

BRETHREN HILLCREST GATEWAY PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
RESPONSES TO PUBLIC COMMENTS

December 5, 2025

The primary objective and purpose of the Initial Study/Mitigated Negative Declaration (IS/MND) public review process is to obtain comments on the adequacy of the analysis of environmental impacts, the mitigation measures presented, and other analyses contained in the Initial Study prepared by the City of La Verne (City). The California Environmental Quality Act (CEQA) requires that the City decision makers consider the comments received during the public review of the IS/MND prior to carrying out or approving the project (*CEQA Guidelines* Section 15074[b]). Comments that do not directly relate to the analysis in the Initial Study (i.e., are outside the scope of this document) are not given specific responses; however, all comments are included in this section so that the decision makers may know the opinions of the commenter(s).

The Brethren Hillcrest Gateway Project IS/MND was circulated to the public and public agencies for a 20-day public review from November 3 to November 24, 2025. One (1) comment letter was received from a public agency as listed below:

- Sanitation Districts of Los Angeles County (Comment Letter A dated November 12, 2025)

The City has responded to the comment received on the project. The comment letter along with the City's responses are attached. Neither the comments nor the following responses to comments constitute "significant new information" (*CEQA Guidelines* Section 15073.5) that would require recirculation of the IS/MND or the preparation of an Environmental Impact Report (EIR).

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Comment Letter	Comment Number	Comment	Response
A	A-1	<p>Section XIX Utilities and Service Systems, answer to question D stated that there are a variety of landfills available, including Mesquite Landfill and Puente Hills Landfill. Please note that the Mesquite Regional Landfill is currently not in operation for waste disposal, and the Puente Hills Landfill closed permanently on October 31, 2013.</p>	<p>The City of La Verne (City) acknowledges that the Mesquite Regional Landfill is currently not in operation for waste disposal, and the Puente Hills Landfill closed permanently on October 31, 2013. Text in the Final Initial Study/Mitigated Negative Declaration (IS/MND) will be updated to remove reference to the Mesquite Regional Landfill and Puente Hills Landfill.</p> <p>This comment does not identify any new significant environmental issues or impacts that are germane to the California Environmental Quality Act (CEQA) or that were not already addressed in the Draft IS/MND. Neither this comment nor the response constitutes new information requiring recirculation of the Draft IS/MND.</p>
	A-2	<p>The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' 12-inch diameter La Verne Trunk Sewer, Section 2, located in Wheeler Avenue at Arrow Highway. This trunk sewer has a capacity of 1.3 million gallons per day (mgd) and conveyed a peak flow of 0.3 mgd when last measured in 2024.</p>	<p>The City acknowledges that wastewater originating from the project site would discharge to a local sewer line, which is not maintained by the Sanitation Districts of Los Angeles County (Districts), for conveyance to the Districts' 12-inch diameter La Verne Trunk Sewer, Section 2, located in Wheeler Avenue at Arrow Highway, which has a capacity of 1.3 million gallons per day (mgd) and conveyed a peak flow of 0.3 mgd when last measured in 2024. Text in the Final Initial Study/Mitigated Negative Declaration (IS/MND) will be updated to include this language.</p> <p>The project is anticipated to generate 0.0026 mgd, which would be adequately served by the Districts' La Verne Trunk Section 2 Trunk Sewer.</p>

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			<p>This comment does not identify any new significant environmental issues or impacts that were not already addressed in the Draft IS/MND. Neither this comment nor the response constitutes new information requiring recirculation of the Draft IS/MND.</p>
	A-3	<p>The expected average wastewater flow from the project, described in the NOI as demolition of four single-family homes (SFH) and construction of seven SFH, is 780 gallons per day. A copy of the District’s average wastewater generation factors is available on our website at Table 1, Loadings for Each Class of Land Use.</p>	<p>The City acknowledges Sanitation Districts of Los Angeles County (Districts) has provided a copy of the District’s average wastewater generation factors.</p> <p>The calculation of average wastewater flow in the IS/MND is based on the District’s average wastewater generation factors. As detailed on page 160 of the IS/MND, development of the project would result in a total of 10 single family residential units, which would generate approximately 2,600 total gallons of wastewater per day (gpd) or 0.0026 million gallons per day (mgd). There are 7 units currently on the project sites, which generate an average of 1,820 gallons of wastewater per day (baseline conditions). Therefore, an additional 3 residential units would result in an increase of 780 gpd or 0.00078 mgd of wastewater compared to baseline conditions.</p> <p>This comment does not identify any new significant environmental issues or impacts that were not already addressed in the Draft IS/MND. Neither this comment nor the response constitutes new information requiring recirculation of the Draft IS/MND.</p>
	A-4	<p>The wastewater generated by the proposed project will be treated at the Pomona Water Reclamation Plant,</p>	<p>The City acknowledges the Districts has provided accurate information regarding wastewater flow originating from the project site, which is conveyed</p>

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		<p>which has a capacity of 15 mgd and currently processes an average recycled flow of 4.3 mgd.</p>	<p>ultimately to the Pomona Water Reclamation Plant with a capacity of 15 million gallons per day (mgd) and average processing volume of 4.3 mgd. Accordingly, the text in the Final Initial Study/Mitigated Negative Declaration (IS/MND) is updated to incorporate the information provided by the Districts.</p> <p>This comment indicates the Pomona Water Reclamation Plant maintains a surplus wastewater treatment capacity of 10.7 mgd, which is adequate capacity to serve the project, and therefore does not identify any new significant environmental issues or impacts that were not already addressed in the Draft IS/MND. Neither this comment nor the response constitutes new information requiring recirculation of the Draft IS/MND.</p>
	<p>A-5</p>	<p>The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the</p>	<p>The City acknowledges the Districts charges a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities.</p> <p>Charges and payments of development impact fees are administrative and fiscal actions, which would not result in a tangible change in the physical environment. Therefore, no change in the text of the Final IS/MND is required.</p> <p>Since the IS/MND concluded the Districts' facilities and Pomona Water Reclamation Plant maintain adequate capacity to serve the project, this comment does not identify any new significant environmental issues or impacts that are germane to CEQA or that</p>

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		parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, please contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.	were not already addressed in the Draft IS/MND. Neither this comment nor the response constitutes new information requiring recirculation of the Draft IS/MND.
	A-6	In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service but is to advise the City that the Districts intend to provide this service up to the levels that are legally permitted and to inform the City of the currently existing capacity and any proposed expansion of the Districts' facilities.	<p>The City acknowledges Districts indicates their wastewater treatment capacity is based on growth projections of the Southern California Association of Governments (SCAG). The available capacity of the Districts' treatment facilities will be limited to levels associated with the approved growth identified by SCAG. The Districts' comment letter does not constitute a guarantee of wastewater service but is to advise the developer that the District's intend to provide wastewater service up to levels that are legally permitted and to inform the developer of the current capacity and any proposed expansion of the Districts' facilities.</p> <p>The IS/MND concluded the project is generally consistent with growth projections of the City's General Plan and goals and policies of SCAG's 2024 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), also known as Connect SoCal 2024 (refer to responses to Checklist Questions III(a), VIII(b), and XI(b) of the IS/MND). Additionally, the Districts' facilities and Pomona Water Reclamation Plant maintain adequate capacity to serve the project. Accordingly, the project is designed to integrate within the City's and region's existing and proposed infrastructure framework, and cumulative overburdening of</p>

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			<p>community infrastructure and service capacity is not expected to occur.</p> <p>This comment does not identify any new significant environmental issues or impacts that were not already addressed in the Draft IS/MND. Neither this comment nor the response constitutes new information requiring recirculation of the Draft IS/MND. No change in the text of the Final IS/MND is required.</p>