

**STATEMENT OF OVERRIDING CONSIDERATIONS  
SAN DIMAS DOWNTOWN SPECIFIC PLAN PROJECT  
ENVIRONMENTAL IMPACT REPORT  
(STATE CLEARINGHOUSE NUMBER 2022110018)**

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**Lead Agency:**

**City of San Dimas Planning Division**

The California Environmental Quality Act ("CEQA") requires a public agency to balance the benefits of a proposed project against the proposed project's significant and unavoidable adverse impacts in determining whether to approve the project. The San Dimas Downtown Specific Plan Project will result in environmental effects, which, although mitigated to the extent feasible by the implementation of mitigation measures required for the Project, will remain significant and unavoidable, as discussed in the Final Environmental Impact Report (EIR) and CEQA Findings of Fact. These impacts are summarized below and constitute the impact for which this Statement of Overriding Considerations is made.

**Significant and Unavoidable Impacts:**

1. Despite the implementation of all feasible and reasonable mitigation, the Project would have a significant and unavoidable impact on operational emissions of future development would exceed SCAQMD regional thresholds. As shown in Table 4.1- 7 of the Draft EIR, operational emissions from projected development in the DTSP Area would exceed the SCAQMD daily regional thresholds and area considered significant for this reason. It should be noted that these significance thresholds were developed by SCAQMD for evaluation of individual development projects and, for this reason, the emissions estimated for plans like the DTSP will usually exceed these thresholds. When taking into account the removal of the existing uses, the net operational emissions would be reduced, however impacts would remain significant. Further, As shown in Table 4.1-8 of the Draft EIR, the daily maximum localized construction emissions would not exceed the SCAQMD daily significance thresholds for NOx, CO, or PM2.5, however, emissions would likely result in an exceedance of daily PM10 emissions. During operation, emissions would not exceed the significance threshold for NOx or CO, however emissions would result in an exceedance of daily PM10 and PM2.5 emissions. Therefore, the daily localized impact of PM10 and PM2.5 emissions would be considered a potentially significant impact

Mitigation measures **MM AQ-1** through **MM AQ-4** would mitigate the emissions generated by subsequent individual development projects within the DTSP area. **MM AQ-1** would require individual developments within the DTSP area to conduct project specific air quality analysis and implement

additional mitigation as needed. **MM AQ-2** and **MM AQ-3** would directly reduce construction emissions including CO, NO<sub>2</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> by implementing working training that reviews the SCAQMD Dust Control Plan and requiring the use Tier 4 construction equipment. **MM AQ-4** would reduce operational area and energy emissions by using more efficient technology.

Through implementation of mitigation measures, emissions generated within the DTSP through future development would be reduced. However, there are no feasible mitigation measures available to emissions likely to be generated by subsequent individual development projects in the proposed DTSP area to less than significant that would be consistent with the objectives of the DTSP. The Project would be consistent with applicable policies of the Air Quality Element which calls for compliance with SCAQMD's AQMP, minimizing emissions within the City, and reducing VMT's. Reducing growth in the DTSP areas would not necessarily reduce population growth because people could still move to the region or Basin but would reside outside of the DTSP Area. Additionally, as the AQMP is updated to reflect new growth assumptions, the anticipated growth from the DTSP would be accounted for in the next AQMP. Therefore, even with the incorporation of mitigation, impacts would remain significant and unavoidable.

2. Despite the implementation of all feasible and reasonable mitigation, the Project would have a significant and unavoidable impact on cumulatively considerable net increase of any criteria pollutant thresholds. The cumulative significance methodologies contained in the CEQA Air Quality Handbook, SCAQMD staff has suggested that the emissions-based thresholds be used to determine if a project's contribution to regional cumulative emissions is cumulatively considerable. Individual projects that exceed SCAQMD-recommended daily thresholds for project-specific impacts would be considered to cause a cumulatively considerable increase in emissions for those pollutants for which the SCAB is in nonattainment. By applying SCAQMD's cumulative air quality impact methodology, implementation of the Project would not result in exceedance of regional thresholds during construction (refer to Table 4.1-6 of the Draft EIR). However, the Project would exceed operational thresholds (refer to Table 4.1-7 of the Draft EIR). The proposed Project's emissions would contribute to existing violations of the criteria pollutants in exceedance (PM<sub>10</sub>) and are considered potentially significant for this reason. As such, the proposed Project's cumulative construction and operation related impacts would be potentially significant.

Through implementation of mitigation measures **MM AQ-1** through **MM AQ-4**, emissions generated within the DTSP through future development would be reduced. However, there are no feasible mitigation measures available to emissions likely to be generated by subsequent individual development projects in the proposed DTSP area to less than significant that would be consistent with the objectives of the DTSP. The Project would be consistent with applicable policies of the Air Quality

Element which calls for compliance with SCAQMD's AQMP, minimizing emissions within the City, and reducing VMT's. Reducing growth in the DTSP areas would not necessarily reduce population growth because people could still move to the region or Basin but would reside outside of the DTSP Area. Additionally, as the AQMP is updated to reflect new growth assumptions, the anticipated growth from the DTSP would be accounted for in the next AQMP. Therefore, even with the incorporation of mitigation, impacts would remain significant and unavoidable.

**Finding:** The City of San Dimas finds and determines in approving the San Dimas Downtown Specific Plan Project that the Final EIR has considered the identified means of lessening or avoiding the Project's significant effects and that to the extent any significant environmental effect remains unavoidable or not mitigated to below a level of significance after mitigation, such impact is acceptable in light of the social, legal, economic, environmental, technological and other Project benefits discussed below, and such benefits override, outweigh, and make "acceptable" any such remaining environmental impacts of the project (CEQA Guidelines Section 15092(b)).

The following benefits and considerations, taken together or individually, outweigh such significant and unavoidable adverse environmental impacts. All of these benefits and considerations are based on the facts set forth in the Findings, the Final EIR, and the record of proceedings for the Project. The City of San Dimas determines that the evidence in the record constitutes substantial evidence to support the determinations made in this Statement of Overriding Considerations, that the facts stated in this document and in the Findings are supported by substantial evidence in the record, including testimony received at the public hearing, the staff presentations, staff reports and all materials in the project files. The City of San Dimas also determines that to the extent other evidence was presented that is contrary to the determinations made herein or in the Findings, such evidence was nevertheless considered, weighed and determined to be either lacking in credibility or insufficient in weight to detract from the determinations made herein or in the Findings such that the City of San Dimas reached these determinations after due consideration of all evidence presented to it. Each of these benefits and considerations is a separate and independent basis that justifies approval of the Project, so that if a court were to set aside the determination that any particular benefit or consideration will occur and justifies project approval, the City of San Dimas determines that it would stand by its determination that the remaining benefit(s) or consideration(s) is or are sufficient to warrant project approval.

**Facts in Support of Statement of Overriding Considerations:** Each benefit set forth below constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, and the City of San Dimas determines that the adverse environmental impacts of the Project are "acceptable" if any one of these benefits will be realized. The Project will provide benefits to the City of San Dimas and the region as follows:

1. **Provides Economic Benefits and Jobs to the City of San Dimas:** The Project would encourage redevelopment and economic investment of residential and commercial development. Implementation of the Project is expected to annually generate revenue to the City General Fund from property taxes, transfer taxes, sales and use taxes, utility user taxes, business license taxes, and other governmental revenues that more than offset the annual cost of re-occurring public services to the Project, representing an annual net benefit to the General Fund. General Fund revenues are used for a wide variety of City services and activities and are subject to the appropriation discretion of the City Council, and a portion of property taxes are also paid directly to local school districts, thereby increasing funding for local schools.
2. **Provide Housing in Close Proximity to Transit:** The Project would allow development of new multi-family housing consisting of apartments, townhomes and condominiums in the City's downtown, which would increase the range of housing types available in the vicinity. As the Project is designed to complement the development of the new San Dimas Metro "A" Line station, all such new housing would be well-supported by transit infrastructure, and the DTSP's pedestrian-oriented design considerations would result in a walkable area that promotes active transportation among residents and visitors. The Project has been designed to further the vision of San Dimas contained in the San Dimas General Plan. The Project would support mixed-use, transit-oriented development that is consistent with the existing General Plan and includes a high-quality, pedestrian-oriented public realm framed by context-sensitive buildings that emulate the historic character of San Dimas' Historic Core. Furthermore, by focusing a portion of the forecasted growth of San Dimas into the Project area, the City's open space and habitat resources that are at distant locations would experience less development pressure.
3. **Sustainability and Efficiency:** The Project represents a model of sustainable development practices; seeks to support existing residential neighborhoods through providing a vibrant link between the existing downtown area and the surrounding neighborhoods; and accommodates a range of uses. Development plans initiated pursuant to the Specific Plan following its adoption would need to meet sustainability criteria including the most recent Passive Design Handbook by the California Sustainability Alliance, sustainable landscape and stormwater runoff design recommendations in the Urban Street Stormwater Guide published by the National Association of City Transportation Officials (NACTO); solar panels; and bicycle facilities. The DTSP will encourage compact development near the new Metro "A" Line transit station to decrease automobile dependency, reduce both local and regional traffic congestion and related greenhouse gas emissions, and provide additional guidance and plans to increase multimodal access to and from the historic Downtown area.

4. **Transportation and Community Safety:** The proposed Project improves mobility access and safety, increases travel choices, and encourages development of diverse housing types in areas that are supported by multiple transportation options. The Project would make improvements to transit, bicycle and pedestrian facilities to improve safety and provide a high-quality, pedestrian-oriented public realm. The proposed DTSP identifies transit improvements including improved lighting and seating at bus shelters to the Foothill Transit Bus Stops located along Bonita Avenue. Bicycle facility improvements include adding bicycle friendly intersections and bike parking. Bicycle friendly intersections would include bike boxes, two-stage left turn lanes, and green transition lanes. Bicycle parking would be located near the intersection of Bonita Avenue and Walnut Avenue, and at the "A" Line San Dimas Station parking facility. Future developments will also be required to provide bicycle parking pursuant to the Downtown Specific Plan and the San Dimas Municipal Code. Pedestrian Facility improvements include curb extensions, high visibility crosswalks, and improved wayfinding. New housing would be well-supported by transit infrastructure, and the DTSP's pedestrian-oriented design considerations would result in a walkable area that promotes active transportation among residents and visitors.

**Conclusion:** CEQA requires a public agency to balance the benefits of a proposed project against its significant and unavoidable adverse impacts in determining whether to approve the project. As discussed more fully above, the Project would result in a significant and unavoidable impact to operational emissions of future development which would exceed SCAQMD regional thresholds and a cumulatively considerable net increase of any criteria pollutant thresholds, which, although mitigated to the extent feasible by the implementation of mitigation measures required for the Project, will remain an unavoidable significant adverse impact. This City of San Dimas finds that such impacts are at an acceptable level in light of each of the Project benefits described above and make "acceptable" any such remaining significant environmental impacts of the Project.