Summary Form for Electronic Document Submittal

Form F

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: 2019110341	
Project Title: The Commons	
Lead Agency: City of Claremont	
Contact Name: Jennifer Davis	
Email: jdavis@romoplanninggroup.com	Phone Number: 909-399-5470
Project Location: City of Claremont	Los Angeles
City	County

Project Description (Proposed actions, location, and/or consequences).

The Commons would establish land use regulations, development standards, and design guidelines for development within the Speciifc Plan planning area in the City of Claremont only. The intent is to provide specificity with regard to permitted uses and expectations for the design and construction of new buildings and parking facilities, development and use of open space, internal roadway and other circulation improvements, lighting, and landscaping. Future development within The Commons would provide a high quality planned development that provides a diverse mix of housing opportunities with a small area of retail. The Commons would include a total of 62 dwelling units (27 single-family detached homes, 20 townhomes with 15 flats above the retail spaces) and 5,000 square feet of retail and associated parking. The development will have a 150 foot wide avigation easement, which be uses as active and passive open space for the project. There are three types of plans that will be built onsite: single-family detached units, 2, 3 and 4 bedroom townhomes, and single-story flats. The site will be accessed by two driveways on Foothill Boulevard and one on Monte Vista Avenue. The Project is at the northwest corner of the Foothill Boulevard/Monte Vista Avenue intersection.

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

Please see the attached Executive Summary Table for the proposed Project. This table identifies the significant or potentially significant impacts of the Project and proposed mititgation measures.	

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.
Cable Airport Operational hazards exposure to future Project site occupants. Vehicle Miles Traveled (VMT) above threshold limits.
Provide a list of the responsible or trustee agencies for the project.
1. Los Angeles County Airport Land Use Commission 2. South Coast Air Quality Control District 3. Santa Ana Regional Water Quality Control Board 4. California Department of Fish and Wildlife Country Country Air Country



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
4.1 Air Quality			
Impact 4.1.5.1 Air Quality Management Plan Consistency: Criteria pollutants during construction and operation of the proposed Project would not have the potential to cause or affect a violation of the ambient air quality standards. The proposed Project's residential units and 5,000 square feet of retail uses would introduce an estimated net residential population of approximately 172 persons (residents + employees). Thus, Project residents would account for less than 0.01 percent of the population growth forecast by Southern California Association of Governments (SCAG) in the County of Los Angeles subregion between 2015 and 2040. Because similar projections form the basis of the 2016 Air Quality Management Plan (AQMP), it can be concluded that the proposed Project would be consistent with projections in the AQMP. No consistency or obstruction of the AQMP would occur.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.1.5.2 Increase in Criteria Air Pollutants (Regional Construction and Operation): The proposed Project would adhere to standard (South Coast Air Quality Management District (SCAQMD), California Air Resource Board (CARB) and other rules/regulations ensuring that sensitive receptors on the Project site or surrounding the site would not be exposed to substantial pollutant emissions during construction. During Project operation/occupation the proposed Project would not generate emissions that would exceed regional or daily thresholds.	Less than Significant Impact	No mitigation measures required.	Less than Significant

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
Impact 4.1.5.3: Sensitive Receptor Exposure to Pollutants (Local Construction and Operation): Adherence to standard SCAQMD, CARB, and other rules/regulations would ensure that sensitive receptors are not exposed to substantial pollutants during construction activities. Emissions of regional pollutants during operation/occupation of the Project would not exceed established daily thresholds and would not expose sensitive receptors to substantial pollutants.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.1.5.4 Odors: Emissions leading to odors are typically produced by industrial uses, landfills, and other similar uses. Odors generated from the site during construction and operation would be temporary and typical of a mixed-use residential development.	Less than Significant Impact	No mitigation measures required.	Less than Significant
4.1.6 Cumulative Air Quality Impact: If a project does not exceed the SCAQMD recommended daily regional emission thresholds, the project-specific impacts would also not result in a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. The proposed Project's short-term construction CO, NO ₂ , PM ₁₀ , and PM _{2.5} emissions would not exceed the Localized Significance Thresholds (LSTs). While the Project would contribute emissions to the cumulative condition, its long-term operational emissions would not exceed SCAQMD's criteria pollutant threshold. The Project impacts on air quality are not cumulatively considerable.	Not cumulatively considerable	No mitigation measures required.	Not cumulatively considerable



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
4.2 Biological Resources			
Impact 4.2.5.1 Candidate, Non-listed Sensitive, or Special-Status Plant and Wildlife Species: Development of the Project would result in the modification of the site and the removal of existing vegetation. 14 special-status species have been reported within 1.5-miles of the site. The RAFFS habitat consisting of 3.01 acres in the study area provides low quality habitat for the coastal California gnatcatcher. While this species was not identified during the on-site general biological resources survey, the on-site Riversidean Alluvial Fan Sage Scrub (RAFSS) provides potentially suitable habitat for the coastal California gnatcatcher. California gnatcatcher surveys conducted onsite included 4 nonbreeding and 4 breeding season protocol surveys and no gnatcatchers were observed onsite.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.2.5.2 Sensitive Natural Communities: The on-site RAFSS community is highly degraded, small in size (3.01 acres), isolated from other RAFSS areas by existing residential, industrial, commercial, and roadway uses, and no longer functions as part of a fluvial system. No other sensitive natural community is located within the Project limits.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.2.5.3 Jurisdictional Waters/Wetlands: The Project site does not include any federally or State protected wetlands. One remnant drainage features is present on the Project site and is associated with an existing concrete box culvert under Foothill Boulevard. However, this drainage feature shows no upstream connectivity to any water conveyance features or systems.	No Impact	No mitigation measures required.	No Impact

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341 **APRIL 2020**

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
Impact 4.2.5.4 Wildlife Movement and Nesting/Migratory Birds: During the bird breeding season (typically February 1 through August 31), large trees adjacent to the Project site may be used by hawks, ravens, or other large birds for nesting. Trees, shrubs, and other vegetation on site may provide nest sites for smaller birds. Nesting bird species, with potential to occur are protected by California Fish and Game Code Sections 3503, 3503.5, and 3800, and by the Migratory Bird Treaty Act (MBTA) (16 USC 703–711).	Potentially Significant Impact	4.2.5.4A Pre-construction Nesting Bird Survey. Vegetation removal shall be conducted outside of the nesting season (February 1, or January 1 for raptors, through September 15). If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within three days prior any disturbance of the site, including disking, demolition activities, and grading. If an active avian nest is identified, a biological monitor shall be present to delineate the boundaries of the buffer area and monitor the active nest to ensure that nesting behavior is not adversely affected by construction activities. Construction activities must occur outside of a 300-foot buffer around the active nest. For listed and raptor species, this buffer may be expanded to up to 500 feet from the active nest. The biological monitor shall have the authority to temporarily halt construction if it occurs within an established avian buffer or if new nesting activity occurs and a new buffer is required. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur or resume. Upon completion of construction monitoring, the biological monitor shall prepare a report of findings documenting if any impacts to active avian nests occurred.	Less than Significant
Impact 4.2.5.5 Adopted Policies and/or Ordinances: The Project would not conflict with any local policies or ordinance protection biological resources.	No Impact	No mitigation measures are required	No Impact
Impact 4.2.5.6 Adopted Habitat Conservation Plans: The Project would not conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or State habitat conservation plan.	No Impact	No mitigation measures are required	No impact
4.2.6 Cumulative Biological Resources Impact: The Project-specific biological resource impacts have been reduced to less than significant levels. Due to	Not cumulatively considerable	No mitigation measures are required	Not cumulatively considerable



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
the disturbed and isolated nature of the site, the limited extent of degraded RAFSS habitat, and the proximity of existing urban development, the Project impacts on biological resources are not cumulatively considerable.			
4.3 Cultural Resources			
Impact 4.3.5.1 Historical Resources: A segment of former Route 66, adjacent to the site, was determined by Caltrans in 2010 to lack the requisite level of integrity to meet National and California Register criteria. The Project site contains remnants of concrete structures that were determined not to be historical. Overall, no historical resources as defined in Section 15064.5 of the State CEQA Guidelines located within the proposed Project site.	No Impact	No mitigation measures required.	No Impact
Impact 4.3.5.2 Archaeological Resources: Three historic-period archaeological resources were identified in the Project area. These resources were determined not to represent noteworthy archaeological data, have specific historic association, and were also moderately to severely disturbed by erosion. Although the resources on site do not meet significance criteria under CEQA and have no potential for significant archaeological data, the Project site's proximity to a historically renowned archaeological site (Planes of Fame aviation museum) and location within the former drainage of a major water course indicates that the site may have some sensitivity for subsurface archaeological resources.	Potentially Significant Impact	 4.3.1A: Archaeological Resources a. Prior to the commencement of construction activities, the Construction Contractor shall provide evidence to the City for review and approval that a qualified archaeologist who meets Secretary of the Interior Standards has been retained to provide pre-construction briefing, monitoring, and investigation of ground-disturbing activities. The scope, limit, duration and frequency of construction monitoring shall be established by the qualified archaeologist, City, construction contractor and Native American monitor prior to the initiation of ground-disturbance operations. b. Prior to the commencement of construction activities, the construction Contractor(s) shall provide evidence to the City for review and approval that on-site work crews have been informed of the procedures to follow in the event an identified cultural resource 	Less Than Significant

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
		is unearthed during construction. The pre-construction briefing shall be conducted by a qualified archaeologist.	
		c. In the event previously unidentified cultural resources are unearthed during construction, all work within a minimum of 100 feet of the discovery shall cease until the extent and nature of the discovery has been identified by the qualified archaeologist. Construction activities outside the exclusion area shall be permitted to continue.	
		d. Any potential cultural/archaeological resource unearthed by project construction activities shall be evaluated to determine eligibility for the California Register of Historical Resources or qualification as unique archaeological resources pursuant to CEQA. If the resource is determined by the qualified archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or has a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the Construction Contractor, City and Native American monitor to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any non-Native American historic cultural/archaeological resource shall be curated at a public, non-profit institution with a research interest in the materials.	
		e. The qualified archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation (DPR) site	



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
		forms at the conclusion of treatment and/or following archaeological construction monitoring. The report shall include a description of resources unearthed, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources. The report and the site forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center and representatives of other appropriate agencies.	
Impact 4.3.5.3 Human Remains: No previously identified human remains are present on the Project site and there are no facts or evidence indicating that Native American or people or European descent are buried on the proposed Project site. However, undiscovered human remains may be present below the ground surface on any property.	Potentially Significant Impact	4.11.2A Human Remains Assessment and Treatment. Upon discovery of human remains, cremations, and/or associated grave goods, the Tribal monitor and/or archaeological monitor shall halt work within a minimum of 150 feet of the discovery. The discovery shall be kept confidential and secure to prevent further disturbance. The Tribe and the County Coroner shall be notified within 24 hours of any such discovery. Work within the 150 foot buffer area shall be diverted while the County Coroner determines the nature of the remains and the Most Likely Descendant (MLD) identified.	Less Than Significant
		The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD shall identify and direct the most appropriate means of treating the human remains and any associated funerary object(s).	
		Prior to the continuation of ground-disturbing activities, the landowner 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 Tribe will make every effort to recommend diverting the Project and keeping the remains in situ and	

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
		protected. If the Project cannot be diverted, it may be determined that burials will be removed. The Tribal monitor will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum, detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe/Tribal 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 Tribe 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 Tribe Nation and the Native American Heritage Commission. The Tribe does not authorize any scientific study or the utilization of invasive diagnostics on human remains.	
		Kizh-Gabrieleno Procedures for Burials and Funerary Remains. If the Gabrieleno Band of Mission Indians - Kizh Nation is designated MLD, the following treatment measures shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary	



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
		objects are objects that, as part of the death rite or ceremony of a culture,	
		are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively	
		for burial purposes or to contain human remains can also be considered	
		as associated funerary objects.	
		Treatment Measures. Prior to the continuation of ground disturbing	
		activities, the land owner shall arrange a designated site location within	
		the footprint of the project for the respectful reburial of the human	
		remains and/or ceremonial objects. In the case 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 placed over the excavation opening to	
		protect the remains. If this type of steel plate is not available, a 24-hour	
		guard should be posted outside of working hours. The Tribe shall 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 shall be removed. The Tribe "shall work closely	
		with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the	
		Tribe, documentation shall be taken which includes at a minimum	
		detailed descriptive notes and sketches. Additional types of	
		documentation shall be approved by the Tribe for data recovery	
		purposes. Cremations "shall either be removed in bulk or by means as	
		necessary to ensure completely recovery of all material. If the discovery	
		of human remains includes four or more burials, the location is	
		considered a cemetery and a separate treatment plan shall be created.	
		Once complete, a final report of all activities is to be submitted to the	
		Tribe and the NARC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains.	
		the utilization of any invasive diagnostics on number reflains.	
		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	

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
		secure container on site if possible. These items should 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 Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.	
Impact 4.3.6 Cumulative Cultural Resources Impact: Potential impacts of the proposed Project to unknown cultural resources, when combined with the impacts of past, present, and reasonably foreseeable projects in the City could contribute to a cumulatively significant impact due to the overall loss of historical and archaeological artifacts unique to the region.	Cumulatively Considerable Impact	Implementation of Mitigation Measure 4.3.1A and Mitigation Measure 4.11.2A.	Not cumulatively considerable
4.4 Energy			
Impact 4.4.5.1 Energy Consumption: Impacts related to energy use during construction would be temporary and would be relatively small in comparison to the Los Angeles County overall usage and the State's available energy sources. Energy use during occupation/operation would also be relatively small in comparison to the overall energy used in Los Angeles County and California. Regulatory Compliance Measures would also be implemented to reduce energy usage by the Project during construction and operation/occupation.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.4.5.2 Project Consistency with Energy Strategies: The proposed Project would implement energy conservation strategies as put forth by California and the City of Claremont and therefore would not obstruct State or local plans for renewable energy or energy efficiency.	Less than Significant Impact	No mitigation measures required.	Less than Significant



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
Impact 4.4.6 Cumulative Energy Impacts: The proposed Project would consume electricity, natural gas, and fuel (gasoline and diesel); however, the consumption would be relatively small compared to the consumption on a regional and statewide basis and therefore would not be cumulatively considerable.	Not cumulatively considerable	No mitigation measures required.	Not cumulatively considerable
4.5 Greenhouse Gas			
Impact 4.5.6.1 Greenhouse Gas Emissions: The proposed Project would generate 1,695 metric tons (MT) of " CO_2 equivalents" per year (CO_2 e/yr). The Project's emissions are less than the South Coast Air Quality Management District Tier 3 threshold of 3,000 MT CO_2 e/yr for residential projects.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.5.6.2 Greenhouse Gas Plan, Policy, and Regulation Consistency: The Project would be consistent with the City of Claremont General Plan air quality policies, and the Project would be consistent with Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) performance standards.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.5.7 Cumulative Greenhouse Gas Emissions Impact: The proposed Project has incorporated sustainability design measures in accordance with regulatory requirements as provided throughout the analysis and to reduce the proposed Project's potential impact with respect to greenhouse gas (GHG) emissions. As GHG emissions would not exceed the SCAQMD Tier 3 numerical screening threshold and Project design measures would be	Not cumulatively considerable	No mitigation measures required.	Not cumulatively considerable

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
applied to lower the GHG emissions, the proposed Project would result in a less than significant cumulative impact related to GHG emissions. The proposed Project's GHG reduction measures make it consistent with Assembly Bill 32, 2016 RTP/SCS, and City of Claremont General Plan. The proposed Project's GHG impacts are not cumulatively considerable.			
4.6 Hazards and Hazardous Materials			
Impact 4.6.5.1 Within Two Miles of a Private Airport or Within an Airport Land Use Plan or Within Two Miles of a Public Airport: The proposed Project is located in Safety Zone 2 and Safety Zone 4 as established under the California Airport Land Use Planning Handbook. The proposed Project would place residents and buildings on a parcel that is undeveloped; as such, although the potential for a Cable Airport plane crash causing onsite injuries or casualties to occur on the site is low it is greater than the probability of such an injuries occurring if the site was vacant/unoccupied.	Potentially Significant Impact	 4.6.1A: Prior to the issuance of building permits, the Project applicant shall provide the City of Claremont a copy of an Airport Proximity Disclosure that will be presented to prospective buyers of real estate within the Project site. The Airport Proximity Disclosure shall convey information to prospective buyers about airport-associated annoyances or inconveniences such as noise, vibration, or odors. The Airport Proximity Disclosure shall: 1. Contain the following language dictated by State law in conjunction with real estate transfer: "NOTICE OF AIRPORT IN VICINITY: This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example: noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what appropriate annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you." 2. Include signs declaring the NOTICE OF AIRPORT IN VICINITY and a map of the Airport Influence Area to be prominently posted in the real estate sales office and/or other key locations at the Project site. 	Significant and Unavoidable



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
		4.6.1B: Any activity (i.e., activities taking place in the common areas and parks within the site) or development (i.e., residential and retail development) on the Project site shall be prohibited from:	
		Emitting/generating smoke (or any visibility-reducing emissions);	
		 Producing electromagnetic frequencies at levels that could interfere with the safe operation of Cable Airport; and, 	
		 Installing lighting that is not shielded and focused in a downward position to avoid direct light spillage/light glare/illumination into the direction of Runway 6/24 of the Cable Airport and into the sky where aircraft cross over the Project site. 	
		The Project applicant shall provide final design of the proposed Project to staff at the City of Claremont and to the owners of Cable Airport showing that onsite activities will not cause safety issues to pilots arriving and departing from Cable Airport or to pilots flying over the Project site.	
		4.6.5.1C: Prior to recording of final tract maps of the Project site, the Project applicant shall provide a copy of a recorded and deed restricted avigation easement between the property owner (grantor) and Cable Airport (grantee) to the City of Claremont. This would establish a perpetual right and easement for the unobstructed flight of aircraft over the proposed Project site and the perpetual right to cause noise and other impacts inherent in the operation of aircraft of all types over the proposed Project site.	
Impact 4.6.6 Cumulative Hazards and Hazardous Materials Impact: The proposed Project would not combine with other projects to result in a cumulatively considerable impact related to safety hazards from nearby airport as this type of impact is considered on a project-by-project basis.	Cumulatively Considerable Impact	Implementation of Mitigation Measure 4.6.1A, 4.6.1B, and 4.6.1C.	Not Cumulatively Considerable

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

APRIL 2020

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
4.7 Hydrology and Water Quality			•
Impact 4.7.5.1 Water Quality Standards and Waste Discharge: The Project-specific Low Impact Development (LID) Plan would be reviewed and approved as a routine action during the processing of the Project by the City. The LID Plan measures would be implemented to safeguard water quality. Standard Conditions HYD-1 through HYD-3 and Regulations would be implemented as part of the Project to ensure the protection of surface and groundwater quality.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.7.5.2 Groundwater: Nearby wells indicate groundwater in the Project area is greater than 115 feet below the ground surface. Therefore, development of the Project site is not expected to encounter any groundwater or require dewatering during construction activities. Through preservation of the site's existing drainage pattern and implementation of the underground Contech retention/infiltration system on site designed to exceed the site's design capture volume in accordance with the City's National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer Systems (MS4) Permit, storm flows would be ultimately conveyed to the same areas where groundwater recharge in the Upper Claremont Heights Basin and the Pomona Basin predominantly occurs. Furthermore, these basins are subject to adjudication through the Six Basins Judgment to ensure safe operating yield and avoidance of groundwater over-extraction.	Less than Significant Impact	No mitigation measures required.	Less than Significant



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
Impact 4.7.5.3 Drainage Pattern and Capacity-	Less than	No mitigation measures required.	Less than
Related Impacts: The Project would potentially	Significant Impact		Significant
increase runoff volume due to the increase in			
impervious surfaces on site; as such, approximately			
30 percent of the site would comprise drought-			
tolerant landscaping and other pervious surfaces			
designed to retain or detain storm water runoff			
while minimizing volume and pollutant			
concentrations. The remainder of on-site flows that			
currently sheet flow onto Foothill Boulevard and			
comingle with the San Antonio Creek Channel			
approximately 0.4 mile east of the Project site would			
be captured on site via a retention/infiltration			
system designed to capture more storm water runoff			
than currently flows across the site during a design			
storm event. The drainage channel that proceeds			
beneath Foothill Boulevard via a box culvert shows			
no upstream connectivity to any water conveyance			
features or systems. The on-site runoff is not carried			
via this drainage feature, which would drain to catch			
basins along the north property line and convey			
flows underground through the site via pipelines			
before discharging into an existing box culvert			
beneath Foothill Boulevard without comingling with			
on-site storm water flows. Although conversion of			
pervious surfaces to impervious surfaces has the			
potential to increase the velocity and volume of on-			
site storm water runoff, this conversion would			
reduce the potential for on-site siltation and erosion			
during operation of the Project because less soil			
would be exposed to runoff.			

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
Impact 4.7.5.4 Flood Hazard, Tsunami, and Seiche	Less than	No mitigation measures required.	Less than
Zones: The Project site is 34 miles from the Pacific	Significant Impact		Significant
Ocean and is located at an elevation of 1,362 feet			
above mean sea level. No bodies of water or			
enclosed water storage features are located on,			
upslope of, or in the vicinity of the Project site. As			
such, the Project is not subject to known flood			
hazards, tsunamis, or seiches.			
The Project site is in an area of potential dam			
inundation for the San Antonio Dam. In December			
2008, the United States Army Corps of Engineers			
(USACE) issued San Antonio Dam a Dam Safety			
Action Class II rating, which is given to dams where			
failure could begin during normal operations or be			
initiated as the consequence of an event. However,			
the San Antonio Dam was designed to withstand the			
strongest possible earthquake that could occur in			
the area, and flooding that would occur from a dam			
breach would be reduced by the number and			
capacity of settling basins that are located south of			
the dam and upslope of the Project site. Claremont			
General Plan Policies 6-6.1 and 6-6.2 require the City			
to work with the USACE and Los Angeles County to			
ensure dam structures are upgraded as needed to			
best withstand earthquakes and prevent dam			
inundation and to encourage regular maintenance of			
flood-control facilities. The Federal Emergency			
Management Agency (FEMA) requires that all dam			
owners develop Emergency Action Plans (EAPs) for			
warning, evacuation, and post-flood actions, and			
development of potential flood inundation maps			
and facilitation of emergency response is the			



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
responsibility of the dam owner. Therefore, through implementation of Claremont General Plan Policy 6-6.1 it is reasonable to conclude the Project site is adequately protected from potential dam inundation to the degree that other surrounding developed properties are protected.			
Impact 4.7.5.5 Water Quality Control Plan and Sustainable Groundwater Management Plan: The proposed Project would comply with the requirements of the State Water Resources Control Board NPDES Construction General Permit pursuant to the Clean Water Act, California's Porter-Cologne Act, and the City's NPDES MS4 Permit through implementation of Standard Conditions and Regulations HYD-1 through HYD-3. Pursuant to the Groundwater Management Act, the Six Basins Judgment defines adjudication for the Upper Claremont Heights Basin and the Pomona Basin underlying the Project site. The Watermaster calculates the operating safe yield based on fluctuating hydrologic conditions to ensure safe operating yield and avoidance of groundwater overextraction.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.7.6 Cumulative Hydrology and Water Quality Impacts: Similar to the proposed Project, all future development in the cumulative study area and throughout the Santa Ana RWQCB would be required to comply with the applicable requirements of the NPDES permit program and water quality standards defined by local, regional, State, and federal agencies. The proposed Project would make an incremental contribution to production of urban	Not Cumulatively Considerable	No mitigation measures required.	Not Cumulatively Considerable

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

APRIL 2020

	Significance before		Significance after
Issues/Impacts	Mitigation	Mitigation Measure(s)	Mitigation
pollutants, but the site-specific water quality best management practices (BMPs) would help ensure that these contributions would not make a significant contribution to any cumulatively considerable regional water quality impacts. Implementation of the Project would result in continuation of the drainage pattern consistent with the Los Angeles County's Low Impact Development Standards Manual and would not result in a cumulatively considerable impact to water quality, drainage, or hydrology.			
4.8 Land Use and Planning			
Impact 4.8.5.1 Physically Divide an Established Community: Since the proposed Project is a mixed-use development in an area currently comprising commercial, office, and residential uses currently divided by the vacant, underutilized Project site, the proposed Project would facilitate residential and commercial connectivity in the area instead of physically divide an established community.	No Impact	No mitigation measures required.	No Impact
Impact 4.8.5.2 Conflict with Applicable Land Use Plans, Policies, or Regulations: The proposed Project will be consistent with the following applicable planning documents: City of Claremont General Plan; 2011 California Airport Land Use Planning Handbook (in lieu of a Los Angeles County Airport Land Use Compatibility Plan for Cable Airport in Claremont); Regional Comprehensive Plan; Regional Transportation Plan; and, the Sustainable Communities Strategy (SCS) Plan. The proposed Project will include a text amendment to the Claremont General Plan to permit residential units	Less than Significant Impact	No mitigation measures are warranted.	Less than Significant



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
within an area exposed to aircraft generated noise levels of up to 70 dBA CNEL.			
Impact 4.8.6 Cumulative Land Use and Planning Impacts: Since the proposed Project would not affect land uses of properties it would not cocupy, the proposed Project would not combine with other projects to result in a cumulatively considerable impact related to physical division of communities. Furthermore, the proposed Project represents a shift in land use designations for the site (i.e., commercial to mixed-use) and would introduce more housing in an area determined to be "jobsrich" and "housing-poor."	Not Cumulatively Considerable	No mitigation measures required.	Not Cumulatively Considerable
4.9 Noise and Vibration			
Impact 4.9.7.1 Noise Levels in Excess of Established Local Standards: Project construction activities would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the City of Claremont General Plans or noise ordinances. Project-related traffic noise increase would reach up to 0.2 dBA. Noise level increases less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Exterior noise levels at on-site sensitive receptors would not be exposed to noise levels that exceed City of Claremont standards. Interior noise levels of the onsite residential units would be exposed to noise levels that exceed City of Claremont standards; as such, the impact is potentially significant.	Potentially Significant Impact	 4.9.1A: Prior to the issuance of building permits, the Project applicant shall submit evidence to the City of Claremont for review and approval that air conditioning units would be installed in all proposed structures on site. 4.9.1B: Prior to the issuance of building permits and once final architectural plans are available showing exterior wall detail and window types, the Project applicant shall prepare and submit to the City of Claremont for review and approval a Final Acoustic Report confirming that the interior living spaces of all residential dwelling units would meet the Claremont's interior noise standard of 45 dBA CNEL with windows and doors closed. Additionally, the Final Acoustic Report shall include analysis that confirms that aircraft-related interior noise levels would be no greater than 40 dBA CNEL with windows and doors closed for interior living spaces of all residential units within the proposed Project. 	Less Than Significant

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
Impact 4.9.7.2 Groundborne Vibration/ Groundborne Noise Impacts: Vibration levels generated by construction activities have the potential to result in community annoyance because the vibration levels exceed the Federal Transit Administration's (FTA) community annoyance threshold of 84 vibration velocity decibels (VdB) for non-sensitive uses; however, vibration levels would not result in building damage because vibration levels would not exceed the FTA vibration damage threshold of 94 VdB (0.2 peak particle velocity (PPV) [in/sec]) for structures constructed of nonengineered timber. The proposed residences and commercial uses would not generate vibration during Project occupation/operation. Vibration sources from nearby roadways would not affect onsite residential uses.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.9.7.3 Public/Private Airport Noise: Residential units on the Project site would be exposed to excessive interior noise levels due to aircraft overflights from Cable Airport. As part of the proposed Project, a General Plan Text Amendment would be requested to update existing text in the general plan pertaining to the "maximum acceptable exposure from aircraft-related noise for new residential development is 60 dBA CNEL" to the following: "However, in order to promote the development of housing urgently needed during the current California housing crisis and to meet the City's current Regional Housing Needs Assessment RHNA, residential uses located in a mixed-use development where there is a mix of residential	Potentially Significant Impact	Implementation of Mitigation Measures 4.9.1A and 4.9.1B would reduce interior noise levels to 40 dBA CNEL.	Less than Significant



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
housing types including multi-family housing, are allowed maximum noise level exposures up to 70 dBA CNEL."			
With implementation of the proposed General Plan amendment impacts the exterior noise levels would be less than significant.			
Residential interior noise levels would be above the City's threshold of 45 dBA CNEL from Cable Airport aircraft overflights, which is a significant impact requiring mitigation.			
Impact 4.9.8 Cumulative Noise and Vibration Impact: In the event that adjacent properties (or projects within the cumulative study area) are developed at the same time as the proposed Project, adherence to the City of Claremont provisions (e.g., construction exemption) that regulate the timing construction activities would reduce impacts pertaining to construction noise. The proposed Project's construction noise would not be cumulatively considerable.	Not Cumulatively Considerable	No mitigation measures required.	Not Cumulatively Considerable
It is likely that operation activities on adjacent properties (or projects within the cumulative study area) would generate noises that would be additive in nature because (1) the noise sources would have to be adjacent or in close proximity to one another in order for the noises to intermingle, and (2) the sensitive receptor or receptors would also have to be adjacent to or in close proximity to the noise generators. Increasing traffic on local roadways would cumulatively increase traffic noise in the Project area, which would increase the potential for			

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
cumulatively significant noise levels at new and existing development. However, each project would be required to identify and mitigate noise such that exterior and interior noise levels do not exceed established City of Claremont (or jurisdictions where the cumulative projects are located) standards at any noise-sensitive use. Adherence to standard City of Claremont provisions that regulate noise and implementation of Project-specific mitigation for the proposed development as well as other identified cumulative projects would ensure operational noise generated by the proposed Project would not be cumulatively considerable.			
4.10 Transportation			
Impact 4.10.5.1 Conflicts with a program, plan, ordinance, or policy addressing the circulation system: The Project, during construction, would generate more trips than are currently being generated. However, the Project would adhere to City of Claremont requirements and the <i>California Manual on Uniform Traffic Control Devices</i> to reduce potential impacts to roadways during construction. Overall, the Project would be consistent with all programs, plans, ordinances, or policies addressing the local circulation system in Claremont.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.10.5.2 State CEQA Guidelines Section 15064.3, Subdivision(b) VMT: Claremont has not adopted methodologies or thresholds for Vehicle miles traveled (VMT) to analyze impacts within their jurisdictions. However, the State Office of Planning and Research Technical Advisory provides a threshold to analyze VMT and determine impacts to	Potentially Significant Impact	No feasible mitigation measures available to reduce impacts.	Significant and Unavoidable Impact



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
transportation. The VMT of the proposed Project would be 23 percent higher than the Region VMT and would also be 8 percent higher than the 15 percent thresholds as suggested by the Technical Advisory.			
Impact 4.10.5.3 Design Features or Incompatible Uses: With the installation of Project improvements, it is reasonable to conclude that geometric design features required for the Project site and the cities in general would be installed and appropriately maintained.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.10.5.4 Inadequate Emergency Access: The proposed Project is not anticipated to cause significant impacts to roadways or intersections that may be used by emergency vehicles. The implementation of recommendations outlined in the California Manual on Uniform Traffic Control Devices would minimize the length of time that any roadways would be blocked for construction vehicle and material delivery. At all times during construction and operation, no roadways would be closed or feature obstructions to through traffic and emergency vehicles.	Less than Significant Impact	No mitigation measures required.	Less than Significant
Impact 4.10.6 Cumulative Transportation Impacts: All study area intersections are anticipated to operate at an acceptable LOS under Cumulative with Project Traffic volumes. Given the distance between the proposed Project site and cumulative project sites, impacts associated with air traffic patterns, design hazards, emergency access, or conflicts with adopted policies, plans, or programs supporting alternative transportation would not comingle and	Cumulatively Considerable Impact	Feasible mitigation measures are not available to reduce the incremental cumulative increase in the Project contribution to Regional VMT.	Cumulatively Considerable

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
create impacts over and above those associated with the proposed Project. The proposed Project would not have a cumulatively considerable impact on traffic.			
The proposed Project would cumulatively contribute to an incremental increase in the Region's VMT. Mitigation is not available to reduce such a cumulative contribution.			
4.11 Tribal Cultural Resources			
Impact 4.11.5.1 Tribal Cultural Resources: Due to the longevity of use of tribal cultural landscapes in the Project area, the Tribe identified a "high potential" that Tribal Cultural Resources may be present in the Project area; therefore, a significant potential exists that Project-related development activities could affect or inadvertently unearth, disturb, and/or destroy such resources. The City of Claremont entered into an agreement on February 4, 2019 with the Gabrieleño Band of Mission Indians–Kizh Nation to "Accept Tribal Mitigation Measures" which are presented as the mitigation measures for this potentially significant impact.	Potentially Significant Impact	The following measures have been identified to mitigate potential impacts to known, unknown or potential Tribal cultural resources in the Project area. For purposes of these measures, the term "Tribe" shall refer to the Gabrieleño Band of Mission Indians—Kizh Nation. 4.11.1A: Retention of Tribal Monitor. Prior to the issuance of grading applicants, the Project applicant shall provide evidence a Native American monitor has been retained and appropriately compensated for construction monitoring services. The monitor shall be approved by the Gabrieleño Band of Mission Indians—Kizh Nation (Tribe) and shall be listed on the Native American Heritage Commission's (NAHC's) Tribal Contact list for the area of the Project location. The monitor shall 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 shall 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	Less than Significant



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
		consultation with the City, have indicated that the site has a low potential for impact to Tribal Cultural Resources.	
		4.11.1B: Unanticipated Discovery. Upon discovery of any archaeological resource, construction activities in the immediate vicinity of the find shall ceased until the find can be assessed. All archaeological resources unearthed by the Project construction activities shall be evaluated by a qualified archaeologist and the Tribe. If the resources are Native American in origin, the Tribe 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 archaeologist to be a "historical resource" or "unique archaeological 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.	
		For unique archaeological resources, preservation in place is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery extraction to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological 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.	
		4.11.1C: Archaeological 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	

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341 **APRIL 2020**

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
		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 archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.	
		4.11.1D: Prior to the issuance of grading permits, the applicant shall provide evidence that the Tribal Cultural Resource mitigation measure(s) identified in this EIR and the current contact information for the Tribe, Tribal monitor, qualified archaeologist, County Coroner(s) and Native American Heritage Commission are included in construction documentation and are readily available to the construction contractor(s) for the duration of on-site ground disturbance activities.	
Impact 4.11.5.2 Native American Human Remains: Although no evidence exists to suggest the Project site has been utilized in the past for human burials, on-site construction could uncover previously unknown buried human remains.	Potentially Significant Impact	4.11.2A: Human Remains Assessment and Treatment. Upon discovery of human remains, cremations, and/or associated grave goods, the Tribal monitor and/or archaeological monitor shall halt work within a minimum of 150 feet of the discovery. The discovery shall be kept confidential and secure to prevent further disturbance. The Tribe and the County Coroner shall be notified within 24 hours of any such discovery. Work within the 150 foot buffer area shall be diverted while the County Coroner determines the nature of the remains and the Most Likely Descendant (MLD) identified.	Less than Significant
		The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD shall identify and direct the most appropriate means of treating the human remains and any associated funerary object(s).	
		Prior to the continuation of ground-disturbing activities, the landowner 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	



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
		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 Tribe shall 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 would be removed. The Tribal monitor shall work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum, detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe/Tribal monitor for data recovery purposes.	
		Cremations shall 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 Tribe 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 Tribe Nation and the Native American Heritage Commission. The Tribe does not authorize any scientific study or the utilization of invasive diagnostics on human remains.	
		Kizh-Gabrieleno Procedures for Burials and Funerary Remains. If the Gabrieleno Band of Mission Indians - Kizh Nation is designated MLD, the	

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
		following treatment measures shall be implemented. To the Tribe, the	
		term "human remains" encompasses more than human bones. In ancient	
		as well as historic times, Tribal Traditions included, but were not limited	
		to, the burial of funerary objects with the deceased, and the ceremonial	
		burning of human remains. These remains are to be treated in the same	
		manner as bone fragments that remain intact. Associated funerary	
		objects are objects that, as part of the death rite or ceremony of a culture,	
		are reasonably believed to have been placed with individual human	
		remains either at the time of death or later; other items made exclusively	
		for burial purposes or to contain human remains can also be considered	
		as associated funerary objects.	
		Treatment Measures. Prior to the continuation of ground disturbing	
		activities, the land owner shall arrange a designated site location within	
		the footprint of the project for the respectful reburial of the human	
		remains and/or ceremonial objects. In the case 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 placed over the excavation opening to	
		protect the remains. If this type of steel plate is not available, a 24-hour	
		guard should be posted outside of working hours. The Tribe shall 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 shall be removed. The Tribe "shall work closely	
		with the qualified archaeologist to ensure that the excavation is treated	
		carefully, ethically and respectfully. If data recovery is approved by the	
		Tribe, documentation shall be taken which includes at a minimum	
		detailed descriptive notes and sketches. Additional types of	
		documentation shall be approved by the Tribe for data recovery	
		purposes. Cremations "shall either be removed in bulk or by means as	
		necessary to ensure completely recovery of all material. If the discovery	
		of human remains includes four or more burials, the location is	
		considered a cemetery and a separate treatment plan shall be created.	



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
		Once complete, a final report of all activities is to be submitted to the Tribe and the NARC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains.	
		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 if possible. These items should 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 Tribe and landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.	
Impact 4.11.6 Cumulative Tribal Resources Impacts: Past, present, and reasonably foreseeable future projects in Native American traditional use area(s) would similarly include ground-disturbing activities with the potential to destroy, damage, or displace surface or previously undiscovered Native American cultural resources, including burials and associated funerary objects; therefore, the Project, in combination with other cumulative activities in the Project area, has the potential to result in a cumulatively considerable impact.	Cumulatively Considerable Impact	Implementation of Mitigation Measures 4.11.1A through 4.11.1D and Mitigation Measure 4.11.2A.	Not Cumulatively Considerable
4.12 Wildfire			
Impact 4.12.5.1 Impair an Emergency Response or Emergency Evacuation Plan: Based on the features to be implemented as part of the Project, operation of the proposed Project would not physically interfere with or impair an adopted emergency response or emergency evacuation plan. Although these design features would be implemented to reduce the spread of wildfire (or fires) a Fire	Potentially Significant Impact	4.12.1A: Fire Protection Plan. The Project applicant/developer shall adhere to Chapter 7A of the California Building Code (CBC) and/or Section R337 of the California Residential Code (CRC). All structures in the Project shall adhere to the standards from Chapter 7A of the CBC and/or Section R337 of the CRC pertaining to roofing and venting to help prevent the intrusion of embers into structures. Fire Master Plan. Since the proposed Project is located in an LRA VHFHSZ, the Project applicant/developer shall develop a Fire Master Plan that	Less than Significant

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341 APRIL 2020

Table 1.D: The Commons Environmental Impacts and Mitigation Measures

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
Protection Plan, Fire Master Plan, Fuel Modification Plan for the Project would need to be prepared and approved by the Fire Code Official.		identifies the proper installation and maintenance of fire access roadways, the locations of fire hydrants, a sufficient water supply for adequate fire flow requirements, and emergency access to residences and structures within the Project site as required by the most current California Fire Code and City of Claremont Municipal Code.	
		Fuel Modification Plan. A Fuel Modification Plan shall be prepared for the proposed Project by the Project applicant/developer and reviewed and approved by the Fire Code Official at the time of final plan submittal as the Project site is located within a LRA VFHFSZ. As part of the Fuel Modification Plan, all new buildings to be developed or installed in hazardous fire areas shall comply with the following:	
		 A preliminary Fuel Modification Plan shall be submitted to and approved by the Fire Code Official prior to or concurrently with the approval of the tentative map. 	
		 A Final Fuel Modification Plan shall be submitted to and approved by the Fire Code Official prior to the issuance of the grading permit. 	
		The Fuel Modification Plan shall be reviewed by the Forestry Division of the Fire Department (Los Angeles County) for defensible space, fire safety and compliance with Section 325.2.1, 325.2.2, 325.10 and 503.2.1 of the Los Angeles County Code of Ordinances, the Los Angeles County Fire Department's fuel modification guidelines, and California Code of Regulations, Title 14, Division 1.5, Chapter 7, subchapter 2.	
		The Fuel Modification Plan may be altered if conditions change. Any alterations to the fuel modification areas shall have prior approval from the Fire Code Official.	
		All elements of the Fuel Modification Plan shall be maintained in accordance with the approval plan and are subject to the enforcement process outlined in the California Fire Code.	



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
Impact 4.12.5.2 Risks from Pollutant Concentrations or Uncontrolled Spread from Wildfires: The Project site is located in a Local Responsibility Area (LRA) Very High Fire Hazard Severity Zones (VHFHSZ) as designated by California Department of Forestry and Fire Protection Fire Resources Assessment Program (CAL FIRE FRAP). The area to the northeast of the site designated as LRA VHFHSZ continues north into the foothills of the San Gabriel Mountains. Despite the LRA VHFHSZ designation of the Project site, the uncontrolled spread of a wildfire in the vicinity of the Project site is unlikely due to the existing non-combustible development and roadways and due to the fire break State Route 210 provides north of the site. Impacts of downwind pollutant concentrations from a wildfire to occupants as a result of the Project would be negligible.	Potentially Significant	Implementation of Mitigation Measure 4.12.1A.	Less than Significant
Impact 4.12.5.3 Fire Risk Exacerbation Due to Project Related Infrastructure Maintenance or Installation: The proposed Project would not require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or result in temporary or ongoing impacts to the environment.	Less than Significant Impact	No mitigation measures are required.	Less than Significant
Impact 4.12.5.4 Secondary Risks Due to Post-Fire Hazards: In the event that a wildfire should spread to the Project site, it would not expose any on-site slopes to erosion and potential failure because the Project site does not contain any steep slopes that are prone to landslides or mudslides. The proposed	No Impact	No mitigation measures are required.	No Impact

DRAFT ENVIRONMENTAL IMPACT REPORT SCH No. 2019110341

APRIL 2020

Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
Project would not expose people or structures to significant risks, including downslope landslides of mudslides, as a result of runoff, post-fire slope instability, or drainage changes.			
Impact 4.12.5.5 Risk to People and Structures Involving Wildland Fires: The Project site is located in a Local Responsibility Area (LRA) Very High Fire Hazard Severity Zones (VHFHSZ) as designated by California Department of Forestry and Fire Protection Fire Resources Assessment Program (CAL FIRE FRAP). Required mitigation would ensure the proposed Project is developed in a manner that reduces the potential for the commencement of wildfires on the property and therefore would not expose nearby people or structures either directly or indirectly to a significant loss of injury or death.	Potentially Significant Impact	Implementation of Mitigation Measure 4.12.1A.	Less than Significant
Impact 4.12.6 Cumulative Wildfire Impacts: Potential impacts of the proposed Project with regard to a wildfire, when combined with the impacts of past, present, and reasonably foreseeable projects in the cumulative project study area, could contribute to a cumulatively significant impact due to the increased risk of wildfire and impacts to resources and human life as a result of wildfire. However, each development application received by the City of Claremont and jurisdictions where the cumulative projects are located is required to undergo environmental review pursuant to CEQA and identify the appropriate mitigation measures. As the proposed Project is subject to environmental review and includes mitigation for wildfire risks, it	Not Cumulatively Considerable	No mitigation measures are required.	Not Cumulatively Considerable



Issues/Impacts	Significance before Mitigation	Mitigation Measure(s)	Significance after Mitigation
would not generate a cumulatively considerable impact from wildfire.	, and the second	,	