2 2B.2	Meadows and seeps. Near hot springs. 110-1340m. Blooms Jul-Sep.
Horkelia cuneata var. *puberula* mesa horkelia	None/None G4T1/S1 1B.1	Perennial herb. Blooms February to September. Chaparral, cismontane woodland, coastal scrub. Sandy or gravelly sites. 70-810 m (230-2655 ft)
Imperata brevifolia California satintail	None/None G4/S3 2B.1	Chaparral, Coastal scrub, Meadows and seeps, Mojavean desert scrub, Riparian scrub. Mesic sites, alkali seeps, riparian areas. 0-1215m. Blooms Sep-May.
Lilium parryi lemon lily	None/None G3/S3 1B.2	Lower montane coniferous forest, Meadows and seeps, Riparian forest, Upper montane coniferous forest. Wet, mountainous terrain; generally in forested areas; on shady edges of streams, in open boggy meadows and seeps. 1220-2745m. Blooms Jul-Aug.
Linanthus concinnus San Gabriel linanthus	None/None G2/S2 1B.2	Chaparral, Lower montane coniferous forest, Upper montane coniferous forest. Dry rocky slopes, often in Jeffrey pine/canyon oak forest. 1520-2800m. Blooms Apr-Jul.
Monardella australis ssp. *jokerstii* Jokerst's monardella	None/None G4T1?/S1? 1B.1	Chaparral, Lower montane coniferous forest. Steep scree or talus slopes between breccia. Secondary alluvial benches along drainages and washes. 1350-1750m. Blooms Jul-Sep.
Monardella macrantha ssp. *hallii* Hall's monardella	None/None G5T3/S3 1B.3	Broadleafed upland forest, Chaparral, Cismontane woodland, Lower montane coniferous forest, Valley and foothill grassland. Dry slopes and ridges in openings. 730-2195m. Blooms Jun-Oct.
Muhlenbergia utilis aparejo grass	None/None G4/S2S3 2B.2	Chaparral, Cismontane woodland, Coastal scrub, Marshes and swamps, Meadows and seeps. Alkaline (sometimes), Serpentinite (sometimes) 25-2325m. Blooms Mar-Oct.
Navarretia prostrata prostrate vernal pool navarretia	None/None G2/S2 1B.2	Coastal scrub, Meadows and seeps, Valley and foothill grassland, Vernal pools. Alkaline soils in grassland, or in vernal pools. Mesic, alkaline sites. 3-1210m. Blooms Apr-Jul.

Scientific Name Common Name	Status	Habitat Requirements
Oreonana vestita woolly mountain-parsley	None/None G3/S3 1B.3	Lower montane coniferous forest, Subalpine coniferous forest, Upper montane coniferous forest. High ridges; on scree, talus, or gravel. 1615-3500m. Blooms Mar-Sep.
Orobanche valida ssp. *valida* Rock Creek broomrape	None/None G4T2/S2 1B.2	Chaparral, Pinyon and juniper woodland. On slopes of loose decomposed granite; parasitic on various chaparral shrubs. 1030-2000m. Blooms May-Sep.
Phacelia stellaris Brand's star phacelia	None/None G1/S1 1B.1	Coastal dunes, Coastal scrub. Open areas. 1-400m. Blooms Mar-Jun.
Pseudognaphalium leucocephalum white rabbit-tobacco	None/None G4/S2 2B.2	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland. Sandy, gravelly sites. 0-2100m. Blooms (Jul)Aug-Nov(Dec).
Sagittaria sanfordii Sanford's arrowhead	None/None G3/S3 1B.2	Marshes and swamps. In standing or slow-moving freshwater ponds, marshes, and ditches. 0-650m. Blooms May-Oct(Nov).
Senecio aphanactis chaparral ragwort	None/None G3/S2 2B.2	Chaparral, Cismontane woodland, Coastal scrub. sometimes alkaline. 15-800 m. annual herb. Blooms Jan-Apr (May)
Sidalcea neomexicana salt spring checkerbloom	None/None G4/S2 2B.2	Chaparral, Coastal scrub, Lower montane coniferous forest, Mojavean desert scrub, Playas. alkaline, mesic. 15-1530 m. perennial herb. Blooms Mar-Jun
Symphyotrichum defoliatum San Bernardino aster	None/None G2/S2 1B.2	Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Marshes and swamps, Meadows and seeps, Valley and foothill grassland. Vernally mesic grassland or near ditches, streams and springs; disturbed areas. 2-2040m. Blooms Jul-Nov.
Symphyotrichum greatae Greata's aster	None/None G2/S2 1B.3	Broadleafed upland forest, Chaparral, Cismontane woodland, Lower montane coniferous forest, Riparian woodland. Mesic canyons. 300-2010m. Blooms Jun-Oct.
Thelypteris puberula var. *sonorensis* Sonoran maiden fern	None/None G5T3/S2 2B.2	Meadows and seeps (seeps and streams). 50-610 m. perennial rhizomatous herb. Blooms Jan-Sep
Thysanocarpus rigidus rigid fringepod	None/None G1G2/S1 1B.2	Pinyon and juniper woodland. Dry, rocky slopes and ridges of oak and pine woodland in arid mountain ranges. 425-2165. 600-2200m. Blooms Feb-May.
Viola pinetorum ssp. grisea grey-leaved violet	None/None G4G5T3/S3 1B.2	Meadows and seeps, Subalpine coniferous forest, Upper montane coniferous forest. Dry mountain peaks and slopes. 1500-3400m. Blooms Apr-Jul.
Invertebrates		
Rhaphiomidas terminatus abdominalis Delhi Sands flower-loving fly	FE/None G1T1/S1	Found only in areas of the Delhi Sands formation in southwestern San Bernardino and northwestern Riverside counties. Requires fine, sandy soils, often with wholly or partly consolidated dunes and sparse vegetation. Oviposition req. shade.
Fish		
Catostomus santaanae Santa Ana sucker	FT/None G1/S1	Endemic to Los Angeles Basin south coastal streams. Habitat generalists, but prefer sand-rubble-boulder bottoms, cool, clear water, and algae.
Gila orcuttii arroyo chub	None/None G2/S2 SSC	Native to streams from Malibu Creek to San Luis Rey River basin. Introduced into streams in Santa Clara, Ventura, Santa Ynez, Mojave and San Diego river basins. Slow water stream sections with mud or

Scientific Name Common Name	Status	Habitat Requirements
		sand bottoms. Feeds heavily on aquatic vegetation and associated invertebrates.
Oncorhynchus mykiss irideus pop. 10 steelhead - southern California DPS	FE/None G5T1Q/S1	Federal listing refers to populations from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego County). Southern steelhead likely have greater physiological tolerances to warmer water and more variable conditions.
Rhinichthys osculus ssp. 8 *Santa Ana speckled dace*	None/None G5T1/S1 SSC	Headwaters of the Santa Ana and San Gabriel rivers. May be extirpated from the Los Angeles River system. Requires permanent flowing streams with summer water temps of 17-20 C. Usually inhabits shallow cobble and gravel riffles.
Amphibians		
Anaxyrus californicus arroyo toad	FE/None G2G3/S2S3 SSC	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, desert wash, etc. Rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.
Ensatina eschscholtzii klauberi large-blotched salamander	None/None G5T2?/S3 WL	Found in conifer and woodland associations. Found in leaf litter, decaying logs, and shrubs in heavily forested areas.
Rana boylii foothill yellow-legged frog	None/SE G3/S3 SSC	Partly shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Needs at least some cobble-sized substrate for egg-laying. Needs at least 15 weeks to attain metamorphosis.
Rana muscosa southern mountain yellow-legged frog	FE/SE G1/S1 WL	Federal listing refers to populations in the San Gabriel, San Jacinto and San Bernardino mountains (southern DPS). Northern DPS was determined to warrant listing as endangered, Apr 2014, effective Jun 30, 2014. Always encountered within a few feet of water. Tadpoles may require 2 - 4 yrs. to complete their aquatic development.
Spea hammondii western spadefoot	None/None G3/S3 SSC	Occurs primarily in grassland habitats but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.
Taricha torosa Coast Range newt	None/None G4/S4 SSC	Coastal drainages from Mendocino County to San Diego County. Lives in terrestrial habitats and will migrate over 1 km to breed in ponds, reservoirs, and slow-moving streams.
Reptiles		
Anniella stebbinsi Southern California legless lizard	None/None G3/S3 SSC	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally, in moist, loose soil. They prefer soils with a high moisture content.
Arizona elegans occidentalis California glossy snake	None/None G5T2/S2 SSC	Patchily distributed from the eastern portion of San Francisco Bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular ranges, south to Baja California. Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.
Aspidoscelis hyperythra *orange-throated whiptail*	None/None G5/S2S3 WL	Inhabits low-elevation coastal scrub, chaparral, and valley-foothill hardwood habitats. Prefers washes and other sandy areas with patches of brush and rocks. Perennial plants necessary for its major food: termites.

Scientific Name Common Name	Status	Habitat Requirements
Aspidoscelis tigris stejnegeri coastal whiptail	None/None G5T5/S3 SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland and riparian areas. Ground may be firm soil, sandy, or rocky.
Coleonyx variegatus abbotti San Diego banded gecko	None/None G5T5/S1S2 SSC	Coastal and cismontane Southern California. Found in granite or rocky outcrops in coastal scrub and chaparral habitats.
Crotalus ruber red-diamond rattlesnake	None/None G4/S3 SSC	Chaparral, woodland, grassland, and desert areas from coastal San Diego County to the eastern slopes of the mountains. Occurs in rocky areas and dense vegetation. Needs rodent burrows, cracks in rocks or surface cover objects.
Emys marmorata western pond turtle	None/None G3G4/S3 SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.
Phrynosoma blainvillii coast horned lizard	None/None G3G4/S3S4 SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.
Salvadora hexalepis virgultea coast patch-nosed snake	None/None G5T4/S2S3 SSC	Brushy or shrubby vegetation in coastal Southern California. Require small mammal burrows for refuge and overwintering sites.
Thamnophis hammondii two-striped gartersnake	None/None G4/S3S4 SSC	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 ft. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.
Birds		
Accipiter cooperii Cooper's hawk	None/None G5/S4 WL	Woodland, chiefly of open, interrupted or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river floodplains; also, live oaks.
Agelaius tricolor tricolored blackbird	None/ST G2G3/S1S2 SSC	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few km of the colony.
Aimophila ruficeps canescens southern California rufous-crowned sparrow	None/None G5T3/S3 WL	Resident in Southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.
Ammodramus savannarum grasshopper sparrow	None/None G5/S3 SSC	Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs, and scattered shrubs. Loosely colonial when nesting.
Aquila chrysaetos golden eagle	None/None G5/S3 FP WL	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.
Artemisiospiza belli Bell's sage sparrow	None/None G5T2T3/S3 WL	Nests in chaparral dominated by fairly dense stands of chamise. Found in coastal sage scrub in south of range. Nest located on the ground beneath a shrub or in a shrub 6-18 inches above ground. Territories about 50 yards apart.

Scientific Name Common Name	Status	Habitat Requirements
Asio otus long-eared owl	None/None G5/S3? SSC	Riparian bottomlands grown to tall willows and cottonwoods; also, belts of live oak paralleling stream courses. Require adjacent open land, productive of mice and the presence of old nests of crows, hawks, or magpies for breeding.
Athene cunicularia burrowing owl	None/None G4/S3 SSC	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.
Buteo swainsoni Swainson's hawk	None/ST G5/S3	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.
Campylorhynchus brunneicapillus sandiegensis coastal cactus wren	None/None G5T3Q/S3 SSC	Southern California coastal sage scrub. Wrens require tall opuntia cactus for nesting and roosting.
Coccyzus americanus occidentalis western yellow-billed cuckoo	FT/SE G5T2T3/S1	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.
Coturnicops noveboracensis yellow rail	None/None G4/S1S2 SSC	Summer resident in eastern Sierra Nevada in Mono County. Freshwater marshlands.
Cypseloides niger black swift	None/None G4/S2 SSC	Coastal belt of Santa Cruz and Monterey counties; central and southern Sierra Nevada; San Bernardino and San Jacinto mountains. Breeds in small colonies on cliffs behind or adjacent to waterfalls in deep canyons and sea-bluffs above the surf; forages widely.
Elanus leucurus white-tailed kite	None/None G5/S3S4 FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.
Empidonax traillii extimus southwestern willow flycatcher	FE/SE G5T2/S1	Riparian woodlands in Southern California.
Eremophila alpestris actia California horned lark	None/None G5T4Q/S4 WL	Coastal regions, chiefly from Sonoma County to San Diego County. Also main part of San Joaquin Valley and east to foothills. Short-grass prairie, "bald" hills, mountain meadows, open coastal plains, fallow grain fields, alkali flats.
Falco columbarius merlin	None/None G5/S3S4 WL	Seacoast, tidal estuaries, open woodlands, savannahs, edges of grasslands and deserts, farms and ranches. Clumps of trees or windbreaks are required for roosting in open country.
Icteria virens yellow-breasted chat	None/None G5/S3 SSC	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 ft of ground.
Laterallus jamaicensis coturniculus California black rail	None/ST G3G4T1/S1 FP	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.
Polioptila californica coastal California gnatcatcher	FT/None G4G5T2Q/	Obligate, permanent resident of coastal sage scrub below 2500 ft in Southern California. Low, coastal sage scrub in arid washes, on

Scientific Name Common Name	Status	Habitat Requirements
	S2 SSC	mesas and slopes. Not all areas classified as coastal sage scrub are occupied.
Setophaga petechia yellow warbler	None/None G5/S3S4 SSC	Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.
Vireo bellii pusillus least Bell's vireo	FE/SE G5T2/S2	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, Baccharis, mesquite.
Mammals		
Antrozous pallidus pallid bat	None/None G5/S3 SSC	Found in a variety of habitats including deserts, grasslands, shrublands, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts in crevices of rock outcrops, caves, mine tunnels, buildings, bridges, and hollows of live and dead trees which must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.
Chaetodipus fallax fallax northwestern San Diego pocket mouse	None/None G5T3T4/S3 S4 SSC	Inhabits coastal sage scrub, sagebrush scrub, grasslands, and chaparral communities. Found in open, sandy areas in southwestern California and northern Baja California. Prefers moderately gravelly and rocky substrates.
Dipodomys merriami parvus San Bernardino kangaroo rat	FE/SCE G5T1/S1 SSC	Alluvial scrub vegetation on sandy loam substrates characteristic of alluvial fans and flood plains. Needs early to intermediate seral stages.
Dipodomys stephensi Stephens' kangaroo rat	FE/ST G2/S2	Found primarily in annual & perennial grasslands, but also occurs in coastal scrub & sagebrush with sparse canopy cover. Prefers buckwheat, chamise, brome grass & filaree. Will burrow into firm soil and use the burrows of California ground squirrels and pocket gophers. Occurs only in southern California.
Eumops perotis californicus western mastiff bat	None/None G5T4/S3S4 SSC	Occurs in open, semi-arid to arid habitats, including coniferous and deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosts in crevices in cliff faces and caves, and buildings. Roosts typically occur high above ground.
Lasiurus xanthinus western yellow bat	None/None G4G5/S3 SSC	Occurs in arid regions of the southwestern United States. Typically found in riparian woodlands, oak or pinyon-juniper woodland, desert wash, palm oasis habitats, and urban or suburban areas. Roosts in trees, often between palm fronds.
Lepus californicus bennettii San Diego black-tailed jackrabbit	None/None G5T3T4/S3 S4 SSC	Occurs in Los Angeles, San Bernardino, Riverside, and San Diego Counties of southern California. Typically found in open shrub habitats. Will also occur in woodland habitats with open understory adjacent to shrublands.
Neotoma lepida intermedia San Diego desert woodrat	None/None G5T3T4/S3 S4 SSC	Occurs in scrub habitats of southern California from San Luis Obispo County to San Diego County.
Nyctinomops femorosaccus pocketed free-tailed bat	None/None G5/S3 SSC	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc. Rocky areas with high cliffs.

Scientific Name Common Name	Status	Habitat Requirements
Nyctinomops macrotis big free-tailed bat	None/None G5/S3 SSC	Low-lying arid areas in Southern California. Need high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.
Ovis canadensis nelsoni desert bighorn sheep	None/None G4T4/S3 FP	Widely distributed from the White Mtns in Mono Co. to the Chocolate Mts in Imperial Co. Open, rocky, steep areas with available water and herbaceous forage.
Perognathus longimembris brevinasus Los Angeles pocket mouse	None/None G5T2/S1S2 SSC	Lower elevation grasslands and coastal sage communities in and around the Los Angeles Basin. Open ground with fine, sandy soils. May not dig extensive burrows, hiding under weeds and dead leaves instead.
Taxidea taxus American badger	None/None G5/S3 SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.

Regional Vicinity refers to within a nine-quad search radius of site.

Status (Federal/State)
FE = Federal Endangered
FT = Federal Threatened
FD = Federal Delisted
FC = Federal Candidate
SA = Special Animal
SE = State Endangered
ST = State Threatened
SCE = State Candidate Endangered
SR = State Rare
SD = State Delisted
SSC = CDFW Species of Special Concern
FP = CDFW Fully Protected
WL = CDFW Watch List

CRPR (CNPS California Rare Plant Rank)
1B = Rare, Threatened, or Endangered in California and elsewhere
2A = Presumed extirpated in California, but common elsewhere
2B= Rare, Threatened, or Endangered in California, but more common elsewhere
3 = Need more information (Review List)
4 = Limited Distribution (Watch List)

CRPR Threat Code Extension
.1 = Seriously endangered in California (>80% of occurrences threatened/ high degree and immediacy of threat)
.2 = Moderately threatened in California (20-80% of occurrences threatened/ moderate degree and immediacy of threat)
.3 = Not very endangered in California (<20% of occurrences threatened/ low degree and immediacy of threat)

Other Statuses
G1 or S1 Critically Imperiled Globally or Sub-nationally (state)
G2 or S2 Imperiled Globally or Sub-nationally (state)
G3 or S3 Vulnerable to extirpation or extinction Globally or Sub-nationally (state)
G4/5 or S4/5 Apparently secure, common, and abundant

Additional notations may be provided as follows
T – Intraspecific Taxon (subspecies, varieties, and other designations below the level of species)
Q – Questionable taxonomy that may reduce conservation priority
? – Inexact numeric rank

Appendix D

California Emissions Estimator Model Results

Claremont HE Update - South Coast AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Claremont HE Update

South Coast AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Mid Rise	2,795.00	Dwelling Unit	73.55	2,795,000.00	7994
Single Family Housing	10.00	Dwelling Unit	3.25	18,000.00	29

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	9			**Operational Year**	2030
Utility Company	Clean Power Alliance				
CO2 Intensity (lb/MWhr)	471.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Demolition - Based on 100% lot acreage of developed sites

Grading - Assume sites are balanced

Woodstoves - no woodstoves or wood fireplaces

Water And Wastewater - 100 percent aerobic treatment

Energy Mitigation - 72 percent of housing opportunity sites can be maximum 3 stories and therefore must have solar in accordance with CBC.

Table Name	Column Name	Default Value	New Value
tblFireplaces	NumberWood	154.40	0.00
tblFireplaces	NumberWood	0.45	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWoodstoves	NumberCatalytic	154.40	0.00
tblWoodstoves	NumberCatalytic	0.45	0.00
tblWoodstoves	NumberNoncatalytic	154.40	0.00
tblWoodstoves	NumberNoncatalytic	0.45	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2022	0.4551	5.7647	3.5055	0.0121	3.3485	0.2046	3.5531	0.8527	0.1893	1.0420	0.0000	1,126.9481	1,126.9481	0.1992	0.0900	1,158.7518
2023	1.0028	4.2648	10.4152	0.0321	3.1366	0.1325	3.2691	0.8461	0.1237	0.9698	0.0000	2,980.6082	2,980.6082	0.1758	0.1380	3,026.1370
2024	1.0890	4.0454	11.6443	0.0378	3.4742	0.1072	3.5813	0.9290	0.1006	1.0295	0.0000	3,546.0500	3,546.0500	0.1561	0.1703	3,600.7099
2025	1.0175	3.8321	10.9943	0.0366	3.4609	0.0948	3.5557	0.9254	0.0890	1.0144	0.0000	3,458.3908	3,458.3908	0.1496	0.1639	3,510.9702
2026	0.9713	3.7690	10.4978	0.0357	3.4609	0.0939	3.5548	0.9254	0.0882	1.0136	0.0000	3,389.6191	3,389.6191	0.1448	0.1588	3,440.5568
2027	0.9290	3.7137	10.0764	0.0349	3.4609	0.0929	3.5538	0.9254	0.0872	1.0126	0.0000	3,326.5407	3,326.5407	0.1407	0.1541	3,375.9850
2028	0.8871	3.6530	9.6895	0.0340	3.4477	0.0915	3.5392	0.9219	0.0859	1.0078	0.0000	3,257.9079	3,257.9079	0.1367	0.1494	3,305.8401
2029	9.9574	1.1251	2.9309	8.5300e-003	0.8080	0.0409	0.8489	0.2155	0.0381	0.2537	0.0000	811.6390	811.6390	0.0602	0.0264	821.0089
Maximum	**9.9574**	**5.7647**	**11.6443**	**0.0378**	**3.4742**	**0.2046**	**3.5813**	**0.9290**	**0.1893**	**1.0420**	**0.0000**	**3,546.0500**	**3,546.0500**	**0.1992**	**0.1703**	**3,600.7099**

Claremont HE Update - South Coast AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2022	0.4551	5.7647	3.5055	0.0121	3.3485	0.2046	3.5531	0.8527	0.1893	1.0420	0.0000	1,126.9475	1,126.9475	0.1992	0.0900	1,158.7512
2023	1.0028	4.2648	10.4152	0.0321	3.1366	0.1325	3.2691	0.8461	0.1237	0.9698	0.0000	2,980.6078	2,980.6078	0.1758	0.1380	3,026.1365
2024	1.0890	4.0454	11.6443	0.0378	3.4742	0.1072	3.5813	0.9290	0.1006	1.0295	0.0000	3,546.0496	3,546.0496	0.1561	0.1703	3,600.7096
2025	1.0175	3.8321	10.9943	0.0366	3.4609	0.0948	3.5557	0.9254	0.0890	1.0144	0.0000	3,458.3904	3,458.3904	0.1496	0.1639	3,510.9698
2026	0.9713	3.7690	10.4978	0.0357	3.4609	0.0939	3.5548	0.9254	0.0882	1.0136	0.0000	3,389.6187	3,389.6187	0.1448	0.1588	3,440.5565
2027	0.9290	3.7137	10.0764	0.0349	3.4609	0.0929	3.5538	0.9254	0.0872	1.0126	0.0000	3,326.5403	3,326.5403	0.1407	0.1541	3,375.9846
2028	0.8871	3.6530	9.6895	0.0340	3.4477	0.0915	3.5392	0.9219	0.0859	1.0078	0.0000	3,257.9075	3,257.9075	0.1367	0.1494	3,305.8397
2029	9.9574	1.1251	2.9309	8.5300e-003	0.8080	0.0409	0.8489	0.2155	0.0381	0.2537	0.0000	811.6388	811.6388	0.0602	0.0264	821.0087
Maximum	**9.9574**	**5.7647**	**11.6443**	**0.0378**	**3.4742**	**0.2046**	**3.5813**	**0.9290**	**0.1893**	**1.0420**	**0.0000**	**3,546.0496**	**3,546.0496**	**0.1992**	**0.1703**	**3,600.7096**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**1-1-2022**	**3-31-2022**	1.9190	1.9190
2	**4-1-2022**	**6-30-2022**	1.5759	1.5759
3	**7-1-2022**	**9-30-2022**	1.3036	1.3036

Claremont HE Update - South Coast AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4	**10-1-2022**	**12-31-2022**	1.3995	1.3995
5	**1-1-2023**	**3-31-2023**	1.2384	1.2384
6	**4-1-2023**	**6-30-2023**	1.3074	1.3074
7	**7-1-2023**	**9-30-2023**	1.3218	1.3218
8	**10-1-2023**	**12-31-2023**	1.3685	1.3685
9	**1-1-2024**	**3-31-2024**	1.2878	1.2878
10	**4-1-2024**	**6-30-2024**	1.2432	1.2432
11	**7-1-2024**	**9-30-2024**	1.2569	1.2569
12	**10-1-2024**	**12-31-2024**	1.3019	1.3019
13	**1-1-2025**	**3-31-2025**	1.2080	1.2080
14	**4-1-2025**	**6-30-2025**	1.1785	1.1785
15	**7-1-2025**	**9-30-2025**	1.1914	1.1914
16	**10-1-2025**	**12-31-2025**	1.2349	1.2349
17	**1-1-2026**	**3-31-2026**	1.1809	1.1809
18	**4-1-2026**	**6-30-2026**	1.1523	1.1523
19	**7-1-2026**	**9-30-2026**	1.1650	1.1650
20	**10-1-2026**	**12-31-2026**	1.2072	1.2072
21	**1-1-2027**	**3-31-2027**	1.1566	1.1566
22	**4-1-2027**	**6-30-2027**	1.1290	1.1290
23	**7-1-2027**	**9-30-2027**	1.1414	1.1414
24	**10-1-2027**	**12-31-2027**	1.1823	1.1823
25	**1-1-2028**	**3-31-2028**	1.1480	1.1480
26	**4-1-2028**	**6-30-2028**	1.1086	1.1086
27	**7-1-2028**	**9-30-2028**	1.1208	1.1208
28	**10-1-2028**	**12-31-2028**	1.1606	1.1606
29	**1-1-2029**	**3-31-2029**	0.7920	0.7920
30	**4-1-2029**	**6-30-2029**	0.3103	0.3103
31	**7-1-2029**	**9-30-2029**	4.2574	4.2574
		Highest	4.2574	4.2574

Claremont HE Update - South Coast AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	12.0628	0.8784	29.0828	5.0100e-003		0.2046	0.2046		0.2046	0.2046	0.0000	679.4008	679.4008	0.0571	0.0116	684.2828
Energy	0.1983	1.6946	0.7211	0.0108		0.1370	0.1370		0.1370	0.1370	0.0000	4,282.6750	4,282.6750	0.1998	0.0556	4,304.2524
Mobile	6.3777	7.0670	65.3625	0.1493	18.7170	0.0979	18.8149	4.9955	0.0912	5.0867	0.0000	14,593.0299	14,593.0299	0.8920	0.6093	14,796.9031
Waste						0.0000	0.0000		0.0000	0.0000	290.5085	0.0000	290.5085	17.1686	0.0000	719.7225
Water						0.0000	0.0000		0.0000	0.0000	71.3908	865.0618	936.4526	0.3062	0.1626	992.5574
Total	**18.6388**	**9.6400**	**95.1664**	**0.1651**	**18.7170**	**0.4394**	**19.1564**	**4.9955**	**0.4327**	**5.4283**	**361.8993**	**20,420.1674**	**20,782.0667**	**18.6237**	**0.8391**	**21,497.7182**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	12.0628	0.8784	29.0828	5.0100e-003		0.2046	0.2046		0.2046	0.2046	0.0000	679.4008	679.4008	0.0571	0.0116	684.2828
Energy	0.1983	1.6946	0.7211	0.0108		0.1370	0.1370		0.1370	0.1370	0.0000	2,612.1559	2,612.1559	0.0830	0.0415	2,626.5943
Mobile	6.3777	7.0670	65.3625	0.1493	18.7170	0.0979	18.8149	4.9955	0.0912	5.0867	0.0000	14,593.0299	14,593.0299	0.8920	0.6093	14,796.9031
Waste						0.0000	0.0000		0.0000	0.0000	290.5085	0.0000	290.5085	17.1686	0.0000	719.7225
Water						0.0000	0.0000		0.0000	0.0000	71.3908	865.0618	936.4526	0.3062	0.1626	992.5574
Total	**18.6388**	**9.6400**	**95.1664**	**0.1651**	**18.7170**	**0.4394**	**19.1564**	**4.9955**	**0.4327**	**5.4283**	**361.8993**	**18,749.6483**	**19,111.5476**	**18.5069**	**0.8250**	**19,820.0601**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**8.18**	**8.04**	**0.63**	**1.69**	**7.80**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2022	5/20/2022	5	100	
2	Site Preparation	Site Preparation	5/21/2022	8/12/2022	5	60	
3	Grading	Grading	8/13/2022	3/17/2023	5	155	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4	Building Construction	Building Construction	3/18/2023	2/23/2029	5	1550	
5	Paving	Paving	2/24/2029	7/27/2029	5	110	
6	Architectural Coating	Architectural Coating	7/28/2029	12/28/2029	5	110	

Acres of Grading (Site Preparation Phase): 90

Acres of Grading (Grading Phase): 465

Acres of Paving: 0

Residential Indoor: 6,286,005; Residential Outdoor: 2,095,335; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	18,713.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	2,227.00	331.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	445.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.0249	0.0000	2.0249	0.3066	0.0000	0.3066	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1320	1.2860	1.0297	1.9400e-003		0.0621	0.0621		0.0578	0.0578	0.0000	169.9511	169.9511	0.0477	0.0000	171.1446
Total	**0.1320**	**1.2860**	**1.0297**	**1.9400e-003**	**2.0249**	**0.0621**	**2.0871**	**0.3066**	**0.0578**	**0.3644**	**0.0000**	**169.9511**	**169.9511**	**0.0477**	**0.0000**	**171.1446**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0391	1.5378	0.3515	5.6600e-003	0.1610	0.0122	0.1733	0.0442	0.0117	0.0559	0.0000	563.5600	563.5600	0.0302	0.0895	590.9771
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.5200e-003	2.0300e-003	0.0266	7.0000e-005	8.2300e-003	5.0000e-005	8.2800e-003	2.1900e-003	5.0000e-005	2.2300e-003	0.0000	6.6963	6.6963	1.8000e-004	1.8000e-004	6.7543
Total	**0.0416**	**1.5398**	**0.3782**	**5.7300e-003**	**0.1693**	**0.0123**	**0.1815**	**0.0464**	**0.0117**	**0.0581**	**0.0000**	**570.2562**	**570.2562**	**0.0304**	**0.0897**	**597.7314**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.0249	0.0000	2.0249	0.3066	0.0000	0.3066	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1320	1.2860	1.0297	1.9400e-003		0.0621	0.0621		0.0578	0.0578	0.0000	169.9509	169.9509	0.0477	0.0000	171.1444
Total	**0.1320**	**1.2860**	**1.0297**	**1.9400e-003**	**2.0249**	**0.0621**	**2.0871**	**0.3066**	**0.0578**	**0.3644**	**0.0000**	**169.9509**	**169.9509**	**0.0477**	**0.0000**	**171.1444**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0391	1.5378	0.3515	5.6600e-003	0.1610	0.0122	0.1733	0.0442	0.0117	0.0559	0.0000	563.5600	563.5600	0.0302	0.0895	590.9771
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.5200e-003	2.0300e-003	0.0266	7.0000e-005	8.2300e-003	5.0000e-005	8.2800e-003	2.1900e-003	5.0000e-005	2.2300e-003	0.0000	6.6963	6.6963	1.8000e-004	1.8000e-004	6.7543
Total	**0.0416**	**1.5398**	**0.3782**	**5.7300e-003**	**0.1693**	**0.0123**	**0.1815**	**0.0464**	**0.0117**	**0.0581**	**0.0000**	**570.2562**	**570.2562**	**0.0304**	**0.0897**	**597.7314**

3.3 Site Preparation - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.5897	0.0000	0.5897	0.3031	0.0000	0.3031	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0951	0.9925	0.5909	1.1400e-003		0.0484	0.0484		0.0445	0.0445	0.0000	100.3182	100.3182	0.0324	0.0000	101.1293
Total	**0.0951**	**0.9925**	**0.5909**	**1.1400e-003**	**0.5897**	**0.0484**	**0.6381**	**0.3031**	**0.0445**	**0.3476**	**0.0000**	**100.3182**	**100.3182**	**0.0324**	**0.0000**	**101.1293**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Site Preparation - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.8100e-003	1.4600e-003	0.0192	5.0000e-005	5.9200e-003	4.0000e-005	5.9600e-003	1.5700e-003	3.0000e-005	1.6100e-003	0.0000	4.8213	4.8213	1.3000e-004	1.3000e-004	4.8631
Total	**1.8100e-003**	**1.4600e-003**	**0.0192**	**5.0000e-005**	**5.9200e-003**	**4.0000e-005**	**5.9600e-003**	**1.5700e-003**	**3.0000e-005**	**1.6100e-003**	**0.0000**	**4.8213**	**4.8213**	**1.3000e-004**	**1.3000e-004**	**4.8631**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.5897	0.0000	0.5897	0.3031	0.0000	0.3031	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0951	0.9925	0.5909	1.1400e-003		0.0484	0.0484		0.0445	0.0445	0.0000	100.3181	100.3181	0.0324	0.0000	101.1292
Total	**0.0951**	**0.9925**	**0.5909**	**1.1400e-003**	**0.5897**	**0.0484**	**0.6381**	**0.3031**	**0.0445**	**0.3476**	**0.0000**	**100.3181**	**100.3181**	**0.0324**	**0.0000**	**101.1292**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Site Preparation - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.8100e-003	1.4600e-003	0.0192	5.0000e-005	5.9200e-003	4.0000e-005	5.9600e-003	1.5700e-003	3.0000e-005	1.6100e-003	0.0000	4.8213	4.8213	1.3000e-004	1.3000e-004	4.8631
Total	**1.8100e-003**	**1.4600e-003**	**0.0192**	**5.0000e-005**	**5.9200e-003**	**4.0000e-005**	**5.9600e-003**	**1.5700e-003**	**3.0000e-005**	**1.6100e-003**	**0.0000**	**4.8213**	**4.8213**	**1.3000e-004**	**1.3000e-004**	**4.8631**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.5477	0.0000	0.5477	0.1921	0.0000	0.1921	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1812	1.9422	1.4521	3.1000e-003		0.0817	0.0817		0.0752	0.0752	0.0000	272.6730	272.6730	0.0882	0.0000	274.8777
Total	**0.1812**	**1.9422**	**1.4521**	**3.1000e-003**	**0.5477**	**0.0817**	**0.6294**	**0.1921**	**0.0752**	**0.2673**	**0.0000**	**272.6730**	**272.6730**	**0.0882**	**0.0000**	**274.8777**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.3600e-003	2.7100e-003	0.0355	1.0000e-004	0.0110	7.0000e-005	0.0110	2.9100e-003	6.0000e-005	2.9800e-003	0.0000	8.9283	8.9283	2.5000e-004	2.4000e-004	9.0058
Total	**3.3600e-003**	**2.7100e-003**	**0.0355**	**1.0000e-004**	**0.0110**	**7.0000e-005**	**0.0110**	**2.9100e-003**	**6.0000e-005**	**2.9800e-003**	**0.0000**	**8.9283**	**8.9283**	**2.5000e-004**	**2.4000e-004**	**9.0058**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.5477	0.0000	0.5477	0.1921	0.0000	0.1921	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1812	1.9422	1.4521	3.1000e-003		0.0817	0.0817		0.0752	0.0752	0.0000	272.6727	272.6727	0.0882	0.0000	274.8774
Total	**0.1812**	**1.9422**	**1.4521**	**3.1000e-003**	**0.5477**	**0.0817**	**0.6294**	**0.1921**	**0.0752**	**0.2673**	**0.0000**	**272.6727**	**272.6727**	**0.0882**	**0.0000**	**274.8774**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.3600e-003	2.7100e-003	0.0355	1.0000e-004	0.0110	7.0000e-005	0.0110	2.9100e-003	6.0000e-005	2.9800e-003	0.0000	8.9283	8.9283	2.5000e-004	2.4000e-004	9.0058
Total	**3.3600e-003**	**2.7100e-003**	**0.0355**	**1.0000e-004**	**0.0110**	**7.0000e-005**	**0.0110**	**2.9100e-003**	**6.0000e-005**	**2.9800e-003**	**0.0000**	**8.9283**	**8.9283**	**2.5000e-004**	**2.4000e-004**	**9.0058**

3.4 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4122	0.0000	0.4122	0.1177	0.0000	0.1177	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0914	0.9492	0.7714	1.7100e-003		0.0392	0.0392		0.0360	0.0360	0.0000	149.9718	149.9718	0.0485	0.0000	151.1844
Total	**0.0914**	**0.9492**	**0.7714**	**1.7100e-003**	**0.4122**	**0.0392**	**0.4513**	**0.1177**	**0.0360**	**0.1537**	**0.0000**	**149.9718**	**149.9718**	**0.0485**	**0.0000**	**151.1844**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7200e-003	1.3200e-003	0.0180	5.0000e-005	6.0300e-003	3.0000e-005	6.0700e-003	1.6000e-003	3.0000e-005	1.6300e-003	0.0000	4.7814	4.7814	1.2000e-004	1.2000e-004	4.8207
Total	**1.7200e-003**	**1.3200e-003**	**0.0180**	**5.0000e-005**	**6.0300e-003**	**3.0000e-005**	**6.0700e-003**	**1.6000e-003**	**3.0000e-005**	**1.6300e-003**	**0.0000**	**4.7814**	**4.7814**	**1.2000e-004**	**1.2000e-004**	**4.8207**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4122	0.0000	0.4122	0.1177	0.0000	0.1177	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0914	0.9492	0.7714	1.7100e-003		0.0392	0.0392		0.0360	0.0360	0.0000	149.9717	149.9717	0.0485	0.0000	151.1842
Total	**0.0914**	**0.9492**	**0.7714**	**1.7100e-003**	**0.4122**	**0.0392**	**0.4513**	**0.1177**	**0.0360**	**0.1537**	**0.0000**	**149.9717**	**149.9717**	**0.0485**	**0.0000**	**151.1842**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7200e-003	1.3200e-003	0.0180	5.0000e-005	6.0300e-003	3.0000e-005	6.0700e-003	1.6000e-003	3.0000e-005	1.6300e-003	0.0000	4.7814	4.7814	1.2000e-004	1.2000e-004	4.8207
Total	**1.7200e-003**	**1.3200e-003**	**0.0180**	**5.0000e-005**	**6.0300e-003**	**3.0000e-005**	**6.0700e-003**	**1.6000e-003**	**3.0000e-005**	**1.6300e-003**	**0.0000**	**4.7814**	**4.7814**	**1.2000e-004**	**1.2000e-004**	**4.8207**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1612	1.4745	1.6650	2.7600e-003		0.0717	0.0717		0.0675	0.0675	0.0000	237.5999	237.5999	0.0565	0.0000	239.0129
Total	**0.1612**	**1.4745**	**1.6650**	**2.7600e-003**		**0.0717**	**0.0717**		**0.0675**	**0.0675**	**0.0000**	**237.5999**	**237.5999**	**0.0565**	**0.0000**	**239.0129**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0367	1.2925	0.4921	6.1800e-003	0.2140	7.1900e-003	0.2212	0.0617	6.8700e-003	0.0686	0.0000	603.8132	603.8132	0.0202	0.0875	630.3905
Worker	0.7119	0.5473	7.4688	0.0214	2.5044	0.0144	2.5188	0.6651	0.0132	0.6783	0.0000	1,984.4419	1,984.4419	0.0504	0.0504	2,000.7285
Total	**0.7486**	**1.8398**	**7.9608**	**0.0276**	**2.7184**	**0.0216**	**2.7399**	**0.7269**	**0.0201**	**0.7470**	**0.0000**	**2,588.2551**	**2,588.2551**	**0.0706**	**0.1379**	**2,631.1190**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1612	1.4745	1.6650	2.7600e-003		0.0717	0.0717		0.0675	0.0675	0.0000	237.5996	237.5996	0.0565	0.0000	239.0126
Total	**0.1612**	**1.4745**	**1.6650**	**2.7600e-003**		**0.0717**	**0.0717**		**0.0675**	**0.0675**	**0.0000**	**237.5996**	**237.5996**	**0.0565**	**0.0000**	**239.0126**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0367	1.2925	0.4921	6.1800e-003	0.2140	7.1900e-003	0.2212	0.0617	6.8700e-003	0.0686	0.0000	603.8132	603.8132	0.0202	0.0875	630.3905
Worker	0.7119	0.5473	7.4688	0.0214	2.5044	0.0144	2.5188	0.6651	0.0132	0.6783	0.0000	1,984.4419	1,984.4419	0.0504	0.0504	2,000.7285
Total	**0.7486**	**1.8398**	**7.9608**	**0.0276**	**2.7184**	**0.0216**	**2.7399**	**0.7269**	**0.0201**	**0.7470**	**0.0000**	**2,588.2551**	**2,588.2551**	**0.0706**	**0.1379**	**2,631.1190**

3.5 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1928	1.7611	2.1179	3.5300e-003		0.0803	0.0803		0.0756	0.0756	0.0000	303.7223	303.7223	0.0718	0.0000	305.5179
Total	**0.1928**	**1.7611**	**2.1179**	**3.5300e-003**		**0.0803**	**0.0803**		**0.0756**	**0.0756**	**0.0000**	**303.7223**	**303.7223**	**0.0718**	**0.0000**	**305.5179**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0457	1.6594	0.6186	7.7800e-003	0.2735	9.2100e-003	0.2827	0.0789	8.8100e-003	0.0877	0.0000	760.6106	760.6106	0.0259	0.1104	794.1448
Worker	0.8505	0.6248	8.9079	0.0265	3.2007	0.0176	3.2183	0.8500	0.0162	0.8662	0.0000	2,481.7170	2,481.7170	0.0584	0.0600	2,501.0472
Total	**0.8963**	**2.2843**	**9.5264**	**0.0343**	**3.4742**	**0.0268**	**3.5010**	**0.9290**	**0.0250**	**0.9540**	**0.0000**	**3,242.3277**	**3,242.3277**	**0.0842**	**0.1703**	**3,295.1921**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1928	1.7611	2.1179	3.5300e-003		0.0803	0.0803		0.0756	0.0756	0.0000	303.7220	303.7220	0.0718	0.0000	305.5175
Total	**0.1928**	**1.7611**	**2.1179**	**3.5300e-003**		**0.0803**	**0.0803**		**0.0756**	**0.0756**	**0.0000**	**303.7220**	**303.7220**	**0.0718**	**0.0000**	**305.5175**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0457	1.6594	0.6186	7.7800e-003	0.2735	9.2100e-003	0.2827	0.0789	8.8100e-003	0.0877	0.0000	760.6106	760.6106	0.0259	0.1104	794.1448
Worker	0.8505	0.6248	8.9079	0.0265	3.2007	0.0176	3.2183	0.8500	0.0162	0.8662	0.0000	2,481.7170	2,481.7170	0.0584	0.0600	2,501.0472
Total	**0.8963**	**2.2843**	**9.5264**	**0.0343**	**3.4742**	**0.0268**	**3.5010**	**0.9290**	**0.0250**	**0.9540**	**0.0000**	**3,242.3277**	**3,242.3277**	**0.0842**	**0.1703**	**3,295.1921**

3.5 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1785	1.6273	2.0991	3.5200e-003		0.0689	0.0689		0.0648	0.0648	0.0000	302.6549	302.6549	0.0711	0.0000	304.4335
Total	**0.1785**	**1.6273**	**2.0991**	**3.5200e-003**		**0.0689**	**0.0689**		**0.0648**	**0.0648**	**0.0000**	**302.6549**	**302.6549**	**0.0711**	**0.0000**	**304.4335**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0445	1.6452	0.6070	7.6000e-003	0.2724	9.2000e-003	0.2816	0.0786	8.8000e-003	0.0874	0.0000	743.9057	743.9057	0.0259	0.1081	776.7523
Worker	0.7946	0.5596	8.2883	0.0255	3.1885	0.0167	3.2053	0.8468	0.0154	0.8622	0.0000	2,411.8302	2,411.8302	0.0526	0.0558	2,429.7844
Total	**0.8391**	**2.2048**	**8.8953**	**0.0331**	**3.4609**	**0.0259**	**3.4869**	**0.9254**	**0.0242**	**0.9496**	**0.0000**	**3,155.7359**	**3,155.7359**	**0.0784**	**0.1639**	**3,206.5367**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1784	1.6273	2.0991	3.5200e-003		0.0689	0.0689		0.0648	0.0648	0.0000	302.6545	302.6545	0.0711	0.0000	304.4331
Total	**0.1784**	**1.6273**	**2.0991**	**3.5200e-003**		**0.0689**	**0.0689**		**0.0648**	**0.0648**	**0.0000**	**302.6545**	**302.6545**	**0.0711**	**0.0000**	**304.4331**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0445	1.6452	0.6070	7.6000e-003	0.2724	9.2000e-003	0.2816	0.0786	8.8000e-003	0.0874	0.0000	743.9057	743.9057	0.0259	0.1081	776.7523
Worker	0.7946	0.5596	8.2883	0.0255	3.1885	0.0167	3.2053	0.8468	0.0154	0.8622	0.0000	2,411.8302	2,411.8302	0.0526	0.0558	2,429.7844
Total	**0.8391**	**2.2048**	**8.8953**	**0.0331**	**3.4609**	**0.0259**	**3.4869**	**0.9254**	**0.0242**	**0.9496**	**0.0000**	**3,155.7359**	**3,155.7359**	**0.0784**	**0.1639**	**3,206.5367**

3.5 Building Construction - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1785	1.6273	2.0991	3.5200e-003		0.0689	0.0689		0.0648	0.0648	0.0000	302.6549	302.6549	0.0711	0.0000	304.4335
Total	**0.1785**	**1.6273**	**2.0991**	**3.5200e-003**		**0.0689**	**0.0689**		**0.0648**	**0.0648**	**0.0000**	**302.6549**	**302.6549**	**0.0711**	**0.0000**	**304.4335**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2026

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0436	1.6335	0.5996	7.4500e-003	0.2724	9.1800e-003	0.2816	0.0786	8.7800e-003	0.0874	0.0000	729.9619	729.9619	0.0259	0.1061	762.2358
Worker	0.7492	0.5082	7.7991	0.0247	3.1885	0.0159	3.2044	0.8468	0.0146	0.8614	0.0000	2,357.0023	2,357.0023	0.0478	0.0527	2,373.8875
Total	**0.7928**	**2.1417**	**8.3988**	**0.0322**	**3.4609**	**0.0251**	**3.4860**	**0.9254**	**0.0234**	**0.9488**	**0.0000**	**3,086.9642**	**3,086.9642**	**0.0737**	**0.1588**	**3,136.1233**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1784	1.6273	2.0991	3.5200e-003		0.0689	0.0689		0.0648	0.0648	0.0000	302.6545	302.6545	0.0711	0.0000	304.4331
Total	**0.1784**	**1.6273**	**2.0991**	**3.5200e-003**		**0.0689**	**0.0689**		**0.0648**	**0.0648**	**0.0000**	**302.6545**	**302.6545**	**0.0711**	**0.0000**	**304.4331**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2026

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0436	1.6335	0.5996	7.4500e-003	0.2724	9.1800e-003	0.2816	0.0786	8.7800e-003	0.0874	0.0000	729.9619	729.9619	0.0259	0.1061	762.2358
Worker	0.7492	0.5082	7.7991	0.0247	3.1885	0.0159	3.2044	0.8468	0.0146	0.8614	0.0000	2,357.0023	2,357.0023	0.0478	0.0527	2,373.8875
Total	**0.7928**	**2.1417**	**8.3988**	**0.0322**	**3.4609**	**0.0251**	**3.4860**	**0.9254**	**0.0234**	**0.9488**	**0.0000**	**3,086.9642**	**3,086.9642**	**0.0737**	**0.1588**	**3,136.1233**

3.5 Building Construction - 2027

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1785	1.6273	2.0991	3.5200e-003		0.0689	0.0689		0.0648	0.0648	0.0000	302.6549	302.6549	0.0711	0.0000	304.4335
Total	**0.1785**	**1.6273**	**2.0991**	**3.5200e-003**		**0.0689**	**0.0689**		**0.0648**	**0.0648**	**0.0000**	**302.6549**	**302.6549**	**0.0711**	**0.0000**	**304.4335**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2027

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0428	1.6215	0.5935	7.3000e-003	0.2724	9.1400e-003	0.2815	0.0786	8.7400e-003	0.0874	0.0000	715.4197	715.4197	0.0259	0.1041	747.0965
Worker	0.7078	0.4649	7.3839	0.0240	3.1885	0.0149	3.2035	0.8468	0.0137	0.8605	0.0000	2,308.4661	2,308.4661	0.0437	0.0500	2,324.4549
Total	**0.7506**	**2.0864**	**7.9774**	**0.0313**	**3.4609**	**0.0241**	**3.4850**	**0.9254**	**0.0225**	**0.9479**	**0.0000**	**3,023.8858**	**3,023.8858**	**0.0696**	**0.1541**	**3,071.5514**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1784	1.6273	2.0991	3.5200e-003		0.0689	0.0689		0.0648	0.0648	0.0000	302.6545	302.6545	0.0711	0.0000	304.4331
Total	**0.1784**	**1.6273**	**2.0991**	**3.5200e-003**		**0.0689**	**0.0689**		**0.0648**	**0.0648**	**0.0000**	**302.6545**	**302.6545**	**0.0711**	**0.0000**	**304.4331**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2027

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0428	1.6215	0.5935	7.3000e-003	0.2724	9.1400e-003	0.2815	0.0786	8.7400e-003	0.0874	0.0000	715.4197	715.4197	0.0259	0.1041	747.0965
Worker	0.7078	0.4649	7.3839	0.0240	3.1885	0.0149	3.2035	0.8468	0.0137	0.8605	0.0000	2,308.4661	2,308.4661	0.0437	0.0500	2,324.4549
Total	**0.7506**	**2.0864**	**7.9774**	**0.0313**	**3.4609**	**0.0241**	**3.4850**	**0.9254**	**0.0225**	**0.9479**	**0.0000**	**3,023.8858**	**3,023.8858**	**0.0696**	**0.1541**	**3,071.5514**

3.5 Building Construction - 2028

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1778	1.6211	2.0910	3.5000e-003		0.0686	0.0686		0.0645	0.0645	0.0000	301.4953	301.4953	0.0709	0.0000	303.2671
Total	**0.1778**	**1.6211**	**2.0910**	**3.5000e-003**		**0.0686**	**0.0686**		**0.0645**	**0.0645**	**0.0000**	**301.4953**	**301.4953**	**0.0709**	**0.0000**	**303.2671**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2028

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0420	1.6051	0.5869	7.1300e-003	0.2714	9.0600e-003	0.2804	0.0783	8.6700e-003	0.0870	0.0000	698.8573	698.8573	0.0258	0.1018	729.8367
Worker	0.6674	0.4269	7.0116	0.0233	3.1763	0.0139	3.1902	0.8436	0.0128	0.8563	0.0000	2,257.5553	2,257.5553	0.0401	0.0476	2,272.7363
Total	**0.7094**	**2.0320**	**7.5985**	**0.0305**	**3.4477**	**0.0229**	**3.4706**	**0.9219**	**0.0214**	**0.9433**	**0.0000**	**2,956.4126**	**2,956.4126**	**0.0659**	**0.1494**	**3,002.5730**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1778	1.6211	2.0910	3.5000e-003		0.0686	0.0686		0.0645	0.0645	0.0000	301.4949	301.4949	0.0709	0.0000	303.2667
Total	**0.1778**	**1.6211**	**2.0910**	**3.5000e-003**		**0.0686**	**0.0686**		**0.0645**	**0.0645**	**0.0000**	**301.4949**	**301.4949**	**0.0709**	**0.0000**	**303.2667**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2028

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0420	1.6051	0.5869	7.1300e-003	0.2714	9.0600e-003	0.2804	0.0783	8.6700e-003	0.0870	0.0000	698.8573	698.8573	0.0258	0.1018	729.8367
Worker	0.6674	0.4269	7.0116	0.0233	3.1763	0.0139	3.1902	0.8436	0.0128	0.8563	0.0000	2,257.5553	2,257.5553	0.0401	0.0476	2,272.7363
Total	**0.7094**	**2.0320**	**7.5985**	**0.0305**	**3.4477**	**0.0229**	**3.4706**	**0.9219**	**0.0214**	**0.9433**	**0.0000**	**2,956.4126**	**2,956.4126**	**0.0659**	**0.1494**	**3,002.5730**

3.5 Building Construction - 2029

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0274	0.2494	0.3217	5.4000e-004		0.0106	0.0106		9.9300e-003	9.9300e-003	0.0000	46.3839	46.3839	0.0109	0.0000	46.6565
Total	**0.0274**	**0.2494**	**0.3217**	**5.4000e-004**		**0.0106**	**0.0106**		**9.9300e-003**	**9.9300e-003**	**0.0000**	**46.3839**	**46.3839**	**0.0109**	**0.0000**	**46.6565**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2029

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.3700e-003	0.2453	0.0898	1.0800e-003	0.0418	1.3900e-003	0.0431	0.0121	1.3300e-003	0.0134	0.0000	105.4792	105.4792	3.9800e-003	0.0154	110.1602
Worker	0.0970	0.0608	1.0319	3.5100e-003	0.4887	1.9900e-003	0.4907	0.1298	1.8300e-003	0.1316	0.0000	341.5927	341.5927	5.6900e-003	7.0300e-003	343.8292
Total	**0.1034**	**0.3061**	**1.1217**	**4.5900e-003**	**0.5304**	**3.3800e-003**	**0.5338**	**0.1418**	**3.1600e-003**	**0.1450**	**0.0000**	**447.0719**	**447.0719**	**9.6700e-003**	**0.0224**	**453.9894**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0274	0.2494	0.3217	5.4000e-004		0.0106	0.0106		9.9300e-003	9.9300e-003	0.0000	46.3838	46.3838	0.0109	0.0000	46.6564
Total	**0.0274**	**0.2494**	**0.3217**	**5.4000e-004**		**0.0106**	**0.0106**		**9.9300e-003**	**9.9300e-003**	**0.0000**	**46.3838**	**46.3838**	**0.0109**	**0.0000**	**46.6564**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2029

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.3700e-003	0.2453	0.0898	1.0800e-003	0.0418	1.3900e-003	0.0431	0.0121	1.3300e-003	0.0134	0.0000	105.4792	105.4792	3.9800e-003	0.0154	110.1602
Worker	0.0970	0.0608	1.0319	3.5100e-003	0.4887	1.9900e-003	0.4907	0.1298	1.8300e-003	0.1316	0.0000	341.5927	341.5927	5.6900e-003	7.0300e-003	343.8292
Total	**0.1034**	**0.3061**	**1.1217**	**4.5900e-003**	**0.5304**	**3.3800e-003**	**0.5338**	**0.1418**	**3.1600e-003**	**0.1450**	**0.0000**	**447.0719**	**447.0719**	**9.6700e-003**	**0.0224**	**453.9894**

3.6 Paving - 2029

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0503	0.4720	0.8018	1.2500e-003		0.0230	0.0230		0.0212	0.0212	0.0000	110.1059	110.1059	0.0356	0.0000	110.9962
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0503**	**0.4720**	**0.8018**	**1.2500e-003**		**0.0230**	**0.0230**		**0.0212**	**0.0212**	**0.0000**	**110.1059**	**110.1059**	**0.0356**	**0.0000**	**110.9962**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2029

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.8000e-003	1.1300e-003	0.0191	6.0000e-005	9.0500e-003	4.0000e-005	9.0900e-003	2.4000e-003	3.0000e-005	2.4400e-003	0.0000	6.3272	6.3272	1.1000e-004	1.3000e-004	6.3686
Total	**1.8000e-003**	**1.1300e-003**	**0.0191**	**6.0000e-005**	**9.0500e-003**	**4.0000e-005**	**9.0900e-003**	**2.4000e-003**	**3.0000e-005**	**2.4400e-003**	**0.0000**	**6.3272**	**6.3272**	**1.1000e-004**	**1.3000e-004**	**6.3686**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0503	0.4720	0.8018	1.2500e-003		0.0230	0.0230		0.0212	0.0212	0.0000	110.1058	110.1058	0.0356	0.0000	110.9960
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0503**	**0.4720**	**0.8018**	**1.2500e-003**		**0.0230**	**0.0230**		**0.0212**	**0.0212**	**0.0000**	**110.1058**	**110.1058**	**0.0356**	**0.0000**	**110.9960**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2029

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.8000e-003	1.1300e-003	0.0191	6.0000e-005	9.0500e-003	4.0000e-005	9.0900e-003	2.4000e-003	3.0000e-005	2.4400e-003	0.0000	6.3272	6.3272	1.1000e-004	1.3000e-004	6.3686
Total	**1.8000e-003**	**1.1300e-003**	**0.0191**	**6.0000e-005**	**9.0500e-003**	**4.0000e-005**	**9.0900e-003**	**2.4000e-003**	**3.0000e-005**	**2.4400e-003**	**0.0000**	**6.3272**	**6.3272**	**1.1000e-004**	**1.3000e-004**	**6.3686**

3.7 Architectural Coating - 2029

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	9.7119					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.4000e-003	0.0630	0.0995	1.6000e-004		2.8300e-003	2.8300e-003		2.8300e-003	2.8300e-003	0.0000	14.0429	14.0429	7.7000e-004	0.0000	14.0621
Total	**9.7213**	**0.0630**	**0.0995**	**1.6000e-004**		**2.8300e-003**	**2.8300e-003**		**2.8300e-003**	**2.8300e-003**	**0.0000**	**14.0429**	**14.0429**	**7.7000e-004**	**0.0000**	**14.0621**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2029

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0533	0.0334	0.5671	1.9300e-003	0.2685	1.0900e-003	0.2696	0.0713	1.0100e-003	0.0723	0.0000	187.7073	187.7073	3.1200e-003	3.8600e-003	188.9362
Total	**0.0533**	**0.0334**	**0.5671**	**1.9300e-003**	**0.2685**	**1.0900e-003**	**0.2696**	**0.0713**	**1.0100e-003**	**0.0723**	**0.0000**	**187.7073**	**187.7073**	**3.1200e-003**	**3.8600e-003**	**188.9362**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	9.7119					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.4000e-003	0.0630	0.0995	1.6000e-004		2.8300e-003	2.8300e-003		2.8300e-003	2.8300e-003	0.0000	14.0429	14.0429	7.7000e-004	0.0000	14.0620
Total	**9.7213**	**0.0630**	**0.0995**	**1.6000e-004**		**2.8300e-003**	**2.8300e-003**		**2.8300e-003**	**2.8300e-003**	**0.0000**	**14.0429**	**14.0429**	**7.7000e-004**	**0.0000**	**14.0620**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2029

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0533	0.0334	0.5671	1.9300e-003	0.2685	1.0900e-003	0.2696	0.0713	1.0100e-003	0.0723	0.0000	187.7073	187.7073	3.1200e-003	3.8600e-003	188.9362
Total	**0.0533**	**0.0334**	**0.5671**	**1.9300e-003**	**0.2685**	**1.0900e-003**	**0.2696**	**0.0713**	**1.0100e-003**	**0.0723**	**0.0000**	**187.7073**	**187.7073**	**3.1200e-003**	**3.8600e-003**	**188.9362**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	6.3777	7.0670	65.3625	0.1493	18.7170	0.0979	18.8149	4.9955	0.0912	5.0867	0.0000	14,593.0299	14,593.0299	0.8920	0.6093	14,796.9031
Unmitigated	6.3777	7.0670	65.3625	0.1493	18.7170	0.0979	18.8149	4.9955	0.0912	5.0867	0.0000	14,593.0299	14,593.0299	0.8920	0.6093	14,796.9031

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	15,204.80	13,723.45	11431.55	49,392,002	49,392,002
Single Family Housing	94.40	95.40	85.50	318,723	318,723
Total	15,299.20	13,818.85	11,517.05	49,710,725	49,710,725

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Single Family Housing	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.537356	0.064746	0.188411	0.126034	0.023886	0.006883	0.012812	0.008954	0.000819	0.000470	0.025457	0.000765	0.003406
Single Family Housing	0.537356	0.064746	0.188411	0.126034	0.023886	0.006883	0.012812	0.008954	0.000819	0.000470	0.025457	0.000765	0.003406

5.0 Energy Detail

Claremont HE Update - South Coast AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Historical Energy Use: N

5.1 Mitigation Measures Energy

Percent of Electricity Use Generated with Renewable Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	649.6463	649.6463	0.0454	5.5100e-003	652.4226
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,320.1654	2,320.1654	0.1622	0.0197	2,330.0806
NaturalGas Mitigated	0.1983	1.6946	0.7211	0.0108		0.1370	0.1370		0.1370	0.1370	0.0000	1,962.5095	1,962.5095	0.0376	0.0360	1,974.1718
NaturalGas Unmitigated	0.1983	1.6946	0.7211	0.0108		0.1370	0.1370		0.1370	0.1370	0.0000	1,962.5095	1,962.5095	0.0376	0.0360	1,974.1718

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Mid Rise	3.65211e+007	0.1969	1.6828	0.7161	0.0107		0.1361	0.1361		0.1361	0.1361	0.0000	1,948.9060	1,948.9060	0.0374	0.0357	1,960.4874
Single Family Housing	254921	1.3700e-003	0.0118	5.0000e-003	7.0000e-005		9.5000e-004	9.5000e-004		9.5000e-004	9.5000e-004	0.0000	13.6035	13.6035	2.6000e-004	2.5000e-004	13.6844
Total		**0.1983**	**1.6946**	**0.7211**	**0.0108**		**0.1370**	**0.1370**		**0.1370**	**0.1370**	**0.0000**	**1,962.5095**	**1,962.5095**	**0.0376**	**0.0360**	**1,974.1718**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Mid Rise	3.65211e+007	0.1969	1.6828	0.7161	0.0107		0.1361	0.1361		0.1361	0.1361	0.0000	1,948.9060	1,948.9060	0.0374	0.0357	1,960.4874
Single Family Housing	254921	1.3700e-003	0.0118	5.0000e-003	7.0000e-005		9.5000e-004	9.5000e-004		9.5000e-004	9.5000e-004	0.0000	13.6035	13.6035	2.6000e-004	2.5000e-004	13.6844
Total		**0.1983**	**1.6946**	**0.7211**	**0.0108**		**0.1370**	**0.1370**		**0.1370**	**0.1370**	**0.0000**	**1,962.5095**	**1,962.5095**	**0.0376**	**0.0360**	**1,974.1718**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Mid Rise	1.07589e+007	2,303.3427	0.1611	0.0195	2,313.1860
Single Family Housing	78579.4	16.8228	1.1800e-003	1.4000e-004	16.8947
Total		**2,320.1654**	**0.1622**	**0.0197**	**2,330.0806**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Mid Rise	3.0125e+006	644.9359	0.0451	5.4700e-003	647.6921
Single Family Housing	22002.2	4.7104	3.3000e-004	4.0000e-005	4.7305
Total		**649.6463**	**0.0454**	**5.5100e-003**	**652.4226**

6.0 Area Detail

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	12.0628	0.8784	29.0828	5.0100e-003		0.2046	0.2046		0.2046	0.2046	0.0000	679.4008	679.4008	0.0571	0.0116	684.2828
Unmitigated	12.0628	0.8784	29.0828	5.0100e-003		0.2046	0.2046		0.2046	0.2046	0.0000	679.4008	679.4008	0.0571	0.0116	684.2828

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.9712					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	10.1648					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0639	0.5459	0.2323	3.4800e-003		0.0441	0.0441		0.0441	0.0441	0.0000	632.1490	632.1490	0.0121	0.0116	635.9056
Landscaping	0.8629	0.3326	28.8506	1.5300e-003		0.1604	0.1604		0.1604	0.1604	0.0000	47.2518	47.2518	0.0450	0.0000	48.3772
Total	**12.0628**	**0.8784**	**29.0828**	**5.0100e-003**		**0.2046**	**0.2046**		**0.2046**	**0.2046**	**0.0000**	**679.4008**	**679.4008**	**0.0571**	**0.0116**	**684.2828**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.9712					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	10.1648					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0639	0.5459	0.2323	3.4800e-003		0.0441	0.0441		0.0441	0.0441	0.0000	632.1490	632.1490	0.0121	0.0116	635.9056
Landscaping	0.8629	0.3326	28.8506	1.5300e-003		0.1604	0.1604		0.1604	0.1604	0.0000	47.2518	47.2518	0.0450	0.0000	48.3772
Total	**12.0628**	**0.8784**	**29.0828**	**5.0100e-003**		**0.2046**	**0.2046**		**0.2046**	**0.2046**	**0.0000**	**679.4008**	**679.4008**	**0.0571**	**0.0116**	**684.2828**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	936.4526	0.3062	0.1626	992.5574
Unmitigated	936.4526	0.3062	0.1626	992.5574

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Mid Rise	201.196 / 126.841	933.7313	0.3053	0.1621	989.6730
Single Family Housing	0.586386 / 0.369678	2.7214	8.9000e-004	4.7000e-004	2.8844
Total		**936.4526**	**0.3062**	**0.1626**	**992.5574**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Mid Rise	201.196 / 126.841	933.7313	0.3053	0.1621	989.6730
Single Family Housing	0.586386 / 0.369678	2.7214	8.9000e-004	4.7000e-004	2.8844
Total		**936.4526**	**0.3062**	**0.1626**	**992.5574**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	290.5085	17.1686	0.0000	719.7225
Unmitigated	290.5085	17.1686	0.0000	719.7225

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Mid Rise	1420.48	288.3446	17.0407	0.0000	714.3616
Single Family Housing	10.66	2.1639	0.1279	0.0000	5.3609
Total		**290.5085**	**17.1686**	**0.0000**	**719.7225**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Mid Rise	1420.48	288.3446	17.0407	0.0000	714.3616
Single Family Housing	10.66	2.1639	0.1279	0.0000	5.3609
Total		**290.5085**	**17.1686**	**0.0000**	**719.7225**

9.0 Operational Offroad

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Appendix E

Transportation Impact Study

CITY OF CLAREMONT HOUSING ELEMENT UPDATE

DRAFT
Transportation Impact Study

DECEMBER 2021

Prepared For

City of Claremont
207 Harvard Avenue
Claremont, CA 91711

Prepared By

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1.0 Introduction

1.1 Purpose of the Report

This Transportation Impact Study (TIS) serves to identify and document potential transportation impacts related to the City of Claremont Housing Element Update (the "Proposed Project") and recommend mitigation measures, as appropriate.

The City of Claremont is located on the eastern edge of Los Angeles County, California, 30 miles east of downtown Los Angeles. It is in the Pomona Valley, at the foothills of the San Gabriel Mountains. **Figure 1.1** displays the City of Claremont location within the Southern California Association of Governments (SCAG) region.

In December 2018, the California Resources Agency certified and adopted revised California Environmental Quality Act (CEQA) Guidelines, including the new Section 15064.3. Under Section 15064.3, vehicle miles traveled (VMT), which includes the amount and distance of automobile traffic attributable to a project, is identified as the "most appropriate measure of transportation impacts."

State law requires each jurisdiction to demonstrate in their Housing Element that its land inventory is adequate to accommodate its share of the region's projected growth. The Housing Element is a required element of the City's General Plan that sets citywide goals, objectives and policies for housing and identifies housing conditions and needs within the community. The Housing Element must be updated every eight years. The Proposed Project evaluates the adoption of the City's 2021-2029 Housing Element, including rezones that will be necessary to implement the Housing Element and to achieve the City's Regional Housing Needs Assessment (RHNA) allocation. The HEU will ensure the City's General Plan is internally consistent and in compliance with State housing law. All housing sites are considered draft as they are subject to further review and approval by the City Council and the California Department of Housing and Community Development.

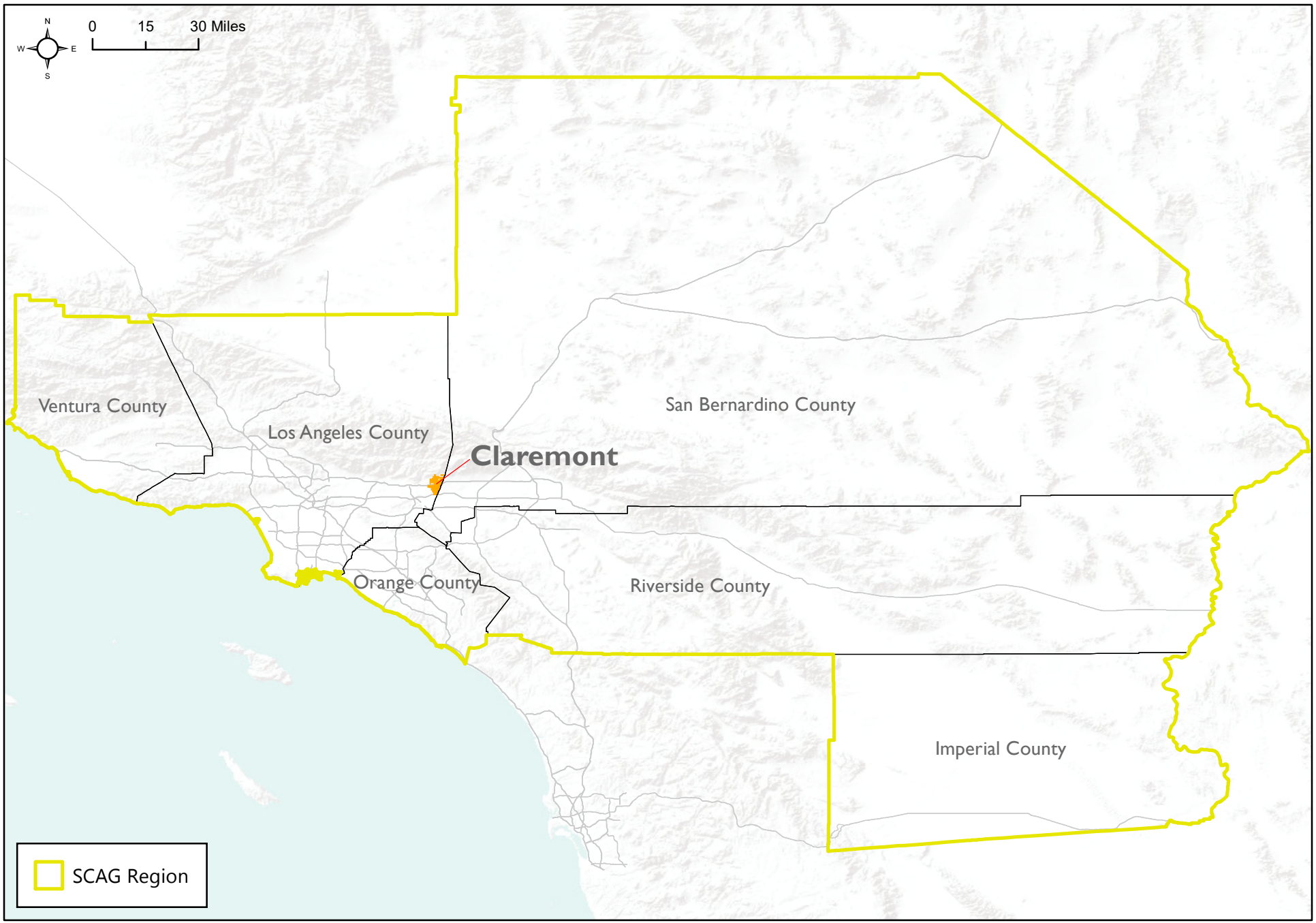
1.2 Study Scenarios

Three (3) study scenarios were evaluated, including base year (2018) and two (2) future year alternatives, as follows:

- **Base Year (2018)** – establishes the baseline VMT within the project study area (City of Claremont and its region, SCAG). The SCAG Model (SCAG) Base Year (2018) was utilized as a starting-point and validated for the City of Claremont.

- **No Project (Adopted General Plan)** – represents buildout of the City of Claremont's currently Adopted General Plan Land Use (both residential and commercial land uses) and Mobility Elements.

- **Proposed Project** – represents buildout of the City (both residential and commercial land uses) and the Proposed Project's rezone sites and proposed housing sites which were developed in collaboration with City staff and the project consultant team. The Proposed Project's sites override the sites identified in the City's Adopted General Plan. A summary of the proposed housing sites and locations are provided in **Appendix A** of this report.



Claremont Housing Element Update Transportation Impact Study

Figure 1.1
Regional Location

C+R

All study scenarios were modeled using the validated SCAG Model with Claremont-specific information, including roadway network and socioeconomic data. Additionally, the SCAG model utilized is consistent with the 2018-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and includes transportation projects such as highway improvements, transportation demand management projects, railroad grade separations, bicycle lanes, new transit hubs, new transit routes, and replacement bridges.

1.3 Report Organization

The remainder of this report is organized into the following chapters:

2.0 *Analysis Methodology* – This chapter describes the methodologies and thresholds utilized to evaluate potential VMT impacts for each of the future alternatives. Note that as of July 1, 2020, VMT is the metric (rather than Level of Service) for CEQA transportation-related impact evaluation.

3.0 *Project Impacts* – This chapter discusses the VMT analysis and identifies potential transportation impacts of the Proposed Project. Mitigation measures to reduce the identified VMT impacts, as necessary, are also discussed.

4.0 *Alternative Analysis* – This chapter discusses the VMT analysis and potential transportation impacts of the No Project alternative.

5.0 *Summary* – This chapter summarizes the findings of the VMT analysis

2.0 Analysis Methodology

On September 27, 2013, Governor Edmund G. Brown, Jr. signed SB-743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. Related revisions to the State's CEQA Guidelines include elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts, and replacement with Vehicle Miles Traveled (VMT) as the preferred CEQA transportation metric.

This chapter describes the methodologies and thresholds utilized to evaluate potential VMT impacts for future alternatives.

2.1 Determination of VMT Significant Impacts

VMT is positively correlated with growth and as the region is expected to grow, VMT is also expected to increase. However, where the growth occurs plays a significant role to determine how much the VMT will increase. Growth in areas with access to high-quality transit, a complete active transportation network, and/or complementary land use mixes are projected to be more VMT efficient.

Per the City of Claremont Transportation Study Guidelines (Claremont TSG) for Vehicle Miles Traveled and Level of Service Assessment (August 2020), the recommended efficiency metric is Resident VMT per Capita.

The following definitions describe how VMT is referred to, calculated, and accounted for in this programmatic CEQA impact analysis:

- **Resident VMT/Capita** includes all daily vehicle-based person trips originated from or ended at the home location of the individual (driver or passenger). Only home-based VMT are included in this calculation. The VMT for each individual is then summed for all individuals in the analysis area and divided by the population of the same analysis area to arrive at Resident VMT/Capita.

The VMT/capita results should be compared to the 85th percentile of region's average for that land use type – in this case, the San Gabriel Valley Council of Governments Northeast resident VMT/Capita was used. The regional average VMT is determined using the SCAG Base Year (2018), and the regional average resident VMT per Capita is 19.5 miles. Excerpts from the regional transportation model are provided in **Appendix B**.

Consistent with the Claremont TSG, the significance threshold is shown in **Table 2.1**.

Table 1.1 - Transportation VMT Thresholds of Significance by Land Use Type

Land Use Type	Threshold for Determination of a Significant Transportation VMT Impact
Residential	15% Below Region's Average Resident VMT/Capita

For the purpose of this transportation impact study, a Plan-to-Ground analysis was conducted by comparing the Proposed Project and the No Project Alternative to Base Year (2018), which is representative of the baseline conditions.

3.0 Impact Analysis

This chapter focuses on whether the Proposed Project would have a significant impact and if the proposed new residential land uses would in aggregate exceed the VMT/Capita threshold identified in Table 3.1.

3.1 VMT Impact Analysis

To establish a baseline understanding, **Table 3.1** displays both the SCAG region and Claremont's resident VMT efficiency metrics for the Base Year (2018) conditions. As shown, Claremont has a more efficient VMT per capita when compared to the region, at approximately 92 percent of the region's resident VMT/capita.

Table 3.1 - Claremont & Region Base Year VMT Metrics for Transportation Impact Analysis

VMT Metric	Base Year (2018)		% of Regional Base Year
	SGVCOG Northeast	Claremont	Claremont
Resident VMT/Capita	19.5	17.9	92%

Source: SCAG, Iteris, CR Associates (2021)

Table 3.2 presents the Claremont average resident VMT/capita for the Proposed Project.

Table 3.2 - Claremont w/Proposed Project & Region VMT Efficiency Metrics for Transportation Impact Analysis of Residential Uses

VMT Metric	SGVCOG Northeast	Claremont	% of Regional Base Year	Significant Impact?
Resident VMT / Capita	19.5	14.4	74% (< 85%)	No

Source: SCAG, Iteris, CR Associates (2021)

As shown in Table 3.2, with the implementation of the Proposed Project land uses, including buildout of the City's General Plan land use and buildout of the transportation network, the VMT efficiency of Claremont increases as the VMT/Capita goes from 17.9 under base year to 14.4.

Residential Land Uses Impact?
As shown in the table above, Claremont is projected to have an average Resident VMT per Capita of 14.4, which is 74 percent of the base year regional average. VMT associated with residential would not exceed the 85 percent threshold at buildout of the Proposed Project. Therefore, impacts related to VMT for residential land uses would be presumed to be less than significant.

3.2 Mitigation Measures

As described in the Land Use Element of the General Plan, the City's goal for residential land uses is to achieve a mix of residential neighborhoods and housing types that meet the diverse economic and physical needs of residents, that is compatible with existing neighborhoods and the surrounding environmental setting, and that reflects community expectations for high quality. Additionally, new residential developments shall be designed to promote environmentally sustainable construction and landscaping and is integrated into the established network of parks, trails and schools that unite neighborhoods. By bringing in varied and complementary uses and a mobility network that supports

and encourages walking, biking, and taking transit, the Proposed Project could contribute to a more VMT efficient and sustainable future for the community.

Residential Land Uses

As shown in Table 3.2, impacts associated with the Proposed Project are presumed to be less than significant, therefore, mitigation measures are not required. Overall, the proposed HEU is a planning document intended to guide future development throughout Claremont. It provides detailed policies and implementation guidance that would be applicable for future developments. Due to the programmatic nature of the proposed HEU, it does not propose any specific development projects, and thus, cannot adequately anticipate specific project-level impact and mitigation requirements at this time.

Projects that are located within Transit Priority Area (TPA) may be presumed to have a less than significant impact and should be evaluated at the project-level. Project-level screening and analysis should be conducted using the City of Claremont TSG[1]. Project-level mitigation measures would be required for those that exceed 85% of the regional VMT/capita threshold. This could be accomplished through a citywide VMT reduction ordinance that would require development projects to reduce their VMT per capita to the extent feasible by providing on-site VMT reducing infrastructure such as those found in the California Air Pollution Control Officers Association (CAPCOA)'s *Quantifying Greenhouse Gas Mitigation Measures* or other sources that have been vetted through peer-review research. Development projects may be required to pay a fee that would fund active transportation infrastructure and transit improvements to reduce citywide VMT, or participate in the regional VMT mitigation bank.

[1] https://www.ci.claremont.ca.us/home/showpublisheddocument/15846/637468392143100000

4.0 Alternatives Analysis

This chapter discusses potential VMT impacts under the No Project alternative. The No Project alternative is identical to the currently adopted General Plan. The VMT reports for residential land uses are included in **Appendix C**.

4.1 No Project Alternative (Adopted General Plan)

The purpose of evaluating the No Project alternative is to allow decision makers to compare the outcomes of approving the Proposed Project vs. maintaining the currently Adopted Plan.

Table 4.1 presents the Claremont average resident VMT under the No Project alternative.

Table 4.1 - Claremont No Project Alternative VMT Efficiency Metrics for Transportation Impact Analysis of Residential Uses

VMT Metric	SGVCOG Northeast	Claremont	% of Regional Base Year	Significant Impact?
Resident VMT / Capita	19.5	16.7	86% (>85%)	Yes

Source: SCAG, Iteris, CR Associates (2021)

As shown in Table 4.1, the No Project VMT/Capita also exceeds 85% of the regional average. The No Project alternative would also result in a significant VMT impact.

Mitigation measures discussed in Section 3.2 should be taken into consideration to reduce VMT/Capita to the extent feasible.

5.0 Summary

As shown in this report, the Proposed Project would not have a resident VMT/capita exceeding 85% of the regional average. The No Project alternative would have a resident VMT/capita exceeding 85% of the regional average. Therefore, mitigation measures would not be required for the Proposed Project.

Appendix A - HEU Land Uses and Locations

RHNA 6th Cycle Site ID	APN	Site Address	UseType	Lot Acerage	Year Built	Current Zone Code	Current Zone Description	Current Zone Dwellings Per Acre	Proposed Zone Code	Proposed Zone Description	Proposed Zone DUA	Proposed Zone DUA Adjusted	Lot Acres Adjusted	Dwelling Units	Income Level Supported	Lower Income Units*	Moderate Income Units*	Above Moderate Income Units*
1	8315-013-016	735 S MILLS AVE	Institutional	1.88	1962	CP	Commercial Professional	21	MFR 30/acre	MFR 30/acre	30	-	1.88	**56**	Lower Income	29	10	18
2	8315-029-011	616 SYCAMORE AVE	Institutional	0.92	1958	RS 8,000	Residential Single-Family Min Lot Size 8,000 sqft	13	RM 2,000	Residential Multi-Family Min Lot Size 2,000 sqft	21	-	0.92	**19**	Moderate Income	-	8	11
3	8315-009-037	630 S INDIAN HILL BLVD	Commercial	0.63	1945	CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	-	0.63	**18**	Lower Income	9	3	6
3	8315-009-036	600 S INDIAN HILL BLVD	Commercial	0.81	1979	CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	-	0.81	**24**	Lower Income	12	4	8
3	8315-009-043	638 S INDIAN HILL BLVD	Institutional	1.31	1948	CP	Commercial Professional	21	MU 30/acre	MU 30/acre	30	-	1.31	**39**	Lower Income	20	7	12
4	8315-008-051	509 S COLLEGE AVE	Institutional	2.67	1959	RS 8,000	Residential Single-Family Min Lot Size 8,000 sqft	13	RM 4000	Residential Multi-Family Min Lot/Unit Area 4,000 sqft	10.89	-	1.37	**14**	Above Moderate Income	-	-	14
5	8316-001-010	395 S INDIAN HILL BLVD	Commercial	0.57	1990	CP	Commercial Professional	21	MU 60/acre	MU 60/acre	60	-	0.57	**34**	Lower Income	17	6	11
6	8316-001-005	323 S INDIAN HILL BLVD	Commercial	0.16	1981	CP	Commercial Professional	21	MU 60/acre	MU 60/acre	60	-	0.16	**9**	Lower Income	5	2	3
6	8316-001-004	424 W ARROW HWY	Commercial	0.28	1941	CP	Commercial Professional	21	MU 60/acre	MU 60/acre	60	-	0.28	**16**	Lower Income	8	3	5
7	8313-007-009	525 W ARROW HWY BLDG 1	Industrial	2.22	1978	B-IP	Business - Industrial Park	0	MU 30/acre	MU 30/acre	30	-	2.22	**66**	Lower Income	34	11	21
8	8313-025-013	254 S INDIAN HILL BLVD	Residential	0.18	1953	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.18	**10**	Lower Income	5	2	3
8	8313-025-019	-	Commercial	0.18	-	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.18	**10**	Lower Income	5	2	3
8	8313-025-012	258 S INDIAN HILL BLVD	Residential	0.37	-	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.37	**21**	Lower Income	11	4	7
8	8313-025-014	250 S INDIAN HILL BLVD	Residential	0.19	1953	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.19	**10**	Lower Income	5	2	3
8	8313-025-023	220 S INDIAN HILL BLVD	Commercial	0.37	1979	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.37	**21**	Lower Income	11	4	7
8	8313-025-015	240 S INDIAN HILL BLVD	Residential	0.18	1948	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.18	**10**	Lower Income	5	2	3
8	8313-025-011	313 W ARROW HWY	Residential	0.22	-	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.22	**12**	Lower Income	6	2	4
8	8313-025-020	212 S INDIAN HILL BLVD	Commercial	0.19	1975	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.19	**10**	Lower Income	5	2	3
8	8313-025-016	230 S INDIAN HILL BLVD	Residential	0.18	1952	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.18	**10**	Lower Income	5	2	3
9	8313-024-008	194 S INDIAN HILL BLVD	Residential	0.18	1930	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.18	**10**	Lower Income	5	2	3
9	8313-024-009	188 S INDIAN HILL BLVD	Residential	0.12	1917	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.12	**6**	Lower Income	3	1	2
10	8313-008-003	177 S INDIAN HILL BLVD	Industrial	0.55	1956	B-IP	Business - Industrial Park	0	VSSP	Village South Specific Plan	57	-	0.55	**31**	Lower Income	16	5	10
10	8313-008-006	232 BUCKNELL AVE	Residential	0.19	1920	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.19	**11**	Lower Income	6	2	4
10	8313-008-014	445 W ARROW HWY	Residential	0.14	1932	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.14	**8**	Lower Income	4	1	3
10	8313-008-009	260 BUCKNELL AVE	Residential	0.22	1947	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.22	**12**	Lower Income	6	2	4
10	8313-008-010	471 W ARROW HWY	Residential	0.20	1930	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.20	**11**	Lower Income	6	2	4
10	8313-008-028	121 S INDIAN HILL BLVD	Industrial	3.66	1928	B-IP	Business - Industrial Park	0	VSSP	Village South Specific Plan	57	-	3.66	**208**	Lower Income	106	35	67
10	8313-008-025	205 S INDIAN HILL BLVD	Commercial	1.17	1964	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	-	1.17	**66**	Lower Income	34	11	21
10	8313-008-004	191 S INDIAN HILL BLVD	Commercial	2.45	1959	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	-	2.45	**139**	Lower Income	71	24	44
10	8313-008-019	259 S INDIAN HILL BLVD	Commercial	0.24	1945	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	-	0.24	**13**	Lower Income	7	2	4
10	8313-008-020	267 S INDIAN HILL BLVD	Commercial	0.33	1974	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	-	0.33	**18**	Lower Income	9	3	6
10	8313-008-011	469 W ARROW HWY	Commercial	0.42	-	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.42	**23**	Lower Income	12	4	7
10	8313-008-031	433 W ARROW HWY	Commercial	0.21	1931	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.21	**12**	Lower Income	6	2	4
10	8313-008-027	-	Commercial	0.16	-	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.16	**9**	Lower Income	5	2	3
10	8313-008-024	203 S INDIAN HILL BLVD	Commercial	0.46	1971	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	-	0.46	**26**	Lower Income	13	4	8
10	8313-008-021	-	Commercial	0.19	-	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	-	0.19	**10**	Lower Income	5	2	3
10	8313-008-015	449 W ARROW HWY	Residential	0.19	1940	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.19	**10**	Lower Income	5	2	3
10	8313-008-900	451 W ARROW HWY	Residential	1.41	-	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	1.41	**80**	Lower Income	41	14	26
10	8313-008-018	253 S INDIAN HILL BLVD	Residential	0.24	1925	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	-	0.24	**13**	Lower Income	7	2	4
10	8313-008-023	180 BUCKNELL AVE	Industrial	0.73	1956	B-IP	Business - Industrial Park	0	VSSP	Village South Specific Plan	57	-	0.73	**41**	Lower Income	21	7	13
10	8313-008-007	244 BUCKNELL AVE	Residential	0.15	1958	CP	Commercial Professional	21	VSSP	Village South Specific Plan	57	-	0.15	**8**	Lower Income	4	1	3
10	8313-008-026	204 BUCKNELL AVE	Industrial	0.82	1959	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	-	0.82	**46**	Lower Income	23	8	15
10	8313-008-017	241 S INDIAN HILL BLVD	Residential	0.24	1949	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	-	0.24	**13**	Lower Income	7	2	4
10	8313-008-016	233 S INDIAN HILL BLVD	Commercial	0.25	1922	CH	Commercial Highway	21	VSSP	Village South Specific Plan	57	-	0.25	**14**	Lower Income	7	2	4
11	8313-023-012	189 EL CAMINO WAY	Residential	0.16	1954	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 60/acre	MFR 60/acre	60	45	0.16	**7**	Lower Income	4	1	2
11	8313-023-023	195 EL CAMINO WAY	Residential	0.17	1954	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 60/acre	MFR 60/acre	60	45	0.17	**7**	Lower Income	4	1	2
12	8313-021-011	100 W 1ST ST	Commercial	0.68	1981	CV	Commercial Village	0	MU 60/acre	MU 60/acre	60	45	0.68	**30**	Lower Income	15	5	10
13	8313-021-007	250 W 1ST ST	Commercial	2.80	1981	CV	Commercial Village	0	MU 60/acre	MU 60/acre	60	45	0.64	**29**	Lower Income	15	5	9
14	8314-017-900	-	Government	6.13	-	MU2	Mixed Use 2 - College Avenue/South Village Transit-	54	MFR 60/acre	MFR 60/acre	60	45	4.08	**183**	Lower Income	93	31	59
15	8313-006-036	830 W BONITA AVE	Institutional	3.19	1970	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MU 30/acre	MU 30/acre	30	-	1.43	**42**	Lower Income	21	7	13
16	8313-006-003	660 W BONITA AVE	Residential	8.39	1963	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 60/acre	MFR 60/acre	60	45	0.82	**36**	Lower Income	18	6	12
17	8313-011-004	524 W BONITA AVE	Residential	0.18	1992	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.18	**3**	Moderate Income	-	1	2
17	8313-011-006	538 W BONITA AVE	Residential	0.17	1959	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.17	**3**	Moderate Income	-	1	2
17	8313-011-019	140 CORNELL AVE	Residential	0.20	1961	SP8	Specific Plan Area 8 - Village Expansion	21	MX	MX	60	-	0.20	**11**	Lower Income	6	2	4
17	8313-011-001	245 OBERLIN AVE	Residential	0.19	1954	SP8	Specific Plan Area 8 - Village Expansion	62	RMX	RMX	20	-	0.19	**3**	Moderate Income	-	1	2
17	8313-011-031	201 OBERLIN AVE	Residential	0.20	1906	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.20	**4**	Moderate Income	-	2	2
17	8313-011-016	127 OBERLIN AVE	Commercial	1.66	-	SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	-	1.66	**99**	Lower Income	50	17	32
17	8313-011-021	150 CORNELL AVE	Residential	0.21	-	SP8	Specific Plan Area 8 - Village Expansion	21	MX	MX	60	-	0.21	**12**	Lower Income	6	2	4

RHNA 6th Cycle Site ID	APN	Site Address	UseType	Lot Acerage	Year Built	Current Zone Code	Current Zone Description	Current Zone Dwellings Per Acre	Proposed Zone Code	Proposed Zone Description	Proposed Zone DUA	Proposed Zone DUA Adjusted	Lot Acres Adjusted	Dwelling Units	Income Level Supported	Lower Income Units*	Moderate Income Units*	Above Moderate Income Units*
17	8313-011-018	136 CORNELL AVE	Residential	0.10	1930	SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	-	0.10	**6**	Lower Income	3	1	2
17	8313-011-017	130 CORNELL AVE	Residential	0.10	1922	SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	-	0.10	**6**	Lower Income	3	1	2
17	8313-011-007	550 W BONITA AVE	Residential	0.26	1934	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.26	**5**	Moderate Income	-	2	3
17	8313-011-026	214 CORNELL AVE	Residential	0.32	1930	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.32	**6**	Moderate Income	-	3	3
17	8313-011-024	205 OBERLIN AVE	Residential	0.31	1964	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.31	**6**	Moderate Income	-	3	3
17	8313-011-002	516 W BONITA AVE	Residential	0.13	1932	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.13	**2**	Moderate Income	-	1	1
17	8313-011-020	148 CORNELL AVE	Residential	0.21	1907	SP8	Specific Plan Area 8 - Village Expansion	62	MX	MX	60	-	0.21	**12**	Lower Income	6	2	4
17	8313-011-005	528 W BONITA AVE	Residential	0.18	1959	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.18	**3**	Moderate Income	-	1	2
18	8313-012-007	244 OBERLIN AVE	Residential	0.09	1924	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.09	**1**	Moderate Income	-	0	1
18	8313-012-019	216 OBERLIN AVE	Residential	0.09	1910	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.09	**1**	Moderate Income	-	0	1
18	8313-012-038	-	Government	0.05	-	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.05	**-**	Moderate Income	-	-	-
18	8313-012-018	210 OBERLIN AVE	Residential	0.09	1930	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.09	**1**	Moderate Income	-	0	1
18	8313-012-006	490 W BONITA AVE	Residential	0.10	1925	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.10	**2**	Moderate Income	-	1	1
18	8313-012-004	219 N INDIAN HILL BLVD	Commercial	0.25	1966	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.25	**4**	Moderate Income	-	2	2
18	8313-012-003	432 W BONITA AVE	Commercial	0.18	1969	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.18	**3**	Moderate Income	-	1	2
18	8313-012-023	440 W BONITA AVE	Residential	0.44	1924	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.44	**8**	Moderate Income	-	3	5
18	8313-012-001	408 W BONITA AVE	Residential	0.23	1908	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.23	**4**	Moderate Income	-	2	2
18	8313-012-002	231 N INDIAN HILL BLVD	Commercial	0.23	1969	SP8	Specific Plan Area 8 - Village Expansion	21	RMX	RMX	20	-	0.23	**4**	Moderate Income	-	2	2
19	8313-013-800	-	Government	0.44	-	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 30/acre	Residential Multi-Family Min	30	-	0.44	**13**	Lower Income	7	2	4
20	8314-010-012	-	Residential	0.17	-	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	-	0.17	**1**	Above Moderate Income	-	-	1
20	8314-010-011	242 BROOKS AVE	Residential	0.17	1948	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	-	0.17	**1**	Above Moderate Income	-	-	1
20	8314-010-013	-	Residential	0.35	-	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	-	0.35	**2**	Above Moderate Income	-	-	2
20	8314-010-009	230 BROOKS AVE	Residential	0.34	1947	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	-	0.34	**2**	Above Moderate Income	-	-	2
20	8314-010-010	236 BROOKS AVE	Residential	0.34	1912	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	-	0.34	**2**	Above Moderate Income	-	-	-
20	8314-010-015	-	Residential	0.17	-	AV1	Arbol Verde 1	7	AV1	Arbol Verde 1	7.26	-	0.17	**1**	Above Moderate Income	-	-	-
21	8310-019-015	701 HARRISON AVE	Institutional	1.24	1970	IR	Institution Residential	0	MFR 30/acre	Residential Multi-Family Min	30	-	0.57	**17**	Lower Income	9	3	5
22	8310-019-013	731 HARRISON AVE	Residential	0.55	-	IR	Institution Residential	0	MFR 30/acre	Residential Multi-Family Min	30	-	0.55	**16**	Lower Income	8	3	5
22	8310-019-016	-	Residential	0.23	-	IR	Institution Residential	0	MFR 30/acre	Residential Multi-Family Min Lot/Unit Area 1,452 sqft	30	-	0.23	**6**	Lower Income	3	1	2
23	8311-001-016	1030 W FOOTHILL BLVD	Commercial	3.28	1972	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	3.28	**49**	Moderate Income	-	21	28
23	8311-006-021	984 W FOOTHILL BLVD	Commercial	1.00	1950	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	1.00	**15**	Moderate Income	-	6	9
23	8311-006-002	970 W FOOTHILL BLVD	Commercial	0.20	1977	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	0.20	**3**	Moderate Income	-	1	2
23	8311-001-020	1020 W FOOTHILL BLVD	Commercial	0.67	1978	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	0.68	**10**	Moderate Income	-	4	6
23	8311-006-013	956 W FOOTHILL BLVD	Commercial	1.14	1968	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	1.14	**17**	Moderate Income	-	7	10
23	8311-006-022	994 W FOOTHILL BLVD	Commercial	0.60	1950	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	0.60	**8**	Moderate Income	-	3	5
24	8306-016-038	211 W FOOTHILL BLVD	Institutional	6.97	1962	CP	Commercial Professional	21	RS 10,000	Residential Single-Family	4	-	0.86	**3**	Above Moderate Income	-	-	-
25	8303-024-015	817 W FOOTHILL BLVD	Commercial	0.10	1963	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	0.27	**3**	Moderate Income	-	1	2
25	8303-024-016	831 W FOOTHILL BLVD	Commercial	0.12	1963	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	0.12	**1**	Moderate Income	-	0	1
26	8303-024-018	863 W FOOTHILL BLVD	Commercial	0.45	1972	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	0.45	**6**	Moderate Income	-	3	3
26	8303-024-019	855 W FOOTHILL BLVD	Commercial	0.49	1964	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	0.49	**7**	Moderate Income	-	3	4
27	8303-025-022	915 W FOOTHILL BLVD	Commercial	0.65	1976	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	0.65	**9**	Moderate Income	-	4	5
27	8303-025-015	921 W FOOTHILL BLVD	Commercial	0.59	1970	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	0.59	**8**	Moderate Income	-	3	5
28	8303-025-017	981 W FOOTHILL BLVD	Commercial	0.58	1978	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	0.58	**8**	Moderate Income	-	3	5
28	8303-025-018	985 W FOOTHILL BLVD	Commercial	1.01	1973	MU3	Mixed Use 3	15	MU3	Mixed Use 3	15	-	1.01	**15**	Moderate Income	-	6	9
29	8305-016-007	601 W FOOTHILL BLVD	Commercial	3.75	1976	SP10	Specific Plan Area 10	21	MU 30/acre	MU 30/acre	30	-	1.30	**39**	Lower Income	20	7	12
30	8305-020-002	-	Commercial	7.63	1972	SP9	Specific Plan Area 9 - Old School House/Claremont	0	MU 30/acre	MU 30/acre	30	-	1.52	**45**	Lower Income	23	8	14
31	8303-026-011	1364 N TOWNE AVE	Institutional	1.89	1964	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 30/acre	MFR 30/acre	30	-	1.89	**56**	Lower Income	29	10	18
31	8303-026-012	1350 N TOWNE AVE	Commercial	0.76	1965	MU3	Mixed Use 3	37	MU3	Mixed Use 3	15	-	0.76	**11**	Moderate Income	-	5	6
32	8306-008-023	1550 N INDIAN HILL BLVD	Institutional	2.97	1959	IE	Institution Educational	0	MFR 30/acre	Residential Multi-Family Min	30	-	2.98	**89**	Lower Income	45	15	28
32	8306-008-022	1575 N COLLEGE AVE	Institutional	4.37	1951	IE	Institution Educational	0	MFR 30/acre	Residential Multi-Family Min	30	-	4.37	**131**	Lower Income	67	22	42
33	8302-018-028	-	Residential	1.37	-	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	RS 10,000	RS 10,000	4	-	0.78	**3**	Above Moderate Income	-	-	3
33	8302-018-027	-	Residential	1.43	-	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	RS 10,000	RS 10,000	4	-	0.68	**2**	Above Moderate Income	-	-	-
33	8302-021-053	-	Residential	0.37	-	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	RS 10,000	RS 10,000	4	-	0.27	**1**	Above Moderate Income	-	-	-
34	8307-002-041	-	Residential	3.16	-	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	RM 3000	Residential Multi-Family Min	15	-	3.16	**47**	Moderate Income	-	20	27
35	8302-032-025	-	Residential	0.18	-	SP5	Specific Plan Area 5 - Williams Ave	0	MFR 30/acre	MFR 30/acre	30	-	0.18	**5**	Lower Income	3	1	2

RHNA 6th Cycle Site ID	APN	Site Address	UseType	Lot Acerage	Year Built	Current Zone Code	Current Zone Description	Current Zone Dwellings Per Acre	Proposed Zone Code	Proposed Zone Description	Proposed Zone DUA	Proposed Zone DUA Adjusted	Lot Acres Adjusted	Dwelling Units	Income Level Supported	Lower Income Units*	Moderate Income Units*	Above Moderate Income Units*
35	8302-032-900	-	Residential	2.14	-	P/RC	Park / Resource Conservation	0	MFR 30/acre	MFR 30/acre	30	-	2.14	**64**	Lower Income	33	11	20
36	8670-008-025	2050 N INDIAN HILL BLVD	Institutional	3.27	1955	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	MFR 30/acre	MFR 30/acre	30	-	2.25	**67**	Lower Income	34	11	21
37	8302-014-016	-	Residential	0.46	-	RS 10,000	Residential Single-Family Min Lot Size 10,000 sqft	4	MFR 30/acre	MFR 30/acre	30	-	0.46	**13**	Lower Income	7	2	4
38	8670-010-025	431 W BASELINE RD	Commercial	0.97	1965	CP	Commercial Professional	21	MFR 30/acre	MFR 30/acre	30	-	0.97	**28**	Lower Income	14	5	9
39	8313-023-015	165 EL CAMINO WAY	Residential	0.17	1956	RM 2,000	Residential Multi-Family Min Lot/Unit Area 2,000 sqft	21	MFR 60/acre	MFR 60/acre	60	45	0.17	**7**	Lower Income	4	1	2
40	8313-023-019	108 OLIVE ST	Industrial	0.40	1960	MU2	Mixed Use 2 - College Avenue/South Village Transit-	21	MFR 60/acre	MFR 60/acre	60	45	0.40	**17**	Lower Income	9	3	5

Total Units:	**2,638**	**1,177**	**521**	**932**
RHNA Allocation:	1,711	871	297	548
No Net Loss Buffer (20%):	2,053	1,045	356	658
Residual:	585	131	164	274

***Unit Distribution by Income Level:**
State of California Housing and Community Development Department guidelines dictate zoning density of 30 dwelling units to the acre are of sufficient density to support lower income units, density between 15-30 dwelling units to the acre will support moderate income units, and finally density less than 15 dwelling units to the acre support above moderate income units. Total dwelling units for each site have been distributed across income levels based on the allowed density by zone, e.g. Specific Plan 8 Village Expansion MX zone allows 60 units to the acre will support all three income levels and RM 2,000 zone allows 21 units to the acre will support moderate and above moderate income levels.

The table below identifies the distribution of units by income bracket:

Income Brackets	Lower	Moderate	Above
Lower Income (<80% of AMI)	51%		
Moderate Income (80-120% of AMI)	17%	43%	
Above Moderate Income (>120% of AMI)	32%	57%	100%

City of Claremont

Housing Element Opportunity Sites

City Boundary

Opportunity Sites

N

0 0.25 0.5 Miles

Date: June 16, 2021

Appendix B - Base Year and Proposed Project VMT Results

City of Claremont								
	Total Home-based VMT	Total Home-work VMT	Total Work-based VMT	Total Population	Total Employees	VMT/Capita	VMT/Employee	HBW VMT/Employee
Claremont	634,050	339,007	432,773	35,364	19,209	17.9	22.5	17.6

		HBW-PK		HBSC-PK		HBCU-PK		HSSH-PK		HBSR-PK		HBSP-PK		HBO-PK		WBO-PK		OBO-PK		Residential	Non-residential	
CITY	ZONE"	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	Home-based	Work-based	Other
Claremont	22438000	26,839	17,954	656	731	328	-	1,977	2,187	6,261	5,588	1,689	2,228	5,416	4,113	1,173	2,196	5,619	5,872	43,167	19,127	28,534
Claremont	22445000	29,843	75,465	413	2,053	267	-	2,095	2,780	6,858	15,931	1,113	6,695	4,673	13,516	2,556	5,955	12,847	12,031	45,262	78,021	71,809
Claremont	22448000	3,774	13,015	84	-	37	-	210	141	633	2,646	220	703	538	2,108	575	1,457	2,219	2,046	5,496	13,590	11,318
Claremont	22449000	33,973	36,708	1,340	348	360	41	2,521	2,069	7,809	7,246	2,181	2,892	5,663	5,673	1,453	3,204	7,001	6,926	53,846	38,161	35,400
Claremont	22450000	35,658	3,901	889	416	477	-	2,754	424	8,276	2,896	2,381	1,010	7,298	1,548	136	827	2,476	2,246	57,733	4,037	11,843
Claremont	22451000	23,942	7,650	771	628	383	-	1,991	177	5,606	2,491	1,660	1,066	5,033	1,841	406	1,239	2,108	2,612	39,385	8,057	12,161
Claremont	22452000	43,095	67,386	647	4,876	376	297	2,988	4,344	9,689	19,264	2,041	8,712	7,432	15,231	2,978	7,936	15,043	18,429	66,269	70,363	94,132
Claremont	22453000	26,960	61,064	2,312	-	10	7,297	1,285	529	4,006	10,948	1,634	5,905	3,176	12,302	1,487	3,790	8,741	7,737	39,384	62,551	57,250

		HBW-OP		HBSC-OP		HBCU-OP		HSSH-OP		HBSR-OP		HBSP-OP		HBO-OP		WBO-OP		OBO-OP		Residential	Non-residential	
CITY	ZONE"	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	Home-based	Work-based	Other
Claremont	22438000	13,592	8,979	192	251	309	-	3,816	4,287	7,965	7,034	1,102	1,550	8,725	6,472	2,651	4,729	9,137	9,743	35,700	11,630	43,204
Claremont	22445000	15,583	37,872	97	727	172	-	4,142	5,497	8,774	19,785	815	4,475	7,520	21,400	5,501	13,388	21,468	20,577	37,103	43,373	107,317
Claremont	22448000	1,913	6,600	28	-	27	-	403	253	805	3,275	152	483	892	3,364	1,285	3,026	3,680	3,384	4,221	7,886	17,466
Claremont	22449000	17,574	18,464	406	83	186	4	4,984	4,001	9,987	9,071	1,542	1,950	9,289	9,014	3,284	6,860	11,457	11,354	43,967	21,748	53,795
Claremont	22450000	18,090	1,863	280	146	342	-	5,115	804	10,472	3,614	1,496	665	11,633	2,425	317	1,752	4,022	3,701	47,428	2,179	17,130
Claremont	22451000	12,114	3,785	236	212	406	-	3,652	350	7,074	3,075	1,075	752	7,773	2,831	845	2,434	3,382	4,252	32,330	4,630	17,288
Claremont	22452000	22,088	33,311	190	1,981	132	67	5,777	8,342	12,328	24,026	1,441	5,751	12,022	23,948	6,641	16,667	24,460	29,961	53,978	39,952	135,204
Claremont	22453000	13,970	30,395	788	-	3	7,071	2,539	1,015	5,136	13,515	1,180	3,867	5,167	19,489	3,418	8,132	14,407	12,546	28,782	33,813	80,042

City of Claremont								
	Total Home-based VMT	Total Home-work VMT	Total Work-based VMT	Total Population	Total Employees	VMT/Capita	VMT/Employee	HBW VMT/Employee
Claremont	670,887	357,505	413,962	46,713	23,048	14.4	18.0	15.5

		HBW-PK		HBSC-PK		HBCU-PK		HSSH-PK		HBSR-PK		HBSP-PK		HBO-PK		WBO-PK		OBO-PK		Residential	Non-residential	
CITY	ZONE"	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	Home-based	Work-based	Other
Claremont	22438000	26,927	15,890	645	641	334	-	2,018	1,578	6,197	4,927	1,864	1,961	5,529	3,543	1,053	1,767	4,892	4,913	43,513	16,943	24,224
Claremont	22445000	30,943	66,676	308	2,232	270	-	1,816	3,823	6,171	13,517	1,198	6,302	4,494	11,330	2,367	4,502	11,954	11,461	45,199	69,043	65,121
Claremont	22448000	3,048	12,443	66	-	31	-	180	247	516	2,267	193	666	448	1,851	563	1,108	2,068	1,918	4,482	13,006	10,125
Claremont	22449000	40,940	33,200	1,253	381	357	33	3,028	1,573	8,993	6,951	2,477	2,794	6,640	5,089	1,278	2,512	6,526	6,294	63,688	34,478	32,152
Claremont	22450000	41,071	4,191	869	442	517	-	3,268	112	9,931	3,260	3,181	1,026	8,895	1,652	205	849	2,631	2,205	67,733	4,396	12,177
Claremont	22451000	25,998	10,078	634	623	397	-	2,168	319	6,004	2,656	1,850	1,205	5,327	2,184	646	1,258	2,425	2,976	42,378	10,724	13,643
Claremont	22452000	48,143	60,120	465	5,625	371	291	3,210	4,252	10,401	16,570	2,405	8,669	8,217	13,121	2,829	6,144	13,358	17,019	73,211	62,949	85,049
Claremont	22453000	18,790	55,853	1,505	-	9	6,066	1,237	815	3,303	9,311	1,573	5,292	2,710	10,520	1,472	3,025	7,741	7,012	29,127	57,326	49,782

		HBW-OP		HBSC-OP		HBCU-OP		HSSH-OP		HBSR-OP		HBSP-OP		HBO-OP		WBO-OP		OBO-OP		Residential	Non-residential	
CITY	ZONE"	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	Home-based	Work-based	Other
Claremont	22438000	13,488	8,007	191	225	322	-	3,910	3,147	7,903	6,270	1,246	1,365	8,933	5,663	2,423	3,961	8,041	8,147	35,992	10,430	36,818
Claremont	22445000	16,217	33,840	73	813	189	-	3,636	7,651	7,876	17,156	880	4,348	7,233	18,251	5,131	10,415	20,094	19,796	36,106	38,971	98,524
Claremont	22448000	1,589	6,453	22	-	23	-	346	501	649	2,827	138	479	744	3,013	1,267	2,400	3,461	3,238	3,511	7,720	15,918
Claremont	22449000	21,602	16,924	375	88	183	4	5,955	3,096	11,503	8,825	1,774	1,922	10,748	8,202	2,927	5,608	10,666	10,421	52,141	19,852	48,833
Claremont	22450000	20,817	2,021	275	159	415	-	6,119	216	12,684	4,130	2,028	690	14,118	2,575	465	1,839	4,283	3,617	56,456	2,486	17,509
Claremont	22451000	13,234	5,178	195	212	419	-	3,986	645	7,605	3,351	1,238	855	8,242	3,408	1,350	2,543	3,897	4,857	34,920	6,528	19,766
Claremont	22452000	24,780	30,154	135	2,298	138	74	6,271	8,335	13,269	20,881	1,724	5,815	13,294	20,934	6,423	13,481	21,817	27,958	59,611	36,577	121,593
Claremont	22453000	9,917	27,904	503	-	2	5,939	2,585	1,587	4,265	11,631	1,168	3,459	4,379	16,730	3,469	6,686	12,693	11,290	22,819	31,372	70,016

Appendix C - Project Alternatives VMT Results

City Name								
	Total Home-based VMT	Total Home-work VMT	Total Work-based VMT	Total Population	Total Employees	VMT/Capita	VMT/Employee	HBW VMT/Employee
Claremont	699,067	369,385	457,182	41,944	22,818	16.7	20.0	16.2

North East Region								
	Total Home-based VMT	Total Home-work VMT	Total Work-based VMT	Total Population	Total Employees	VMT/Capita	VMT/Employee	HBW VMT/Employee
Northeast Region	4,145,851	2,121,716	2,174,090	212,904	83,474	19.5	26.0	25.4
Azusa	964,169	482,917	422,403	54,550	14,122	17.7	29.9	34.2
Claremont	634,050	339,007	432,773	35,364	19,209	17.9	22.5	17.6
Glendora	1,091,977	565,353	569,147	53,311	21,366	20.5	26.6	26.5
La Verne	712,143	363,006	353,279	34,215	13,418	20.8	26.3	27.1
San Dimas	743,513	371,433	396,487	35,464	15,359	21.0	25.8	24.2

		HBW-PK		HBSC-PK		HBCU-PK		HSSH-PK		HBSR-PK		HBSP-PK		HBO-PK		WBO-PK		OBO-PK		Residential	Non-residential	
CITY	ZONE"	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	Home-based	Work-based	Other
Claremont	22438000	32,990	20,029	797	688	409	-	2,492	1,996	7,266	5,881	2,212	2,364	6,498	4,301	1,340	2,240	6,046	6,101	52,664	21,369	29,617
Claremont	22445000	28,371	63,310	363	2,025	237	-	1,828	2,383	6,058	13,636	1,175	6,080	4,309	11,457	2,308	4,363	11,392	10,669	42,342	65,619	62,003
Claremont	22448000	3,880	16,047	90	-	40	-	232	333	644	2,855	243	830	556	2,348	793	1,493	2,713	2,511	5,686	16,840	13,082
Claremont	22449000	38,794	42,373	1,372	355	365	39	2,920	2,023	8,413	7,639	2,492	3,169	6,312	6,065	1,697	3,063	7,597	7,370	60,669	44,070	37,320
Claremont	22450000	51,767	5,950	1,053	442	664	-	4,044	161	10,998	3,693	3,607	1,263	9,934	1,982	299	1,129	3,167	2,715	82,068	6,249	14,552
Claremont	22451000	34,082	13,162	842	623	515	-	2,816	420	7,213	3,205	2,250	1,450	6,448	2,639	851	1,658	3,048	3,736	54,167	14,013	16,779
Claremont	22452000	55,744	77,231	717	4,735	461	296	3,869	5,016	11,676	20,223	2,819	9,531	9,221	16,378	3,684	7,854	17,028	20,247	84,507	80,915	101,308
Claremont	22453000	24,840	75,082	2,237	-	12	8,213	1,655	1,106	4,178	11,960	2,011	6,813	3,435	13,744	1,987	4,082	10,204	9,174	38,368	77,069	65,296

		HBW-OP		HBSC-OP		HBCU-OP		HSSH-OP		HBSR-OP		HBSP-OP		HBO-OP		WBO-OP		OBO-OP		Residential	Non-residential	
CITY	ZONE"	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	O-VMT	D-VMT	Home-based	Work-based	Other
Claremont	22438000	16,066	45	235	241	394	-	4,803	3,940	9,224	7,439	1,474	1,640	10,539	6,858	3,060	4,951	9,916	10,115	42,735	3,105	45,099
Claremont	22445000	99,978	826	84	727	166	-	3,620	4,780	7,707	17,321	854	4,131	6,869	18,402	5,033	10,205	18,891	18,292	119,279	5,859	92,749
Claremont	22448000	1,722	74	30	-	29	-	448	658	810	3,567	173	600	932	3,856	1,806	3,302	4,536	4,238	4,144	1,880	20,757
Claremont	22449000	679	23,823	409	83	190	4	5,747	3,996	10,774	9,624	1,768	2,163	10,328	9,803	3,874	6,822	12,432	12,218	29,894	27,697	57,146
Claremont	22450000	1,875	413	338	159	540	-	7,612	298	13,969	4,672	2,343	861	16,099	3,142	668	2,405	5,245	4,533	42,776	1,081	21,316
Claremont	22451000	2,350	731	259	213	540	-	5,156	831	9,085	4,027	1,515	1,030	10,093	4,166	1,762	3,345	4,926	6,144	28,998	2,493	24,683
Claremont	22452000	9,730	2,560	212	1,935	183	70	7,534	9,783	14,857	25,460	2,008	6,376	15,002	26,259	8,328	17,205	27,871	33,331	49,525	10,888	148,290
Claremont	22453000	1,108	1,012	753	-	3	8,251	3,464	2,141	5,386	14,861	1,500	4,440	5,598	22,088	4,658	8,951	16,829	14,911	17,812	5,670	92,473