



Amherst Residential Development

Draft Environmental Impact Report State Clearinghouse No. 2020100017

prepared by

City of La Verne

Planning Division, Department of Community Development

3660 "D" Street

La Verne, California 91750

Contact: Candice Bowcock, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.

1980 Orange Tree Lane, Suite 105

Redlands, California 92374

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RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

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Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed Amherst Residential Development Project (proposed project). This section summarizes the characteristics of the proposed project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Project Synopsis

Project Applicant

MW Investment Group, LLC
27702 Crown Valley Parkway, Ste. D-4-197
Ladera Ranch, California 92694

Lead Agency Contact Person

Candice Bowcock, Principal Planner
City of La Verne
Department of Community Development
3660 D Street
La Verne, California 91750
(909)-596-8706

Project Description

This EIR has been prepared to examine the potential environmental effects of the Amherst Residential Development Project. The following is a summary of the full project description, which can be found in Section 2.0, *Project Description*.

The project site is located at 2820 Amherst Street on the southeast corner at the intersection of Amherst Street and Pepperdine Court in the City of La Verne. The proposed project would involve the development of 42 single-family units, consistent with the proposed Amherst Specific Plan. This would result in the removal of the existing greenhouses and the grading of the project site. The site is currently used for agriculture as a plant nursery, with approximately 220,000 square feet being used for outdoor plant cultivation and approximately 20,300 square feet used for six greenhouses. The project would also include public open space within the project in the form of a 0.25-acre pocket park located adjacent to the project entry along Amherst Street.

The site is located in a Planned Residential Development 3 DU/AC Detached (PR3D) Zone, with a General Plan Land Use designation of Low Density Residential (LDR). The proposed project would require the following approvals by the City of La Verne:

- A General Plan Amendment to change the land use designation of the property from Low Density Residential (LDR) to Medium Density Residential (MDR).
- A Zone Change to change zoning of the entire property from the current Planned Residential Development (PR3D) to Specific Plan.
- Approval of the Amherst Specific Plan by City ordinance.

- Certification of an Environmental Impact Report (EIR) prepared in accordance with the California Environmental Quality Act (CEQA). The City will consider certification of the EIR prior to acting on the other requested approvals.
- A Tentative Tract Map (TTM) prepared for the Amherst Specific Plan area and processed through the City in accordance with Chapter 16 of the La Verne Municipal Code and the Subdivision Map Act.
- Development Review Committee approval of a Precise Plan for development within the Amherst Specific Plan area is required before building permits may be issued.
- Tree Removal Permit for the removal of a 42-inch caliper Deodar cedar to be considered by the Development Review Committee.

The project site is currently being used as a plant nursery, with approximately 220,000 square feet being used for outdoor plant cultivation and approximately 20,300 square feet used for six greenhouses. The project is bound by a mobile home park to the south and west, single-family residences to the east, and the City-owned and operated Amherst Groundwater Treatment Plant the northwest. The Amherst Specific Plan provides a detailed description of the proposed land uses, infrastructure, and implementation requirements for the proposed project; see Appendix B.

Project Architecture Design

Proposed building design would implement Mediterranean and traditional architectural themes that are compatible with residential development within the City. Architecture would reflect the design philosophies of Craftsman and Santa Barbara architectural styles.

Project Landscape Design

All landscape would be climate appropriate and use efficient irrigation systems. The use of turf in front yards is discouraged and would be minimized throughout the Amherst Specific Plan area. There are three types of open spaces within the project area: private yard space, common area landscape, and public open space. All project landscaping would be required to meet the City's Water Efficient Landscape Ordinance (La Verne Municipal Code 18.118).

Common open space would be composed of parkways, community entry features, and other landscaped areas within the community that would be maintained by a community homeowners association (HOA). Landscaping in these areas would be designed with water-wise principles, with a consistent landscaping palette that contributes to overall project sense-of place.

Public open space within the project would be provided in the form of a 0.25-acre pocket located adjacent to the project entry. This area would serve as a landscaped gateway to the project and provide outdoor recreation opportunities to project residents and the public.

Project Circulation

Two existing driveways from Amherst Street currently provide access to the property. The easternmost driveway would remain and continue to provide access to the treatment facility. In addition, a central driveway would be constructed for the project entry, emergency access, and delivery access for the adjacent groundwater treatment plant. Pedestrian circulation would be provided throughout the development via a system of interior sidewalks.

Project Infrastructure Plan

The La Verne Public Works Department would provide the following utility services to the Amherst Specific Plan area: solid waste, water, wastewater, and stormwater. Southern California Edison supplies electricity and the Southern California Gas Company provides gas to the area.

Potable water service for the Amherst Specific Plan area is provided by the La Verne Water and Utility Division. Other than abutting improvements, there are no off-site improvements to domestic water lines proposed as part of the project. Proposed water system improvements within the Amherst Specific Plan area would include eight-inch water distribution lines that provide potable water service to dwelling units within the project site. These new facilities would connect to an existing domestic water line located within the Amherst Street right-of-way.

Sewer service for the Amherst Specific Plan area is provided by the La Verne Sewer Division. Proposed eight-inch on-site sewer lines would connect to off-site City main lines. Proposed off-site sewer improvements would occur at the southeast corner of the Amherst Specific Plan area to connect the project to existing sewer main lines within the right-of-way of Williams Avenue. These new improvements would traverse an easement area within an adjacent parcel to connect to existing sewer main lines located within the right-of-way of Williams Avenue.

Development within the Amherst Specific Plan area would utilize existing storm drain line infrastructure owned and maintained by the adjacent Twin Oaks Park mobile home park. A new stormdrain pipe is proposed to be constructed from the southwest corner of the project, through the mobile home park, along Oak Shadow Drive and N. Oak Leaf Drive, to an existing on-site catch basin which connects via a storm drainpipe to the Live Oak Wash flood control channel, managed by Los Angeles County Flood Control District (LACFCD).

Runoff occurring on-site would be collected by a system of surface gutters and conveyed to new catch basins to be located within the Amherst Specific Plan area. Water would be collected and diverted into modular wetlands systems for treatment prior to release into the private stormdrain main. During high flow events, excess stormwater would bypass treatment and drain directly into the private stormdrain main.

Green Building Features

All new residences will be equipped with solar panels and provide renewable energy for home use. The project would be consistent with green building features through project design, which includes complying with the latest Title 24 Green Building Code and Building Efficiency Energy Standards and installing energy-efficient light-emitting diode (LED) lighting, water-efficient faucets and toilets, water efficient landscaping and irrigation, and EV charging parking spaces. The project's water consumption would be minimized with the use of low-flow plumbing fixtures, installation of water-conserving appliances, and use of drought-tolerant native and adaptive plants as part of the landscape design. Furthermore, related to energy production and usage, the project would be equipped with PV systems, ENERGY-star appliances, and use of natural light for building interiors.

Construction and Grading

The Amherst Specific Plan would be built out in one complete phase over a period of one to two years with construction estimated to be completed sometime between 2022 and 2023. Actual build-out would be subject to market and economic conditions, jurisdictional processing of approvals, and infrastructure timing, and may vary from the construction phasing currently anticipated. Project

development would include all on-site infrastructure improvements necessary to service the project including, but not limited to:

- Grading of the Amherst Specific Plan area
- Water distribution lines and related infrastructure
- Sewer distribution lines and related infrastructure
- Storm water lines and related infrastructure
- Other utility services (e.g., electricity, cable television, telephone, etc.)
- Improvements associated with the on-site private streets and drives

Based on preliminary earthwork estimates, project grading would require approximately 7,092 cubic yards (cy) of cut and 5,443 cy of fill. Anticipated depth of excavation would be 6.44 feet. Excess soil of approximately 1,649 cy excavated from the project site would be exported and disposed of off-site.

Project Objectives

Project objectives include the following:

- Increase the supply of housing in the City of La Verne, consistent with the goals and policies of the General Plan Housing Element.
- Implement infill development on underutilized parcels, consistent with the General Plan Housing Element.
- Provide new outdoor park spaces that complement proposed development within the Specific Plan area and are available for public use.
- Reinforce a sense of place through project-specific identity signage.

Required Approvals

The project would require the following approvals by the City:

- A General Plan Amendment to change the land use designation of the property from Low Density Residential (LDR) to Medium Density Residential (MDR).
- A Zone Change to change zoning of the entire property from the current Planned Residential Development (PR3D) to Specific Plan.
- Approval of the Amherst Specific Plan by City ordinance.
- Certification of an Environmental Impact Report (EIR) prepared in accordance with the California Environmental Quality Act (CEQA). The City will consider certification of the EIR prior to acting on the other requested approvals.
- A Tentative Tract Map (TTM) prepared for the Amherst Specific Plan area and processed through the City in accordance with Chapter 16 of the La Verne Municipal Code and the Subdivision Map Act.
- Development Review Committee approval of a Precise Plan for development within the Amherst Specific Plan area is required before building permits may be issued.
- Tree Removal Permit for the removal of a 42-inch caliper Deodar cedar to be considered by the Development Review Committee.

- **Lot Line Adjustment** to move the southerly property line approximately three feet south, in accordance with Chapter 16.18 of the La Verne Municipal Code, to be considered by the Development Review Committee.

The City of La Verne is the lead agency with responsibility for approving the project. No other agency approvals are anticipated.

Areas of Known Controversy

Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the City are summarized in Section 1.0, *Introduction*, Table 1-1.

The primary concern from the community relates to the increase in traffic, and resulting capacity impacts that would be created by the proposed project. Capacity impacts are no longer a consideration under CEQA; however, based on public interest, a discussion of capacity impacts is included in the EIR for informational purposes. See Section 4.1.5 *Capacity Analysis*.

The proposed project would result in significant and unavoidable transportation impacts related to vehicle miles travelled as a result of project operation. Transportation impacts are fully evaluated in Section 4.1, *Transportation*, herein.

In addition, although not proposed as part of the proposed project, the City has received scoping comments indicating support for, and opposition to, the opening/reopening of the Bowdoin Street intersection at Williams Avenue. This topic is also further discussed in Section 4.1.6, *Evaluation of Bowdoin Street at Williams Avenue Reopening of Intersection*. The project does not propose or requires the reopening of this intersection.

Issues to be Resolved

There are no issues to be resolved related to the proposed project.

Any consideration of the opening/reopening of the Bowdoin Street intersection at Williams Avenue would involve consideration, outside of the proposed project.

Issues Not Studied in Detail in the EIR

Table 1-2, *Issues Not Studied in the EIR*, in Section 1.4 summarizes issues from the environmental checklist that were addressed in the Initial Study (Appendix A). As indicated in the Initial Study, there is no substantial evidence that significant impacts would occur related to the following topics: Aesthetics, Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Utilities, and Wildfire.

Impacts to Transportation and Tribal Cultural Resources were found to be potentially significant and are addressed in this EIR.

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts to Transportation and Tribal Cultural Resources are based on the analysis in Sections 4.1 and 4.2, respectively. Impacts to other topics are based on the analysis in the Initial Study (see Appendix A). 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 pursuant to 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.

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measure	Residual Impact
Aesthetics		
The project site is not within scenic vista areas. The proposed project would not substantially impact views of the surrounding hillside. The project would not substantially degrade the existing visual character or quality of the site and its surroundings.	None required.	Less than significant
The project site is not located on a State Scenic Highway, and lacks scenic resources such as trees, rock outcroppings, and vegetation.	None required.	No impact
The proposed project would not create significant impacts with respect to increased lighting or glare.	None required.	Less than significant
Agriculture and Forestry Resources		
The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.	None required.	No impact
The project would not conflict with existing zoning for agricultural use or a Williamson Act contract.	None required.	No impact
The project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)); timberland (as defined by PRC Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).	None required.	No impact
The project would not result in the loss of forest land or conversion of forest land to non-forest use.	None required.	No impact
Impacts are less than significant Involving 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.	None required.	Less than significant
Air Quality		
The project would not generate growth which would exceed the AQMP forecasts.	None required.	Less than significant
The project would not 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.	None required.	Less than significant
The project would not expose sensitive receptors to substantial pollutant concentrations.	None required.	Less than significant
The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	None required.	Less than significant

Impact	Mitigation Measure	Residual Impact
Biological Resources		
The project site is within an urbanized area and no threatened, endangered or rare species or their habitats; locally designated species; locally designated natural communities; wetland habitats; wildlife corridors, or conservation plan areas exist on the site. Therefore, the project would have no impact on these resources.	None required.	No impact
The project would remove a tree which qualifies for consideration under La Verne's tree protection ordinance (Title 18 Chapter 78 of the Municipal Code).	BIO-1 Protected Tree Permit and Replacement. The Applicant shall obtain a <i>Tree or Heritage Grove Removal Permit</i> for the removal of a protected tree (Deodar cedar) pursuant to the Municipal Code. Removal of the protected tree will be mitigated by the onsite replacement of the caliper 42-inch tree by at least four trees with 60-inch minimum boxes, or as further determined by the City of La Verne's Design Review Committee.	Less than significant with mitigation incorporated
Cultural Resources		
No built-environment features that may be considered historical resources are present within the project site. As such, the project will not cause a substantial adverse change in the significance of a historical resource pursuant to <i>CEQA Guidelines</i> Section 15064.5.	None required.	No impact
Construction of the proposed project would involve ground-disturbing activities, which have the potential to unearth or adversely impact previously unidentified archaeological resources, paleontological resources, human remains, if present.	CR-1 Unanticipated Archaeological Resources. If archaeological resources are encountered during ground-disturbing activities, work within 50 feet of the find shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for California Register of Historic Resources (CRHR) eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources.	Less than significant with mitigation incorporated

Impact	Mitigation Measure	Residual Impact
No cemeteries are known to exist within the project site; however, 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 that no further disturbance shall occur until the County coroner has made a determination of origin and disposition pursuant to Public Resources Section 5097.98.	None required.	Less than significant
Energy		
The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The project design and energy features would be in conformance with the latest version of CALGreen and Building Energy Efficiency Standards.	None required.	Less than significant
The project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.	None required.	No impact
Geology and Soils		
Project development would be consistent with the requirements of the California Building Code (CBC), including consideration of seismically-induced ground shaking from nearby faults.	None required.	Less than significant
Proposed structures would be constructed to comply with the seismic design criteria of the CBC. Therefore, the project would result in a less than significant impact regarding causing potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	None required.	Less than significant
The project site is not located in a landslide hazard area, and thus would have no impact related to risk of loss, injury, or death involving landslides.	None required.	No impact
The project would not result in substantial soil erosion or the loss of topsoil since compliance with existing regulatory requirements, including implementation of applicable best management practices (BMPs) related to wind and water erosion control, would reduce potential soil loss and erosion from the site.	None required.	Less than significant
Compliance with applicable CBC seismic standards would reduce impacts related to unstable soils. Impacts would be less than significant regarding being 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.	None required.	Less than significant
Project site soils are anticipated to have a “Very Low” expansion potential based on soil testing completed for the site.	None required.	Less than significant
The project would have sewer service, and thus have no impact related to use of septic tanks or alternative wastewater disposal systems.	None required.	No impact

Impact	Mitigation Measure	Residual Impact
Ground-disturbing activities during project construction may impact previously unknown paleontological resources that may be present below the project site surface. Therefore, construction of the project could result in direct or indirect impacts to paleontological resources that could potentially be significant and mitigation measures would be required.	GEO-1 Paleontological Resources Management Program. The following mitigation measures shall only be implemented during ground construction activities (i.e., grading, trenching, foundation work, excavations) where ground disturbance exceeds eight feet below ground surface within project areas underlain by Pleistocene alluvial fan deposits. a. Mitigation and Monitoring Program. The Paleontological Mitigation and Monitoring Program shall be supervised by a qualified paleontologist. A qualified paleontologist is an individual who meets the education and professional experience standards as set forth by the SVP (2010), which recommends the paleontologist shall have at least a Master's Degree or equivalent work experience in paleontology, shall have knowledge of California geology and local paleontology, shall be familiar with paleontological procedures and techniques, and who has worked as a paleontological mitigation project supervisor for a least one year. Monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources. b. Paleontological Worker Environmental Awareness Program (WEAP). Prior to the start of construction, the qualified paleontologist or his or her designee, shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be fulfilled at the time of a preconstruction meeting. In the event a fossil is discovered by construction personnel	Less than significant with mitigation incorporated

Impact	Mitigation Measure	Residual Impact
	anywhere in the project area, all work in the immediate vicinity of the find shall cease and a qualified paleontologist shall be contacted to evaluate the find before restarting work in the area. If it is determined that the fossil(s) is (are) scientifically significant, the qualified paleontologist shall complete the mitigation outlined below to mitigate impacts to significant fossil resources. c. Resource Recovery and Management Plan. Ground-disturbing activity that does not exceed eight feet in depth in areas of low paleontological sensitivity shall not require paleontological monitoring. Any excavations within undisturbed bedrock in areas of high paleontological sensitivity (i.e., Pleistocene-aged deposits), and excavations that exceed eight feet in depth in those areas potentially underlain by Pleistocene-aged deposits (i.e., Holocene-aged alluvial sediments) shall be monitored on a full-time basis by a qualified paleontological monitor. If no fossils are observed during the first 50 percent of excavations in Holocene-aged sediments exceeding eight feet in depth, or if the qualified paleontologists can determine that excavations below nine feet are not disturbing Pleistocene-aged (or other potentially fossil-containing) sediments, then paleontological monitoring can be discontinued or reduced to spot-checking under the discretion of the qualified paleontologist, subject to approval from Los Angeles County. If fossils are discovered, the qualified paleontologist (or paleontological monitor) shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and	

Impact	Mitigation Measure	Residual Impact
	not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Should larger fossils be discovered, the qualified paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Once salvaged, fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the University of California Museum of Paleontology or other institution determined by the City of La Verne or Los Angeles County), along with all pertinent field notes, photos, data, and maps. Upon completion of ground-disturbing activities (and curation of fossils if necessary), the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.	
Greenhouse Gas Emissions		
The project would be consistent with regional and local strategies to reduce GHG emissions. Additionally, the project would not substantially contribute to City, regional, or statewide GHG emissions or obstruct achievement of local targets and State mandates. The project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and would be consistent with applicable General Plan policies.	None required.	Less than significant

Impact	Mitigation Measure	Residual Impact
The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	None required.	Less than significant
Hazards and Hazardous Materials		
Proposed residential uses would not emit or handle hazardous materials beyond typical household and landscape waste and materials, and the project would not create a hazard to the public through transportation of hazardous materials upon completion and residential occupancy.	None required.	Less than significant
The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school	None required.	No impact
The project would not 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?	None required.	No impact
No public airports or private airstrips are located within two miles of the project site. The project site is located approximately 2.5 miles northeast of Brackett Field Airport, which is the nearest airport to the project site. Zone E areas contain low risk levels of airport activity hazards and are located beyond the airport's 55 decibel noise contour.	None required.	Less than significant
The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project would not interfere with the implementation of the City's emergency management plans from the City's General Plan Safety Element.	None required.	Less than significant
The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.	None required.	No impact
Hydrology/Water Quality		
The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. On-site storage of stormwater runoff, as required pursuant to the City's Low Impact Development ordinance, would provide an opportunity for debris, sediment, and sediment-bound pollutants to settle out of the water column prior to discharge downstream. The requirements of the City's LID ordinance and the applicable MS4 permit are intended to protect water quality and support attainment of water quality standards in downstream receiving water bodies.	None required.	Less than significant

City of La Verne
Amherst Residential Development

Impact	Mitigation Measure	Residual Impact
The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Development of the project would result in a more intense use of the project site compared to current conditions and would increase impermeable surface on site substantially. Consequently, the project may incrementally reduce groundwater recharge and increase the amount of surface runoff.	None required.	Less than significant
The project would not 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. Given that the project site would remain generally flat and be required to implement BMPs to capture and retain stormwater on-site, potential impacts related to the alteration of the site's drainage pattern would be less than significant.	None required.	Less than significant
The project is not located in the inundation zone for the Live Oak Reservoir and the project does not involve storage or processing of pollutants that would be released due to inundation should such an event occur.	None required.	No impact
The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The project proposes no new wells or additional groundwater extraction.	None required.	Less than significant
Land Use and Planning		
The project would not physically divide an established community .	None required.	No impact
The project would not 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.	None required.	No impact
Mineral Resources		
The project site is not associated with any known or locally important mineral resource.	None required	No impact
Noise		
HVAC operational noise levels would be below the City's standards, and further reduced by the proposed concrete masonry walls. Other on-site operational sources would be typical for a residential neighborhood. The increase in traffic noise would be negligible. Construction noise may potentially exceed the City's threshold at nearby residences.	NOI-1 Construction Noise Reduction. The following shall be implemented during project construction: ▪ Mufflers. 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.	Less than significant with mitigation incorporated

Impact	Mitigation Measure	Residual Impact
	▪ Stationary Equipment. All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receptors. ▪ 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. ▪ Noise Barriers. Noise barriers with a minimum height of 11 feet shall be erected along the perimeter of the construction site for the duration of project construction. The noise barriers shall be constructed of material with a minimum weight of two pounds per square foot with no gaps or perforations. Materials which noise barriers may be constructed of include, but are not limited to, 5/8-inch plywood, 5/8-inch oriented strand board, and hay bales.	
Construction activity would be temporary, and the use of vibration-generating heavy equipment would be primarily limited to periodic loaded trucks. Vibration would be a temporary impact during construction and would not occur during normal sleep hours.	None required.	Less than significant
The project site is located approximately 2.5 miles northeast of the Brackett Field Airport and is located in Zone E of the airport's influence area. According to the Brackett Field Airport Land Use Compatibility Plan, the project site is outside the noise and overflight area, and beyond the 55 dB CNEL contour.	None required.	Less than significant
Population and Housing		
The project would not 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).	None required.	No impact
The project would provide 42 new residences. The project would not displace either people or housing, necessitating the construction of replacement housing elsewhere.	None required.	No impact

City of La Verne
Amherst Residential Development

Impact	Mitigation Measure	Residual Impact
Public Services		
With continued implementation of existing practices of the City, including compliance with the California Fire Code and the CBC, the proposed project would not substantially affect community fire protection services and would not result in the need for construction of fire protection facilities	None required	Less than significant
The project would contribute incrementally to demand for new or expanded police protection facilities. New or expanded police facilities would be unlikely to result in substantial environmental impacts, as such facilities are anticipated to be placed in converted commercial, retail, or government facilities already developed and served by existing infrastructure.	None required	Less than significant
Although the project would increase enrollment at Bonita Unified School District schools, payment of the school impact developer fees would be considered full mitigation for the proposed project's impacts under CEQA.	None required	Less than significant
The parkland to resident ratio, would remain at approximately 3.4 acres per 1,000 residents. The project would provide open space/park area for use as public park space for residents of the project and the surrounding area.	None required	Less than significant
The increased demand for library and other public services would be incremental, and public services funded by the City's General Fund would be maintained because future residents of the project site would pay proportionate property taxes to the City.	None required	Less than significant
Recreation		
The project would not appreciably decrease parkland-to-resident ratios and would not interfere with the City's planned acquisition of additional parkland. The project would not create substantial demand on or cause substantial deterioration of City parks such that new park facilities would be required. The project would also include public open space within the project in the form of a 0.25-acre pocket park located adjacent to the project entry along Amherst Street.	None required.	Less than significant
Transportation		
Impact T-1 The proposed project would not involve any disruptions to the local active transportation system, or conflict with applicable policies associated with public transit.	None required.	Less than significant
Impact T-2 The proposed project would result in a significant and unavoidable VMT impact under existing and cumulative conditions.	No feasible mitigation available.	Significant and unavoidable
Impact T-3 The project would not substantially increase hazards due to a design feature; nor would it result in inadequate emergency access.	None required	Less than significant

Impact	Mitigation Measure	Residual Impact
Tribal Cultural Resources		
Impact TCR-1. The project has the potential to significantly impact tribal cultural resources through ground disturbance of resources, if present.	TCR-1 Tribal Monitoring. The project applicant shall retain for the construction monitoring services of the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh), who have expresses interest in consulting with the City pursuant to California Public Resources Code Section 21080.3.1 and Section 21080.3.2 and are listed under the Native American Heritage Commission’s (NAHC’s) Tribal Contact list for the area of the project location. A Kizh monitor will be present on-site only during the construction phases that involve ground-disturbing activities. Ground-disturbing activities are defined as activities that include, but are not limited to: pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling and trenching within the project area. The Kizh monitor will complete daily monitoring logs that provide a description of the day’s activities, including construction activities, locations, soils, and any cultural materials identified. The on-site Tribal monitoring shall end when the project site grading and excavation activities area completed, or when the Kizh representatives, in consultation with the City, have indicated that the site has a low potential for impact to Tribal Cultural Resources. TCR-2 Discovery of Archaeological Resources. Upon discovery of any archeological resource, construction activities in the immediate vicinity of the find shall ceased until the find can be assessed. All archeological resources unearthed by the	Less than significant with mitigation incorporated

Impact	Mitigation Measure	Residual Impact
	project construction activities shall be evaluated by a qualified archeologist and the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh) monitor. If the resources are Native American in origin, the Kizh monitor shall coordinate with the landowner regarding the treatment and curation of these resources. Typically, the Kizh request reburial or preservation for educational purpose. Work may continue on other parts of the project while evaluation occurs. If a discovery is determined by the qualified archeologist to be a “historical resource” or “unique archeological resources”, a treatment plan shall be developed (pursuant to CEQA Guidelines, Section 15064.5[f]) allowing for sufficient time and funding to identify and implement avoidance measures and/or appropriate mitigation. ▪ TCR-3 Treatment of Archaeological Resources. For unique archeological resources, preservation in place is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archeological data recovery extraction to remove the resource along with subsequent laboratory processing and analysis. Any historic archeological material that is not Native American in origin shall, at the discretion of the landowner, be curated at a public, non-profit institution with a research interest agreeing to accept in the materials. If no such institution agrees to accept the materials, they shall be offered to a local school or historical society in the area for educational purposes.	

Impact	Mitigation Measure	Residual Impact
	TCR-4. Human Remains. Public Resources Code (Section 5097.98(d)(1)) defines Native American remains as “...an inhumation or cremation, and in any state of decomposition or skeletal completeness.” Funerary objects, called “grave goods” shall be treated similarly according to this statute. These objects are those reasonably believed to have been placed with human remains either at the time of death; other items made exclusively for burial purposes; or contain human remains. The treatment of funerary objects shall be treated in the same manner as human remains. Health and Safety Code (Section 7050.5) dictates that any discovery of human remains shall immediately be reported to the Los Angeles County Coroner, and excavation shall be halted until the Coroner has determined the nature of the remains. If the Coroner recognizes the remains to be those of a Native American or has reason to believe they are those of a Native American, he or she, shall contact the NAHC and appropriate provisions of Public Resources Code (Section 5097.98) shall be followed. Upon discovery of human remains and/or associated grave goods, the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh) monitor and/or archeological monitor/consultant shall immediately divert work a minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) shall notify the Kizh Nation, the qualified lead archeologist, and the construction manager who will call the Los Angeles County Coroner. The discovery	

Impact	Mitigation Measure	Residual Impact
	shall be kept confidential and secure to prevent further disturbance. Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site within the footprint of the project for the respectful reburial of the human remains and/or funerary objects. In cases where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment to protect the remains. If this type of protection is not available, a 24-hour guard shall be posted outside of working hours. The Kizh monitor will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Kizh monitor will work closely with the qualified archeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Kizh monitor, document shall be taken which includes at a minimum, detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Kizh monitor for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all material. Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony shall be removed to a secure container on site. These items shall be	

Impact	Mitigation Measure	Residual Impact
	retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Kizh monitor and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. If the discovery of human remains includes four or more burials, the location shall be considered a cemetery, and a separate treatment plan shall be developed. Once complete, a final report of all activities shall be submitted to the Kizh Nation and the Native American Heritage Commission. The Kizh Nation does not authorize any scientific study or the utilization of invasive diagnostics on human remains. TCR-5. Qualifications of Monitors. Archeological and Native American monitoring and excavation during construction shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel shall meet the Secretary of Interior standards for archaeology and have a minimum of ten years of experience as a principal investigator working with Native American archeological sites in southern California. The Qualified Archeologist shall ensure that all other personnel are appropriately trained and qualified.	

City of La Verne
Amherst Residential Development

Impact	Mitigation Measure	Residual Impact
Utilities and Service Systems		
The project may require water and sewer line extensions on-site to serve the proposed residential structures.	None required.	Less than significant
Wastewater treatment facilities operated by the City of La Verne and Los Angeles County Sanitation District (LACSD) possess sufficient capacity to process additional wastewater generated by the project.	None required.	Less than significant
Annual project water demand would equal less than one percent of the projected water supply for normal, single, and multiple dry years through 2040. Therefore, the project would have a less than significant impact.	None required.	Less than significant
The project would comply with the City's Solid Waste Ordinance, codified in Chapter 13, Article 28 of the LVMC, which regulates waste collection, transfer, and disposal in the City. The project would be required to comply with federal, State, and local statutes and regulations related to solid waste.	None required.	Less than significant
Wildfire		
The project site is not located in or near a State Responsibility Area or lands classified as a Very High Fire Hazard Severity Zone. The project would not result in significant traffic impacts with the potential to impede emergency response or evacuation. The project site is within a relatively flat portion of La Verne and not located near a landslide hazard area or floodplain, minimizing the potential for impacts related to post-fire flooding, landslides, or slope instability.	None required.	Less than significant

Alternatives to the Proposed Project

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the proposed project. Studied alternatives include the following four alternatives, further described below.

- Alternative 1: No Project/No Build Alternative 1
- Alternative 2: No Project/General Plan Alternative 2
- Alternative 3: Reduced Intensity Alternative 3

Based on the alternative's analysis, Alternative 3 was determined to be the environmentally superior alternative. Refer to Section 6.0, *Alternatives*, for the complete alternatives analysis.

No Project/No Build Alternative 1

The No Project Alternative assumes that the proposed project would not be developed, and the project site would continue to operate as a nursery. The new residential buildings and the park would not be developed.

the No Project Alternative would avoid or lessen many of the impacts of the proposed project, including aesthetics, energy, noise, public services, transportation, cultural resources, tribal cultural resources, and utilities.

The No Project Alternative would not fulfill any project objectives because the existing nursery would not increase the City housing supply, promote infill development on underutilized parcels, provide for a park space, or reinforce a sense of place via project identity signage.

No Project/General Plan Alternative 2

Under Alternative 2, the project site would be developed with up to 29-single-family units, an over 30 percent decrease in residential uses compared to the proposed project. Development would be at a density of 5 units per acre. Development would be consistent with a traditional subdivision and guided by the Municipal Code. No park or common amenities would be provided.

As further discussed below, the Alternative 2 would avoid or lessen many of the impacts of the proposed project, including air quality, energy, greenhouse gas, transportation, and utilities.

Alternative 2 would fulfill some of the project objectives, but to a lesser extent than the proposed project, because it would not increase the City housing supply to the same degree, and it would not provide a park.

Reduced Intensity Alternative 3

Under Alternative 3, the project site would be developed with up to 22-single-family units, a nearly 50 percent decrease in residential uses compared to the proposed project. Development would be at a density of approximately 4 units per acre. Development would be consistent with a traditional subdivision and guided by the Municipal Code. No park or common amenities would be provided

As further discussed below, the Alternative 3 would avoid or lessen many of the impacts of the proposed project, including air quality, energy, greenhouse gas, transportation, and utilities.

Alternative 3 would fulfill some of the project objectives, but to a much lesser extent than the proposed project, because it would increase the City housing supply by only 22 units, 20 fewer units than the proposed project. It would not provide a park.

Environmentally Superior Alternative

CEQA requires that an EIR identify the Environmentally Superior Alternative, and discuss the facts that support that selection, as well as whether it would accomplish the project objectives or be infeasible (Public Resources Section 21081.5; CEQA Guidelines Sections 15091, 15126.6).

Based on the alternative's analysis provided above, Alternative 1, the No Project/No Build Alternative, would be the environmentally superior alternative, as it would result in fewer impacts as compared to the proposed project, and would reduce the significant and unavoidable impact associated with the projects VMT. However, Alternative 1 would not meet any of the project objectives.

If the No Project Alternative is the Environmentally Superior Alternative, CEQA requires that an Environmentally Superior Build Alternative be identified. Based on this consideration, Alternative 3 would be the Environmentally Superior Alternative. However, Alternative 3 would not meet the project objectives to the same extent as the proposed project, would not provide the same amenities and benefits, including the same degree of provision of housing, and providing a park. In addition, Alternative 3 would underutilize the project site.

1 Introduction

This Environmental Impact Report (EIR) has been prepared for a proposed residential development located adjacent to Amherst Street and at the terminus of Pepperdine Court in the City of La Verne, California. The proposed residential project (hereafter referred to as the proposed project, or project) would be constructed on a site currently occupied by a plant nursery. The project would involve demolition of the existing agricultural structures, grading for site preparation, and development of 42 single-family dwelling units, along with associated improvements (e.g., driveways, parking, detention facilities, etc.), and on-site recreational amenities. The 42 buildings would range in size from 2,002 to 2,433 square-feet (SF) of living space and up to 418 SF garage (Appendix B). The proposed project is described in detail in Section 2.0, *Project Description*.

This section discusses (1) the legal basis for preparing an EIR; (2) the project and EIR background; (3) the scope and content of the EIR; (4) topics found not to be significant; (5) the lead, responsible, and trustee agencies; and (6) the environmental review process required under the California Environmental Quality Act (CEQA).

1.1 Purpose and Legal Authority

The proposed project requires the discretionary approval of the City of La Verne (City); therefore, the project is subject to the environmental review requirements of CEQA. In accordance with Section 15121(a) of the *CEQA Guidelines* (California Code of Regulations, Title 14), the purpose of this EIR is to serve as an informational document that:

“...will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.”

This EIR has been prepared as a project EIR pursuant to Section 15161 of the *CEQA Guidelines*. A project EIR is appropriate for a specific development project. As stated in the *CEQA Guidelines*:

“This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.”

This EIR will serve as an informational document for the public and City of La Verne decision makers. The process will include public hearings before the City Council to consider certification of a Final EIR and approval of the proposed project.

1.2 Environmental Impact Report Background

The City distributed a Notice of Preparation (NOP) of a Draft EIR for a 30-day agency and public review period starting on October 1, 2020 and ending on November 2, 2020. In addition, the City posted a project information video on their website. The video, was aimed at providing information about the proposed project to members of public agencies, interested stakeholders, and residents/community members.

The City received comment letters from four parties in response to the NOP during the public review period, including one agency response. The NOP, and the NOP comments received, are provided in Appendix A. Table 1-1 summarizes the environmental comments and where the issues raised are addressed in the EIR.

Table 1-1 October 2020 NOP Comment Summary and EIR Response

Agency or Subject Comment	Remarks
Agency Comments	
California Department of Fish and Wildlife (CDFW)	
CDFW provides information about its role as both a Trustee and Responsible Agency under CEQA, as well as specific comments, including: ▪ CDFW is concerned that a new stormdrain pipe may result in changes in water quality, quantity, and turbidity in the Live Oak flood control channel. The project may substantially adversely discharge activities to a stream, which absent specific mitigation, could result in substantial erosion or siltation on site or offsite. ▪ 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, of a river or stream, or use material from a streambed. ▪ CDFW recommends an investigation of the site for possible surface drainages to the surround areas that may feed into this channel. ▪ CDFW recommends a hydrological study to identify any change in the percentage to the current water budget for the Live Oak Wash channel, pre, during, and post construction, among other considerations.	As indicated in the Section 2.5.5 <i>Project Drainage</i>, the drainage has been designed to emulate pre-development conditions in terms of volume, rate and water quality. The project would also implement a Stormwater Pollution Prevention Plan to control erosion and other pollutants during project construction. Also see the hydrology discussion in the Initial Study (Appendix A).
CDFW indicates that on site trees may support nesting bird, and recommends mitigation be provided to avoid impacts to nesting birds.	The project is required to comply with the provisions of the Migratory Bird Treaty Act which includes provisions for nesting birds.
CDFW recommends using native, locally appropriate plant species for the project and avoid invasive/exotic plants. CDFW states concern that an investigation regarding the potential for tree pests is not included, as project activities have the potential to result in the spread of tree insect pests and disease. CDFW provides tree replacement mitigation.	This comment is noted and will be considered in conjunction with the City's evaluation of the landscape plan. As documented in the Initial Study (Appendix A), the project would not result in adverse impacts to biological resources, and the project would mitigate the impact to protected trees consistent with the City's tree protection ordinance.
CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats.	As documented in the Initial Study (Appendix A), the project site is not identified as critical habitat for threatened and endangered species and the probability that federally or State listed species are present on the project site is low to none due to the developed nature and use of the site.

Agency or Subject Comment	Remarks
CDFW recommends a discussion regarding the purpose and need for the project, and a range of feasible alternatives to the project to minimize direct and indirect impacts to sensitive biological resources and wildlife movement. CDFW provides information regarding California Endangered Species Act (CESA), and expresses concern regarding take under CESA.	As documented in the Initial Study (Appendix A), the project would not result in adverse impacts to biological resources.
California Department of Transportation (Caltrans)	
Comment provides a reminder that Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020. The development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. The environmental report should include a Transportation Impact Study (TIS) to ensure all modes are well served by planning and development activities. Caltrans encourages the Lead Agency to evaluate the potential Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to better manage the transportation network and transit service, as well as bicycle or pedestrian connectivity improvements.	A project-specific VMT analysis, as well as a traditional capacity analysis has been conducted for the project. See Section 4.1, <i>Transportation and Traffic</i>, for further discussion. The City is in the process of developing a TDM strategy in further support of its VMT policy, however, this program is not yet in place.
South Coast Air Quality Management District (SCAQMD)	
Comments provide guidance for evaluation of air quality and greenhouse gas (GHG) analyses and request a copy of the completed analysis in digital form. Recommendations include: ▪ Use of SCAQMD's CEQA Air Quality Handbook and website, use of CalEEMod land use emissions software, ▪ Quantify criteria pollutant emissions and compare the emissions to SCAQMD's CEQA regional pollutant emissions significance thresholds and localized significance thresholds (LSTs) to determine the project's air quality impacts ▪ Identify any potential adverse air quality impacts that could occur from all phases and air pollutant sources related to the project, including construction and operation ▪ Perform a mobile source health risk assessment, if the Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles. ▪ Information sources for mitigation.	An evaluation of air quality impacts and GHG emissions was included in the Initial Study prepared for the project, and available on the City's website, in conjunction with release of the NOP, at: https://www.cityoflaverne.org/index.php/article-amherst-housing-development This evaluation substantially follows SCAQMD recommendation. Given the nature of the project (residential use), a health risk assessment was not conducted. A copy of the Initial Study and related modeling files will be provided directly to SCAQMD in conjunction with release of the Draft EIR.
Public Comments	
Traffic	
Comments express general concern about increase in traffic on Amherst Street as a result of the project. Comments indicate that Bowdoin Street be opened to reduce the share of traffic on Amherst Street. Concern regarding project traffic impacting Bowdoin Street. Concern regarding an increase in traffic, and the ability to evacuate during a wildfire.	See Section 4.1, <i>Transportation and Traffic</i>, for discussion of project impacts on traffic, as well as a discussion regarding Bowdoin Street.

Agency or Subject Comment	Remarks
Other Topics	
Indicates that many parties did not receive notice and notification should be distributed to all residents on Amherst Street.	Consistent with City requirements, property owners within 300 feet of the project area were notified.
Concern regarding the increased use in utilities: water, electricity, and cellular stations. Current residents have previously been asked to limit the use of water.	See Section 1.4 below regarding impacts not studied in detail, as well as the Initial Study in Appendix A.
Concern about aesthetics, and blocking of view. Concern about the overall density and “loss of old town feel.”	As documented in the Initial Study (Appendix A), impacts to aesthetics would be less than significant.
Positive comments regarding the aesthetics/architecture of the project.	As documented in the Initial Study (Appendix A), impacts to aesthetics would be less than significant.
Concern regarding low-income housing.	The project proposes market rate housing.
Concern regarding crime.	This is not a consideration under CEQA.
General expression of opposition to the project.	This is not a consideration under CEQA.

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:

- Tribal Cultural Resources
- Transportation

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 7.0, *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 three alternative development scenarios for the project 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:

“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

Table 1-2 summarizes issues from the environmental checklist that were addressed in the Initial Study (Appendix A). As indicated in the Initial Study, there is no substantial evidence that significant impacts would occur in any of these issue areas.

Table 1-2 Issues Not Studied in the EIR

Issue Area	Initial Study Findings
Aesthetics	The project site would not substantially hinder views of the skyline from public areas, nor is it located on a State Scenic Highway. The site also lacks scenic resources such as trees, rock outcroppings, and vegetation. Impacts to scenic vistas would be less than significant. The proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings, nor would it create significant impacts with respect to increased lighting. Impacts to these resources would be less than significant.
Agricultural and Forestry Resources	The project site is within an urbanized area of La Verne that lacks forest or timber, and is not designated as Farmland. The project would convert a nursery to a residential use. Although agricultural use is allowed within the existing zoning, the primary use is intended for residential. Impacts to agriculture and forestry would be less than significant.
Air Quality	The project would not conflict with the SCAQMD's Air Quality Management Plan and the population increase generated by the proposed project would not substantially alter air quality conditions in the Basin and would not generate emissions that would adversely affect regional air quality. Project impacts related to conflicts with, or obstructing implementation of the applicable air quality plan, would be less than significant. The emissions generated by the proposed project would not exceed the SCAQMD's construction or operational thresholds. Therefore, the impacts to air quality associated with construction and operation of the proposed project would be less than significant. Maximum daily carbon monoxide (CO) construction emissions would not exceed the SCAQMD's regional threshold for CO. Likewise, net new operational emissions from area, energy, and mobile sources combined would be below the SCAQMD regional threshold of 550 pounds. Both the SCAQMD's regional thresholds and localized significance thresholds (LSTs) designed to be protective of public health. The project would not create new hotspots or contribute substantially to existing hotspots. Localized air quality impacts related to CO hot spots would be less than significant. Due to the relatively short period of exposure and minimal emissions on site, toxic air contaminants (TACs) generated during construction would not result in concentrations causing significant health risks. Furthermore, the project does entail routine operational activities that would generate TAC emissions. As such, the project would not result in substantial TAC exposure to sensitive receptors in the vicinity of the proposed project and impacts would be less than significant. The proposed residential uses would not generate objectionable odors that would affect a substantial number of people. Odors would be similar to existing residential uses surrounding the project site. Impacts would be less than significant.
Biological Resources	The project site is within an urbanized area and no threatened, endangered or rare species or their habitats; locally designated species; locally designated natural communities; wetland habitats; wildlife corridors, or conservation plan areas exist on the site. Therefore, the project would have no impact on these resources. The project site currently contains nursery plants and two ornamental shade trees, which would be removed as part of the project. One of the trees onsite qualifies for consideration under La Verne's tree ordinance, Title 18 Chapter 78 of the Municipal Code. Implementation of Mitigation Measures BIO-1 would require the obtainment of a Tree or Heritage Grove Removal Permit, and replacement trees pursuant to Title 18 Chapter 78 of the Municipal Code.

Issue Area	Initial Study Findings
	BIO-1 Protected Tree Permit and Replacement. The Applicant shall obtain a Tree or Heritage Grove Removal Permit for the removal of a protected tree (Deodar cedar) pursuant to the Municipal Code. Removal of the protected tree will be mitigated by the onsite replacement of the caliper 42-inch tree by at least four trees with 60-inch minimum boxes, or as further determined by the City of La Verne’s Design Review Committee. Therefore, with implementation of Mitigation Measure BIO-1, impacts related to conflicts with policies or ordinances protecting biological resources would be less than significant.
Cultural Resources	No built-environment features that may be considered historical resources are present within the project site. As such, the project will not cause a substantial adverse change in the significance of a historical resource pursuant to <i>CEQA Guidelines</i> Section 15064.5. Therefore, the project would have no impact to historical resources. The project site has been disturbed by the project site’s orchard history, the construction of the water treatment plant, and current use as a plant nursery. The site has been disturbed by previous development and no archaeological resources have been recorded within the project site. Although no archaeological resources are known to exist within the project site, unanticipated discoveries are a possibility during ground disturbance activities. Impacts to unknown archaeological resources would be mitigated to less than significant with implementation of Mitigation Measure CUL-1. CR-1 Unanticipated Archaeological Resources. If archaeological resources are encountered during ground-disturbing activities, work within 50 feet of the find shall be halted and an archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for California Register of Historic Resources (CRHR) eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources. No cemeteries are known to exist within the project site; however, 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 that no further disturbance shall occur until the County coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) 5097.98. In the event of an unanticipated discovery of human remains, the County coroner would be notified immediately. If the human remains are determined to be prehistoric, the County coroner would notify the NAHC, which would determine and notify a most likely descendant (MLD). The MLD would complete the inspection of the site within 48 hours of being granted access to the site. With adherence to existing regulations, project impacts to human remains would be less than significant.
Energy	Construction of the project would be temporary, typical of similar residential projects, and would not result in wasteful energy use due to the provision of housing. Occupancy of the proposed residential units would increase the use of electricity and natural gas on the project site than compared to the existing plant nursery use. However, project design and energy features would be in conformance with the latest version of CALGreen and Building Energy Efficiency Standards. In addition, Southern California Edison and Southern California Gas have submitted Will Serve letters to indicate their ability to serve the project. Therefore, project impacts would be less than significant. Because the project would be equipped with a photovoltaic system pursuant to 2019 CCR Title 24 requirements, the project would generate renewable energy and would not conflict with statewide plans to increase the use of clean energy. Additionally, the project would include water-efficient appliances and fixtures in every residential unit in accordance with the 2019 Title 24 standards, which would reduce the energy needed to provide water to the project. Therefore, the project would have no impact related to conflict with, or obstruct, a State or local plan for renewable energy or energy efficiency.

Issue Area	Initial Study Findings
Geology and Soils	The project site is not located within an area that has been identified as having a known earthquake fault, and no known fault lines cut through the site. No impact would occur. Development in the City of La Verne is required to adhere to the Uniform Building Code (UBC) and California Building Code (CBC). The impact to people, buildings, or structures on the project site from strong seismic ground shaking would be reduced by the required conformance with applicable building codes, and accepted engineering practices. Impacts would be less than significant. The soils underlying the site would not be susceptible to liquefaction. the Geotechnical Study prepared by LGC Geotechnical, Inc. (2020) evaluated the site-specific liquefaction potential based on project site soil samples, and determined that due to the absence of groundwater and the presence of stiff fine-grained soils and generally dense sandy alluvial soils in the upper 50 feet, the potential for liquefaction is considered very low to remote. The project would result in a less than significant impact. The CBC and UBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of adverse soil conditions. Impacts would be less than significant. Expansive soils are primarily comprised of clays, which increase in volume when water is absorbed and shrink when dry. Expansive soils are of concern since building foundations may rise during the rainy season and fall during dry periods in response to the clay's action. Project site soils are anticipated to have a "Very Low" expansion potential based on soil testing completed for the site. Therefore, project impacts would be less than significant. The lack of elevation difference on the project site, the relatively flat surroundings, and the fact that the project site is not located within the landslide hazard zone on the Seismic Hazards Map, result in no potential for landslides. Impacts would be less than significant. The project would be connected to the City's existing sewer system for wastewater disposal and would not require nor install a septic system. Therefore, the project would not result in impacts related to septic tanks or alternative wastewater systems. Ground-disturbing activities during project construction may impact previously unknown paleontological resources that may be present below the project site surface. Mitigation Measure GEO-1 will mitigate potential impacts to paleontological resources to less than significant. GEO-1 Paleontological Resources Management Program. The following mitigation measures shall only be implemented during ground construction activities (i.e., grading, trenching, foundation work, excavations) where ground disturbance exceeds eight feet below ground surface within project areas underlain by Pleistocene alluvial fan deposits. Mitigation and Monitoring Program. The Paleontological Mitigation and Monitoring Program shall be supervised by a qualified paleontologist. A qualified paleontologist is an individual who meets the education and professional experience standards as set forth by the SVP (2010), which recommends the paleontologist shall have at least a Master's Degree or equivalent work experience in paleontology, shall have knowledge of California geology and local paleontology, shall be familiar with paleontological procedures and techniques, and who has worked as a paleontological mitigation project supervisor for a least one year. Monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources. Paleontological Worker Environmental Awareness Program (WEAP). Prior to the start of construction, the qualified paleontologist or his or her designee, shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be fulfilled at the time of a preconstruction meeting. In the event a fossil is discovered by construction personnel anywhere in the project area, all work in the immediate vicinity of the find shall cease and a qualified paleontologist shall be contacted to evaluate the find before re-starting work in the area. If it is determined that the fossil(s) is (are) scientifically

Issue Area	Initial Study Findings
	significant, the qualified paleontologist shall complete the mitigation outlined below to mitigate impacts to significant fossil resources. c. Resource Recovery and Management Plan. Ground-disturbing activity that does not exceed eight feet in depth in areas of low paleontological sensitivity shall not require paleontological monitoring. Any excavations within undisturbed bedrock in areas of high paleontological sensitivity (i.e., Pleistocene-aged deposits), and excavations that exceed eight feet in depth in those areas potentially underlain by Pleistocene-aged deposits (i.e., Holocene-aged alluvial sediments) shall be monitored on a full-time basis by a qualified paleontological monitor. If no fossils are observed during the first 50 percent of excavations in Holocene-aged sediments exceeding eight feet in depth, or if the qualified paleontologists can determine that excavations below nine feet are not disturbing Pleistocene-aged (or other potentially fossil-containing) sediments, then paleontological monitoring can be discontinued or reduced to spot-checking under the discretion of the qualified paleontologist, subject to approval from Los Angeles County. If fossils are discovered, the qualified paleontologist (or paleontological monitor) shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Should larger fossils be discovered, the qualified paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Once salvaged, fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the University of California Museum of Paleontology or other institution determined by the City of La Verne or Los Angeles County), along with all pertinent field notes, photos, data, and maps. Upon completion of ground-disturbing activities (and curation of fossils if necessary), the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.
Greenhouse Gas Emissions	Annual project GHG emissions would not exceed threshold for residential projects. The project would not conflict with plans and policies aimed at reducing GHG emissions. Therefore, the project would have a less than significant impact on GHG emissions.
Hazards and Hazardous Materials	Proposed residential uses would not emit or handle hazardous materials beyond typical household and landscape waste and materials, and the project would not create a hazard to the public through transportation of hazardous materials upon completion and residential occupancy. Therefore, the project would result in a less than significant impact. There are no schools within a 0.25-mile radius of the project site. The Lutheran High School (3960 Fruit Street) is located nearest to the project site, approximately 0.47 mile west from the project site. The project would not emit or handle hazardous materials, substances, or waste during project construction or operation and the project would pose no hazards nor transport hazardous materials past existing or proposed schools. Therefore, the project would have no impact. The project site has no evidence of having asbestos-containing construction materials or any facilities used to store, process, or discharge petroleum or other hazardous substances based on review of historic uses and records for the project site. According to the State Water Resources Control Board Geotracker and State Department of Toxic Substances Control's EnviroStor databases, there are no hazardous material sites present within a 1,000-foot radius of the project site. Therefore, the project would have no impact.

Issue Area	Initial Study Findings
	No public airports or private airstrips are located within two miles of the project site. The project site is located approximately 2.5 miles northeast of Brackett Field Airport, which is the nearest airport to the project site. The project site is located in Zone E of the airport's influence area. Zone E areas contain low risk levels of airport activity hazards and are located beyond the airport's 55 decibel noise contour. Therefore, the project would have a less than significant impact. The project would increase traffic around the project site and vicinity. However, project construction and operational activities would not result in any street closures that could impede emergency access or evacuation. Final project design would be subject to plan check by the City Planning and Building Agency and the La Verne Fire Department to ensure the proposed driveway along Amherst Street and on-site circulation meet applicable turn-radius standards for emergency vehicles and fire apparatus. Therefore, the project would have a less than significant impact. The project site is in an urbanized area adjacent to existing residential uses. There are no wildland conditions on or adjacent to the project site. The project site is not located in a designated Very High Fire Hazard Severity Zone (VHFHSZ) or a State Responsibility Area. The nearest VHFHSZ is located approximately 0.25 mile north of the project site, north of SR 210. Therefore, the project would have no impact.
Hydrology and Water Quality	On-site storage of stormwater runoff, as required pursuant to the City's (Low-Impact Development) LID ordinance, would provide an opportunity for debris, sediment, and sediment-bound pollutants to settle out of the water column prior to discharge downstream. The requirements of the City's LID ordinance and the applicable municipal separate storm sewer system (MS4) permit are intended to protect water quality and support attainment of water quality standards in downstream receiving water bodies. Therefore, operation of the project would not violate any water quality standards or waste discharge requirements, nor would it otherwise substantially degrade water quality. Therefore, water quality impacts from project operation would be less than significant. Development of the project would result in a more intense use of the project site compared to current conditions and would increase impermeable surface on site substantially. Consequently, the project may incrementally reduce groundwater recharge and increase the amount of surface runoff. However, the site accounts for a marginal amount of total recharge area in the Spadra sub-basin. Landscaped areas on the project site would help preserve infiltration capacity on the site. As a result, impacts related to groundwater recharge would be less than significant. Compliance with the City's LID ordinance and the Los Angeles County MS4 permit requires capture and treatment of the 85th percentile, 24-hour storm event. As part of the project's final design review, the project would be required to submit a Standard Urban Storm Water Mitigation Plan demonstrating adequate stormwater retention using infiltration basins, bioretention areas, capture and controlled release tanks, or another BMP. Such BMPs would slow the velocity of water and allow sediment and debris to settle out of the water column, thereby minimizing the potential for downstream flooding, erosion/siltation, or exceedances of stormwater drainage system capacity. The Federal Emergency Management Agency classifies the La Verne under Flood Zone X, indicating an area of minimal flood hazard. The project site is not located in a floodplain and would not divert or redirect flood flows. Therefore, impacts would be less than significant. The project site is approximately 42 miles from the Pacific Ocean and not subject to tsunamis, and the nearest inland surface water body that may be subject to seiche is Lake Oak Reservoir, approximately 1.2 miles to the north. The project site is not located in the inundation zone for the Live Oak Reservoir. Furthermore, the project does not involve storage or processing of pollutants that would be released due to inundation should such an event occur. Therefore, the project would result in no impact.

City of La Verne
Amherst Residential Development

Issue Area	Initial Study Findings
Land Use and Planning	The project site is surrounded by existing residential uses. The project site would provide community connection and does not involve construction of freeways, walls, or other features that would divide an established community. Project site plans indicate on-site vehicle and pedestrian circulation pathways that would not interfere with existing off-site traffic patterns or divide the existing neighboring communities. Therefore, the project would have no impact. The Amherst Specific Plan is consistent with the applicable goals and policies contained within the adopted City of La Verne General Plan and serves as zoning for the project site. The project requires a General Plan Amendment and a Zone Change to create uniform zoning and land use designation throughout the project site and to conform with the Amherst Specific Plan. A General Plan Amendment to designate the Amherst Specific Plan area to Medium Density Residential (MDR) and a Zone Change to designate the project site as Amherst Specific Plan zone would establish conformity with adopted City General Plan land use plans, policies, and regulations. Therefore, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. There would be no impact.
Mineral Resources	The project site currently consists of a plant nursery, and no portion of the project site would be used for extraction of mineral resources, nor would extraction be consistent with the adjacent residential uses. The La Verne General Plan does not identify any mineral resources in the area of the Amherst Specific Plan. Therefore, the project would have no impact on mineral resources.
Noise	The proposed project would not result in a significant long-term increase in traffic noise levels, and temporary construction noise would be less than significant, based on compliance with the City's time restrictions on construction activities contained in the Municipal Code. The project does not involve operational activities that would adversely affect nearby receptors. Impacts would be less than significant. Construction activity would be temporary, and the use of vibration-generating heavy equipment would be primarily limited to periodic loaded trucks. Vibration would be a temporary impact during construction and would not occur during normal sleep hours. Impacts would be less than significant. The project site is located approximately 2.5 miles northeast of the Brackett Field Airport and is located in Zone E of the airport's influence area. According to the Brackett Field Airport Land Use Compatibility Plan, the project site is outside the noise and overflight area, and beyond the 55 dB CNEL contour. Therefore, noise impacts related to airports would be less than significant.
Population and Housing	The project would construct 42 single-family residences, which would cause a direct increase in the City's population by introducing new residents to the project site. The level of population growth associated with the project (115 residents) would not exceed Southern California Association of Government's regional population projections, and the project would not directly or indirectly induce substantial unplanned population growth. No impact would occur. The project site is currently being used as a plant nursery, which would be demolished and redeveloped under the project; there are no residential uses present on the project site. The project would construct 42 single-family residential units. Implementation of the project would not displace any housing. No impact would occur.
Public Services	Fire protection, rescue services, and emergency medical (paramedic services) are provided by the La Verne Fire Department (LVFD). With continued implementation of existing practices of the City, including compliance with the California Fire Code and the UBC, the proposed project would not substantially affect community fire protection services and would not result in the need for construction of fire protection facilities. Impacts would be less than significant.

Issue Area	Initial Study Findings
	Police protection is provided by the La Verne Police Department (LVPD). The proposed project would cause an increase in population, future residents on the project site may require increased police protection services, including officers, equipment, and facilities. Consequently, the project would contribute incrementally to demand for new or expanded police protection facilities. New or expanded police facilities would be unlikely to result in substantial environmental impacts, as such facilities are anticipated to be placed in converted commercial, retail, or government facilities already developed and served by existing infrastructure. Impacts would be less than significant. The project site is served by the Bonita Unified School District (BUSD). Although the project would increase enrollment at BUSD schools, payment of the school impact developer fees would be considered full mitigation for the proposed project's impacts under CEQA, and impacts to schools would be less than significant. The project would add approximately 115 residents to the City. This population increase would not substantially decrease the existing parkland-to-resident ratio, which would remain at approximately 3.4 acres per 1,000 residents. Approximately 0.25 acre of open space/park area within the Amherst Specific Plan area would be utilized as public park space for residents of the project and the surrounding area. Future parkland expansion projects would be required to undergo the appropriate level of project-specific environmental review and mitigate potentially significant environmental impacts, as necessary. Therefore, the project would not substantially worsen the City's existing deficiency in meeting its parkland ratio goal, and impacts would be less than significant. The La Verne Public Library is located approximately 0.7 mile (walking/driving distance) east of the project site. The increased demand for library and other public services would be incremental, and public services funded by the City's General Fund would be maintained because future residents of the project site would pay proportionate property taxes to the City. Therefore, impacts would be less than significant.
Recreation	The project would not appreciably decrease parkland-to-resident ratios, would not interfere with the City's planned acquisition of additional parkland, the project would not create substantial demand on or cause substantial deterioration of City parks such that new park facilities would be required. Therefore, the project would have a less than significant impact on recreational facilities. The project would also include public open space within the project in the form of a 0.25-acre pocket park located adjacent to the project entry along Amherst Street.
Utilities	The project may require water line extensions on-site to serve the proposed residential structures. As with water facilities, sewer line extensions necessary to connect the proposed new buildings to existing facilities along Williams Avenue would be installed in conjunction with the project and would not substantially increase potential environmental impacts analyzed in this document. Wastewater treatment facilities operated by the City of La Verne and Los Angeles County Sanitation District (LACSD) possess sufficient capacity to process additional wastewater generated by the project. The project would be responsible for constructing on-site wastewater treatment conveyance systems and paying standard sewer connection fees to the City of La Verne and LACSD. Furthermore, LACSD provided a Will Serve letter for the project based on preliminary review, confirming the existing sewer infrastructure can meet project demands. Impacts would be less than significant. The overall effect of the proposed project would be to ultimately reduce pollutants from the site that enter the storm drain system since the new development would be subject to current regulatory requirements, which are more stringent than regulations to which the existing onsite development was subject. Impacts would be less than significant. The project would comply with the City's Solid Waste Ordinance, codified in Chapter 13, Article 28 of the LVMC, which regulates waste collection, transfer, and disposal in the City. The project would be required to comply with federal, State, and local statutes and regulations related to solid waste. Therefore, the project would have a less than significant impact.

Issue Area	Initial Study Findings
Wildfire	The project site is not located in or near a State Responsibility Area or lands classified as a VHFHSZ. The nearest such zone is a local responsibility area designated as a VHFHSZ located approximately 0.5 mile north of the project site. The VHFHSZ is separated from the site by residential development with minimal vegetation north of Amherst Street and SR 210, a ten-lane divided freeway. The project would construct of 42 single-family residential structures on a lot currently occupied by a plant nursery surrounded by existing residential land uses. The project would be served by existing water utilities, including fire hydrants along Amherst Street, with the nearest hydrant located approximately 220 feet west of the project site. As described in Section 17, <i>Transportation</i> , the project would not result in significant traffic impacts with the potential to impede emergency response or evacuation. The project site is within a relatively flat portion of La Verne and not located near a landslide hazard area or floodplain, minimizing the potential for impacts related to post-fire flooding, landslides, or slope instability. Given the project site's urbanized location and distance from fire hazard severity zones, project impacts related to wildfire would be less than significant.

1.5 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible and trustee agencies. The City of La Verne 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. Responsible agencies include the Los Angeles Regional Water Quality Control Board, which regulates water quality in the region.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the proposed project.

1.6 Environmental Review Process

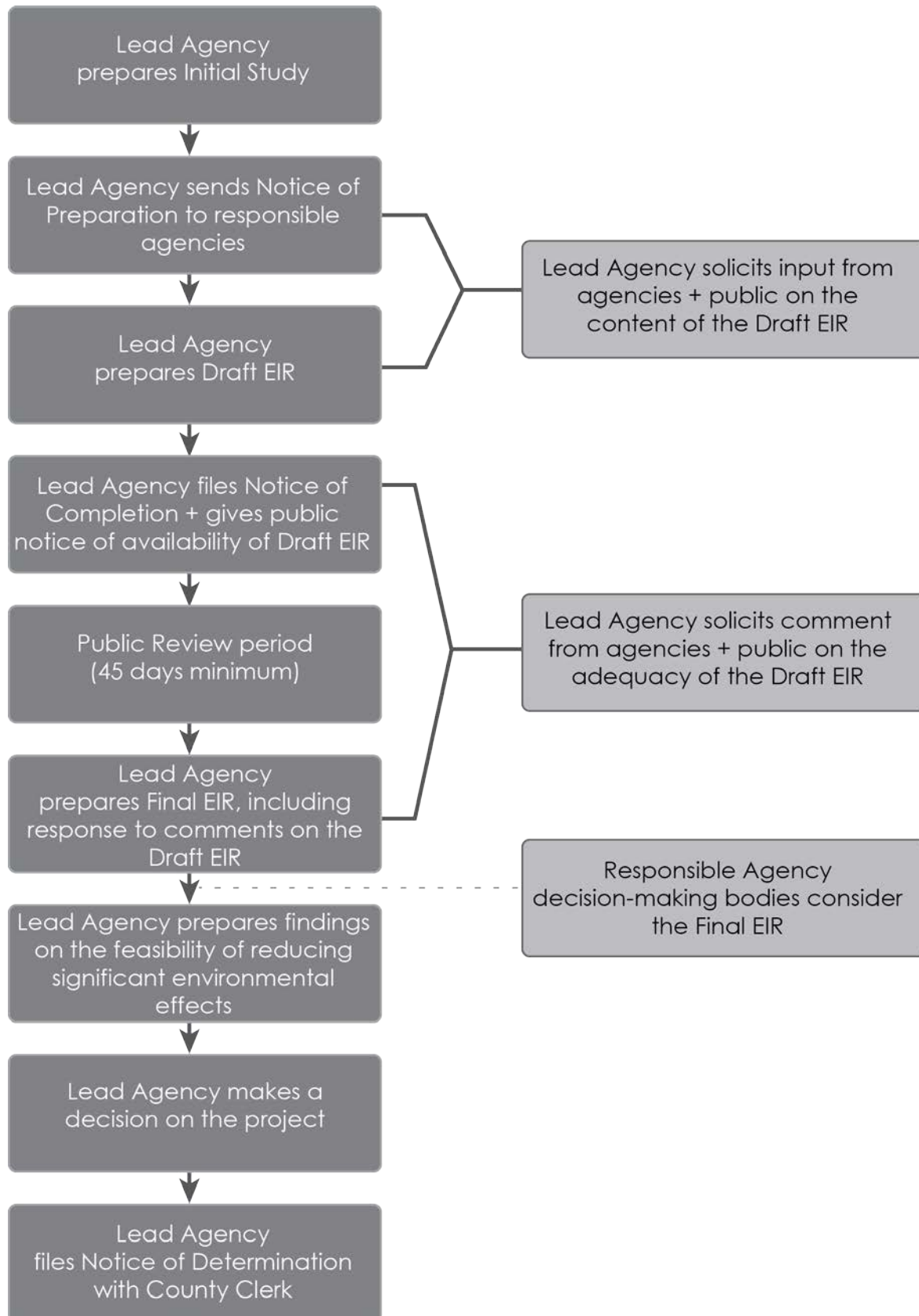
The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **Notice of Preparation (NOP) and Initial Study.** After deciding that an EIR is required, the lead agency (City of La Verne) 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; PRC 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 Notice of Preparation in the County Clerk's office for 30 days (PRC Section 21092) and send a copy 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 (PRC 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 (PRC Section 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 (PRC Section 21167[c]).

Figure 1-1 Environmental Review Process



2 Project Description

This section describes the proposed project, including the project applicant, the project site and surrounding land uses, major project characteristics, project objectives, and discretionary actions needed for approval. The proposed project would involve the development of up to 42 single-family dwelling units on the site of an approximately 5.6 acre plant nursery.

2.1 Project Applicant

MW Investment Group, LLC
27702 Crown Valley Parkway, Suite D-4-197
Ladera Ranch, California 92694

2.2 Lead Agency Contact Person

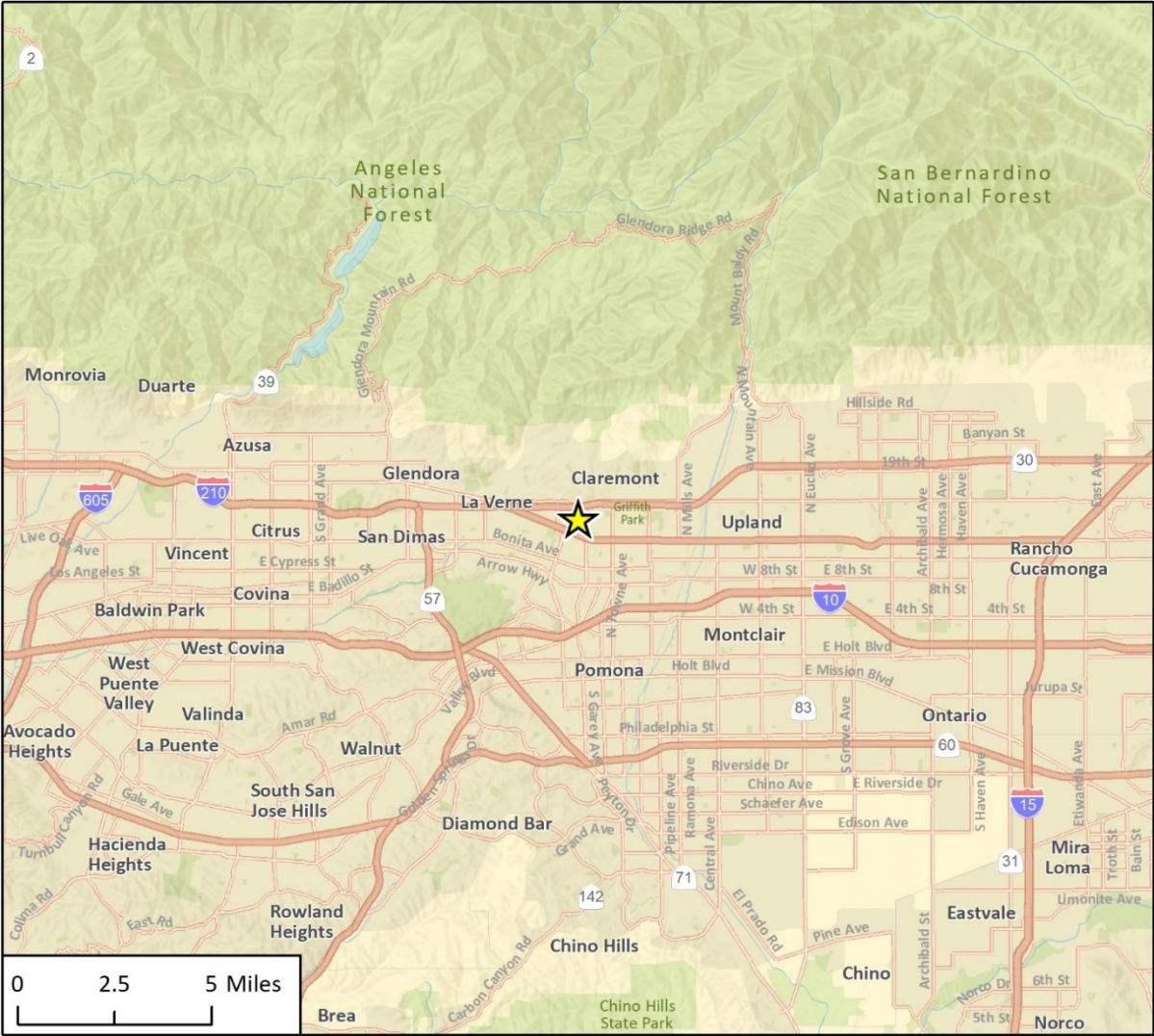
Candice Bowcock, Principal Planner
City of La Verne
Department of Community Development
3660 D Street
La Verne, California 91750
(909) 596-8706

2.3 Project Location

The 5.6-acre project site is located at 2820 Amherst Street situated at the eastern city limit within the City of La Verne, Los Angeles County, California. The project site is composed of two parcels (Assessor Parcel Numbers 8666-021-902 and 866-021-904), approximately 450 feet in width along the Amherst Street frontage, and 630 feet in depth. The project site is approximately 0.25 mile south of State Route 210 (SR 210), and 0.5 mile north of the historic State Route 66 (SR 66). Regional access to the site is available from the south via Interstate 10 (I-10) and from the east and west via the SR 210. Local access is available at the Fruit Avenue on- and off-ramps, approximately one mile northwest of the site. Direct access is provided to the project site via Amherst Street and Williams Avenue, which intersect Fruit Street and SR 66 and provide access to the greater regional vehicular circulation network.

The site is used primarily for agriculture as a plant nursery, with approximately 220,000 square feet being used for outdoor plant cultivation and approximately 20,300 square feet used for six greenhouses. The site is predominately flat, with a gentle slope from 1,219 above mean sea level (amsl) in the southwest corner of the project to 1,240 amsl in the northeast corner. The site drains to the southwest. The nearest bus stop is located approximately 0.5-mile to the southwest, at the intersection of SR 66 and Falcon Street. The project is bound by a mobile home park to the south and west, single-family residences to the east, and the City-owned and operated Amherst Groundwater Treatment Plant to the northeast. Figure 2-1 shows the regional context of the project site, and Figure 2-2 shows the project site in its neighborhood context.

Figure 2-1 Regional Location



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★ Project Location

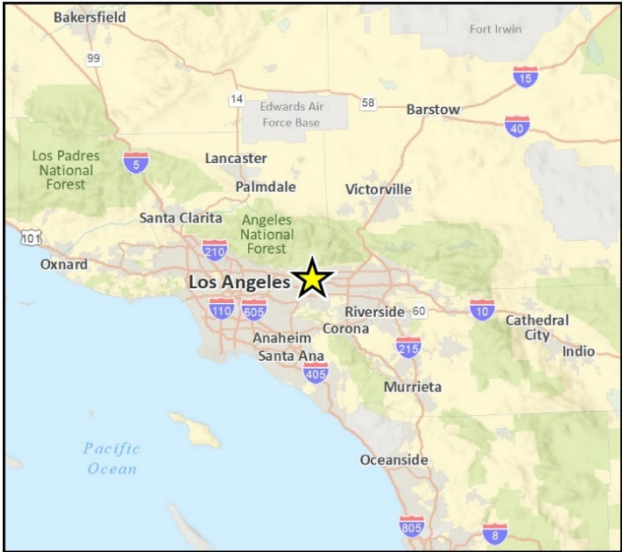


Fig. 3 Regional Location

Figure 2-2 Project Site Location



Imagery provided by Microsoft Bing and its licensors © 2020.

Fig 2 Project Location

2.4 Existing Site Characteristics

2.4.1 Current Land Use Designation and Zoning

The project site is currently used for agriculture as a plant nursery, with approximately 220,000 square feet being used for outdoor plant cultivation and approximately 20,300 square feet used for six greenhouses located at 2820 Amherst Street. The project is bound by a mobile home park (multi-family residential) to the south and west, single-family residences to the north and east, and the City-owned and operated Amherst Groundwater Treatment Plant to the northeast. The project site has a General Plan land use designation of Low-Density Residential (LDR) (La Verne 1998). The site is zoned Planned Residential Development 3 DU/AC Detached (PR3D), as defined by the City's Zoning Ordinance and the Land Use Element of the General Plan. Uses permitted in the PR3D Residential Zone include single-family housing, licensed home facilities¹, supportive and transitional housing, farms and ranches. The proposed project would require a General Plan Amendment to change the land use designation of the property from Low Density Residential (LDR) to Medium Density Residential (MDR). Furthermore, the proposed project would also require a change in zoning of the entire property from the current Planned Residential Development (PR3D) to Specific Plan.

2.4.2 Surrounding Land Uses

The project site is bordered by a mobile home park (multi-family residential) to the south and west, single-family residences to the north and east, and the City-owned and operated Amherst Groundwater Treatment Plant to the northeast. The Amherst Specific Plan provides a detailed description of the proposed land uses, infrastructure, and implementation requirements for the proposed project.

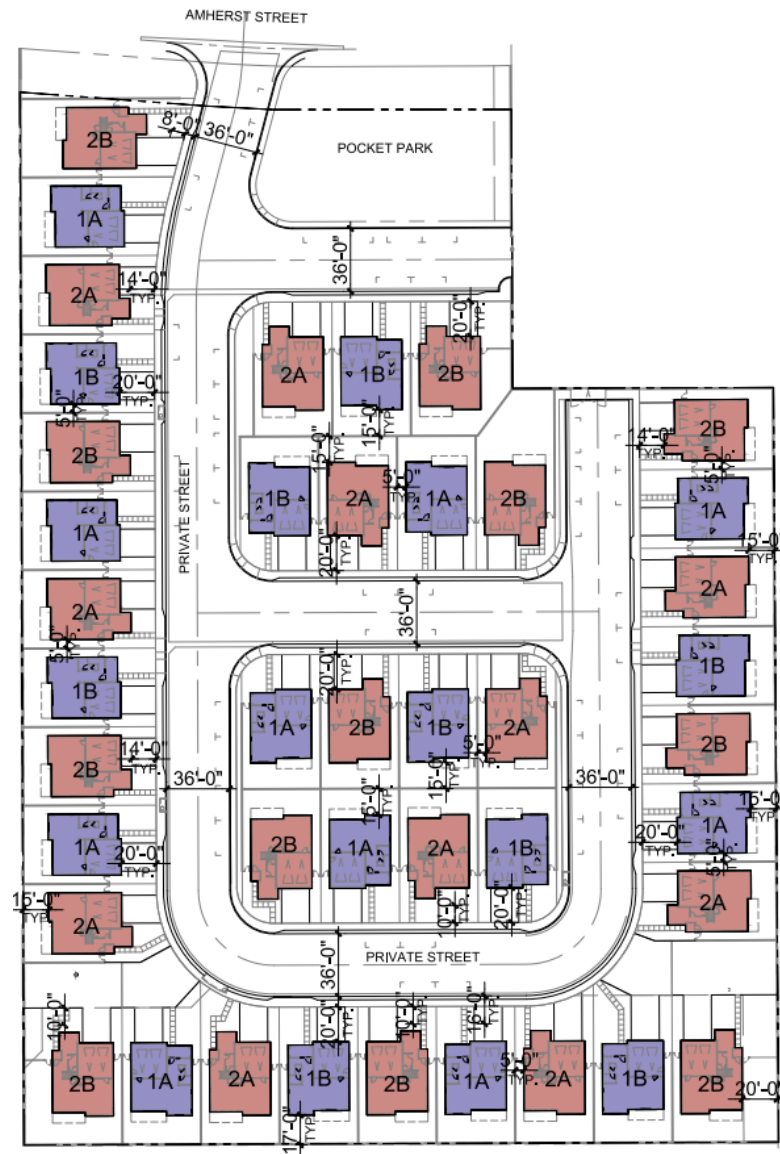
2.5 Project Characteristics

The proposed project would involve the development of 42 single-family units, consistent with the proposed Amherst Specific Plan. This would result in the removal of the existing greenhouses and the grading of the project site. The site is currently used for agriculture as a plant nursery, with approximately 220,000 square feet being used for outdoor plant cultivation and approximately 20,300 square feet used for six greenhouses. The project would also include public open space within the project in the form of a 0.25-acre pocket park located adjacent to the project entry along Amherst Street. This area would serve as a landscaped gateway to the project and provide outdoor recreation opportunities to project residents and the public. The Amherst Specific Plan provides a detailed description of the proposed land uses, infrastructure, and implementation requirements for the proposed project; see Appendix B.

Figure 2-3 and Figure 2-4 show the conceptual site and landscape plans. Table 2-1 shows the characteristics of the proposed single-family dwelling units.

¹ Group homes, day care, community care, etc.

Figure 2-3 Conceptual Site Plan

**PROJECT SUMMARY**

Total Area:	7.060 AC
Proposed Project Area:	5.570 AC
Proposed Units:	42 DU
Density:	8.0 DU/AC
Zoning:	PR3D Planned Residential

Dwelling Units

PLAN 1	2,002 SF (3bd+loft, 2.5ba)	19 Du (45%)
PLAN 2	2,433 SF (4bd+loft, 3ba)	23 Du (55%)
TOTAL		42 Du

Elevation Style

A	Santa Barbara
B	Craftsman

Figure 2-4 Conceptual Landscape Plan

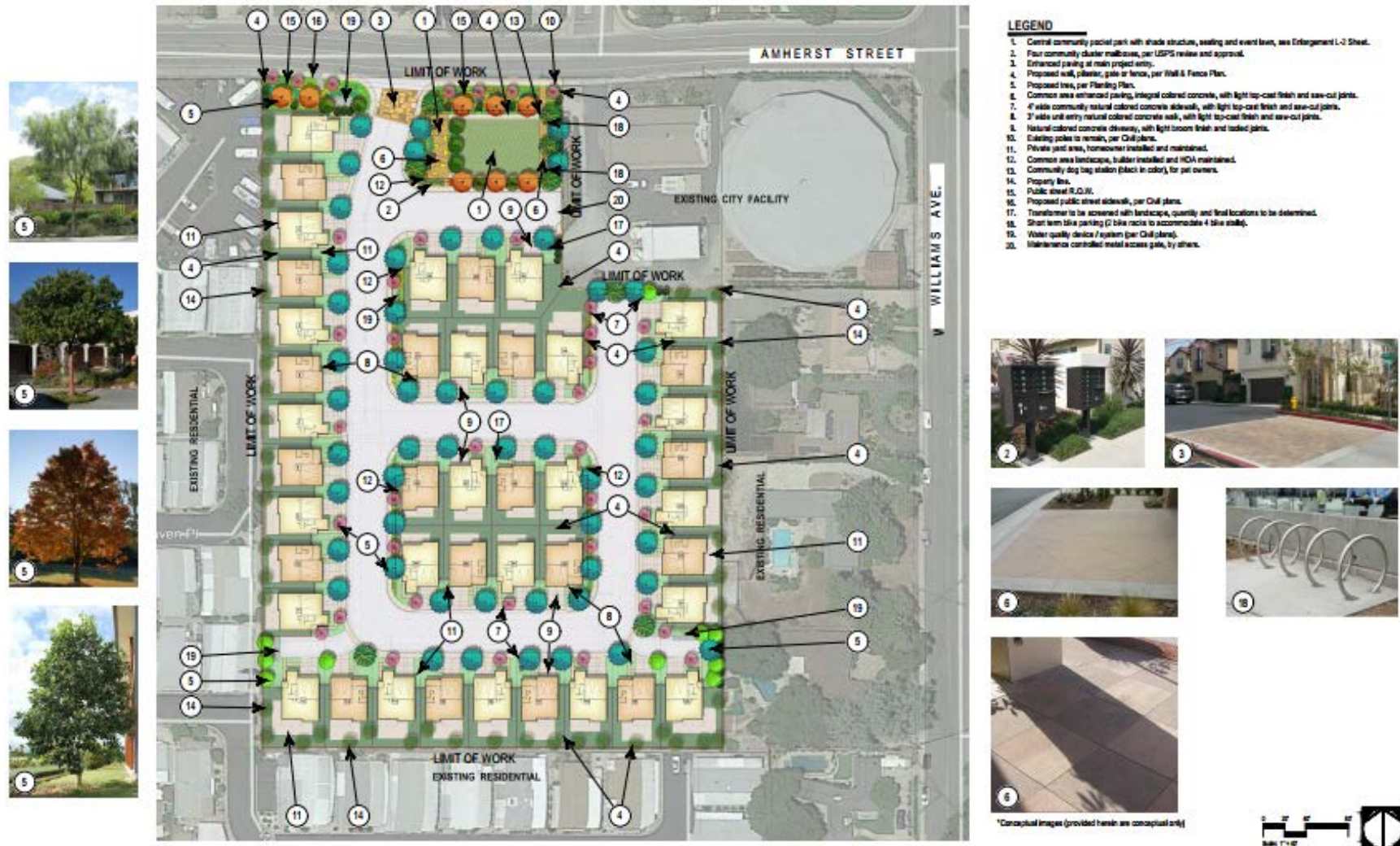


Table 2-1 Project Characteristics

Development Standards		Requirements
Maximum Units		42 dwelling units
Density		8 dwelling units per acre
Minimum Lot Area		3,350 square-feet
Minimum Lot Dimensions		45 feet wide by 75 feet deep
Square-footage		2,002 to 2,433
Height		
Maximum Building Height		30 feet
Setbacks and Separation		
Minimum Building Setback from Amherst Street Right-of-Way		25 feet
Minimum Setback from Garage Door to Sidewalk		20 feet
Minimum Front Setback		12 feet
Interior Side Setback		5 feet
Interior Rear Setback		15 feet
Minimum Building Separation		10 feet
Parking		
Minimum Parking Required per Dwelling Unit		Two spaces within garage and two on the driveway
Source: Draft Amherst Specific Plan 2020		

2.5.1 Project Landscape Design

All landscape would be climate appropriate and use efficient irrigation systems. The use of turf in front yards is discouraged and would be minimized throughout the Amherst Specific Plan area. There are three types of open spaces within the project area: private yard space, common area landscape, and public open space. All project landscaping would be required to meet the City's Water Efficient Landscape Ordinance (La Verne Municipal Code 18.118).

Common open space would be composed of parkways, community entry features, and other landscaped areas within the community that would be maintained by a community homeowners association (HOA). Landscaping in these areas would be designed with water-wise principles, with a consistent landscaping palette that contributes to overall project sense-of place.

Public open space within the project would be provided in the form of a 0.25-acre pocket park to be located adjacent to the project entry. This area would serve as a landscaped gateway to the project and provide outdoor recreation opportunities to project residents and the public. The conceptual design for the pocket park is shown in Figure 2-4. Park amenities may include, but are not limited to:

- Event lawn/turf
- Picnic Tables
- Built in BBQ and buffet counter area
- Wood structure with string-lighting

- Fire-pit with group lounge seating
- Enhanced paving
- Dog-bag station
- Bicycle Rack
- Benches

Walls and fences within the Amherst Specific Plan area are intended to contribute to the sense-of-place for the project site, provide privacy and access control to privately owned areas, and facilitate safe recreational activities in the pocket park. Any wall or fence erected within the Amherst Specific Plan area must complement the overall architectural theme of the community.

Private yard space would be composed of front, rear, and side yards. These landscape areas would be maintained by the property owner upon which the yard is situated. Water-wise landscape principles would be encouraged in these privately maintained spaces.

2.5.2 Project Architecture Design

Proposed building design would implement Mediterranean and traditional architectural themes that are compatible with residential development within the City. Architecture would reflect the design philosophies of Craftsman and Santa Barbara architectural styles. The Santa Barbara architectural style is a derivative of Spanish-themed architecture and would incorporate aspects of Mediterranean style, such as arched openings, red-tile roofs, white and beige stucco walls, and dark wood trims. The Craftsman style is an American domestic style of architecture that features low pitched roofs, tapered columns and supports, and exposed wooden structural and decorative elements. Figure 2-5 illustrates the architectural styles, and Figure 2-6 shows a representative architectural elevations.

2.5.3 Project Circulation

Two existing driveways from Amherst Street currently provide access to the property. The easternmost driveway would remain and continue to provide access to the treatment facility. In addition, a central driveway would be constructed for the project entry, emergency access, and delivery access for the adjacent groundwater treatment plant. Pedestrian circulation would be provided throughout the development via a system of interior sidewalks.

2.5.4 Project Infrastructure and Utilities

The La Verne Public Works Department would provide the following utility services to the Amherst Specific Plan area: solid waste, water, wastewater, and stormwater. Southern California Edison supplies electricity and the Southern California Gas Company provides gas to the area.

Potable water service for the Amherst Specific Plan area is provided by the La Verne Water and Utility Division. Other than abutting improvements, there are no off-site improvements to domestic water lines proposed as part of the project. Proposed water system improvements within the Amherst Specific Plan area would include eight-inch water distribution lines that provide potable water service to dwelling units within the project site. These new facilities would connect to an existing domestic water line located within the Amherst Street right-of-way.

Figure 2-5 Architectural Styles



Figure 2-6 Architectural Elevations



LEFT



FRONT



RIGHT



REAR

Sewer service for the Amherst Specific Plan area is provided by the La Verne Sewer Division. Proposed eight-inch on-site sewer lines would connect to off-site City main lines. Proposed off-site sewer improvements would occur at the southeast corner of the Amherst Specific Plan area to connect the project to existing sewer main lines within the right-of-way of Williams Avenue. These new improvements would traverse an easement area within an adjacent parcel to connect to existing sewer main lines located within the right-of-way of Williams Avenue.

2.5.5 Project Drainage

The existing site topography slopes from the northeast to the southwest. Runoff from the site sheet flows southwest to an off-site concrete ditch adjacent to the southern property line. There are no onsite surface drainages or wetlands. From the ditch water flows within the Twin Oaks Mobile Homes development to a Los Angeles County Flood Control District catch basin at the southwest corner of Oak Leaf Drive. The catch basin connects to a pipe which discharges to Live Oak Wash.

Development within the Amherst Specific Plan area would utilize existing storm drain line infrastructure owned and maintained by the adjacent Twin Oaks Park mobile home park. The project would implement principles of Low Impact Design, consistent with National Pollutant Discharge Elimination System Requirements, including water quality best management practices (KHR Associates 2020). A new stormdrain pipe is proposed to be constructed from the southwest corner of the project, through the mobile home park, along Oak Shadow Drive and N. Oak Leaf Drive, to an existing on-site catch basin; currently this connection is made via sheet flow through the street. The catch basin connects via a storm drainpipe to the Live Oak Wash flood control channel, managed by Los Angeles County Flood Control District (LACFCD).

Runoff occurring on-site would be collected by a system of surface gutters and conveyed to new catch basins to be located within the Amherst Specific Plan area. Water would be collected and diverted into modular wetlands systems for treatment prior to release into the private stormdrain main. During high flow events, excess stormwater would bypass treatment and drain directly into the private stormdrain main. The resulting runoff has been designed to emulate pre-development conditions in terms of volume, rate and water quality.

In addition, the project would implement a Stormwater Pollution Prevention Plan to control erosion and other pollutants during project construction.

2.5.6 Green Building Features

All new residences will be equipped with solar panels and provide renewable energy for home use. The project would be consistent with green building features through project design, which includes complying with the latest Title 24 Green Building Code and Building Efficiency Energy Standards and installing energy-efficient light-emitting diode (LED) lighting, water-efficient faucets and toilets, water efficient landscaping and irrigation, and electric vehicle charging parking spaces. The garages in the homes may be pre-wired to accommodate charging of electric vehicles. The project's water consumption would be minimized with the use of low-flow plumbing fixtures, installation of water-conserving appliances, and use of drought-tolerant native and adaptive plants as part of the landscape design. Furthermore, related to energy production and usage, the project would be equipped with photovoltaic systems, ENERGY-star appliances, and use of natural light for building interiors.

2.6 Construction and Grading

The Amherst Specific Plan would be built out in one complete phase over a period of one to two years with construction estimated to be completed sometime between 2022 and 2023. Actual build-out would be subject to market and economic conditions, jurisdictional processing of approvals, and infrastructure timing, and may vary from the construction phasing currently anticipated. Project development would include all on-site infrastructure improvements necessary to service the project including, but not limited to:

- Grading of the Amherst Specific Plan area
- Water distribution lines and related infrastructure
- Sewer distribution lines and related infrastructure
- Storm water lines and related infrastructure
- Other utility services (e.g., electricity, cable television, telephone, etc.)
- Improvements associated with the on-site private streets and drives

Based on preliminary earthwork estimates, project grading would require approximately 7,092 cubic yards (cy) of cut and 5,443 cy of fill. Anticipated depth of excavation would be 6.44 feet. Excess soil of approximately 1,649 cy excavated from the project site would be exported and disposed of off-site.

2.7 Project Objectives

Project objectives include the following:

1. Increase the supply of housing in the City of La Verne, consistent with the goals and policies of the General Plan Housing Element.
2. Implement infill development on underutilized parcels, consistent with the General Plan Housing Element.
3. Provide new outdoor park spaces that complement proposed development within the Specific Plan area and are available for public use.
4. Reinforce a sense of place through project-specific identity signage.

2.8 Required Approvals

2.8.1 City of La Verne

The project would require the following approvals by the City:

- A General Plan Amendment to change the land use designation of the property from Low Density Residential (LDR) to Medium Density Residential (MDR).
- A Zone Change to change zoning of the entire property from the current Planned Residential Development (PR3D) to Specific Plan.
- Approval of the Amherst Specific Plan by City ordinance.

- Certification of an Environmental Impact Report (EIR) prepared in accordance with the California Environmental Quality Act (CEQA). The City will consider certification of the EIR prior to acting on the other requested approvals.
- A Tentative Tract Map (TTM) prepared for the Amherst Specific Plan area and processed through the City in accordance with Chapter 16 of the La Verne Municipal Code and the Subdivision Map Act.
- Development Review Committee approval of a Precise Plan for development within the Amherst Specific Plan area is required before building permits may be issued.
- Tree Removal Permit for the removal of a 42-inch caliper Deodar cedar to be considered by the Development Review Committee.
- Lot Line Adjustment to move the southerly property line approximately three feet south, in accordance with Chapter 16.18 of the of the La Verne Municipal Code, to be considered by the Development Review Committee.

2.8.2 Other Agency Approvals

The City of La Verne is the lead agency with responsibility for approving the project. No other agency approvals are anticipated.

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3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4.0, *Environmental Impact Analysis*.

3.1 Regional Setting

The project site is located in the City of La Verne, immediately south of La Verne's western border with Claremont, and approximately 3 miles west of La Verne's eastern border with San Dimas. It is located on the southwest corner of the intersection of Amherst Street and Williams Avenue, north of the terminus of Pepperdine Court. The approximately 5.6-acre site is currently occupied by a plant nursery. Figure 2 in Section 2.0, *Project Description*, shows the location of the project site in the region and Figure 3 shows the project location in relation to the surrounding community.

A grid system of east-west and north-south roadways, including arterials, collectors, and local streets, provide vehicular access throughout the City. The major roadways include North Garey Avenue, Fruit Street, Williams Avenue, Amherst Street and Bradford Street. The closest freeways are State Route 210 (SR-210) approximately 0.25 mile south, and State Route 66 (SR-66) 0.5 mile north, of the project site.

La Verne is located in southeastern Los Angeles County, within the Inland Valley region of southern California surrounded by the San Gabriel Mountains to the north and Central Transverse Ranges to the east. The climate is typical of Los Angeles County and surrounding cities: hot, dry summers and mild, relatively wet winters with rainfall concentrated in the winter months. La Verne is approximately 30 miles inland from the Pacific coastline.

3.2 Project Site Setting

As shown in Figure 3 in Section 2.0, *Project Description*, the project site is bordered by a residential development to the north and east, Amherst Street to the north, and Williams Avenue to the east. The adjacent Twin Oaks Mobile Home Park is located south and west of the project site. The Amherst Groundwater Treatment Plant and storage facility is located adjacent to the Amherst Specific Plan area.

The project site is currently occupied by a plant nursery and has a General Plan land use designation of Low Density Residential (LDR). The site is zoned Planned Residential Development (PR3D), as defined by the City's Zoning Ordinance. The proposed project would require a zone change from Planned Residential Development (PR3D) to Specific Plan, to comply with the Zoning Ordinance. Furthermore, a General Plan Amendment would also be required to change the land use designation of the property from Low Density Residential (LDR) to Medium Density Residential (MDR). Uses permitted in the MDR designation include single-family dwellings, multi-family dwellings, group homes, foster care facilities, community residential homes and other congregate living facilities in appropriate locations.

The existing site topography is slopes from the northeast to the southwest. Runoff from the site sheet flows southwest to an off-site concrete ditch adjacent to the southern property line, and sheet flows within the Twin Oaks Mobile Homes development to a Los Angeles County Flood Control

District catch basin at the southwest corner of Oak Leaf Drive. The catch basin connects to a pipe which discharges to Live Oak Wash. (KHR Associates 2020.)

3.3 Cumulative Development

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of the proposed project. 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 proposed project 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. No specific currently planned or pending projects were identified by the City of La Verne.

4 Environmental Impact Analysis

This section discusses the possible environmental effects of the Amherst Residential Development Project for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. “Significant effect” is defined by the *CEQA Guidelines* Section 15382 as:

“...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 planned and pending developments in the area listed in Section 3.0, *Environmental Setting*.

The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the proposed project.

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4.1 Transportation

This section presents evaluates the projects potential impacts on transportation, consistent with CEQA requirements. Additional analysis is provided in this section for informational purposes, and includes, evaluation of the project's impacts on roadway capacity (see Section 4.1.5 *Capacity Analysis*) and evaluation of the reopening of the Bowdoin Street and Williams Avenue Intersection (see Section 4.1.5 herein).

The analysis is based on *Trip Generation Estimate and Vehicle Miles Travelled (VMT) Analysis Memorandum*, prepared by Kittelson & Associates (2020), and *Amherst Residential Traffic Impact Analysis (TIA)*, prepared by Ganddini Group Inc. (2020), both included in Appendix C.

4.1.1 Environmental Setting

a. Existing Roadway System

Regional access to the project area is provided by the Interstate 210 (I-210), north of the project site. The north-south roadways providing local circulation are Fruit Street, White Avenue, Bradford Street, Falcon Street, and Williams Avenue. The east-west roadways providing local circulation are Amherst Street and Foothill Boulevard. In addition, Bowdoin Street provides limited east-west access because it terminates at just west of Williams Avenue.

b. Pedestrian and Bicycle Facilities

Sidewalks are provided along each side of Amherst Street, along Williams Street, most of Bradford Street, Pepperdine Court and Stone Circle.

Existing bicycle facilities near the project site include a segment of White Avenue south of Fruit Street (Class II), and on Fruit Street from Foothill Boulevard to Baseline Road (Class II), the Marshall Canyon Trail along Wheeler Avenue, and Class I and II bike paths/lanes in neighboring Claremont and Pomona.

c. Existing Transit Service

Foothill Transit serves La Verne, and the greater San Gabriel and Pomona Valley. Routes 188, 291 and 690 currently operate on Foothill Boulevard with the nearest bus stop located approximately 0.4 mile to the south of the project site. Transit service is reviewed and updated periodically to address ridership, budget and community demand needs. Access to the Metrolink San Bernardino Line is approximately 1.8 miles south of the project site at the Pomona North Metrolink Station.

4.1.2 Regulatory Setting

This section includes a discussion of the applicable federal, State, and local laws, ordinances, regulations, and standards governing transportation and traffic, which must be adhered to before and during implementation of the proposed project.

California Senate Bill 743

Senate Bill 743 (SB 743) was signed into law on September 27, 2013 and directed the Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. SB 743 was enacted, in part, as further

implementation of California's Climate Action Plan to meet California Global Warming Solutions Act (Assembly Bill 32) greenhouse gas (GHG) emission reduction targets. SB 743 seeks to reduce criteria air pollutants and GHG emissions in the transportation sector by reducing VMT. SB 743 changed the approach to transportation impact analysis by establishing measures such as VMT, VMT per capita, or automobile trip generation rates as the primary measures of transportation impacts and eliminates the traditionally used measures of auto delay, level of service (LOS), and other measures of traffic congestion as a basis for determining significant impacts.

In December 2018, OPR adopted and promulgated its changes to the CEQA Guidelines (14 California Code of Regulations [CCR] Section 15000 et seq.) in response to SB 743. Section 15064.3 of the CEQA Guidelines contains the operative language for implementing the goals of SB 743 when determining the significance of a project's transportation impacts. There are four key aspects of CEQA Guidelines Section 15064.3 that apply in the case of the proposed project:

1. "[A] project's effect on automobile delay shall not constitute a significant environmental impact" (Section 15064.3[a]).
2. For a land use project like the proposed project, "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact... Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact" (Section 15064.3[b][1]).
3. "A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure" (Section 15064.3[b][4]).
4. The terms and conditions of Section 15064.3 apply prospectively and a lead agency "may elect to be governed by the provisions of [15064.3] immediately. Beginning on July 1, 2020, the provisions of [15064.3] shall apply statewide" (Section 15064.3[c]).

4.1.3 Impact Analysis

Impacts related to transportation and circulation would be potentially significant if development facilitated by the proposed project 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?

Threshold:	Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
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Impact T-1 THE PROPOSED PROJECT WOULD NOT INVOLVE ANY DISRUPTIONS TO THE LOCAL ACTIVE TRANSPORTATION SYSTEM. FURTHER, THE PROPOSED PROJECT WOULD NOT CONFLICT WITH APPLICABLE POLICIES ASSOCIATED WITH PUBLIC TRANSIT. THEREFORE, THE PROJECT WOULD HAVE A LESS THAN SIGNIFICANT IMPACT.

The project site is served by an existing sidewalk network along the project frontage and nearby roads. The project would retain a sidewalk along its frontage, and also develop a park along the Amherst Street frontage for use by project residents. This park would also be open to the public, and promote walkability and pedestrian activities in the neighborhood.

The project would not involve off-site changes to the roadway system with the potential to affect existing or planned bicycle facilities.

The project would be developed approximately 0.4 mile (walking distance) from the nearest bus stop on Foothill Boulevard, which would allow for easy access to public transportation for project residents.

The project may result in temporary traffic impacts to Amherst Street during construction, and particularly during the development of access improvements on Amherst Street. A traffic control plan will be prepared and submitted for City review and address temporary closures, detours, and notification of key agencies (emergency providers, etc.). In addition, the proposed haul route for construction equipment and materials delivery is subject to review and approval by the City. With these requirements and City oversight, impacts related to construction would be less than significant.

Given these considerations, the proposed project would have less than significant impacts related to public transit, bikeways, or pedestrian facilities.

Mitigation Measures

Mitigation measures would not be required.

Threshold:	Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
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IMPACT T-2 THE PROJECT WOULD RESULT IN A SIGNIFICANT AND UNAVOIDABLE VMT IMPACT UNDER EXISTING AND CUMULATIVE CONDITIONS.

Trip Generation

Trips were estimated using trip generation data provided by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition. Trip generation was estimated using Single-Family Detached Residential land use code (ITE Land Use Code 210) for the project. The trips generated by the existing nursery (ITE Land Use Code 818) were deducted from the project trips. Therefore, the number of net new trips was calculated as the project trips minus trips generated by the existing nursery as shown in Table 4.1-1.

Table 4.1-1 Project Trip Generation

Land Use	Size		AM In	AM Out	AM Total	PM In	PM Out	PM Total
Southbound								
Single-family detached housing	43 units	406	8	24	32	27	26	43
Nursery (wholesale)	5.6 acres	-107	-1	-1	-2	-1	-1	-2
Net New Trips		299	7	23	30	26	15	41

LOS=level of service

Source: Kittelson & Associates, Inc. 2020

As indicated in Table 4.1-1, the project would generate 299 net new trips daily, including 30 new trips in the AM peak hour, and 41 new trips in the PM peak hour.

VMT Analysis

La Verne has adopted VMT thresholds for land use project screening, which can be used to screen out projects that are expected to generate low VMT out from a further transportation analysis. The City's VMT thresholds that are relevant to this project are:

- **Trip Generation.** Projects generating less than 110 daily trips can be screened out.
- **Project Impact.** A significant impact would occur if the VMT rate for the project would exceed 15 percent below the applicable existing VMT rate, also referred to as the existing VMT threshold.
- **Cumulative Project Effect.** A significant impact would occur if the project would exceed 15 percent below the VMT rate in cumulative no project conditions, also referred to as the cumulative VMT threshold.

The VMT rate is defined as the San Gabriel Valley Coalition of Governments (SGVCOG) Northeast Subarea VMT per applicable service population. To be screened out of a further transportation analysis, a project would need to satisfy one of the above VMT screening criteria. Based on the City's thresholds, projects generating less than 110 daily trips can be screened out. Since the project would generate 299 new daily trips, it would not meet this criterion.

The SGVCOG VMT evaluation tool provides VMT per applicable service population estimates for parcels from the base year (2012) to the cumulative year (2040). Based on this tool, the project would have a VMT rate of 40.82, which is higher than the existing VMT threshold of 31.02. Under cumulative conditions, the VMT rate of the project would be 36.71, and higher than the cumulative VMT threshold of 28.32. Overall, the project's VMT would be greater than the significance VMT threshold, and thus would result in a significant VMT impact under existing and cumulative conditions.

Mitigation Measures

Project VMT rates would need to be reduced to 31.02 under the existing condition and to 28.32 to reduce the impacts to less than significant. Based on the SGVCOG VMT evaluation tool, the maximum reduction in VMT that could be achieved with mitigation would be 20 percent. A reduction of 20 percent would result in a VMT rate of 32.66 under the existing condition, and 29.37 VMT rate in the cumulative conditions. Thus, both under the existing and cumulative

conditions, the resulting VMT rate, with mitigation, would exceed the applicable VMT thresholds and remain significant and unavoidable.

The VMT mitigation measures recommended by the SGVOG VMT evaluation tool includes measures that would not be feasible for the project to implement because they are beyond the scope of the project. The proposed measures are generally broader in nature, or employment land use based, and require a larger program to implement (community or regional implementation). See Table 4.1-2 below for an evaluation of the potential mitigation.

Table 4.1-2 Evaluation of Mitigation Measures

Description	Evaluation
Increase affordable housing units	Not supported by the City or Community at this location.
Add traffic calming beyond development frontage	Beyond the scope of the project.
Improve pedestrian networks beyond development frontage	Beyond the scope of the project.
Provide bicycle parking	To be provided.
Provide end-of-trip bike facilities	To be provided.
Offer school pool programs	No practical mechanism for implementing.
Provide bicycle share programs	A bicycle share program is being implemented on a regional basis. The park could be an appropriate site for bike share parking.
Provide car share programs	No practical mechanism for implementing at a residential project level.
Provide subsidized transit program	No practical mechanism for implementing at a residential project level.
Increase transit frequency	Beyond the scope of the project.
Upgrade routes serving the project	Beyond the scope of the project.

Impacts to VMT would remain significant and unavoidable, even with the implementation of feasible mitigation.

Threshold:	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)?
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Threshold:	Would the project result in inadequate emergency access?
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IMPACT T-3 THE PROJECT WOULD NOT SUBSTANTIALLY INCREASE HAZARDS DUE TO A DESIGN FEATURE (E.G. SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G. FARM EQUIPMENT); NOR WOULD IT RESULT IN INADEQUATE EMERGENCY ACCESS.

The project involves construction of single-family residential structures on parcels substantially surrounded by existing residential uses, and therefore would be a compatible use with the area.

The project would include improvements at Amherst Street and the project access driveway to provide appropriate ingress/egress for the project site. Amherst is a straight, east-west, road, and project construction would not introduce hazardous design features such as, but not limited to, sharp curves or dangerous intersections.

During project operation, traffic would involve circulation of passenger vehicles and would not involve any incompatible use of area roadways, nor would it substantially increase hazards for area roadways.

The project would also implement traffic control plan during construction, that would be reviewed and approved by La Verne prior to construction to address any temporary lane closures, detours, haul routes, and hours of operation to limit construction impacts during peak hours.

There are no unusual access concerns associated with the project site. The City design review will confirm sufficient access to the satisfaction of the La Verne Fire Department.

Therefore, no impact associated with hazards from a geometric design feature or incompatible use would occur, and the project would have no impacts related to inadequate emergency access.

Mitigation Measures

Mitigation measures would not be required.

4.1.4 Cumulative Impacts

The cumulative impact area for VMT impacts is defined as the San Gabriel Valley Coalition of Governments (SGVCOG) Northeast Subarea. As discussed under Impact T-2, the project would result in a VMT rate which exceeds the cumulative VMT threshold. As further discussed therein, the cumulative impacts would not be mitigable to less than significant. Therefore, the project would result in significant and unavoidable impacts associated with VMT.

4.1.5 Capacity Analysis

Roadway capacity and operation, including level of service, is no longer a consideration for determination of significance, and mitigation, under CEQA. However, given the community's interest and concern regarding the capacity and operation of the local circulation system, a summary of the project's effects on roadway capacity is provide for informational purposes.

Methodology

Level of Service

Traffic operations of roadway facilities are described using the term LOS, a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow. The thresholds used by La Verne and other relevant jurisdictions are provided in Table 4.1-3.

Table 4.1-3 Thresholds for Intersections by Jurisdiction

Jurisdiction	Category
La Verne	Volume-to-capacity (v/c) incremental increase of: 0.04 or more for intersections with a LOS C 0.02 or more for intersections with LOS D 0.01 or more for intersections with LOS E and F
Pomona	Signalized Intersections - Any study intersection operating at LOS A through D without project traffic in which the addition of project traffic causes the intersection to degrade to LOS E or F - Any study intersection operating at LOS E or F without project traffic Unsignalized Intersections - Addition of project traffic causes the intersection to move from LOS D or better to LOS E or worse - Addition of project traffic to an intersection already projected to operate at an LOS E or F with background traffic - The project adds ten or more trips to any approach - The intersection meets the peak hour traffic signal warrant after the addition of project traffic.
Claremont	Project increases traffic demand on a facility by two percent (increase in v/c greater than or equal to 0.02), causing the facility to operate at unacceptable LOS, or for an intersection that already operates at unacceptable LOS.
Caltrans	Project traffic is forecast to cause the performance of a State Highway study intersection to change from acceptable LOS D or better, to unacceptable LOS E or F.

LOS=level of service, v/c=volume to capacity ratio

Source: Ganddini 2020

Study Intersections

The Traffic Impact Analysis evaluated potential project-related traffic impacts at seven key intersections in the vicinity of the project site. The seven study intersections traverse several jurisdictions, which have varying significance threshold levels, as summarized in Table 4.1-4.

Table 4.1-4 TIA Study Intersections

Study Intersections ¹	Jurisdiction
Fruit Street (NS) at Amherst Street (EW)	City of La Verne
Fruit Street/White Avenue (NS) at Foothill Boulevard (EW)	City of La Verne/Caltrans
Bradford Street (NS) at Amherst Street (EW)	City of La Verne
Falcon Street (NS) at Foothill Boulevard (EW)	City of La Verne/City of Pomona/Caltrans
Project Access (NS) at Amherst Street (EW)	City of La Verne
Williams Avenue (NS) at Amherst Street (EW)	City of La Verne/City of Claremont
Williams Avenue (NS) at Foothill Boulevard (EW)	City of La Verne/City of Pomona/Caltrans

¹ NS = north-south roadway; EW = east-west roadway, Caltrans = California Department of Transportation

Source: Ganddini Group, Inc. 2020 (Appendix H)

Project Trip Generation and Trip Distribution

The project would generate 299 net new trips daily, including 30 new trips in the AM peak hour, and 41 new trips in the PM peak hour; see Table 4.1-1 under Impact T-2. See the Traffic Impact Analysis in Appendix C, for additional discussion on the trip distribution.

Analysis

The Traffic Impact Analysis includes an evaluation of the following scenarios:

- Existing Conditions Plus Project
- Opening Year Plus Project
- Year 2040 Plus Project

Evaluation of Existing Plus Project Traffic Conditions

Table 4.1-5 provides a summary of the peak hour conditions at intersections under the Existing and the Existing Plus Project conditions.

Table 4.1-5 Existing and Existing Plus Project Traffic Conditions during Peak Hour

Study Intersections	AM ICU or [Delay] ²	AM LOS	PM ICU or [Delay]	PM LOS	Project AM ICU or [Delay]	Project AM LOS	Project PM ICU or [Delay]	Project PM LOS
Fruit Street (NS) at Amherst Street (EW)	562.6	F	379.0	F	609.4	F	459.1	F
Fruit Street/White Avenue (NS) at Foothill Boulevard (EW)	0.614	B	0.805	D	0.615	B	0.807	D
Bradford Street (NS) at Amherst Street (EW)	[7.4]	A	[7.3]	A	[7.5]	A	[7.4]	A
Falcon Street (NS) at Foothill Boulevard (EW)	0.424	A	0.615	B	0.424	A	0.616	B

Study Intersections	AM ICU or [Delay] ²	AM LOS	PM ICU or [Delay]	PM LOS	Project AM ICU or [Delay]	Project AM LOS	Project PM ICU or [Delay]	Project PM LOS
Williams Avenue (NS) at Amherst Street (EW)	[9.6]	A	[9.5]	A	[9.7]	A	[9.6]	A
Williams Avenue (NS) at Foothill Boulevard (EW)	[23.9]	C	[60.4]	F	[24.5]	C	[63.8]	F
Fruit Street/White Avenue (NS) at Foothill Boulevard (EW)	25.0	C	30.6	C	25.0	C	30.7	C
Falcon Street (NS) at Foothill Boulevard (EW)	22.6	C	19.3	B	22.6	C	19.3	B

NS=north-south roadway, EW=east-west roadway, LOS=level of service, n/a=not applicable

² ICU = Intersection Capacity Utilization. Delay is shown in [seconds/vehicle].

Source: Ganddini Group, Inc. 2020 (Appendix H)

As shown in Table 4.1-5, the following intersections would operate at unacceptable LOS with or without the project:

- Fruit Street at Amherst Street: LOS F during AM and PM peak hours
- Williams Avenue at Foothill Boulevard: LOS F during PM peak hours

Though two of the study intersections would continue operating at unacceptable LOS with project traffic, the project does not result in operational impacts to the study intersections.

Evaluation of Opening Year (2022) Plus Project Conditions

Table 4.1-6 provides a summary of the peak hour conditions at intersections under Opening Year 2022 and the Opening Year 2022 Plus Project conditions.

Table 4.1-6 Opening Year and Opening Year Plus Project Traffic Conditions during Peak Hour

Study Intersections	AM ICU or [Delay] ²	AM LOS	PM ICU or [Delay]	PM LOS	Project AM ICU or [Delay]	Project AM LOS	Project PM ICU or [Delay]	Project PM LOS
Fruit Street (NS) at Amherst Street (EW)	688.6	F	469.8	F	741.7	F	565.6	F
Fruit Street/White Avenue (NS) at Foothill Boulevard (EW)	0.630	B	0.826	D	0.631	B	0.828	D
Bradford Street (NS) at Amherst Street (EW)	[7.4]	A	[7.3]	A	[7.5]	A	[7.4]	A
Falcon Street (NS) at Foothill Boulevard (EW)	0.434	A	0.630	B	0.434	A	0.631	B
Williams Avenue (NS) at Amherst Street (EW)	[9.6]	A	[9.5]	A	[9.7]	A	[9.6]	A

City of La Verne
Amherst Residential Development

Study Intersections	AM ICU or [Delay] ²	AM LOS	PM ICU or [Delay]	PM LOS	Project AM ICU or [Delay]	Project AM LOS	Project PM ICU or [Delay]	Project PM LOS
Williams Avenue (NS) at Foothill Boulevard (EW)	[25.0]	D	[67.0]	F	[25.7]	D	[71.3]	F
Fruit Street/White Avenue (NS) at Foothill Boulevard (EW)	25.2	C	31.3	C	25.2	C	31.4	C
Falcon Street (NS) at Foothill Boulevard (EW)	22.4	C	19.3	B	22.4	C	19.2	B

NS=north-south roadway, EW=east-west roadway, LOS=level of service, n/a=not applicable

² ICU = Intersection Capacity Utilization. Delay is shown in [seconds/vehicle].

Source: Ganddini Group, Inc. 2020 (Appendix H)

As shown in Table 4.1-6, the following intersections would operate at unacceptable LOS with or without the project:

- Fruit Street at Amherst Street: LOS F during AM and PM peak hours
- Williams Avenue at Foothill Boulevard: LOS F during PM peak hours

Though two of the study intersections would continue operating at unacceptable LOS with project traffic, the project does not result in operational impacts to the study intersections.

Evaluation of Year 2040 Plus Project Conditions

Table 4.1-7 provides a summary of the peak hour conditions at intersections under the Year 2040 and Year 2040 Plus Project conditions.

Table 4.1-7 Year 2040 and Year 2040 Plus Project Traffic Conditions during Peak Hour

Study Intersections	AM ICU or [Delay] ²	AM LOS	PM ICU or [Delay]	PM LOS	Project AM ICU or [Delay]	Project AM LOS	Project PM ICU or [Delay]	Project PM LOS
Fruit Street (NS) at Amherst Street (EW)	3,310.8	F	2,648.4	F	3,476.7	F	3,084.6	F
Fruit Street/White Avenue (NS) at Foothill Boulevard (EW)	0.773	C	1,023	F	0.774	C	1,026	F
Bradford Street (NS) at Amherst Street (EW)	7.6	A	7.5	A	7.7	A	7.6	A
Falcon Street (NS) at Foothill Boulevard (EW)	0.525	A	0.775	C	0.525	A	0.775	C
Williams Avenue (NS) at Amherst Street (EW)	10.0	B	9.8	A	10.1	B	9.4	A
Williams Avenue (NS) at Foothill Boulevard (EW)	40.4	E	270.4	F	42.4	E	310.5	F

Study Intersections	AM ICU or [Delay] ²	AM LOS	PM ICU or [Delay]	PM LOS	Project AM ICU or [Delay]	Project AM LOS	Project PM ICU or [Delay]	Project PM LOS
Fruit Street/White Avenue (NS) at Foothill Boulevard (EW)	28.4	C	47.8	D	28.5	C	47.8	D
Falcon Street (NS) at Foothill Boulevard (EW)	20.9	C	19.9	B	20.9	C	19.9	B

NS=north-south roadway, EW=east-west roadway, LOS=level of service

² ICU = Intersection Capacity Utilization. Delay is shown in [seconds/vehicle].

Source: Ganddini Group, Inc. 2020 (Appendix H)

As shown in Table 4.1-7, the following intersections would operate at unacceptable LOS with or without the project:

- Fruit Street at Amherst Street: LOS F during AM and PM peak hours
- Fruit Street/White Avenue at Foothill Boulevard: LOS F during PM peak hour
- Williams Avenue at Foothill Boulevard: LOS F during PM peak hours

Though two of the study intersections would continue operating at unacceptable LOS with project traffic, the project does not result in operational impacts to the study intersections.

4.1.6 Evaluation of Bowdoin Street at Williams Avenue Reopening of Intersection

The west leg of the intersection of Williams Avenue at Bowdoin Street is blocked to not allow east-west traffic. In response to the scoping process for the proposed project, the City has received extensive comments concerning an increase in project traffic in the community, including comments in support of the reopening of the Williams Avenue at Bowdoin Street intersection to absorb its fair share of east-west traffic. In order to provide the community with a greater understanding of this issue, the following evaluation has been provided by as part of the Traffic Impact Assessment (Ganddini 2020).

Amherst Development

With reopening of the west leg, project trips are anticipated to be nominal since trips from the project would not be anticipated to utilize the intersection Williams Avenue/Bowdoin Street intersection. For project trips to traverse this intersection, they would have to travel in a circuitous route to head westbound towards Fruit Street, instead of taking a direct route. Thus, reopening of this intersection to allow for east-west travel would not affect project trip patterns.

Bowdoin Street, East of Bradford Street

Current single-family residential dwelling units located along Bowdoin Street, east of Bradford Street, would see redistribution of travel patterns with this reopening. Trips from these residences intending to head southbound to Foothill Boulevard, and specifically eastbound on Foothill Boulevard, would travel eastbound on Bowdoin Street to Williams Avenue, and southbound to Foothill Boulevard. This would be in lieu of current travel patterns in which these vehicles head

westbound on Bowdoin Street to Bradford Street, and southbound on Bradford Street to Foothill Boulevard, or southbound on Bradford Street turning eastbound on Amherst Street to Williams Avenue, before heading southbound to Foothill Boulevard. Thus, this reopening would remove trips off Bradford Street, Amherst Street, and a portion of Foothill Boulevard redistributing them to Williams Avenue. The lack of a signal at William Street and Foothill Boulevard can make it difficult to turn left-onto Foothill Boulevard, and thus, may also limit this trip transfer.

This would also reduce VMT for these homes since the reopening of the west leg of the Williams Avenue and Bowdoin Street intersection would provide for a more direct route of travel southbound to Foothill Boulevard. This redirected travel pattern would result from less than 50 homes and resulting LOS at the affected intersections would be nominal.

Westbound traffic, East of Williams Avenue

Traffic coming from the east of Williams Avenue heading westbound to Fruit Street would also have a redistribution of travel patterns. The majority of traffic heading westbound from College Way and Smith Drive towards Fruit Street would better be served using Bowdoin Street, instead of Amherst Street, to travel to Fruit Street, since Bowdoin Street would be a more direct route. This would reduce VMT for these motorists. Fruit Street at Bowdoin Street is a signalized intersection whereas Fruit Street at Amherst Street is unsignalized. Redirecting volumes from the unsignalized intersection of Fruit Street at Amherst Street, to the signalized intersection of Fruit Street at Bowdoin Street, would improve operations along Fruit Street, reducing delay at Amherst Street, while providing signalized traffic control at Bowdoin Street.

Summary

It is anticipated that the cumulative result of the reopening of the west leg of the Williams Avenue at Bowdoin Street intersection would benefit roadway operations by reducing traffic volumes on Amherst Street, reducing overall VMT, creating more direct pathway of travel for residences, and redirecting traffic from the unsignalized intersection of Fruit Street at Amherst Street to the signalized intersection of Fruit Street at Bowdoin Street. However, the proposed project does not warrant the opening of Bowdoin Street. Further study should be conducted should the City want to consider reopening the Bowdoin Street at Williams Avenue intersection.

4.2 Tribal Cultural Resources

This section analyzes the effects of the proposed residential project on tribal cultural resources. Additionally, the discussion and analysis contained herein is informed by comments received during the NOP public review period

4.2.1 Setting

a. Regulatory Setting

Federal Regulations

Native American Involvement

Several federal and state laws address Native American involvement in the development review process. The most notable of these are the federal Native American Graves Protection and Repatriation Act (1990) and the California Native American Graves Protection and Repatriation Act (2001). These acts ensure that Native American human remains and cultural items be treated with respect and dignity.

State Regulations

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.

4.2.2 Impact Analysis

a. Methodology and Significance Thresholds

Potential impacts on tribal cultural resources are analyzed based on the potential for the project to impact any tribal cultural resources during construction or operation. The significance of a tribal cultural resource and subsequent significance of any impact is determined by, among other things, consideration of whether or not that resource has heritage value to California Native Americans. This impact analysis is based on consultations with the interested tribal representatives.

In July 2018, the City of La Verne distributed SB 18 and AB 52 consultation letters for the proposed project, including project information and a map, to Native American tribes on its applicable consultation list. The following responses were received, and actions taken:

- The Quechan Indian Tribe indicated it did not wish to comment on this project, and deferred to the more local Tribe(s) and support their decisions on the project. No further action was taken.
- San Manuel Band of Mission Indians indicated that the project is within Serrano ancestors territory, and of interest to the Tribe. Additional information was requested regarding the project site, proposed development, and available cultural information. The information requested was forwarded to the Tribe by the City.
- Gabrieleno Band of Mission Indians - Kizh Nation indicated the project site to be within its Ancestral Tribal Territory and requested government-to-government consultation. The City met with the Tribe in November 2020, and agreed to mitigation to address monitoring, and discovery and handling of archaeological resources and human remains.

The discussion of tribal cultural resources is based on consultations with interested Native American tribal representatives and lead by the City of La Verne.

In accordance with Appendix G of the CEQA Guidelines, an impact to Tribal Cultural Resources from the proposed project would be significant if the project would:

1. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe

Grading and ground-disturbing activity could impact currently unknown subsurface cultural resources of tribal or Native American importance. Therefore, impacts associated with the thresholds above are analyzed below.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: 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)?, 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 Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?
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Impact TCR-1 CONSTRUCTION OF THE PROJECT WOULD INVOLVE GROUND-DISTURBING ACTIVITIES SUCH AS GRADING AND SURFACE EXCAVATION, WITH THE POTENTIAL TO UNEARTH OR ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED TRIBAL CULTURAL RESOURCES. PROJECT IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

No tribal cultural resources have been identified within the project site as a result of the Sacred Lands Search. The Gabrieleño Band of Mission Indians – Kizh Nation and the San Manuel Band of Mission Indians have indicated that the project site lies within ancestral tribal territories and it is possible that previously unknown tribal cultural resources may be encountered during ground disturbance activities. Therefore, the project has the potential to significantly impact tribal cultural resources through ground disturbance of encountered resources.

The City has consulted with both Tribes, and mitigation has been identified to address any unanticipated discoveries of tribal cultural resources, as further described below.

Mitigation Measures

Avoidance or preservation in place of a previously unknown tribal cultural resource would be preferred in the event that such a resource is discovered on the project site during ground disturbing activities. However, if avoidance or preservation in place of the resource is not feasible and/or recommended by the qualified archaeologist or Native Tribal American monitor(s), Mitigation Measures TCR-1 through TCR-5, would be implemented to reduce potential project impacts and ensure proper handling of the discovered resource(s).

TCR-1 Tribal Monitoring

The project applicant shall retain for the construction monitoring services of the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh), who have expresses interest in consulting with the City pursuant to California Public Resources Code Section 21080.3.1 and Section 21080.3.2 and are listed under the Native American Heritage Commission's (NAHC's) Tribal Contact list for the area of the project location.

A Kizh monitor will be present on-site only during the construction phases that involve ground-disturbing activities. Ground-disturbing activities are defined as activities that include, but are not limited to: pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling and trenching within the project area. The Kizh monitor will complete daily monitoring logs that provide a description of the day's activities, including construction activities, locations, soils, and any cultural materials identified. The on-site Tribal monitoring shall end when the project site grading and excavation activities area completed, or when the Kizh representatives, in consultation with the City, have indicated that the site has a low potential for impact to Tribal Cultural Resources.

TCR-2 Discovery of Archaeological Resources

Upon discovery of any archeological resource, construction activities in the immediate vicinity of the find shall ceased until the find can be assessed. All archeological resources unearthed by the project construction activities shall be evaluated by a qualified archeologist and the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh) monitor. If the resources are Native American in origin, the Kizh monitor shall coordinate with the landowner regarding the treatment and curation of these resources. Typically, the Kizh request reburial or preservation for educational purpose. Work may continue on other parts of the project while evaluation occurs.

If a discovery is determined by the qualified archeologist to be a "historical resource" or "unique archeological resources", a treatment plan shall be developed (pursuant to CEQA Guidelines, Section 15064.5[f]) allowing for sufficient time and funding to identify and implement avoidance measures and/or appropriate mitigation.

TCR-3 Treatment of Archaeological Resources

For unique archeological resources, preservation in place is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archeological data recovery extraction to remove the resource along with subsequent laboratory processing and analysis. Any historic archeological material that is not Native American in origin shall, at the discretion of the landowner, be curated at a public, non-profit institution with a research interest agreeing to accept in the materials. If no such institution agrees to accept the materials, they shall be offered to a local school or historical society in the area for educational purposes.

TCR-4 Human Remains

Public Resources Code (Section 5097.98(d)(1)) defines Native American remains as "...an inhumation or cremation, and in any state of decomposition or skeletal completeness." Funerary objects, called "grave goods" shall be treated similarly according to this statute. These objects are those reasonably believed to have been placed with human remains either at the time of death; other items made exclusively for burial purposes; or contain human remains. The treatment of funerary objects shall be treated in the same manner as human remains.

Health and Safety Code (Section 7050.5) dictates that any discovery of human remains shall immediately be reported to the Los Angeles County Coroner, and excavation shall be halted until the Coroner has determined the nature of the remains. If the Coroner recognizes the remains to be those of a Native American or has reason to believe they are those of a Native American, he or she, shall contact the NAHC and appropriate provisions of Public Resources Code (Section 5097.98) shall be followed.

Upon discovery of human remains and/or associated grave goods, the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh) monitor and/or archeological monitor/consultant shall immediately divert work a minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) shall notify the Kizh Nation, the qualified lead archeologist, and the construction manager who will call the Los Angeles County Coroner. The discovery shall be kept confidential and secure to prevent further disturbance.

Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site within the footprint of the project for the respectful reburial of the human remains and/or funerary objects. In cases where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment to protect the remains. If this type of protection is not available, a 24-hour guard shall be posted outside of working hours. The Kizh monitor will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Kizh monitor will work closely with the qualified archeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Kizh monitor, document shall be taken which includes at a minimum, detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Kizh monitor for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all material.

Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony shall be removed to a secure container on site. These items shall be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Kizh monitor and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

If the discovery of human remains includes four or more burials, the location shall be considered a cemetery, and a separate treatment plan shall be developed. Once complete, a final report of all activities shall be submitted to the Kizh Nation and the Native American Heritage Commission. The Kizh Nation does not authorize any scientific study or the utilization of invasive diagnostics on human remains.

TCR-5 Qualifications of Monitors

Archeological and Native American monitoring and excavation during construction shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel shall meet the Secretary of Interior standards for archaeology and have a minimum of ten years of experience as a principal investigator working with Native American archeological sites in southern California. The Qualified Archeologist shall ensure that all other personnel are appropriately trained and qualified.

Significance After Mitigation

Implementation of Mitigation Measures TCR-1 through TCR 5 would reduce potential impacts to unanticipated tribal cultural resources, including archaeological resources and human remains, to less than significant.

4.2.3 Cumulative Impacts

The proposed project, in conjunction with other development in the City and surrounding areas, , would cumulatively increase the potential to encounter sensitive tribal cultural resources. However, as discussed above, potential impacts to tribal cultural resources are site-specific and impacts would be reduced due to implementation of mitigation measures that would protect tribal cultural resources. In the event that tribal cultural resources are discovered, each individual project would be required to comply with the applicable regulatory requirements and the consultation requirements of AB 52 to determine and mitigate any potential impacts to tribal cultural resources. Therefore, cumulative impacts to tribal cultural resources would be less than significant and would not be cumulatively considerable.

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5 Other CEQA Required Discussions

This section discusses growth-inducing impacts, and irreversible environmental impacts, that would be caused by the proposed project.

5.1 Growth Inducement

Section 15126(d) of the CEQA Guidelines requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

The project would cause a direct increase in the City's population by introducing new residents to the project site. Given an average household size of 2.74 persons per household for La Verne, the project would potentially add an estimated 115 residents to the City (DOF 2020).

The 2020 population of La Verne is 33,300 residents (SCAG 2019). SCAG forecasts the population of La Verne will increase to approximately 35,600 residents by the year 2035, which is an increase of approximately 2,300 persons from the current population (SCAG 2020). Thus, the project would increase the existing population by 0.35 percent, and would represent five percent of the projected increase in population through 2035. Therefore, the level of population growth associated with the project would not exceed SCAG's regional population projections, and the project would not induce substantial unplanned population growth. The project would not result in significant impacts related to population growth.

Moreover, as discussed in Section 3, *Air Quality*, and Section 8, *Greenhouse Gas Emissions*, of the Initial Study, development and operation of the project would not generate air quality or GHG emissions that would result in a significant impact. Additionally, the project involves redevelopment within a fully urbanized area that lacks significant scenic resources, native biological habitats, known cultural resources, surface water, or other environmental resources. Therefore, any population growth associated with the project would not result in significant long-term physical environmental effects.

5.1.2 Economic Growth

The proposed project would generate temporary employment opportunities during construction. Because construction workers would be expected to be drawn from the existing regional work force, construction of the project would not be growth-inducing from a temporary employment standpoint.

The proposed project would not directly add long-term employment opportunities. However, residents would contribute incrementally to economic growth through patronage of area businesses and services. The proposed project would not be expected to induce substantial economic expansion to the extent that direct physical environmental effects would result. Moreover, the

environmental effects associated with any future development in or around La Verne would be addressed as part of the CEQA environmental review for such development projects.

5.1.3 Removal of Obstacles to Growth

The proposed project is located in a fully developed area that is served by existing utility, public service and roadway infrastructure. As discussed in Section 19, *Utilities*, of the Initial Study (Appendix A), existing infrastructure in La Verne would be adequate to serve the project. Minor improvements to water, sewer, and drainage connection infrastructure could be needed, but would be sized to specifically serve the proposed project. The only transportation improvements, to be implemented by the project, are to facilitate direct project access from existing Amherst Street. No new roads would be required. Because the project constitutes redevelopment within an urbanized area and does not require the extension of new infrastructure through undeveloped areas, project implementation would not remove an obstacle to growth.

5.2 Irreversible Environmental Effects

The CEQA Guidelines require that EIRs contain a discussion of significant irreversible environmental changes. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed project.

The proposed project involves infill development that would replace the existing plant nursery with single-family residences. Construction and operation of the project would involve an irreversible commitment of construction materials and non-renewable energy resources. The project would involve the use of building materials and energy, some of which are non-renewable resources, to construct the 42 new residences, the park, internal roads, and associated infrastructure. Consumption of these resources would occur with any development in the region and are not unique to the proposed project.

The proposed project would also irreversibly increase local demand for non-renewable energy resources such as petroleum products and natural gas. However, increasingly efficient building design would offset this demand to some degree by reducing energy demands of the project. The project 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*) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California, and the Green Building Standards Code requires solar access, natural ventilation, and stormwater capture. Consequently, the project would not use unusual amounts of energy or construction materials, and impacts related to consumption of non-renewable, and slowly renewable, resources would be less than significant. Again, consumption of these resources would occur with any development in the region and is not unique to the proposed project.

Additional vehicle trips associated with the proposed project would incrementally increase local traffic. As discussed in Section 4.1, *Transportation*, impacts related to vehicle miles travelled would be significant and avoidable. Traffic related air pollutant and GHG emissions would also increase. However, as discussed in Section 3, *Air Quality*, and Section 8, *Greenhouse Gas Emissions*, of the Initial Study (Appendix A), development and operation of the project would not generate air quality, or GHG emissions, that would result in a significant impact.

The project would also require a commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. However, as discussed in Section 15, *Public Services*, and Section 19, *Utilities and Service Systems*, of the Initial Study, impacts to these service systems would not be significant.

CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the proposed project would result in a significant and unavoidable long-term impact to transportation related to vehicle miles travelled.

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6 Alternatives

CEQA Guidelines Section 15126.6(a) requires that an EIR describe a range of reasonable alternatives to the project, or a range of reasonable alternatives to the location of the project, that could feasibly attain the project's basic objectives. An EIR does not need to consider every conceivable alternative, but it does have to consider a range of potentially feasible alternatives that will facilitate informed decision making and public participation.

6.1 Introduction

According to CEQA Guidelines Section 15126.6, the discussion of alternatives must include several different issues. The discussion of alternatives must focus on a range of reasonable alternatives to the project, or to the project location, which would avoid or substantially reduce any significant effects of the project, even if the alternatives would be costlier or hinder to some degree the attainment of the project objectives. The "No Project" alternative must also be evaluated. The "No Project" analysis must discuss the existing conditions and what would reasonably be expected to occur in the foreseeable future if the project was not approved. The range of alternatives required is governed by a "rule of reason." Therefore, the EIR must only evaluate those alternatives necessary to permit a reasoned choice. The alternatives must be limited to only ones that would avoid or substantially lessen any of the significant effects of the project.

Additionally, an EIR should not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative. The CEQA Guidelines also require an EIR to state why an alternative is being rejected. If the City ultimately rejects any or all alternatives, the rationale for rejection will be presented in the findings that are required prior to the certification of the EIR and action is taken on the project. According to CEQA Guidelines Section 15126.6(f)(1), among the factors that may be considered when addressing the feasibility of alternatives are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the applicant could reasonably acquire, control, or otherwise have access to the alternate site.

The project alternatives are evaluated to determine the extent to which they attain the basic project objectives, while significantly reducing or avoiding any significant effects of the project. As discussed in Section 2.0, *Project Description*, the objectives for the proposed project, are as follows:

1. Increase the supply of housing in the City of La Verne, consistent with the goals and policies of the General Plan Housing Element.
2. Implement infill development on underutilized parcels, consistent with the General Plan Housing Element.
3. Provide new outdoor park spaces that complement proposed development within the Specific Plan area and are available for public use.
4. Reinforce a sense of place through project-specific identity signage.

The purpose of an alternatives analysis is to allow the decisionmakers to determine whether there is an environmentally superior alternative that would meet most of the project's objectives. An alternatives analysis need not consider every conceivable alternative to the project but rather those

alternatives necessary to permit a reasoned choice. CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in an EIR. Each case must be evaluated on its facts, which in turn must be reviewed in light of CEQA's statutory purpose.

The purpose of an alternatives analysis is to allow the decisionmakers to determine whether there is an environmentally superior alternative that would meet most of the project's objectives. An alternatives analysis need not consider every conceivable alternative to the project but rather those alternatives necessary to permit a reasoned choice. CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in an EIR. Each case must be evaluated on its facts, which in turn must be reviewed in light of CEQA's statutory purpose.

A fundamental mandate of CEQA is that public agencies should not approve projects if there are feasible alternatives which would substantially lessen the significant impacts of the proposed project (Public Resources Code Sections 21002, 21081; emphasis added). One of the purposes of an EIR is to identify alternatives to a proposed project and evaluate the comparative merits of alternatives to the proposed project (CEQA Guidelines Section 16126.6(d)).

In the case of the proposed project, based on the analysis presented in Sections 4.0 through 5.0, and in the Initial Study (see Appendix A), all impacts of the proposed project either do not exceed the threshold of significance, or can be reduced to a less-than-significant level through implementation of mitigation measures, except for transportation. The project would result in a significant and unavoidable impact related to vehicle miles travelled (VMT); see Section 4.1, *Transportation*, Impact T-2 for additional discussion).

As a result, the alternatives analysis focused on those alternatives with the potential to reduce impacts to vehicle miles travelled.

6.2 Alternatives to the Proposed Project

Included in this analysis are four alternatives, including the CEQA-required "no project" alternative, which considers 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 proposed project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project/No Build Alternative 1
- Alternative 2: No Project/General Plan Alternative 2
- Alternative 3: Reduced Intensity Alternative 3

Detailed descriptions of the alternatives are included herein, along with an evaluation of the environmental impacts for each alternative. A summary comparison of the alternative's characteristics is provided in Table 6-1, excluding the Alternative Project Site, which would be the same as the proposed project.

Table 6-1 Comparison of Project Alternatives' Buildout Characteristics

Feature	Proposed Project	No Project/No Build Alt. 1	No Project/ General Plan Alt. 2	Reduced Intensity Alt. 3
Units	42	0	29	22
Use	Residential, park	Nursery	Residential	Residential

6.2.1 No Project/No Build Alternative 1

Description

The No Project Alternative assumes that the proposed project would not be developed, and the site would continue to operate as a nursery. The new residential buildings and the park would not be constructed.

As further discussed below, the No Project Alternative would avoid or lessen many of the impacts of the proposed project, including aesthetics, energy, noise, public services, transportation, cultural resources, tribal cultural resources, and utilities.

The No Project Alternative would not fulfill any project objectives because the existing nursery would not increase the City housing supply, promote infill development on underutilized parcels, provide for a park space.

Impact Analysis

Aesthetics, Light, and Glare

VISUAL RESOURCES

Under Alternative 1, the project site would continue to be characterized by facilities typically associated with a plant nursery. The site is dominated by a mix of permeable and impermeable surfaces, dominated with container plants arranged in rows, with intervening paths, greenhouses, material and equipment storage areas. The site features three mature trees. The nursery site is in moderate contrast to the developed nature of the surrounding uses, though not incompatible. Public views of the project site are limited to those along the Amherst Street frontage. These views are dominated by the site frontage of sidewalk, powerlines, chain link fence, and large potted/box plants that border the project, with background views of smaller potted plant rows. The plants provide a visual respite from the harsher sidewalk, powerlines, and chain link. The result is generally appealing and impacts to visual resources would be less than significant.

Impacts under Alternative 1 would be less, compared to the proposed project.

LIGHT AND GLARE

Current light and glare sources on the project site are minimal, consistent with a wholesale plant nursery, and the project site does not represent a significant source of light or glare. Impacts would be less than significant.

Impacts under Alternative 1 would be less, compared to the proposed project which would have more visible sources of light and glare from homes and vehicles.

Air Quality

Alternative 1 would avoid many of the emissions associated with the construction and operation of the proposed project, but would continue to produce air quality emissions associated with nursery operations. Sources of emissions include application of synthetic and organic fertilizers, the growth of nitrogen-fixing crops, the drainage of organic soils, and irrigation practices. Emissions can include particulate matter and volatile organic compounds, ammonia and hydrogen sulfide. They also produce greenhouse gasses: carbon dioxide, and NOx. Emissions more particular to growing plants may include ammonia, hydrogen sulfide. Impacts would be less than significant.

Impacts under Alternative 1 would be less, compared to the proposed project which would also have construction emissions, and a comparable increase in mobile and stationary operational emissions.

Biological Resources

The project site contains land cover types that would be classified as bare ground, disturbed, and developed; there are no native plant communities or natural communities of special concern present on or adjacent to the project site. As a result, the site does not contain any sensitive plant or wildlife species. The project site does not have any regulated waters, or support any wildlife corridors or movement. Under Alternative 1, the project site would continue to be subject to disturbance from nursery operations. However, given the general lack of biological resources associated with the project site, impacts under Alternative 1 would be less than significant.

Impacts under Alternative 1 would be less, compared to the proposed project.

Energy

Under Alternative 1 energy use from construction activities associated with the proposed project would be avoided. The energy use associated with continued nursery operation would be minimal, limited to fuel use for transport of plants and materials, electricity for water delivery, and electricity or fuel for operation of any onsite equipment. Impacts would be less than significant.

Impacts under Alternative 1 would be less, compared to the proposed project, which would also consume energy associated with fuel for daily vehicles trips to work or school, energy for home appliances, lighting, heating/cooling, and energy used in maintenance activities.

Geology and Soils

As both the nursery and the proposed project would utilize the same site, the geology and soil conditions would be the same for Alternative 1 and the proposed project. Structures under Alternative 1 are limited to the existing greenhouses. Under the proposed project, development would be subject to current standards of the California Building Code, accounting for strong seismic shaking, and project-specific soil conditions. Under Alternative 1 project soils would remain largely exposed and subject to erosion. The proposed project would require a stormwater pollution prevention plan to control erosion during construction, and the project would ultimately provide for long-term stabilization of soils through development and landscaping. Overall impacts would be greater under Alternative 1, but less than significant, similar to the proposed project.

Greenhouse Gas

As previously indicated in the Air Quality discussion above, nursery activities would produce emissions, include GHG emissions. Given the small size of the nursery, the resulting emissions, would be below the SCAQMD thresholds.

Impacts under Alternative 1 would be less, compared to the proposed project which would also have construction emissions, and a comparable increase in mobile and stationary operational emissions.

Hazards and Hazardous Materials

Site conditions would be the same for Alternative 1 and the proposed project. The site is not near a school, airport or airstrip, or listed on a hazardous materials site pursuant to Government Code Section 65962.5. Similar to the proposed project, Alternative 1 would result in significant impacts related to the exposure or release of hazardous materials, inference with an adopted emergency response plan or emergency evacuation plan, or exposure to wildland fires. Impacts related to hazards for Alternative 1 would be less than significant and similar to the proposed project.

Hydrology and Water Quality

Under Alternative 1 project soils remain largely exposed and subject to erosion from runoff. The plant nursery uses approximately 3.6 acre-feet of water for each acre per year (Monterey County Water Resources Agency 2014). At 5.6 acres, the estimated water use is 20.2 acre-feet per year, or 6,582,219 gallons per year). Impacts would be less than significant under Alternative 1.

In comparison, the proposed project would require a stormwater pollution prevention plan to control erosion during construction, would ultimately provide for long-term stabilization of soils through Low Impact Development including bioretention and filtration, and landscaping. The project would use approximately 4,461,618 gallons of water per year for residential and outside use¹, an approximately 33 percent reduction compared to the proposed project.

Impacts would be greater under Alternative 1, compared to the proposed project.

Land Use and Planning

Under Alternative 1, neither the proposed residences nor the local park would be developed. While Alternative 1 would not divide an established community, the alternative would not provide the park that may serve to connect the community. Under Alternative 1, there would be no General Plan Amendment and zone change needed to create uniform zoning and land use designation and conform with the Specific Plan. Conformity with the Specific Plan furthers goals within the City's General Plan, that Alternative 1 would not contribute to. Overall impacts would be greater under Alternative 1, but less than significant, like the proposed project.

Noise

Under Alternative 1, the existing nursery would continue to operate. Construction noise impacts associated with the proposed project would be avoided. No new noise-generating sources would be introduced to the project site, and no new traffic would be introduced to area roads as a result of site development. Noise impacts would be less than significant

¹ Based on 65,154 annual gallons per dwelling unit for indoor use, and 41,075 for outdoor use (California Air Pollution Control Officers Association 2017).

Impacts under Alternative 1 would be less, compared to the proposed project.

Population and Housing

Under Alternative 1, no new housing would be developed or displaced, and the population would not be increased. Impacts under this alternative would be less than significant, but would not provide the benefits of new housing associated with the proposed project. Overall impacts are similar for the Alternative 1 and the proposed project.

Public Services and Recreation

Under Alternative 1 there would be no impact to public services, but the local park for recreation and gathering space would not be developed. Impacts to public services would be reduced under the proposed project, and less than significant similar to the proposed project.

Transportation and Traffic

Under Alternative 1 there would be no increase in site-related traffic, and no increase in vehicle miles travelled (VMT). There would also be no new local park to support walkability and pedestrian activities in the neighborhood.

Impacts under Alternative 1 would be less than significant, and reduced compared to the proposed project which has significant VMT impacts.

Cultural and Tribal Cultural Resources

Under Alternative 1, impacts associated with unknown buried resources would be avoided. Impacts would be less than significant, and less than those associated with the proposed project.

Utilities and Service Systems

Under Alternative 1, and as discussed under *Hydrology and Water Quality* above, the plant nursery would use over 6 million gallons per year. However, Alternative 1 would have minimal need for other utilities, and would not create any increase in the demand for utilities (gas, electricity, sewer, communications). Impacts would be less than significant.

Impacts related to water demand would be greater under Alternative 1, compared to the proposed project, which would use 33 percent less water. However, impacts related to other utilities would be greater. On balance, overall impacts would be similar under Alternative 1, compared to the proposed project.

Wildfire

The project site is not located in or near a State Responsibility Area or lands classified as a VHFHSZ. The nearest such zone is a local responsibility area designated as a VHFHSZ located approximately 0.5 mile north of the project site. The VHFHSZ is separated from the site by residential development with minimal vegetation north of Amherst Street and SR 210, a ten-lane divided freeway. The project site is within a relatively flat portion of La Verne and not located near a landslide hazard area or floodplain, minimizing the potential for impacts related to post-fire flooding, landslides, or slope instability. Given the project site's urbanized location and distance from fire hazard severity zones, project impacts related to wildfire would be less than significant under Alternative 1.

Project impacts would be the same under Alternative 1, compared to the proposed project.

6.2.2 No Project/ General Plan Alternative 2

The purpose of a No Project, General Plan Alternative is to evaluate the impacts of the reasonably foreseeable future use of the project site, if developed under the existing General Plan land use designation. In this case, the project site has a General Plan land use designation of Low Density Residential, which allows for single-family units at a density of zero to five units per acre.

Description

Under Alternative 2, the project site would be developed with up to 29-single-family units, an over 30 percent decrease in residential uses compared to the proposed project. Development would be at a density of 5 units per acre. Development would be consistent with a traditional subdivision and guided by the Municipal Code. No park or common amenities would be provided.

As further discussed below, the Alternative 2 would avoid or lessen many of the impacts of the proposed project, including air quality, energy, greenhouse gas, transportation, and utilities.

Alternative 2 would fulfill some of the project objectives, but to a lesser extent than the proposed project, because it would not increase the City housing supply to the same degree, and it would not provide a park.

Impact Analysis

Aesthetics, Light, and Glare

VISUAL RESOURCES

Under Alternative 2, impacts would be similar in nature to the proposed project, and characterized by facilities typically associated with residential subdivisions, but would have 13 less units over the same and a lower development density, and not feature the park amenity and greenspace. Impacts would be similar under Alternative 2, compared to the proposed project, and less than significant, similar to the proposed project.

LIGHT AND GLARE

Under Alternative 2, impacts would be similar in nature to the proposed project, and characterized by facilities typically associated with residential, but at a lower density, and thus decreased intensity of lighting. Impacts would be similar under Alternative 2, compared to the proposed project, and less than significant, like the proposed project.

Air Quality

Construction impacts would be similar under Alternative 2 as the proposed project, because the same development footprint would be involved. Alternative 2 would have slightly reduced operational emissions associated with the decrease in vehicles trips related to 13 less residential units.

Impacts under Alternative 2 would be lesser than those for the proposed project, and would be less than significant, like the proposed project.

Biological Resources

Alternative 2 would involve the same development footprint as the proposed project, and thus have the same impacts to biological resources. Impacts would be less than significant for both Alternative 2, and the proposed project.

Energy

Construction impacts would be similar under Alternative 2 as the proposed project, because the same development footprint would be involved. Alternative 2 would have slightly reduced energy use associated with the 13 less residential units.

Impacts under Alternative 2 would be lesser than those for the proposed project, and would be less than significant, like the proposed project.

Geology and Soils

Alternative 3 would involve the same development footprint as the proposed project. As discussed in the Initial Study, the project is in an area subject to strong seismic shaking, but is otherwise not within an area susceptible to adverse soil conditions (liquefaction, expansive soils), fault rupture, or landslide. Development in the City of La Verne is required to adhere to the California Building Code (CBC). The impact to people, buildings, or structures on the project site from strong seismic ground shaking would be reduced by the required conformance with applicable building codes, and accepted engineering practices. Ground-disturbing activities during project construction may impact previously unknown paleontological resources that may be present below the project site surface, and mitigation to address potential paleontological discoveries would be required. Impacts would be less than significant with implementation of mitigation.

Impacts under Alternative 3 would be similar to the proposed project.

Greenhouse Gas

Construction impacts would be similar under Alternative 2 as the proposed project, because the same development footprint would be involved. Alternative 2 would have slightly reduced greenhouse gas emissions associated with the decrease in vehicles trips related to 13 less residential units.

Impacts under Alternative 2 would be lesser than those for the proposed project, and would be less than significant, like the proposed project.

Hazards and Hazardous Materials

Alternative 2 would involve the same development footprint as the proposed project. As discussed in the Initial Study, the project site has no evidence of having asbestos-containing construction materials or any facilities used to store, process, or discharge petroleum or other hazardous substances based on review of historic uses and records for the project site. According to the State Water Resources Control Board Geotracker and State Department of Toxic Substances Control's EnviroStor databases, there are no hazardous material sites present within a 1,000-foot radius of the project site. No public airports or private airstrips are located within two miles of the project site. The project site is in an urbanized area adjacent to existing residential uses. There are no wildland conditions on or adjacent to the project site. The project site is not located in a designated Very High Fire Hazard Severity Zone (VHFHSZ) or a State Responsibility Area.

Similar to the proposed project, under Alternative 2, residential uses would not emit or handle hazardous materials beyond typical household and landscape waste and materials, and the project would not create a hazard to the public through transportation of hazardous materials upon completion and residential occupancy. There are no schools within a 0.25-mile radius of the project site. Alternative 2 would not emit or handle hazardous materials, substances, or waste during project construction or operation and the project would pose no hazards nor transport hazardous materials past existing or proposed schools. Under Alternative 2, project construction and operational activities would not result in any street closures that could impede emergency access or evacuation. Alternative 2 would have a less than significant impact.

Impacts under Alternative 2 would be similar to those for the proposed project, and would be less than significant, like the proposed project.

Hydrology and Water Quality

Alternative 2 would involve the same development footprint as the proposed project. Similar to the proposed project, Alternative 2 would require a stormwater pollution prevention plan to control erosion during construction, and would ultimately provide for long-term stabilization of soils through Low Impact Development including bioretention and filtration, and landscaping. The Alternative would use approximately 3,080,641 gallons of water per year for residential and outside use², an over 30 percent reduction compared to the proposed project. Impacts under Alternative 2 would be less than significant.

Impacts under Alternative 2 would be lesser, compared to the proposed project.

Land Use and Planning

Under Alternative 2, less housing would be provided, and the local park would not be developed. While neither Alternative 2 nor the proposed project would divide an established community, Alternative 2 would not provide the park that may serve to connect the community. Under Alternative 2, there would be no General Plan Amendment and zone change needed to create uniform zoning and land use designation, and no Specific Plan. However, conformity with the Specific Plan furthers goals within the City's General Plan, that Alternative 2 would not contribute to the same extent. Overall impacts would be greater under Alternative 2, but less than significant, like the proposed project.

Noise

Alternative 2 would involve the same development footprint as the proposed project, and thus have the similar construction noise impacts, but at a slightly reduced duration due to the reduction in units. On site operational noise would be similar in nature to the proposed project, but would have less sources associated with fewer residential units. While the project would involve a slight decrease in traffic, the 20 unit reduction is unlikely to appreciable change the degree of traffic noise associated with project, because the dominant source of traffic noise is the existing traffic. Impacts under Alternative 2 would be less than significant.

Impacts under Alternative 2 would be lesser, compared to the proposed project.

² Based on 65,154 annual gallons per dwelling unit for indoor use, and 41,075 for outdoor use (California Air Pollution Control Officers Association 2017).

Population and Housing

Alternative 2 would involve 13 less residential units compared to the proposed project, thus reducing both the related housing and population compared to the proposed project. Impacts under Alternative 2 would be less than significant.

Impacts under Alternative 2 would be lesser, compared to the proposed project.

Public Services and Recreation

Under Alternative 2, there would be a decrease in the need for public services associated with 13 fewer units, compared to the proposed project. In addition, Alternative 2 would not provide for the development of the new local park, and would instead create an increase in the demand for recreation facilities.

Therefore, under Alternative 2, there would be a lesser impact to some public services, but an increase in the need for recreation facilities. Impacts under Alternative 3 would be less than significant.

Impacts under Alternative 2 would be lesser, compared to the proposed project.

Transportation and Traffic

The significant impacts of the proposed project related to vehicle miles travelled are predominantly driven by the site location, outside of a transit priority area. Thus, although Alternative 2 would provide an overall decrease in vehicle miles travelled compared to the proposed project, it is insufficient to reduce impacts to less than significant. In addition, Alternative 2, would not provide a new local park to support walkability and pedestrian activities in the neighborhood. Impacts under Alternative 2 would be significant and unavoidable.

Impacts under Alternative 2, would be lesser, compared to the proposed project.

Cultural and Tribal Cultural Resources

Alternative 2 would involve the same development footprint as the proposed project, and thus have the same impacts related to cultural and tribal cultural resources. Tribal cultural resources mitigation measures would be required, similar to the proposed project. Impacts would be less than significant with implementation of mitigation for both Alternative 2, and the proposed project.

Utilities and Service Systems

Alternative 2 would involve the same development footprint as the proposed project, and thus have the same impacts related to the construction of utility services for the project site. There would be a slight decrease in the operational demand for utilities associated with 13 fewer units, compared to the proposed project. Thus, impacts would be slightly less for Alternative 2, compared to the proposed project, and impacts would be less than significant for both Alternative 2, and the proposed project.

Wildfire

Alternative 2 would involve the same development footprint as the proposed project. The project site is not located in or near a State Responsibility Area or lands classified as a VHFHSZ. The nearest such zone is a local responsibility area designated as a VHFHSZ located approximately 0.5 mile north of the project site. The VHFHSZ is separated from the site by residential development with minimal

vegetation north of Amherst Street and SR 210, a ten-lane divided freeway. The project site is within a relatively flat portion of La Verne and not located near a landslide hazard area or floodplain, minimizing the potential for impacts related to post-fire flooding, landslides, or slope instability. Given the project site's urbanized location and distance from fire hazard severity zones, project impacts related to wildfire would be less than significant under Alternative 2.

Project impacts would be the same under Alternative 2, compared to the proposed project.

6.2.3 Reduced Intensity Alternative 3

The Reduced Intensity – Alternative 3 evaluates a residential project, at a size that would be sufficiently small to avoid significant impacts related to vehicle miles travelled. Based on the City's VMT screening criteria, a residential project is presumed to have less than significant impacts related to VMT if it would generate less than 110 trips per day. This translates to 22 residential units or less.

Description

Under Alternative 3, the project site would be developed with up to 22-single-family units, a nearly 50 percent decrease in residential uses compared to the proposed project. Development would be at a density of approximately 4 units per acre. Development would be consistent with a traditional subdivision and guided by the Municipal Code. No park or common amenities would be provided.

As further discussed below, the Alternative 3 would avoid or lessen many of the impacts of the proposed project, including air quality, energy, greenhouse gas, transportation, and utilities.

Alternative 3 would fulfill some of the project objectives, but to a much lesser extent than the proposed project, because it would increase the City housing supply by only 22 units, 20 fewer units than the proposed project. It would not provide a park.

Impact Analysis

Aesthetics, Light, and Glare

VISUAL RESOURCES

Under Alternative 3, impacts would be similar in nature to the proposed project, and characterized by facilities typically associated with residential subdivisions, but would not feature the park amenity and greenspace. Impacts would be similar under Alternative 3, compared to the proposed project, and less than significant, like the proposed project.

LIGHT AND GLARE

Under Alternative 3, impacts would be similar in nature to the proposed project, but at a reduced density, and characterized by facilities typically associated with residential use. Impacts would be similar under Alternative 3, compared to the proposed project, and less than significant, like the proposed project.

Air Quality

Construction impacts would be lesser under Alternative 3, compared to the proposed, because less units would be constructed. Alternative 3 would have reduced operational emissions associated with the decrease in vehicles trips related to 20 less residential units.

Impacts under Alternative 3 would be less than those for the proposed project, and would be less than significant, like the proposed project.

Biological Resources

Alternative 3 would involve the same development footprint as the proposed project, and thus have the same impacts to biological resources. Impacts would be less than significant for both Alternative 3, and the proposed project.

Energy

Construction impacts would be similar in nature under Alternative 3, but for a shorter duration as the proposed project, because less units would be constructed . Alternative 3 would have moderately reduced energy use associated with the 20 less residential units.

Impacts under Alternative 3 would be less than those for the proposed project, and would be less than significant, similar to the proposed project.

Geology and Soils

Alternative 3 would involve the same development footprint as the proposed project. As discussed in the Initial Study, the project is in an area subject to strong seismic shaking, but is otherwise not within an area susceptible to adverse soil conditions (liquefaction, expansive soils), fault rupture, or landslide. Development in the City of La Verne is required to adhere to the CBC. The impact to people, buildings, or structures on the project site from strong seismic ground shaking would be reduced by the required conformance with applicable building codes, and accepted engineering practices. Ground-disturbing activities during project construction may impact previously unknown paleontological resources that may be present below the project site surface, and mitigation to address potential paleontological discoveries would be required. Impacts would be less than significant with implementation of mitigation.

Impacts under Alternative 3 would be similar to the proposed project.

Greenhouse Gas

Construction impacts would be lesser under Alternative 3, compared to the proposed, because less units would be constructed. Alternative 3 would have reduced operational greenhouse gas emissions associated with the decrease in vehicles trips related to 20 less residential units.

Impacts under Alternative 3 would be less than those for the proposed project, and would be less than significant, like the proposed project.

Hazards and Hazardous Materials

Alternative 3 would involve the same development footprint as the proposed project. As discussed in the Initial Study, the project site has no evidence of having asbestos-containing construction materials or any facilities used to store, process, or discharge petroleum or other hazardous substances based on review of historic uses and records for the project site. According to the State Water Resources Control Board Geotracker and State Department of Toxic Substances Control's EnviroStor databases, there are no hazardous material sites present within a 1,000-foot radius of the project site. No public airports or private airstrips are located within two miles of the project site. The project site is in an urbanized area adjacent to existing residential uses. There are no

wildland conditions on or adjacent to the project site. The project site is not located in a designated Very High Fire Hazard Severity Zone (VHFHSZ) or a State Responsibility Area.

Similar to the proposed project, under Alternative 3, residential uses would not emit or handle hazardous materials beyond typical household and landscape waste and materials, and the project would not create a hazard to the public through transportation of hazardous materials upon completion and residential occupancy. There are no schools within a 0.25-mile radius of the project site. Alternative 3 would not emit or handle hazardous materials, substances, or waste during project construction or operation and the project would pose no hazards nor transport hazardous materials past existing or proposed schools. Under Alternative 3, project construction and operational activities would not result in any street closures that could impede emergency access or evacuation. Alternative 3 would have a less than significant impact.

Impacts under Alternative 3 would be similar to those for the proposed project, and would be less than significant, like the proposed project.

Hydrology and Water Quality

Alternative 3 would involve the same development footprint as the proposed project. Similar to the proposed project, Alternative 3 would require a stormwater pollution prevention plan to control erosion during construction, and would ultimately provide for long-term stabilization of soils through Low Impact Development including bioretention and filtration, and landscaping. The Alternative would use approximately 2,337,038 gallons of water per year for residential and outside use³, a nearly 50 percent reduction compared to the proposed project. Impacts under Alternative 3 would be less than significant.

Impacts under Alternative 3 would be lesser, compared to the proposed project.

Land Use and Planning

Under Alternative 3, nearly half as much housing would be provided, and the local park would not be developed. While neither Alternative 3 nor the proposed project would divide an established community, Alternative 3 would not provide the park that may serve to connect the community. Under Alternative 3, there would be no General Plan Amendment and zone change needed to create uniform zoning and land use designation, and no Specific Plan. However, conformity with the Specific Plan furthers goals within the City's General Plan, that Alternative 3 would not contribute to the same extent. Overall impacts would be greater under Alternative 3, but less than significant, similar to the proposed project.

Noise

Alternative 3 would involve the same development footprint as the proposed project, but would have a reduced building duration associated with less units. On site operational noise would be similar in nature to the proposed project, but would have less sources associated with fewer residential units. While the project would involve a slight decrease in traffic, the 20 unit reduction is unlikely to appreciable change the degree of traffic noise associated with project, because the dominant source of traffic noise is the existing traffic. Impacts under Alternative 3 would be less than significant.

³ Based on 65,154 annual gallons per dwelling unit for indoor use, and 41,075 for outdoor use (California Air Pollution Control Officers Association 2017).

Impacts under Alternative 3 would be lesser, compared to the proposed project.

Population and Housing

Alternative 3 would involve 20 less residential units, nearly half as much compared to the proposed project's 42 units, thus reducing both the related housing and population compared to the proposed project. Impacts under Alternative 3 would be less than significant.

Impacts under Alternative 3 would be lesser, compared to the proposed project.

Public Services and Recreation

Under Alternative 3, there would be a decrease in the need for public services associated with 20 fewer units, compared to the proposed project. In addition, Alternative 3 would not provide for the development of the new local park, and would instead create an increase in the demand for recreation facilities.

Therefore, under Alternative 3, there would be a lesser impact to some public services, but an increase in the need for recreation facilities. Impacts under Alternative 3 would be less than significant.

Impacts under Alternative 3 would be lesser, compared to the proposed project.

Transportation and Traffic

Alternative 3 would avoid significant and avoidable impacts of the proposed project related to vehicle miles travelled, through a substantial reduction in units, to remain below City screening thresholds for vehicle miles travelled. However, Alternative 3, would not provide a new local park to support walkability and pedestrian activities in the neighborhood. Impacts under Alternative 3 would be less than significant.

Impacts under Alternative 3 would be lesser, compared to the proposed project.

Cultural and Tribal Cultural Resources

Alternative 3 would involve the same development footprint as the proposed project, and thus have the same impacts related to cultural and tribal cultural resources. Tribal cultural resources mitigation measures would be required, similar to the proposed project. Impacts would be less than significant with implementation of mitigation for both Alternative 3, and the proposed project.

Utilities and Service Systems

Alternative 3 would involve the same development footprint as the proposed project, and thus have the same impacts related to the construction of utility services for the project site. There would be a decrease in the operational demand for utilities associated with 20 fewer units, compared to the proposed project. Thus, impacts would be less for Alternative 3, compared to the proposed project, and impacts would be less than significant for both Alternative 3, and the proposed project.

Wildfire

Alternative 3 would involve the same development footprint as the proposed project. The project site is not located in or near a State Responsibility Area or lands classified as a VHFHSZ. The nearest such zone is a local responsibility area designated as a VHFHSZ located approximately 0.5 mile north of the project site. The VHFHSZ is separated from the site by residential development with minimal

vegetation north of Amherst Street and SR 210, a ten-lane divided freeway. The project site is within a relatively flat portion of La Verne and not located near a landslide hazard area or floodplain, minimizing the potential for impacts related to post-fire flooding, landslides, or slope instability. Given the project site's urbanized location and distance from fire hazard severity zones, project impacts related to wildfire would be less than significant under Alternative 3.

Project impacts would be the same under Alternative 3, compared to the proposed project.

6.2.4 Alternatives Considered but Eliminated from Consideration

CEQA Guidelines Section 15126.6(c) require an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. One alternatives that might avoid or substantially lessen project impacts was considered, but rejected as infeasible, and is briefly discussed below.

Alternative Project Site

CEQA Guidelines Section 15126.6(f)(2) sets forth considerations to be used in evaluating an alternative location. The section states that the "key question" is whether any of the significant effects of the project would be avoided or substantially lessened by relocating the project. The CEQA Guidelines identify the following factors that may be taken into account when addressing the feasibility of an alternative location: site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site.

The CEQA Guidelines establish that only locations that would accomplish these objectives should be considered alternative locations for the proposed project. In the case of the proposed project, significant and unavoidable impacts are related to vehicle miles travelled. These impacts are a function of both proposed use and site location – with the greater emphasis on site location, in this case. With respect to the proposed project site, appropriate uses that would support a less than significant finding would have to be at a very low intensity of development, such that it would result in substantial underutilization of the project site.

This would not be the case if the proposed project were developed in a Transit Priority Area, or TPA. Thus, there is value in considering whether an alternative project site would avoid the less than significant impacts associated with vehicle miles travelled. TPAs are likely to be established in the future in conjunction with Gold Line extension into the City. However, at present, the City has not established any TPAs, as there is not applicable rapid transit that would apply.

Therefore, the evaluation of an Alternative Project Site is not evaluated further.

6.3 Environmentally Superior Alternative

CEQA requires that an EIR identify the Environmentally Superior Alternative, and discuss the facts that support that selection, as well as whether it would accomplish the project objectives or be infeasible (Public Resources Section 21081.5; CEQA Guidelines Sections 15091, 15126.6).

Table 6-2 indicates whether each alternative's environmental impact is greater than, less than or similar to that of the proposed project for each of the environmental topics studied. The environmentally superior alternative is further discussed below.

Table 6-2 Impact Comparison of Alternatives

Topic	Proposed Project	No Project/ No Build Alternative 1	No Project/ General Plan Alternative 2	Reduced Intensity Alternative 3
Aesthetics, light, and glare	Less than significant	<	=	=
Air quality	Less than significant	<	<	<
Biological resources	Less than significant	<	=	=
Energy	Less than significant	<	<	<
Geology and soils	Less than significant	>	=	=
Greenhouse gas	Less than significant	=	<	<
Hazards and hazardous materials	Less than significant	=	=	=
Hydrology and water quality	Less than significant	>	<	<
Land use and planning	Less than significant	>	>	>
Noise	Less than significant	<	<	<
Population and housing	Less than significant	=	<	<
Public services	Less than significant	<	<	<
Transportation and traffic	Significant and unavoidable	<	<	<
Cultural and tribal cultural resources	Less than significant with mitigation	<	=	=
Utilities and service systems	Less than significant	<	<	<
Wildfire	Less than significant	=	=	=
> Impacts would be greater compared to the proposed project (increased level of impact)				
< Impacts would be less compared to the proposed project (reduced level of impact)				
= Similar level of impact to the proposed project				

Based on the alternative's analysis provided above, Alternative 1, the No Project/No Build Alternative, would be the environmentally superior alternative, as it would result in fewer impacts as compared to the proposed project, and would reduce the significant and unavoidable impact associated with the projects VMT. However, Alternative 1 would not meet any of the project objectives.

If the No Project Alternative is the Environmentally Superior Alternative, CEQA requires that an Environmentally Superior Build Alternative be identified. Based on this consideration, Alternative 3 would be the Environmentally Superior Alternative. However, Alternative 3 would not meet the project objectives to the same extent as the proposed project, would not provide the same amenities and benefits, including the same degree of provision of housing, and providing a park. In addition, Alternative 3 would underutilize the project site.

7 References

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