

3 Changes to the Draft Environmental Impact Report

3.1 Introduction

All additions or corrections to the Draft Environmental Impact Report (EIR) text, tables, and figures generated either from responses to comments or independently by the City of Montclair (City) are stated in this chapter of the Final EIR.

As provided in Section 15088(c) of the California Environmental Quality Act (CEQA) Guidelines, responses to comments may take the form of a revision to a Draft EIR or may be a separate section in the Final EIR. This chapter complies with the latter, and provides changes to the Draft EIR presented in strikethrough text (i.e., ~~strikethrough~~) signifying deletions, and underline text (i.e., underline) signifying additions. These notations are meant to provide clarification, corrections, or minor revisions needed as a result of public comments or because of changes in the proposed Montclair Place District Specific Plan (MPDSP, or Proposed Project), since the release of the Draft EIR, as required by CEQA Guidelines Section 15132. None of the corrections or additions constitutes significant new information or substantial program changes requiring recirculation of the EIR, as defined by CEQA Guidelines Section 15088.5. The Draft EIR revisions are incorporated as part of the Final EIR for consideration by City of Montclair’s City Council.

3.2 Changes to the Draft Environmental Impact Report

Executive Summary

Population and Housing			
a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Potentially Significant Impact	MM-AES-1 MM-AQ-1 through MM-AQ-9 MM-GHG-1 MM-GHG-2 MM-HAZ-1 MM-HYD-1 MM-HYD-2 MM-PUB-1 (See Public Services Section of this Table) MM-TCR-1 (See Tribal Cultural Resources Section of this Table) MM-TCR-2 (See Tribal Cultural Resources Section of this Table) <u>MM-UTIL-1</u> (See Utilities and Service Systems Section of this Table) <u>MM-UTIL-2</u> (See Utilities and Service Systems Section of this Table)	Significant and Unavoidable Impact
b. Would the project displace substantial numbers of	No Impact	None required	No Impact

Population and Housing			
existing people or housing, necessitating the construction of replacement housing elsewhere?			
Would the project have a cumulative impact on population and housing?	Potentially Significant Impact	MM-AES-1 MM-AQ-1 through MM-AQ-9 MM-GHG-1 MM-GHG-2 MM-HAZ-1 MM-HYD-1 MM-HYD-2 MM-PUB-1 (See Public Services Section of this Table) MM-TCR-1 (See Tribal Cultural Resources Section of this Table) MM-TCR-2 (See Tribal Cultural Resources Section of this Table) <u>MM-UTIL-1</u> (See Utilities and Service Systems Section of this Table) <u>MM-UTIL-2</u> (See Utilities and Service Systems Section of this Table)	Significant and Unavoidable Impact

Section 3.6 Hazards and Hazardous Materials

C. *Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Less Than Significant Impact With Mitigation Incorporated. There are five schools located within 0.25 mile of the Plan area. International Montessori School is located on the west side of the Plan area on the Unitarian Universalist church property; Moreno Elementary School is located approximately 0.08 mile west of the Plan area; Serrano Middle School is located approximately 0.16 mile west of the Plan area; US Colleges of San Bernardino is located approximately 0.25 mile east of the Plan area; and OPARC (a center for adults with disabilities) is located approximately 0.25 mile northeast of the Plan area.

As discussed previously, implementation the Proposed Project could result in the handling of hazardous materials, substances, or waste during demolition, grading, and construction activities. However, compliance with local, state, and federal regulations, as well as mitigation measure **MM-HAZ-1**, would ensure that the handling of hazardous materials, substances, and wastes is conducted in a safe manner and does not result in adverse effects to surrounding land uses. As such, construction of the Proposed Project is not expected to create a significant hazard to nearby schools, and children, teachers, staff, and visitors at the nearby schools would not be exposed to hazardous materials.

During operation of the Proposed Project, hazardous materials that are routinely used for building and grounds maintenance would be present on-site, such as chemical reagents, solvents, fuels, paints, and

cleansers. The Proposed Project could also involve the use, storage, transport, and disposal of a variety of medical materials and medical wastes, some of which may be considered hazardous. A release or accident involving potentially hazardous materials and/or wastes may create a hazard for the public, with the potential to affect students, staff, and visitors at nearby schools. However, due to the types of materials that would be used on the Plan area and the existing regulations that are required to be put in place, the Proposed Project is not expected to create a significant hazard to nearby schools, and children, teachers, staff, and visitors at the nearby schools would not be exposed to hazardous materials.

Many of the hazardous materials that would be used for building and grounds maintenance are common to businesses and households and pose a lower risk to people and the environment relative to some less common hazardous materials. Furthermore, such materials would be stored, transported, used, and disposed of in accordance with local, state, and federal laws, which would minimize the potential for such materials be released to the environment and to affect nearby schools. Additionally, as described in the discussions above, hazardous materials and medical wastes would be handled in accordance with an MWMP and an HMBP. These plans would set forth safety and management protocols for medical wastes and other hazardous materials. Implementation of these plans would ensure that hazardous materials used any potential future medical use would be handled and treated in a manner that minimizes releases and accidents to the extent practicable. These plans would also require oversight and enforcement from CDPH's Medical Waste Management Program, from the City, and from SBCFD. As described in the discussions above, the hazardous materials used on-site would also be subject to a variety of local, state, and federal laws, which require proper handling and storage of hazardous materials. Upon preparation and implementation of a MWMP and a HMBP, as well as compliance with applicable federal, state, and local regulations for the use of hazardous materials, the Proposed Project is not expected to result in effects related to hazardous materials or hazardous emissions at nearby schools. As such, upon compliance with applicable regulations involving hazardous materials, operational impacts would be **less than significant with mitigation incorporated**. ~~No mitigation is required.~~

Section 3.10 Population and Housing

Summary

In summary, the maximum development potential allowed under the MPDSP would provide a residential population of 18,331, 6,321 dwelling units, and 1,404 jobs. The Proposed Project would exceed the SCAG population, housing, and employment growth projections for the City; however, the Proposed Project would represent a nominal percentage of the overall projected population, housing, and employment projections for the County and SCAG region. Although the Proposed Project exceeds the City's projected population growth, the Proposed Project would not stimulate substantial growth outside of the Plan area. Additionally, the Proposed Project would contribute to the County's RHNA housing production goals. Further, the Proposed Project would contribute to the City's job-housing balance, but providing more housing units than jobs in a "jobs rich" City.

Nonetheless, the Proposed Project's estimated population of 18,331 persons, 6,321 dwelling units, and 1,404 jobs would exceed SCAG's growth projections for the City. To reduce potential impacts that substantial population growth could have on the environment, mitigation measures **MM-AES-1, MM-AQ-1 through MM-AQ-9, MM-GHG-1, MM-GHG-2, MM-HAZ-1, MM-HYD-1, MM-HYD-2, MM-PUB-1, MM-TCR-1, and MM-TCR-2, MM-UTIL-1, and MM-UTIL-2**

are included within Section 3, Environmental Analysis, of this EIR. Additionally, as further discussed in Section 4, Alternatives, Alternative 3 (Reduced Residential Alternative) and Alternative 4 (Reduced Commercial/Office Alternative) present reduced project alternatives, both of which discuss a reduction in development potential and its potential to lessen environmental impacts associated with the Proposed Project. However, even upon implementation of mitigation measures identified throughout this EIR, implementation of the MPDSP would still exceed SCAG's forecasted population growth within the City. Therefore, impacts related to population growth are considered **significant and unavoidable**.

3.10.5 Cumulative Impacts

As defined in the State CEQA Guidelines Section 15130, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for population, housing, and employment. The cumulative study area used to assess potential cumulative population and housing impacts includes the City of Montclair, the County of San Bernardino, and the SCAG region because employees of the MPDSP may live within or outside the City's jurisdictional boundaries.

SCAG's 2020-2045 RTP/SCS serves as a regional guide for future development in the counties of San Bernardino, Imperial, Los Angeles, Orange, Riverside, and Ventura. As previously discussed in Section 3.10.4, Impacts Analysis, the Proposed Project would exceed the SCAG population, housing, and employment growth projections for the City; however, the Proposed Project would represent a nominal percentage of the overall projected population, housing, and employment projections for the County and SCAG region. The Proposed Project would contribute to the RHNA housing production targets for the County. Additionally, the Proposed Project is consistent with increasing the number of households compared to jobs within the City.

As discussed in Section 3.10.1, Existing Conditions, projected percentage of growth per year for 2016-2045 is slightly higher for housing than population, while employment is declining in the City and growing at a slower rate than projected in the County and SCAG region. While the SCAG region is well within the projected growth for population, the SCAG region was below the projected housing growth by 5,322 dwelling units from 2016 to 2018. Further, based on 2016 to 2018 data, the housing projections within the SCAG region are not being met. Although the Proposed Project's residential population would exceed the SCAG's population, housing, and employment growth projections for the City, the proposed 6,321 housing units aims to create a balance of jobs and housing within the City, and help the region meet housing projections. Nonetheless, since the Proposed Project would induce substantial population growth, a cumulatively considerable effect would result when combined with population growth caused by other projects within the City, County, or SCAG region. Even with the implementation of mitigation measures **MM-AES-1**, **MM-AQ-1** through **MM-AQ-9**, **MM-GHG-1**, **MM-GHG-2**, **MM-HAZ-1**, **MM-HYD-1**, **MM-HYD-2**, **MM-PUB-1**, **MM-TCR-1**, and **MM-TCR-2**, **MM-UTIL-1**, and **MM-UTIL-2**, the effects of substantial population growth combined with other future projects would be cumulatively considerable. As such, cumulative impacts to population and housing would be **significant and unavoidable**.

3.10.6 Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires EIRs to describe feasible measures that can minimize significant adverse impacts. Mitigation measures **MM-AES-1** (see Section 3.1 Aesthetics), **MM-AQ-1** through **MM-AQ-9** (see Section 3.2 Air Quality), **MM-GHG-1** and **MM-GHG-2** (see Section 3.5 Greenhouse Gas Emissions), **MM-HAZ-1** (see Section 3.6 Hazards and Hazardous Materials), **MM-HYD-1** and **MM-HYD-4** (see Section 3.7 Hydrology and Water Quality), **MM-PUB-1** (see Section 3.11 Public Services), and **MM-TCR-1** and **MM-TCR-2** (see Section 3.14 Tribal Cultural Resources), **MM-UTIL-1** and **MM-UTIL-2** (see Section 3.15, Utilities and Service Systems) would be required to help reduce potential impacts to population and housing.