CITY OF COVINA

CYPRESS VILLAS PROJECT

DRAFT ENVIRONMENTAL IMPACT REPORT

SCH No. 2019120104

Prepared for:

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EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

PROPOSED PROJECT

This environmental impact report (EIR) evaluates the proposed Cypress Villas Project, which includes redevelopment of a former (now vacant) grocery store site with 61 single family detached homes and four commercial buildings totaling 13,000 square feet. The L-shaped project site is approximately 7.92 acres in size, with extensive frontage along the eastern side of Azusa Avenue (State Highway 39) and additional land that extends to Cypress Street. The proposed project would include two distinct land uses:

Cypress Villas – the residential portion of the project would be located in the eastern 4.99 acres of the project site and would consist of 61 detached single-family homes of two or three stories. All of the homes would be for-sale, at market rates.

Covina Commons – the western portion of the project site of approximately 2.93 acres would be developed with four buildings facing Azusa Avenue, to be occupied by fast food and retail businesses. Two of the buildings are designed for drive-thru operations.

The development of the site will include removal of the existing structure, pavement, landscaping and utility facilities. The project includes dedication of 0.078 acres along the Cypress Street frontage as public street right of way. Additionally, the project would construct underground infrastructure improvements for water, sewer, storm drainage, energy, and communication.

The commercial and residential components of the project would be developed in two distinct programs. These programs may proceed concurrently or in different time sequences. The commercial portion would be constructed over an estimated timeframe of 17 months, in four distinct phases: demolition/grading, paving, construction and landscaping, and painting. The residential portion would be constructed over an estimated 29 months, in five distinct phases: demolition, grading, paving, construction and landscaping, and painting.

REQUIRED APPROVALS

City of Covina

- General Plan Amendment (GPA) 19-001: To redesignate the eastern 4.99 acres from General Commercial to Medium-Density Residential, to allow for development of single-family homes at a density of 12.25 units per acre.
- Zone Change (ZCH) 19-001: To rezone the eastern 4.99 acres from C-4 Highway Commercial to RD Multi-Family Zone.
- Specific Plan (SP) 19-001: To approve a Specific Plan to establish custom development standards corresponding to the proposed residential development plan.
- Tentative Tract Map (TTM) 82315: To reconfigure the existing parcels to create private and common area lots for the residential component, and three individual lots for the commercial component.
- Site Plan Review (SPR) 19-002: To approve the layout of the overall development plan.

- Conditional Use Permit (CUP) 19-002: To allow for development of drive-through facilities in the commercial side of the project.

Los Angeles Regional Water Quality Control Board, Region 4

- National Pollutant Discharge Elimination System Construction General Permit

SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table ES-1, below, summarizes the findings of this EIR with respect to the project's environmental impacts, and identifies measures to mitigate potentially significant impacts. Through the EIR scoping process, which is documented in Appendix A of this Draft EIR, several types of impacts were found to have effects that were not significant. These are identified in Section 6.3 of this Draft EIR.

Table ES-1

SUMMARY OF IMPACTS AND MITIGATION MEASURES

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
AESTHETICS		
Impact 3.1a: The project would result in a substantial change in the visual character and quality of the site and surroundings, compared to existing conditions, and compared to the existing C-4 zone development standards. The proposed project would represent an increase in building intensity across the project site, and structural forms would occur closer to adjacent homes than in the existing condition. The proposed commercial part of the project is consistent with all C-4 zone development standards and would maintain the desired low-scale character of this major commercial corridor (Azusa Avenue). The proposed two- and three-story single- family homes in the residential side of the project would be closer to adjacent homes than the former grocery store structure within the project site and closer than would be permitted under the existing C-4 zone standards. Proposed two-story homes along the eastern edge would be taller than the adjacent single-story homes; however, these would be sufficiently separated from the adjacent homes by rear yards and a wall along the common boundary. Proposed three-story homes along the northern edge would be taller than the adjacent two-story townhomes; however, there would be a sufficient spatial separation to avoid a significant visual impact. The proposed landscaping features within both the commercial and residential parts of the project would provide beneficial softening of structural forms, and represent positive visual features as viewed from adjacent streets and private properties, and that may be considered an improvement over existing conditions. Project impacts would be less than significant.	None Required	Not Applicable
Impact 3.1b: With the outdoor lighting mitigation measures to be applied to the proposed residential development, there would not	**MM 3.1-1**: No outdoor lighting fixtures shall be permitted on any home above the first-floor roof line.	Less than Significant

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
be significant light intrusion or glare impacts at neighboring homes. Project impacts would be less than significant.		
AIR QUALITY		
Impact 3.2a: The project would not conflict with or obstruct implementation of the 2016 AQMP and impacts would be less than significant.	None Required	Not Applicable
Impact 3.2b: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. Therefore, impacts would be less than significant.	None Required	Not Applicable
Impact 3.2c: The project would not expose sensitive receptors to substantial pollutant concentrations.	None Required	Not Applicable
Impact 3.2d: The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people and a less than significant impact would occur.	None Required	Not Applicable
GREENHOUSE GAS EMISSIONS		
Impact 3.3a: The project would not generate greenhouse gas emissions, either directly or indirectly, that would have a significant impact on the environment and impacts would be less than significant	None Required	Not Applicable
Impact 3.3b: The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases and impacts would be less than significant.	None Required	Not Applicable
NOISE		
Impact 3.4a: The project would generate temporary construction noise levels that could result in adverse impacts to the nearest sensitive receptors. The project's operational activities would not generate significant increases in local noise levels and mitigation would not be required for operational activities.	MM 3.4-1: To reduce impacts due to construction, the project applicant must demonstrate, to the satisfaction of the City of Covina Community Development Director, that the project complies with the following:	Less than Significant

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
	• Prior to approval of grading plans and/or issuance of building permits, plans shall include a note indicating that noise-generating project construction activities shall only occur between the hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday, with no activity allowed on Sundays or public holidays. The project construction supervisor shall ensure compliance with the note and the City of Covina shall conduct periodic inspection at its discretion. • During all project construction, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receptors nearest the site. • The construction contractor shall locate equipment staging in areas that would create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the site (i.e., to the center) during all project construction. • Prior to the approval of the grading permit, construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective action shall be implemented and a report of the action provided to the reporting party.	

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
	• The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday, with no activity allowed on Sundays or public holidays). Further, the contractor shall submit proposed haul routes that avoid residential streets, for approval by the Director of Public Works, prior to any truck haul activities.	
Impact 3.4b: Project implementation would not result in significant vibration impacts to nearby sensitive receptors or any building damage.	None Required	Not Applicable
POPULATION AND HOUSING		
Impact 3.5a: The project would directly induce population growth by providing new housing that would expand the City's population and by building new commercial space that would increase local jobs. This would not result in significant growth-inducing impacts involving employment; however, the new homes represent unplanned residential growth. The residential population would worsen the City's existing parkland deficit. This impact cannot be mitigated at this time.	None feasible	Significant
PUBLIC SERVICES		
Impact 3.6.1a: The project would result in the addition of approximately 43 school-aged children who would attend elementary, junior and high schools that serve the project area. The schools would each have sufficient capacity, and payment of mandatory development impact fees to each affected school district would sufficiently offset the project's impacts involving added student enrollment to a level of less than significant.	None Required	Not Applicable
Impact 3.6.2a: The project would add approximately 183 new residents to the City's population who would utilize local public parks and recreation facilities. This would worsen the existing citywide deficit in public parkland. Payment of mandatory in-lieu	None feasible	Significant

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
fees to support acquisition of additional parkland, as specified in the Covina Municipal Code, would not offset the project's impact, which would be significant and unavoidable..		
TRANSPORTATION		
Impact 3.7a: The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	None Required	Not Applicable
Impact 3.7b: The project would not result in a significant impact involving vehicle miles traveled and would not, therefore, result in a conflict with Section 15064.3 of the CEQA Guidelines.	None Required	Not Appliccable
Impact 3.7c: The project would not increase hazards due to geometric design features or uses that are incompatible with the surrounding circulation network.	None Required	Not Applicable
TRIBAL CULTURAL RESOURCES		
Impact 3.8.1a and b: There is some potential to encounter unknown tribal cultural resources during excavation into native soil materials. With Mitigation Measure 3.8-1, potentially significant impacts would be avoided.	**MM 3.8-1: Tribal Cultural Resources Mitigation Plan** **a. Retain a Native American Monitor/Consultant**: The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may 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 Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including	Less Than Significant

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
	construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources. **b. Unanticipated Discovery of Tribal Cultural and Archaeological Resources:** Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5(f)). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. 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	

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
	include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes. **c. Unanticipated Discovery of Human Remains and Associated Funerary Objects:** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed. **d. Resource Assessment & Continuation of Work Protocol**: Upon discovery, the tribal and/or archaeological monitor/consultant will immediately divert work at minimum 150 feet and place an exclusion	

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
	zone around the burial. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD). **e. Kizh-Gabrieleño Procedures for burials and funerary remains**: If the Gabrieleño 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 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. **f. Treatment Measures**: 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 will be covered with muslin cloth and a steel	

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
	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 will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe 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 for data recovery purposes. Cremations will 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 NAHC. 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 will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will 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 the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.	

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
	g. Professional Standards: Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 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.	
UTILITIES AND SERVICE SYSTEMS		
Impact 3.9.1a: The project would require installation of new off-site public water mains on Azusa Avenue and Cypress Street, which would connect to an existing water main in Cypress Street, as well as on-site water meters, service lines, and backflows for residential, commercial, and irrigation areas. Construction impacts would be short -term, common, and less than significant. Upgrades to the existing water main in Cypress Street would not be required.	None Required	Not Applicable
Impact 3.9.1b: The project would include 61 new residential units with private and common landscape areas on the project site and 13,000 square feet of commercial development. This would result in less water demand than if the site were entirely developed with commercial uses, as is currently planned for in the UWMP. As the demand would be less, the project would not conflict with the UWMP. As such, impacts on water supply would be less than significant.	None Required	Not Applicable
Impact 3.9.2a: Wastewater flows from the project site would be conveyed to the Los Angeles County Sanitation District's Cypress Street Sewer, then conveyed to the San Jose Creek Water Reclamation Plant (WRP) for treatment. The Cypress Street trunk	None Required	Not Applicable

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
sewer and San Jose Creek WRP would have sufficient capacity to convey and treat the flows generated by the fully developed project. Therefore, the project would not require the construction of new or expanded wastewater collection or treatment facilities and impacts would be less than significant.		
Impact 3.9.2b: Wastewater flows from the project site would be conveyed to the Los Angeles County Sanitation District's Cypress Street Sewer, then conveyed to the San Jose Creek WRP for treatment. The Cypress Street trunk sewer and San Jose Creek WRP have sufficient capacity to treat the flows generated by the fully developed project. As such, impacts would be less than significant.	None Required	Not Applicable
Impact 3.9.3a: The stormwater drainage facilities developed on-site would be designed to contain a 25-year storm event. The subsurface basins are designed to hold a greater capacity than the water quality volume required by the County of Los Angeles, while two of the subsurface basins would also have expanded capacity to reduce the outflow rate to within LACDPW requirements. As such, the project would not require new or expanded stormwater drainage facilities outside of the project limits; therefore, the project would have a less than significant impact on existing municipal storm drain facilities. No unique impacts would result from the proposed on-site drainage improvements beyond the impacts evaluated for the overall project footprint.	None Required	Not Applicable
Impact 3.9.4a: The project area is already served by electricity, natural gas, and telecommunication service providers, with local infrastructure in place to serve the project site. As such, the proposed project would require connections to existing local infrastructure in adjacent roadways, and the project would not require any significant construction or expansion of dry utility facilities. Impacts would be less than significant.	None Required	Not Applicable

ALTERNATIVES

Section 15126.6 of the CEQA Guidelines requires an evaluation of a reasonable range of alternatives to the proposed project or to the location of the project, to provide an opportunity to consider other scenarios that could reduce or avoid one or more of the project's significant or potentially significant impacts. Alternatives that are infeasible or highly speculative have been rejected from further consideration, including an All-Residential Alternative, a Light Industrial Alternative, an and Alternative Site.

Three alternatives are examined in Chapter 5 of this Draft EIR:

1) No-Project/No Build: No changes to existing vacant site conditions
2) Retain the existing, former grocery store structure and modify the building and related site improvements to support one or two retail tenants
3) Retain the existing, former grocery store structure and add building space to create a mixture of retail, fast food/drive-thru restaurants and professional office uses

Alternative 2 – Retain Existing Building for Retail Tenant(s) is considered to be the Environmentally Superior Alternative

AREAS OF CONTROVERSY OR KNOWN CONCERN

Comments Made at Public Scoping Meeting Held on December 16, 2019

- Traffic—congestion and traffic controls, effects on local access and circulation, consequences on local circulation, parking adequacy

  These comments are addressed in the Transportation Section (3.7) of this Draft EIR. Parking adequacy will be addressed in the City's staff report, as this issue isoutside of the scope of a CEQA document. .

- Aesthetics

  These comments are addressed in the Aesthetics Section (3.1) of this Draft EIR.

- Utilities

  These comments are addressed in the Utilities Section (3.8) of this Draft EIR.

- Keep the process transparent

  The City is committed to a transparent planning process for this project and that is accomplished through its existing planning procedures, record keeping and public notification and participation efforts.

Written Comments Received During Notice of Preparation Response Period

California Department of Transportation (Caltrans)

- Caltrans encourages reducing the amount of parking whenever possible.
- Caltrans encourages the use of Vehicle Miles Traveled (VMT) to be used in the EIR.

- Caltrans encourages the inclusion of a pedestrian pathway between the residential and commercial portions of the project.

The amount of parking proposed by the project will be addressed in the City's staff report; however, it is not an issue addressed by the City's CEQA thresholds. Project vehicle miles traveled metrics are discussed in Section 3.7 Transportation. A pedestrian access from the residential area to the commercial area is proposed via a locking gate at the southwest corner of Lot 33.

Native American Heritage Commission (NAHC)

- NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project site.
- Perform an archaeological records search through the regional California Historical Research Information System.
- If an archaeological inventory survey is required, a professional report detailing findings and recommendations should be prepared.
- A Sacred Lands File search should be conducted through NAHC.
- Lack of surface evidence of archaeological resources does not preclude their subsurface existence.

These comments were addressed within the Initial Study/NOP (found in Appendix A of this Draft EIR) and are further addressed in Section 3.8 of this Draft EIR

ISSUES TO BE RESOLVED

The project would worsen an existing citywide deficit of public parkland by increasing the residential population on a site that is designated for commercial land uses. While the residential component would be required to pay parkland dedication in-lieu fees to support acquisition of additional parkland, there is presently no program in place that would alleviate the total parkland deficit. The Project Applicant has agreed to implement all proposed mitigation measures pertaining to aesthetics and construction noise impacts. No other significant impacts have been identified.

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1. INTRODUCTION

1. INTRODUCTION

1.1 PURPOSE AND LEGAL AUTHORITY

This Environmental Impact Report (EIR) evaluates the environmental consequences that could result from implementation of the Cypress Villas Project (project). The project consists of a mixture of retail shops and drive through/fast food service businesses on the western 2.93 acres along the Azusa Avenue frontage and development of 61 single-family detached homes on the eastern and southern 4.99 acres.

The retail component would consist of four buildings, totaling 13,000 square feet of floor area, arranged in three distinct building sites, with two designed to accommodate fast food/drive through businesses, and two for general retail/commercial tenants. The residential component would consist of 61 single-family homes, in two-story and three-story structures, with floor plans ranging from approximately 1,760 square feet to approximately 2,600 square feet.

The commercial and residential areas would be developed independently and may be constructed concurrently or at different time frames, in response to market demand. For purposes of analysis, this EIR assumes concurrent construction of the residential and commercial phases in order to present a worst-case scenario. Additionally, both areas are anticipated to be completed and fully occupied by late 2022 to mid-2023.

This EIR has been prepared to meet all the substantive and procedural requirements of the California Environmental Quality Act (CEQA; California Public Resources Code Section 21000 et seq.) as amended; the CEQA Guidelines (California Code of Regulations Title 14, Section 15000 et seq.); and the City of Covina's rules, regulations, and procedures for the implementation of CEQA. The City of Covina is the lead agency for this project, with primary responsibility for conducting the environmental review process and approving or denying the project.

In enacting CEQA, the California state legislature declared its intent regarding the purposes of an EIR in Section 21002.1 of the CEQA statute, as follows:

1) Serve as an informational document that will inform the City's decision-makers and the public generally of the significant environmental impacts of the project.

2) Identify possible ways to minimize the significant effects and consider reasonable alternatives that could avoid or reduce one or more of the significant environmental effects that is identified with respect to the project.

3) Obligate the City to impose measures identified in the EIR to avoid or mitigate potentially significant effects, whenever it is feasible to do so.

4) Grant the City the right to approve a project, despite identification of potential significant effects on the environment that cannot be mitigated, because of overriding economic, social, or other benefits.

5) Provide meaningful public disclosure, in a timely and cost-effective manner, of the potential environmental effects that the City considers to be significant.

CEQA Guidelines Section 15382 defines a significant effect to the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant."

The City is required to consider the information in the EIR, along with any other relevant information, in making its decision on the project. The EIR is circulated to responsible agencies and trustee agencies with resources affected by the project, state agencies with jurisdiction by law, federal agencies, neighboring jurisdictions, and interested parties and individuals. The purpose of public and agency review of the EIR includes sharing expertise, disclosing agency analysis, checking for accuracy, detecting omissions, discovering public concerns, and soliciting comments. In reviewing the EIR, reviewers should focus on the sufficiency of the document in identifying and analyzing potentially significant effects on the environment and avoiding or mitigating the significant effects of the project.

1.2 SCOPE AND CONTENT OF THE EIR

To initiate the public scoping process for this EIR, the City prepared and circulated an Initial Study and a Notice of Preparation (NOP) in compliance with CEQA Guidelines Section 15082. The NOP was mailed to 24 entities, consisting of the State Clearinghouse, other state, county, regional and local government agencies, the local school district, utility purveyors, Native American tribes, and interested individuals and organizations. The NOP was also posted at the Los Angeles County Clerk's office, announcing the public review and response period of December 6**,** 2019, through January 16, 2020. A public scoping meeting was held at Covina City Hall on December 16, 2019, to solicit input from interested agencies, organizations, and individuals. A copy of the Initial Study and NOP and comments received on the NOP are included in **Appendix A** of this EIR. City staff determined the scope of analysis of this EIR based on the findings of the Initial Study and public and agency comments on the NOP. Potentially significant impacts were identified in regard to the following topics, which are examined in this EIR:

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions
- Noise
- Population and Housing
- Public Services
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems

The EIR also contains other discussions as required by CEQA, including an analysis of cumulative impacts, effects found not to be significant, significant and unavoidable environmental effects, growth-inducing effects, significant irreversible environmental effects, and alternatives to the project.

1.3 EFFECTS FOUND NOT TO BE SIGNIFICANT

Based on the EIR scoping process described in the preceding section, the City determined that the proposed project would not result in significant impacts regarding the following topics addressed by CEQA, and thus, do not warrant further analysis in the EIR:

- Agriculture and Forestry Resources – the project site is not located on or near any properties that are zoned or used for agricultural purposes Further, there are no forest resources located on or near the project site.
- Biological Resources – the project site is located within a fully urbanized area, where former natural biological resources have been removed through land disturbance and development activities. The project site has been completely disturbed and is almost entirely covered in impervious surfaces. There are no sensitive plants or wildlife resources present that would cause the project to have a significant impact on biological resources.
- Cultural Resources – due to the extensive ground disturbances on the project site from past development activities, it is considered unlikely that archaeological materials remain within the near surface soils. Nonetheless, to avoid impacts to unknown cultural resources that could potentially occur due to deeper excavations into native materials, the project will be required to comply with Mitigation Measure V-1 described in the Initial Study, involving monitoring of such excavation by a qualified professional archaeologist. The complete language of the mitigation measure is found in Appendix A of this Draft EIR.
- Energy – compliance with state laws and regulations requiring energy efficient design and installation of rooftop solar photovoltaic electricity-producing panels would ensure that project impacts would be less than significant.
- Geology and Soils – due to the location of the project site as well as the characteristics of the underlying geology identified in the project's geotechnical report, there are no serious soils, geologic or seismic hazards affecting the site. Further, mandatory compliance with the City's building code standards would ensure that the project is properly designed and constructed to provide stable footings for all structures and adequate protection against strong seismic ground motions resulting from movement along a regional earthquake fault. To avoid impacts to unknown fossil resources that could potentially occur due to deeper excavations into older Quaternary materials, the project will be required to comply with Mitigation Measure VII-1 (described in the Initial Study), involving targeted monitoring of grading activities by a professional paleontologist. The complete language of this mitigation measure is found in Appendix A of this Draft EIR. A copy of the preliminary geotechnical report is on file with the City of Covina Community Development Department.
- Hazards and Hazardous Materials – the project site does not have any recognized environmental conditions, did not have elevated levels of hazardous chemicals as shown during a Phase II assessment, and is not located near an airport. The project would not involve the regular storage or transportation of hazardous materials, would not expose people or structures to a risk involving wildland fires, and would not interfere with implementation of an emergency response plan.
- Hydrology and Water Quality – due to the project's fully urbanized location and its compliance with federal, state, and local laws and regulations, the project would not have a significant impact on beneficial waters, would not induce flooding, would not place structures within a

floodplain, and would not directly impact any regulated or unregulated water bodies or drainage courses.

- Land Use and Planning – the project would not divide an established community or conflict with land use plans, policies, or regulations adopted to avoid or mitigate environmental impacts and therefore project impacts would be less than significant.
- Mineral Resources – there have been no mineral resource extractions on the project site in the recent past and there are no known significant mineral resources on the project site.
- Recreation – the project is not expected to result in increased use of local parks that would result in substantial physical deterioration of existing parks. Further, there are no recreation facilities on site and the project would not require the construction or expansion of any off-site recreational facilities.
- Wildfire – the project site is not located in or adjacent to an area designated as a very high fire hazard severity zone or other type of wildfire hazard and therefore would not have a significant impact.

1.4 LEAD, RESPONSIBLE AND TRUSTEE AGENCIES

The City of Covina is the lead agency for this EIR because it holds the primary responsibility for approving the project and certifying the EIR. A responsible agency is a public agency other than the lead agency that has discretionary approval over a project. A trustee agency is a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of California. Refer to Subsection 1.5, Intended Uses of this EIR, below, for a list of lead agency approval actions required for this project, along with other approvals required from responsible agencies. It has been determined that there are no trustee agencies for this project.

1.5 INTENDED USES OF THE EIR

This document has been prepared as a project EIR, to provide information that will inform the City's considerations on whether to approve, approve with revisions, or deny any or all of the following discretionary land use approval actions:

- General Plan Amendment (GPA) 19-001: To redesignate the eastern 4.99 acres from General Commercial to Medium-Density Residential, to allow for development of single-family homes at a density of 12.25 units per acre.
- Zone Change (ZCH) 19-001: To rezone the eastern 4.99 acres from C-4 Highway Commercial to RD Multi-Family Zone.
- Specific Plan (SP) 19-001: To establish custom development standards corresponding to the proposed residential development plan.
- Tentative Tract Map (TTM) 82315: To reconfigure the existing parcels to create a subdivision for the residential component with privately owned lots for the homes and other lots for common ownership of streets, outdoor amenities, parking, and landscaping, and three individual lots for the commercial component.
- Site Plan Review (SPR) 19-002: To approve the layout of the overall development plan.

- Conditional Use Permit (CUP) 19-002: To allow for development of drive-through facilities in the commercial side of the project.

Additionally, the EIR will support the following action to be taken by the responsible agency noted below:

- Los Angeles Regional Water Quality Control Board: National Pollution Discharge Elimination System (NPDES) General Construction Permit, Clean Water Act Section 401 Certification

1.6 ENVIRONMENTAL REVIEW PROCESS

As an initial step in complying with the procedural requirements of CEQA, the City of Covina filed an NOP with the California Governor's Office of Planning and Research. This is the official notice that an EIR would be prepared as outlined above in Subsection 1.2, Scope and Content of the EIR.

A Notice of Completion (NOC) and a Notice of Availability (NOA) of the Draft EIR were published in the **[LOCATION]** on **[DATE]** and circulated for public review and comment on August 27, 2020**.** The NOC and copies of the Draft EIR were sent to the State Clearinghouse for review and comment by interested state agencies, and the EIR has been assigned State Clearinghouse Number 2019120104. The Draft EIR will be available for review and comment by the public and public agencies for a 45-day period from August 27, 2020 to October 12, 2020.

Comments on the EIR should be sent to the following:

Nancy Fong, Community Development Consultant
City of Covina
Community Development Department
125 E. College Street
Covina, CA 91723

Email: NFong@covinaca.org
Phone: (626) 384-5451

The Draft EIR will also be available for review on the City's website **[VERIFY LINK].**

The City, as the lead agency, will consider written comments received on the Draft EIR in making its decision whether to certify the Final EIR prior to approving or taking action on the project. Written responses to comments raised with respect to environmental issues discussed in the Draft EIR will be prepared and presented in the Final EIR. Furthermore, written responses to comments received from any public agencies will be made available to these agencies at least 10 days prior to the public meeting at which certification of the Final EIR will be considered. These comments, and their responses, will be included in the Final EIR for consideration by the City Council, as well as by any other decision-makers.

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2. PROJECT DESCRIPTION

2. PROJECT DESCRIPTION

This section describes the project's environmental setting; identifies various community-based and private real estate-based objectives that the proposed plan aims to achieve; describes the land use, design, and infrastructure elements of the development plan; outlines the proposed construction program and time frames; and lists the various discretionary land use approvals required to permit the project to proceed.

2.1 PROJECT TITLE AND SUMMARY

The proposed project is referred to as the "Cypress Villas Project" or simply the "project." The proposed development plan includes a mixture of residential and commercial land uses on the 7.92-acre project site. The residential development would be located on the eastern 4.99 acres of the project site, consisting of 61 single-family detached homes, common area open space, homeowner and visitor parking, private yards, private drives, and two- and three-story floor plan options. Site access would be from a gated entry located on Cypress Street. The commercial uses would be developed on the western 2.93 acres, along the Azusa Avenue frontage. This would consist of four buildings totaling approximately 13,000 square feet on three building sites, with two buildings designed to accommodate fast food/drive through businesses. Access to the commercial parcels would be from three existing drives located along the Azusa Avenue frontage, and from an existing drive located on the Cypress Street frontage. The project also includes dedication of .078 acres along the Cypress Street frontage as public street right-of-way.

2.2 ENVIRONMENTAL SETTING

The project site is located in the City of Covina in the central San Gabriel Valley area, in the eastern perimeter of Los Angeles County, California, as shown in ***Figure 2-1, Regional Location Map***. The project site is located on the east side of Azusa Avenue, between Cypress Street and Covina Boulevard and west of N. Conwell Avenue, as shown in ***Figure 2-2, Project Location Map.*** The subject property consists of Los Angeles County Assessor's Parcel Numbers 8421-001-016 and 8421-001-061. It is assigned two street addresses: 1000 N. Azusa Avenue and 845 W. Cypress Street. The entire site is designated in the Covina General Plan as General Commercial and the entire site is in the C-4 Highway Commercial zone district.

Surrounding land uses are shown in ***Figure 2-3, Aerial View of Site and Surroundings*** and described below.

North: U-Haul truck rental center and two-story townhomes community.

South: Fast-food restaurants at the northeast corner of Cypress Street and Azusa Avenue, Los Angeles County Fire Station 152 at the northwest corner of Cypress Street and N. Conwell Street, and single-family homes on the south side of Cypress Street.

East: A neighborhood of one-story, single-family homes, within unincorporated territory governed by the County of Los Angeles.

West: A mixtures of commercial uses and mobile home communities on the west side of Azusa Avenue. To the southwest is the Northview High School.

The project site consists of 7.99 acres of developed land, with remnant improvements from a former Albertsons grocery store that was constructed in 1991 and vacated in November 2012. The former grocery store is 81,333 square feet in total floor area, in a box-shaped structure reaching a height of 44 feet.

A large surface parking lot with numerous small landscape planters and several pole-mounted lighting clusters is located between the building and the Azusa Avenue frontage, while paved drives abut the northern and eastern sides of the building. There are numerous mature trees within the parking area planters. Masonry walls separate the project site from a townhome community to the north and a single-family neighborhood to the east. The property shows signs of deterioration due to years of vacancy and decline in maintenance. The southern 'leg' of the site that connects to Cypress Street is maintained with low grass cover.

Vehicular access to the site is currently available via three drive approaches along the Azusa Avenue frontage and from another driveway that connects to Cypress Street. The Azusa Avenue frontage is improved with sidewalk, curb, gutter, and two streetlights, and there is a strip of grass between the sidewalk and the parking lot. There are no overhead power poles along this frontage. The Cypress Street frontage of the project site is improved with sidewalk, curb and gutter, and there is a single streetlight at the southeast corner. Overhead power poles and lines are in the sidewalk area, just to the east, starting at the County Fire Station site.

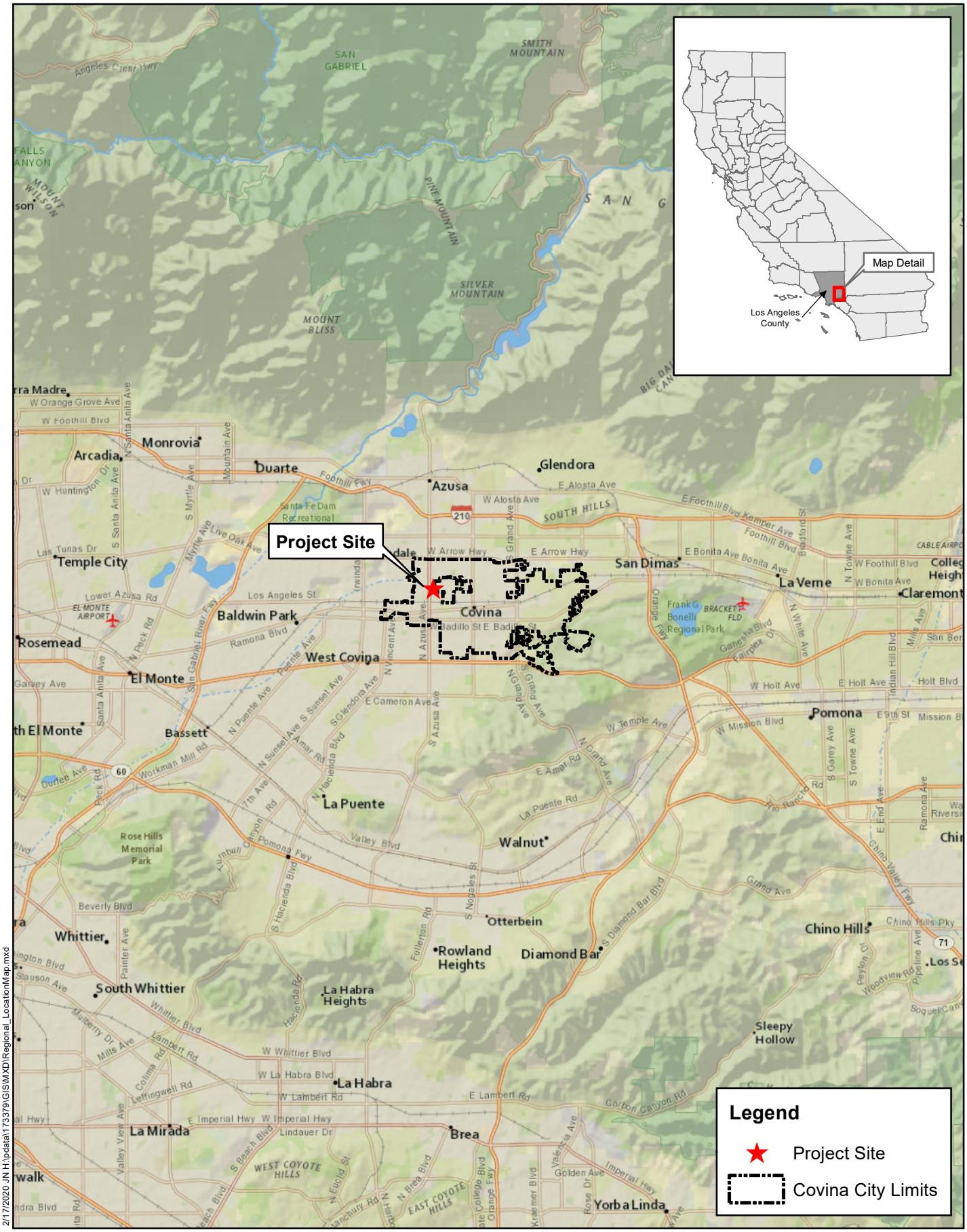
The project site is located in a fully urbanized part of the City of Covina, where the built environment consists of a mixture of low-rise residential and commercial land uses, along with a high school campus. Azusa Avenue is a four-lane, north/south Primary Arterial street with a raised median and is also State Highway 39. The local segment of this street is maintained by the City of Azusa, which also has authority over physical improvements and traffic controls along Azusa Avenue. Cypress Street is a four-lane, east/west Collector Street with a two-way left-turn lane in the project vicinity. On-street parking is generally permitted. There are no bike lanes along either street frontage. There is a bus stop for Foothill Transit Route 280, at the Azusa Avenue/Cypress Street intersection. Metrolink also provides regional and local rail service near the project area. The Covina Metrolink Station is approximately 1.5 miles east of the project site at 600 N. Citrus Avenue. This Metrolink station originates at Los Angeles Union Station and ends at the San Bernardino Metrolink Station.

Site topography is relatively level, with a gentle slope to the west. The site is not within a flood hazard zone. Water, sewer, storm drainage, energy, and telecommunications infrastructure occur in the adjacent streets.

2.3 PROJECT OBJECTIVES

The project applicant has identified the following key objectives that are reflected in the project design and land use elements:

a) Revitalize and redevelop a non-performing property with land uses that respond to current market opportunities and expand the City's tax base.
b) Respond effectively to changing economic conditions indicating a declining demand for larger retail buildings.
c) Provide new, single-family ownership housing next to existing residential uses.
d) Provide small-scale commercial spaces along the Azusa Avenue frontage that are designed to take advantage of significant pass-by traffic volumes.
e) Create an attractive development site that integrates comfortably with adjacent land uses.
f) Establish new zoning standards to accommodate innovate single-family housing designed for urban infill settings.



2/17/2020 JN H:\pdata\173379\GIS\MXD\Regional_LocationMap.mxd

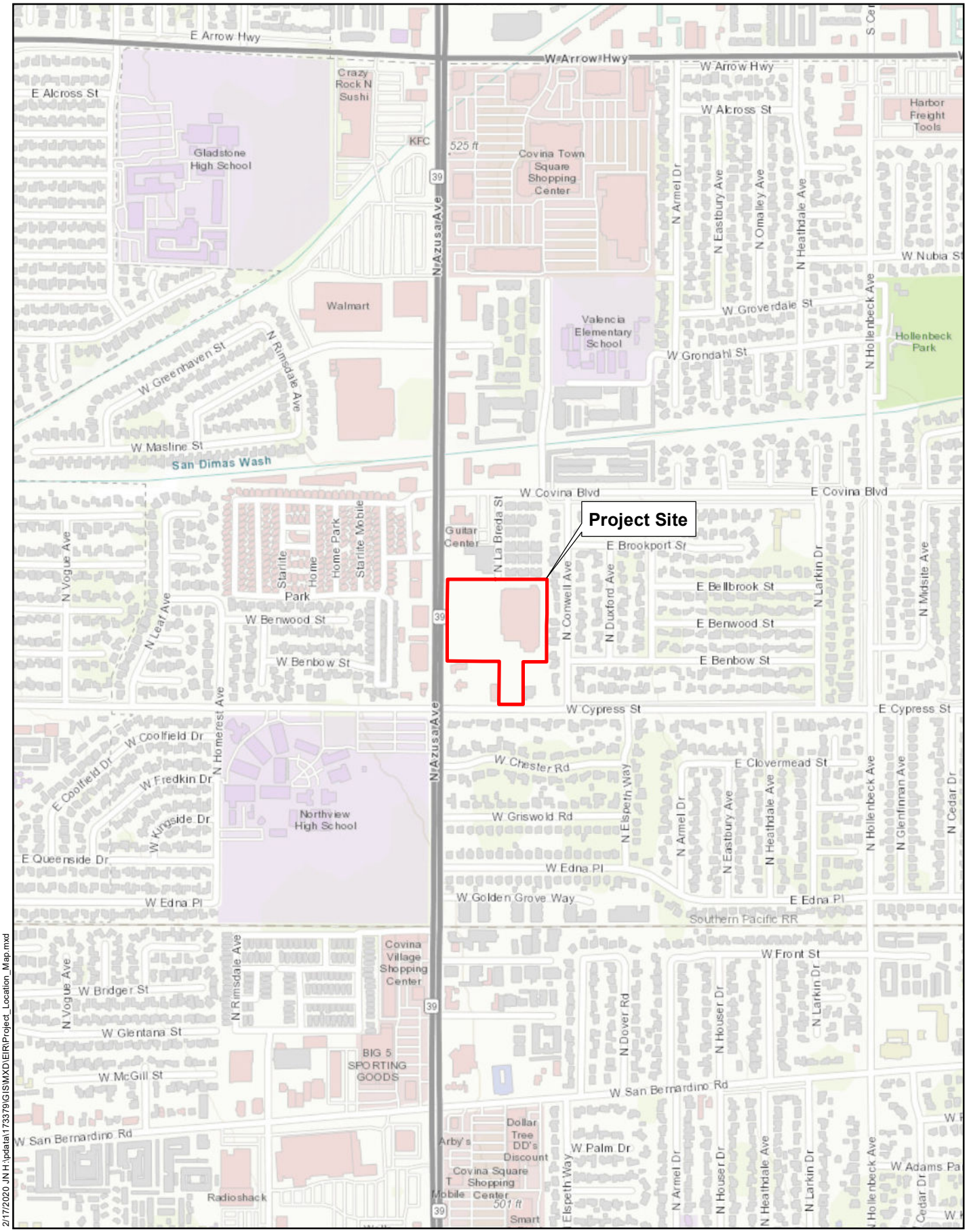
Michael Baker INTERNATIONAL

0 1.5 3 Miles

Source: ArcGIS Online

Regional Location Map

Figure 2-1



2/17/2020 JN:H:\pdata\173379\GIS\MXD\EIR\Project_Location_Map.mxd

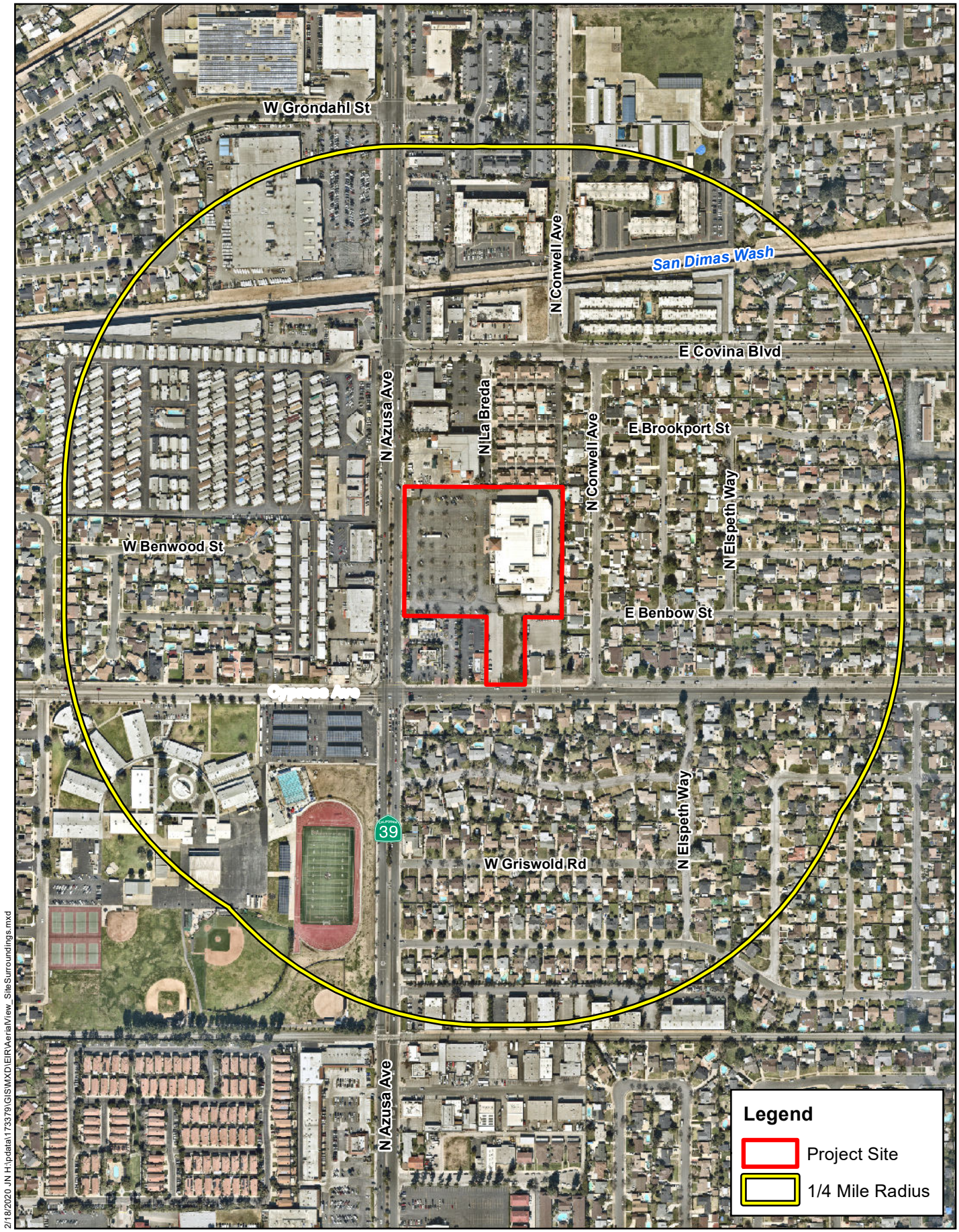
Michael Baker INTERNATIONAL

0 400 800 Feet

Source: ArcGIS Online

Project Location Map

Figure 2-2



2/18/2020 JN H:\pdata\173379\GIS\MXD\EIR\AerialView_SiteSurroundings.mxd

Michael Baker INTERNATIONAL

0 500 Feet

Source: NearMap February 2019

Aerial View of Site and Surroundings

Figure 2-3

2.4 PROJECT CHARACTERISTICS

The proposed project includes retail shops and drive through/fast food service businesses on the western 2.93 acres along the Azusa Avenue frontage and 61 single-family detached homes on the eastern and southern 4.99 acres along Cypress Street as shown in ***Figure 2-4, Site Plan***. A subdivision map (Tentative Tract Map 82315) is proposed to reconfigure the existing parcels to create four lots for the proposed commercial development, 61 private lots for the proposed homes, and four common lots for the proposed residential community, which provide a variety of private drives, community areas, and maintenance responsibilities. A variety of landscape elements would be provided in both development areas, as shown in ***Figure 2-5, Landscape Plan.***

Commercial Development

The commercial component would consist of four buildings, totaling approximately 13,000 square feet of floor area, arranged in three distinct building sites along the Azusa Avenue frontage, with two buildings designed with a drive-through circulation pattern to accommodate fast-food and beverage businesses, and two designed for occupancy by general retail/commercial and possibly restaurant tenants. No tenants have been specified for the commercial buildings at this time; therefore, a range of general retail and fast food services could occupy the four buildings, which range in size as follows:

- Building A: 3,500 square feet
- Building B: 3,000 square feet
- Building C: 3,000 square feet
- Building D: 3,550 square feet

Each building would be designed as a single level, in a contemporary style with brick and stucco finishes, aluminum storefronts, window awnings and special trim coloring, as illustrated in Figure 2-6, Commercial Architecture Concept. The proposed commercial buildings, which would range between 20.6 feet and 25 feet in height, would be below the 35-foot building height restriction for C-4 zones that abut residential zoned lands.

Vehicular access to these commercial uses would be from three existing drive approaches along the Azusa Avenue frontage, and from an existing driveway along Cypress Street that serves two existing fast food businesses on adjacent properties. Two existing driveway connections to the adjacent U-Haul business would be maintained at the northern edge of the site. A total of 134 surface parking spaces would be provided within the three commercial sites. Trash enclosures would be located at each of the three building sites. Pedestrian access would continue to be from the existing Azusa Avenue sidewalk along the project site frontage.

Landscaping would occur along all edges of the site, around the buildings, and interspersed within parking areas. Along the Azusa Avenue frontage, the landscape area would be 20 feet deep. Along the east edge that would border the new homes, the landscape area would be 7 feet wide and there would be a 6-foot-high masonry wall along that entire border. A rectangular landscape zone would be provided at the eastern edge, within the northernmost lot where Building A would be sited, to enable access by emergency vehicles between the commercial and residential areas. A locked gate would be installed

there, with an electronic release controlled by the Fire Department, which would separate the commercial and residential sides.

Because of the preliminary nature of the proposed plans, specific lighting and signage details have not been determined. The City will require submittal of a detailed sign program that will define locations, size restrictions, forms of illumination, etc. that will comply with the provisions of Chapter 17.74 of the Covina Municipal Code (Signs in Commercial Zones). Outdoor lighting is anticipated to consist of low-intensity building-mounted fixtures and possibly low-intensity pole-mounted fixtures to provide for security levels of lighting for employees and customers.

For the purposes of analysis, it is presumed that any or all of the commercial buildings could operate seven days a week, between the hours of 7 a.m. and midnight.

Residential Community

The residential component would consist of 61 single-family detached homes, in two-story and three-story structures, with floor plans ranging from approximately 1,760 square feet to approximately 2,600 square feet. All of the homes adjacent to the eastern boundary would be two-story structures, to enhance compatibility with the one-story, single-family homes immediately east. The new homes would have three to four bedrooms, with optional bonus areas and loft spaces. The proposed density is 12.25 homes per acre. Vehicle parking would include 122 spaces within attached garages, along with 12 spaces located in driveways, 23 "head-in" spaces located along internal driveways, and 7 parallel spaces along the entrance drive. Vehicular access to all of the homes would be from Cypress Street, via a private, gated driveway located between Los Angeles County Fire Station 152 and an existing restaurant site. Three architectural concepts are proposed, as illustrated in ***Figures 2-7*** through ***2-9.***

Open Space, Recreational Amenities, and Landscaping

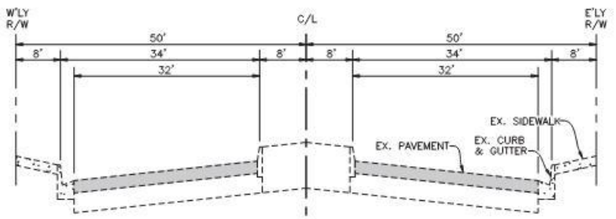
Community landscape elements are proposed to distinguish and enhance the visual character of the community entrance, passive outdoor recreation amenities, selected front yards along the entry street, guest parking areas, street ends, and selected pockets between homes, as shown on ***Figure 2-5, Landscape Plan.*** Rear yards for each home would be maintained by each homeowner and may be landscaped or hardscaped in various ways by individual homeowners.

A 6,651-square-foot common area is proposed adjacent to the project entry. This area would provide a multi-purpose hardcourt, potential garden plots, seating, and tree groupings. The central focus of this space is a multi-purpose turf area and adjacent barbeque/picnic area within decomposed granite surfacing.

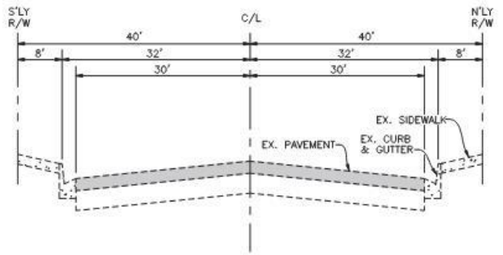
Pocket Park One, as shown on ***Figure 2-5***, would be located roughly in the center of the residential community and would occupy approximately 2,708 square feet. The proposed design includes an elliptical resilient play surface with a play structure and benches. Pocket Park Two would be located in the northern part of the community and would also occupy approximately 2,708 square feet. The proposed design includes active turf play area, with lineal concrete unit pavers transitioning to a community fire pit in a decomposed granite surface setting. Next to the fire pit area there would be a hardscaped social space featuring a shaded arbor structure and lounge furniture.

SITE PLAN

TENTATIVE TRACT MAP NO. 82315
COMMERCIAL & RESIDENTIAL PLANNED DEVELOPMENT
1000 N. AZUSA AVENUE & 845 W. CYPRESS STREET
IN THE CITY OF COVINA COUNTY OF LOS ANGELES, STATE OF CALIFORNIA



AZUSA AVENUE TYPICAL SECTION
(NO SCALE)



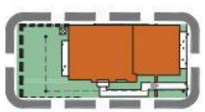
CYPRESS STREET TYPICAL SECTION
(NO SCALE)

LEGEND:

- CB – CATCH BASIN
- EPB – ELECTRICAL PULLBOX
- EX – EXISTING
- FH – FIRE HYDRANT
- GW – GUY WIRE
- MH – MANHOLE
- PP – POWERPOLE
- S – SIGN
- SD – STORM DRAIN
- SL – STREET LIGHT
- SMH – SEWER MANHOLE
- T/A – TRASH AREA
- WM – WATER METER
- WV – WATER VALVE
- – – – 6 FEET HIGH CMU WALL
- – – – – 6 FEET HIGH VINYL FENCE
- ——— 6' HIGH WROUGHT IRON FENCE
- ——— 3 FEET HIGH CMU WALL
- ▶ – GATE
- ~~~~ – PATH OF CONNECTIVITY
- – HARDSCAPE
- – POROUS PAVERS
- – ASPHALT PAVING

N

GRAPHIC SCALE
50 25 0 50 100
SCALE IN FEET
1 inch = 50 ft.



2-STORY HOUSE

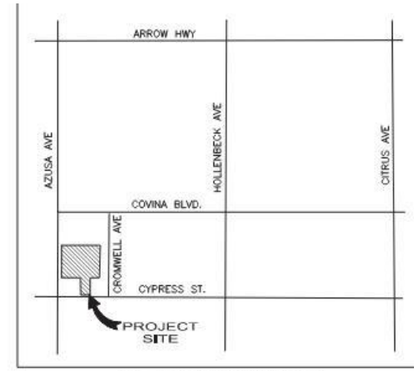


3-STORY HOUSE

PHASING NOTE:
THIS IS A TWO PHASE PROJECT. COMMERCIAL AND RESIDENTIAL ARE SEPARATE PHASES.

ENTRANCE GATE/WALLS NOTE:
PROPOSED ENTRANCE GATE/WALLS FOR RESIDENTIAL UNITS SHALL NOT EXCEED 6 FEET IN HEIGHT.





LOCATION MAP
(NO SCALE)

PROJECT SUMMARY:

APPLICANT/OWNER:	PKL INVESTMENTS, LLC 2863 MARICOPA STREET TORRANCE, CA 90503 (714) 738-0828
ENGINEER:	LAND DEVELOPMENT CONSULTANTS 1520 BROOKHOLLOW DRIVE, SUITE 33 SANTA ANA, CA 92705 (714) 557-7700
ARCHITECT:	WILLIAM HEZMALHALCH ARCHITECTS 2850 RED HILL AVENUE, SUITE 200 SANTA ANA, CA 92705 (949) 250-0607
SOILS ENGINEER:	GEOCONCEPTS 14428 HAMLIN STREET, #200 VAN NUYS, CA 91401 (818) 994-8895
PROJECT LOCATION:	1000 NORTH AZUSA AVENUE 845 WEST CYPRESS STREET COVINA, CA 91722
APNs:	8421-001-016 & 8421-001-061
FLOOD ZONE:	ZONE "X" (FLOOD INSURANCE RATE MAP) COMMUNITY PANEL No. 06037C1700F
PROJECT SITE AREA:	348,165 SF = 7.993 ACRES
STREET DEDICATION:	3,379 SF = 0.078 ACRES
NET SITE AREA:	344,786 SF = 7.915 ACRES
RESIDENTIAL SITE AREA:	217,221 SF = 4.986 ACRES
LOT "A": (PRIVATE DRIVEWAY, PARKING, SIDEWALK, OPEN SPACE)	66,578 SF = 1.528 ACRES
LOT "B": (OPEN SPACE)	6,644 SF = 0.153 ACRES
LOT "C": (OPEN SPACE)	2,708 SF = 0.062 ACRES
LOT "D": (OPEN SPACE)	2,708 SF = 0.062 ACRES
LOTS 1-61:	138,583 SF = 3.181 ACRES
TOTAL UNITS:	61 DETACHED SINGLE FAMILY HOMES * (24) PLAN 1: ±1,761 SF (2-STORY) * (20) PLAN 2: ±2,028 SF (3-STORY) * (17) PLAN 3: ±2,593 SF (3-STORY)
DENSITY:	12.25 HOMES PER ACRE
PARKING:	REQUIRED: * GARAGE: 122 SPACES * GUEST: 13 SPACES * TOTAL: 135 SPACES PROVIDED: * GARAGE: 122 SPACES * GUEST (HEAD IN): 23 SPACES * GUEST (PARALLEL): 7 SPACES * TOTAL: 152 SPACES
BUILDING COVERAGE:	± 65,824 SF (30.3% OF SITE)
RETAIL SITE AREA: (62-65)	127,565 SF = 2.929 ACRES
TOTAL SF:	13,000 SF * BUILDING A: 3,500 SF * BUILDING B: 3,000 SF * BUILDING C: 3,000 SF * BUILDING D: 3,500 SF
PARKING:	REQUIRED: * 130 SPACES PROVIDED: * (9'x19'): 46 SPACES * (9'x17'): 85 SPACES * TOTAL: 131 SPACES

UTILITY:

ELECTRIC:	SO. CALIFORNIA EDISON (800) 655-4555
WATER:	AZUSA LIGHT & WATER (626) 812-5063
GAS:	THE GAS COMPANY (800) 427-2200
CABLE:	TIME WARNER (626) 384-5400
TELEPHONE:	VERIZON (800) 483-4000

SHEET INDEX:

SP1.0 TITLE SHEET
SP2.0 SITE PLAN
SP2.1 SITE PLAN

DATE PREPARED: MARCH 19, 2020

2/19/2020 JN H:\pdata\173379\GIS\MXD\EIR\Site Plan.mxd

[redacted]

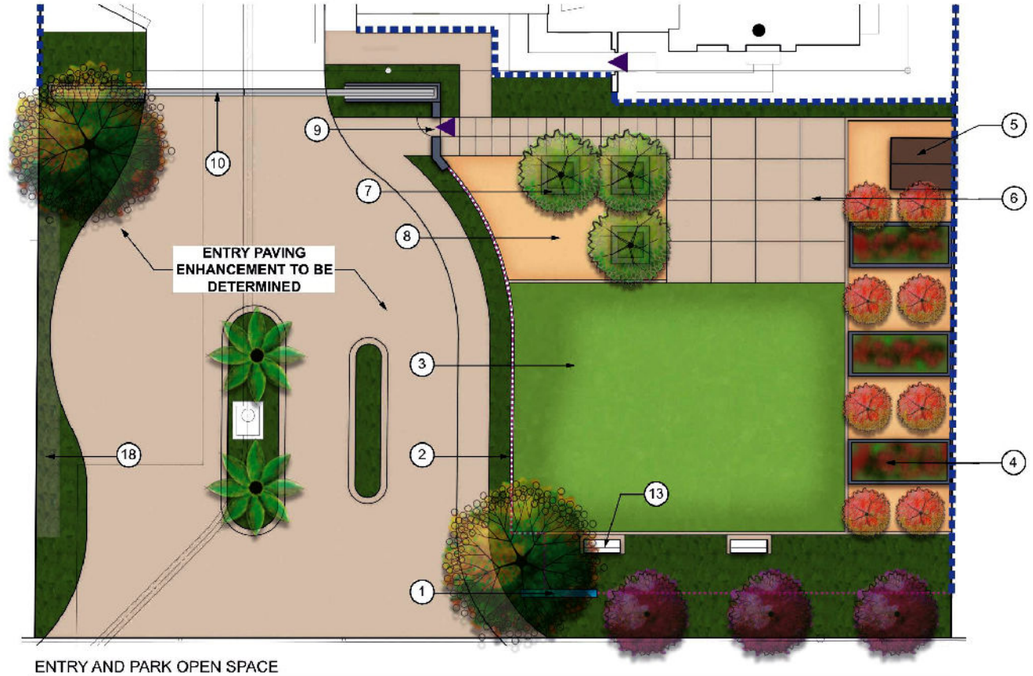
Not to Scale

Source: LDC, March 2020

Site Plan

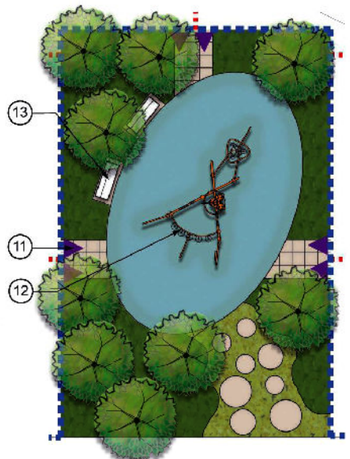
Figure 2-4





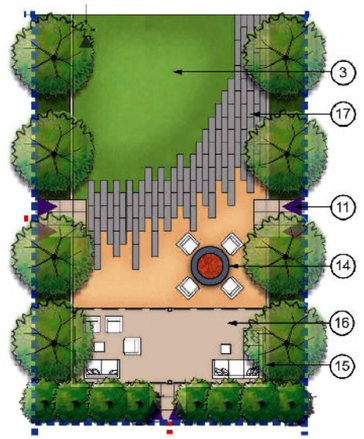
ENTRY AND PARK OPEN SPACE

SCALE: 1" = 10'



POCKET PARK ONE

SCALE: 1" = 10'



POCKET PARK TWO

SCALE: 1" = 10'

PRELIMINARY PLANT LEGEND

TREES
ACONIS FLEXUOSA 'BURGUNDY' / BURGUNDY WILLOW MYRTLE
ARBUTUS X 'MARINA' / ARBUTUS STANDARD
ARECASTRUM ROMANZOFFIANUM / QUEEN PALM
CERCIDIUM X 'DESERT MUSEUM' / THORNLESS PALO VERDE
CERCIS CANADENSIS 'FOREST PANSY' TM / FOREST PANSY REDBUD
CUPRESSUS SEMPERVIRENS 'TINY TOWER' TM / TINY TOWER ITALIAN CYPRESS
LAGERSTROEMIA X 'NATCHEZ' / CRAPE MYRTLE
MAGNOLIA GRANDIFLORA 'LITTLE GEM' / DWARF SOUTHERN MAGNOLIA
MELALEUCA QUINQUENERVIA / CAJEPUT TREE MULTI-TRUNK
PHOENIX DACTYLIFERA / DATE PALM
PODOCARPUS HENKELII / LONG LEAFED YELLOW WOOD COLUMN
PYRUS CALLERYANA 'CHANTICLEER' / CHANTICLEER PEAR
RHUS LANCEA / AFRICAN SUMAC
TRISTANIA CONFERTA / BRISBANE BOX
WASHINGTONIA ROBUSTA / MEXICAN FAN PALM
X CHITALPA TASHKENTENSIS 'PINK DAWN' / PINK DAWN CHITALPA

SHRUBS
AGAVE ATTENUATA / AGAVE
ALOE BARBADENSIS / BARBADOS ALOE
ANIGOZANTHOS FLAVIDUS / KANGAROO PAW
BULBINE FRUTESCENS / STALKED BULBINE
CALLISTEMON VIMINALIS 'LITTLE JOHN' / DWARF WEEPING BOTTLEBRUSH
CALLISTEMON VIMINALIS 'SLIM' / BOTTLE BRUSH
DIANELLA REVOLUTA 'BIG REV' / DIANELLA
DIANELLA TASMANICA 'VARIEGATA' / FLAX LILY
LIGUSTRUM JAPONICUM 'TEXANUM' / WAX LEAF PRIVET
LOMANDRA LONGIFOLIA 'BREEZE' / DWARF MAT RUSH
MUHLENBERGIA CAPILLARIS / PINK MUHLY
PARTHENOCISSUS TRICUSPIDATA / JAPANESE CREEPER
PODOCARPUS X 'ICEE BLUE' / ICEE BLUE PODOCARPUS
PRUNUS CAROLINIANA 'COMPACTA' / CAROLINA CHERRY
RHAPHIOLEPIS INDICA 'BALLERINA' / BALLERINA INDIAN HAWTHORN
RHAPHIOLEPIS INDICA 'CLARA' / INDIAN HAWTHORN
RHAPHIOLEPIS INDICA 'MAJESTIC BEAUTY' TM / MAJESTIC BEAUTY INDIAN HAWTHORNE
RHAPHIOLEPIS UMBELLATA / YEDDA HAWTHORN
ROSA FLORIBUNDA 'ICEBERG' / ICEBERG ROSE

GROUND COVERS
CAREX DIVULSA / BERKELEY SEDGE
DIANELLA REVOLUTA 'BABY BLISS' / BABY FLAX
DIANELLA REVOLUTA 'LITTLE REV' / LITTLE REV FLAX LILY
ROCK MULCH
SENECIO MANDRALISCAE / BLUE FINGER

LEGEND

1 ENTRY MONUMENT
2 PERIMETER TUBULAR STEEL FENCING
3 MULTI-PURPOSE TURF PLAY AREA
4 POTENTIAL COMMUNITY GARDENING PLOTS
5 STORAGE SHED
6 MULTI-PURPOSE HARDSCAPE WITH POTENTIAL FESTIVAL LIGHTING
7 SEAT WALLS WITH SHADE CANOY TREES
8 DECOMPOSED GRANITE WITH BBQ STATIONS
9 ENHANCED PEDESTRIAN ENTRY
10 TELESCOPING VEHICULAR GATE
11 TYPICAL PEDESTRIAN ACCESS FROM ADJOINING LOTS
12 PLAY STRUCTURE ON RESILIENT SURFACING
13 BENCHES
14 FIRE PIT
15 OVERHEAD TRELLIS WITH FESTIVAL LIGHTING
16 LOUNGE HARDSCAPE AREA
17 PLANK UNIT PAVERS
18 HEDGE SCREEN

2-Story House

3-Story House

2/18/2020 JN H:\pdata\173379\GIS\MXD\EIR\Landscape Plan.mxd

Michael Baker INTERNATIONAL

Not to Scale

Source: BDB Design Group, November 2019

Landscape Plan

Figure 2-5



Building A

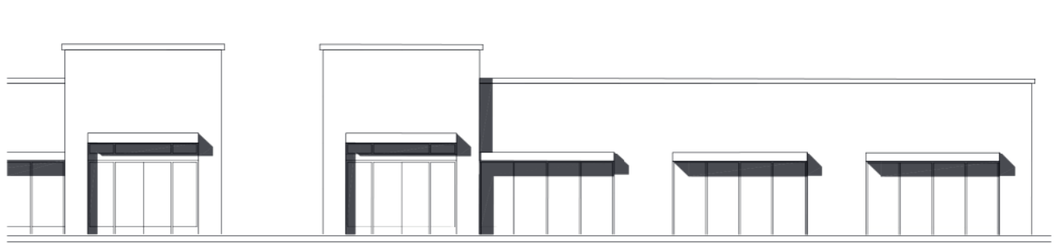
Note: Spaces Between Buildings are Abbreviated



Building B

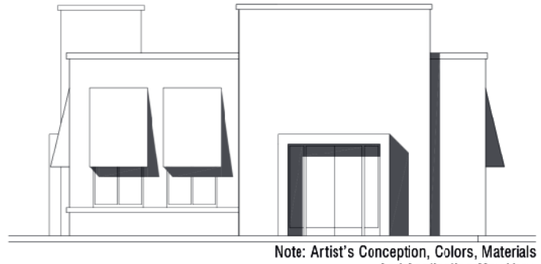
Building C

See Below for Continuation



Building B

See Above for Continuation



Building C

Building D

Note: Artist's Conception, Colors, Materials And Application May Vary.



AWNINGS
TREX
SPICED RUM TRANSCEND

ALUMINUM STOREFRONT
ARCADIA
#11 CLEAR AC-2

BRICK
HEBRON
DESERT COMMON

STUCCO
MATCH SHERWIN WILLIAMS
SW 7574 ECHELON ECRU

TRIM COLOR
SHERWIN WILLIAMS
SW 7501 THRESHOLD TAUPE

2/18/2020 JN H:\data\173379\GIS\MXD\EIR\Commercial Architecture Concept.mxd

Michael Baker INTERNATIONAL

Not to Scale

Source: WHA, November 2019

Commercial Architecture Concept

Figure 2-6

PLAN 1A



RIGHT



REAR

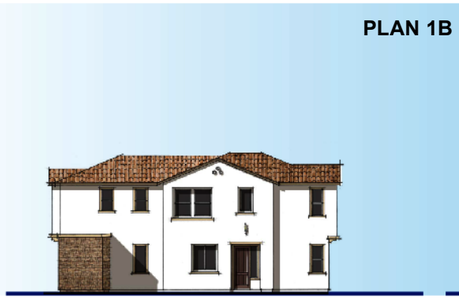


LEFT



FRONT

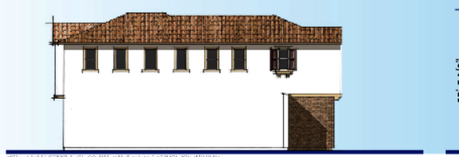
PLAN 1B



RIGHT



REAR



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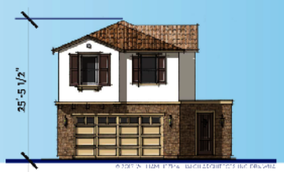
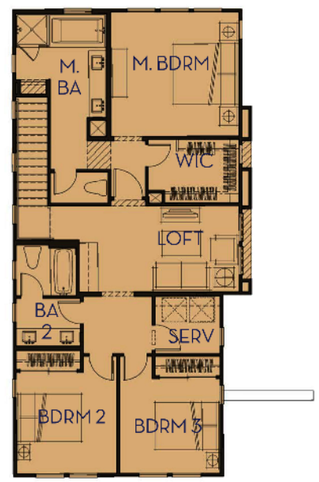


FRONT



FIRST



SECOND

2/18/2020 JN H:\pdata\173379\GIS\MXD\EIR\Residential Architecture Concept-Plan 1.mxd

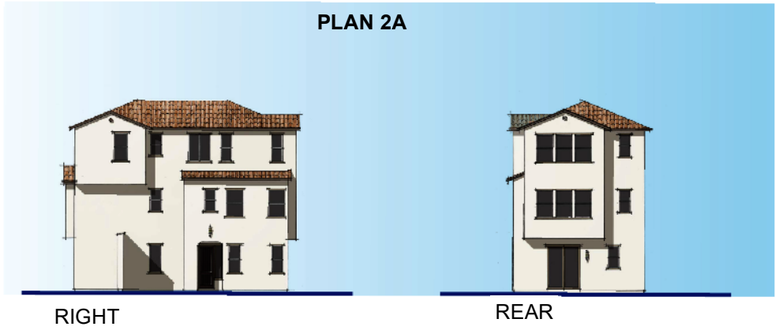
Michael Baker INTERNATIONAL

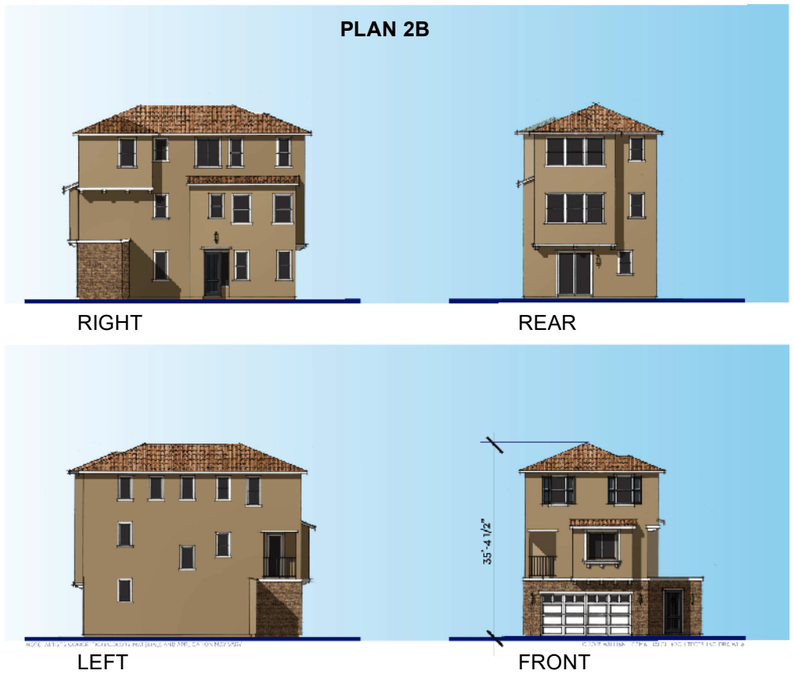
Not to Scale

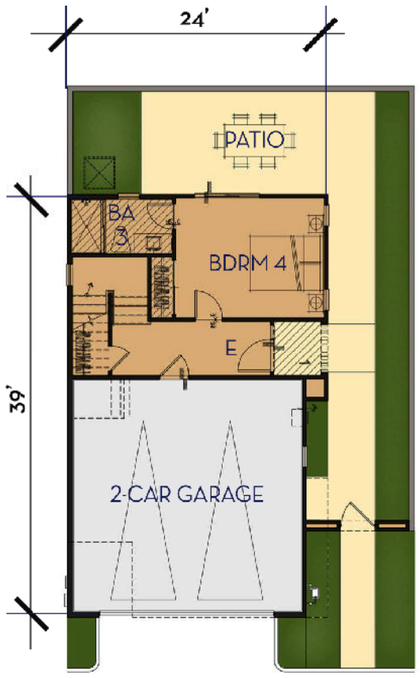
Source: WHA, November 2019

Residential Architecture Concept-Plan 1

Figure 2-7







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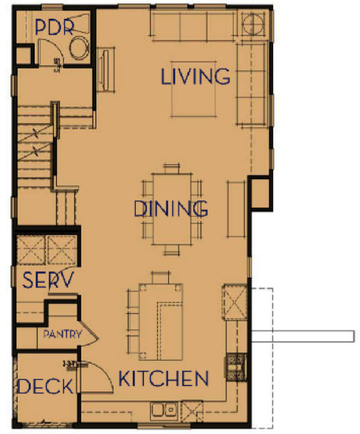

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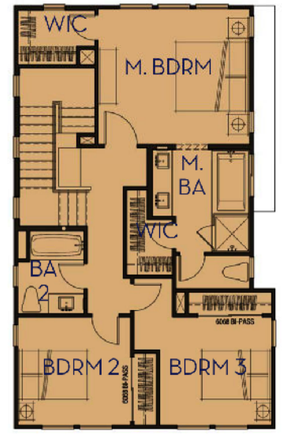


THIRD

2/18/2020 JN H:\pdata\173379\GIS\MXD\EIR\Residential Architecture Concept-Plan 2.mxd

Michael Baker INTERNATIONAL

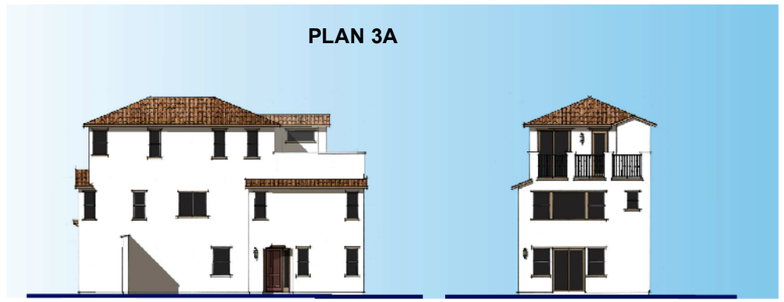
Not to Scale

Source: WHA, November 2019

Residential Architecture Concept-Plan 2

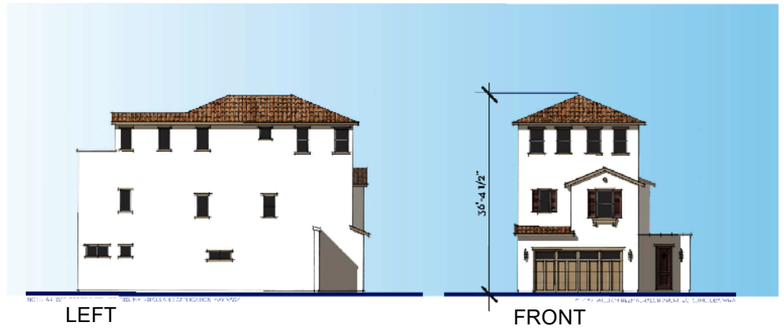
Figure 2-8

PLAN 3A



RIGHT

REAR



LEFT

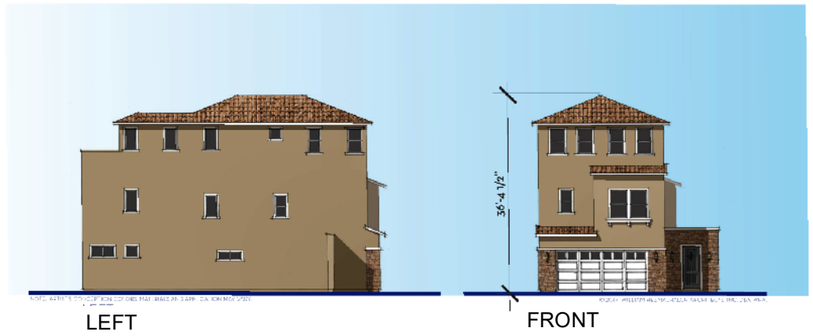
FRONT

PLAN 3B



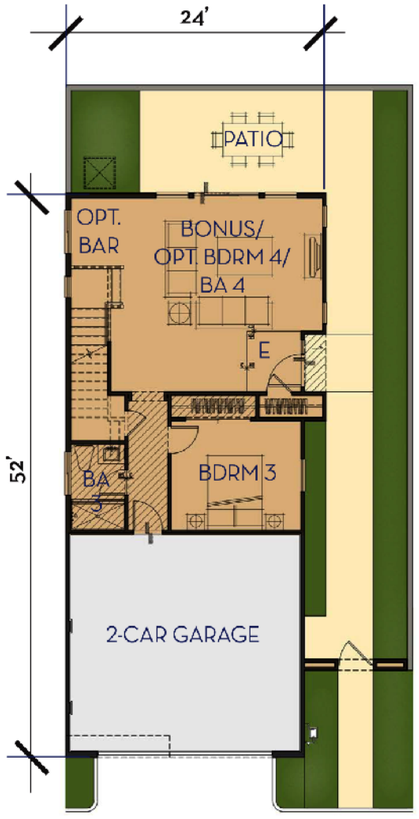
RIGHT

REAR



LEFT

FRONT



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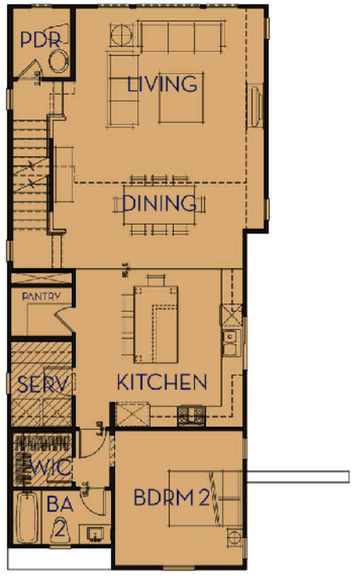
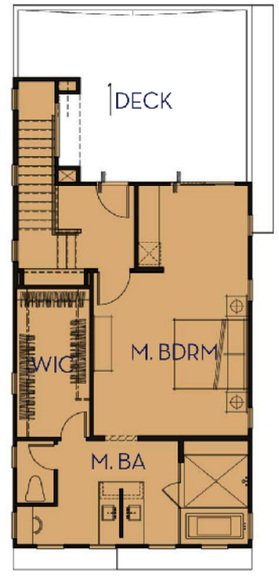


SECOND



THIRD

2/18/2020 JN H:\pdata\173379\GIS\MXD\EIR\Residential Architecture Concept-Plan 3.mxd

Michael Baker INTERNATIONAL

Not to Scale

Source: WHA, November 2019

Residential Architecture Concept-Plan 3

Figure 2-9

Access and Circulation

The residential development would have access from a gated entrance at Cypress Street, approximately 300 feet to the east of the Azusa Avenue and Cypress Street intersection. The residential community will have a private internal street network to provide vehicular access to all homes, and to function as a fire lane for access by fire-fighting apparatus and crews. There would be no vehicular access from the residential side into the commercial side of the project; however, an emergency access fire gate will be constructed along the mutual property line separating the commercial and residential developments. Pedestrian access would be available within the community via sidewalks along one side of each internal street and with connections to the common open space areas. A pedestrian entrance is also proposed from the Cypress Street sidewalk, next to the vehicular drive entry. Along the Cypress Street frontage, the project would dedicate 3,379 square feet to the City, to match the adjoining segments of this frontage and provide the full 80-foot right-of-way for Cypress Street.

Outdoor Lighting and Security

The outdoor lighting system would be designed to be compatible with the architectural theme of the homes and to enhance the building design and adjacent landscape. Common open space lighting would be provided and maintained by the community Homeowners Association (HOA) to provide adequate lighting for security purposes. Lighting adjacent to guest parking areas and exterior building lighting would be shielded and directed downward to prevent spillover lighting. Proposed lighting specifications include restraint in design and avoiding excessive brightness. All proposed lighting is to be reviewed and approved by the Planning and Community Development Department and the Police Department prior to installation.

To deter intruders, this community would be developed as a private, gated community with a code entry system at the vehicle entry gate and a “man-gate” controlled by the Fire Department to provide emergency vehicle access to/from the retail development directly to the west.

Cypress Villas Specific Plan

The proposed residential development plan does not conform with the development standards of any of the City’s residential zone district standards; therefore, the project includes a request to adopt a specific plan that would establish custom design and development standards to facilitate the proposed single family residential community, with a variety of outdoor community amenities, residential, infill lots and private yards, two- and three-story homes, parking and internal circulation.

The Specific Plan is prepared in accordance with the authority granted to the City pursuant to California Government Code, Title 7, Division I, Chapter 3, Article 8, Sections 65450 through 65457. The Government Code authorizes cities to adopt Specific Plans either by resolution as policy or by ordinance as regulation. A Planning Commission hearing and City Council hearing are required. Specific Plans must be adopted by the City Council to be in effect. The Specific Plan is a policy and a regulatory document that establishes policies, development standards, and design guidelines to regulate and guide future redesign and redevelopment of the plan area. It establishes the type, locations, intensity, character, and infrastructure for redevelopment to take place within the eastern 4.99 acres to be rezoned from C-4 Highway Commercial to RD – Multi-Family.

The Specific Plan is composed of the following chapters and addresses the following components:

Chapter I. Introduction and Purpose of Specific Plan. This chapter describes the purpose of the Specific Plan; content, chapters, and components of the Specific Plan; and the Specific Plan's relationship to the City's General Plan.

Chapter II. Description of Specific Plan Area. This chapter describes the Specific Plan area, including existing conditions, onsite structures, buildings, and uses; and the underlying General Plan and Zoning designations.

Chapter III. Description of Specific Plan. This chapter describes the proposed project, including development concepts and intended land uses; conceptual development plans; and required conceptual utilities and services.

Chapter IV. Development Standards. This chapter provides development standards to regulate future redevelopment and design within the Specific Plan area.

Chapter V. Design Guidelines. This chapter provides guidelines and direction on how future development should be designed, including architectural theme; building elevations and facades; 360-degree architecture; site planning and building orientation; quality of materials and colors; landscaping theme; wall and fences; signage theme; parking layout; vehicular access and circulation, etc.

Chapter VI. Administration and Implementation/Maintenance. This chapter explains how the development and community will be maintained.

Chapter VII. Attachments. This chapter provides relevant exhibits and illustrations to the Specific Plan.

2.4.1 INFRASTRUCTURE IMPROVEMENTS

***Water*.** The project would be required to install a new Class 350 ductile iron public water main in Azusa Avenue, from the northern property line to Cypress Street and in Cypress Street from Azusa Avenue to the eastern property line. These water mains would provide potable water service to an on-site, underground water distribution system to serve all interior plumbing fixtures and for all outdoor irrigation applications for the proposed commercial and residential sites.

Sewer. Wastewater generated within the residential and commercial areas would be discharged through into an existing 8-inch sewer main located along the Azusa Avenue frontage, then into another collection sewer to the west that is maintained by the Los Angeles County Sewer Maintenance District.

Storm Drainage. Stormwater runoff from throughout the site would be collected via curb and gutters, catch basins, and subsurface storm drains. The on-site flows would be conveyed to three proposed subsurface water quality treatment basins located within the commercial and residential portions of the project site, then discharged into the Los Angeles County Department of Public Works' (LACDPW) 69-inch storm drain located within Cypress Street.

Energy and Communication. Electrical energy would be provided throughout the residential units and commercial buildings via a connection to Southern California Edison's facilities, located in the adjacent

commercial properties along Cypress Street. A portion of each home's electrical demand would be met with on-site solar photovoltaic panels, pursuant to California's 2019 Building Energy Efficiency Standards (Title 24, Parts 6 and 11 of the California Code of Regulations), which took effect on January 1, 2020. Natural gas service would be provided to all homes and the commercial buildings via a connection to Southern California Gas Company's transmission main lines, located in Cypress Street and/or Azusa Avenue. The project would also install underground cables to enable connections within the commercial and residential areas to telecommunications services from a local provider of such services.

2.5 CONSTRUCTION AND DEVELOPMENT TIME FRAMES

Demolition of the existing vacant grocery store and parking lot and clearance of the entire project site will occur within one month. Construction activities are anticipated to occur six days per week (Monday through Saturday) between the hours of 7 a.m. and 8 p.m., in accordance with the City's Municipal Code restrictions. Estimated phasing and duration of construction for the commercial and residential development sites are identified in ***Tables 2-1*** and ***2-2***, below. Construction would occur in the noted sequences; however, there could be some overlap between phases, where feasible, to shorten the overall construction process.

TABLE 2-1
CONSTRUCTION PROGRAM – COMMERCIAL BUILDINGS

0	Duration (Months)
Demolition of existing building and parking lot/clearing of entire site	1
Grading	2
Paving	2
Construction and Landscaping	12
Painting (*intermittently as construction is completed)*	-
Total Construction Period:	17

Source: Land Development Consultants, 2019

TABLE 2-2
CONSTRUCTION PROGRAM – RESIDENTIAL

Construction Phase	Duration (Months)
Demolition of existing building and parking lot/clearing of entire site	1
Grading	2
Paving	2
Construction and Landscaping	24
Painting *intermittently as construction is completed*	-
Total Construction Period:	29

Source: Land Development Consultants, 2019

At this time, it is anticipated that commercial and residential components would be developed in two separate phases, which may proceed concurrently or in different time sequences. This EIR evaluates project impacts assuming that both components are under construction at the same time. Full build and occupancy of the commercial buildings is anticipated to occur in 2021. Depending on the pace of home

sales and occupancy, completion and full occupancy of the new residential community and all of its elements is estimated to occur by late 2022 to mid-2023. If there is a strong market response to the new homes, the applicant has indicated that the pace of home construction could be accelerated by as much as 10 months overall.

2.6 PERMITS/APPROVALS ADDRESSED BY THIS EIR

This EIR will be used by the City as a decision-making tool for approval of the local land use permits required from the City, as listed in ***Table 2-3***. The EIR is also intended to support other governmental actions and permits, as also noted.

TABLE 2-3
PERMITS/APPROVALS

Approving Agency	Permit/Approval
City of Covina	General Plan Amendment (GPA) 19-001: To redesignate the eastern 4.99 acres from General Commercial to Medium-Density Residential, to allow for development of single-family homes at a density of 12.25 units per acre. Zone Change (ZCH) 19-001: To rezone the eastern 4.99 acres from C-4 Highway Commercial to RD Multi-Family Zone. Specific Plan 19-001: To establish custom development standards corresponding to the proposed residential development plan. Tentative Tract Map (TTM) 82315: To reconfigure the existing parcels to create private and common area lots for the residential component, and three individual lots for the commercial component. Site Plan Review (SPR) 19-002: To approve the layout of the overall development plan. Conditional Use Permit (CUP) 19-002: To allow for development of drive-through facilities in the commercial side of the project.
Los Angeles Regional Water Quality Control Board, Region 4	National Pollutant Discharge Elimination System Construction General Permit

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3. ENVIRONMENTAL IMPACT ANALYSIS

3.1 AESTHETICS

3.1 AESTHETICS

This section evaluates the aesthetic impacts of the project, in terms of the change in public views of the visual character and quality on and near the project site, and with respect to changes in outdoor lighting associated with the proposed commercial and residential improvements. During the EIR scoping process (see Appendix A), it was determined that the project would not result in significant impacts involving scenic vistas or scenic resources; therefore, those issues are not discussed herein.

3.1.1 EXISTING CONDITIONS

Public views of the project site are available primarily from Azusa Avenue and Cypress Street, which border the site, and to a limited extent from N. Conwell Avenue, located just to the east. Viewing audiences are composed mainly of thousands of motorists traveling daily along the two adjacent streets, residents of the adjacent homes to the east and north and the homes located on the opposite side of Cypress Street, and patrons and employees of neighboring businesses along Azusa Avenue and Cypress Street.

Public views along the Azusa Avenue project site frontage are presented in ***Figure 3.1-1***. As shown, the image of the project site is dominated by the expansive surface parking lot and the tree wells and pole-mounted light fixtures interspersed throughout the parking area. The former Albertsons grocery store building is a background feature, and it is a large, whitish, block-shaped structure with a triangular-shaped, red tile roof element in the center. The frontage appears as an area of sparse ground cover vegetation next to a concrete sidewalk. An empty sign structure is visible near the southwestern corner, next to a driveway entrance. Low-rise commercial buildings and trees on adjacent properties are visible to the right of the project site. A U-Haul moving and truck rental center is along the northern (left) edge of the project site, and presents an image of a large, two-story rectangular structure that meanders in and out, with numerous vehicles in the adjacent parking area. A prominent identification sign with a message board appears near the Azusa Avenue frontage

Public views along the western side of Azusa Avenue, opposite the project site, are shown in ***Figure 3.1-2***. As shown, low-rise commercial buildings and overhead power poles and lines are prominently visible. Narrow, grass-covered strips are visible adjacent to the sidewalk. Closer to Cypress Street are two sign structures mounted atop poles that are higher than the adjacent building roofs. There are lower pole-mounted signs along the frontage farther to the north, as well as some vehicle parking areas between and in front of buildings. These commercial sites are not integrated in a common aesthetic theme and do not represent distinctive architectural styles or building characters. A center median within Azusa Avenue is a prominent feature; however, it is devoid of any ground cover and, except for a few trees, lacks any distinctive visual characteristics.

Public views along Cypress Street and the Cypress Street project site frontage are presented in ***Figure 3.1-3***. As shown, the southern 'leg' of the project site is recognizable as the grass area between a driveway and commercial buildings to the left and a Los Angeles County Fire Station to the right. An empty sign structure stands next to the driveway that borders the grass area. The upper portion of the former Albertsons store structure is just visible in the background, beyond the fire station site. Single-story homes that front along N. Conwell Street are visible to the right of the fire station, and single-story homes, driveways, low walled yards, and streetlamp poles are dominant visual features on the other (south) side of the street.

A representative public view along N. Conwell Street, immediately to the east of the project site, is presented in ***Figure 3.1-4***. As shown, this street is lined with single-story homes in a variety of footprint configurations and a variety of yards, trees, and fencing elements. Automobiles can park along both sides of the street. A sidewalk and parkway area are visible along the frontage of the homes that border the project site. Portions of the roofline of the former Albertsons store structure within the project site are visible behind and above the homes.

There are no direct public views of the adjacent townhome community north of the project site, from either N. Conwell Street or Azusa Avenue, as those homes are obstructed from public view along N. Conwell by single-story homes and obstructed from view along Azusa Avenue by intervening commercial structures.

The former Albertsons store structure reaches a maximum height of approximately 44 feet (to the top of the peaked tile roof element, with an average roofline height of 30 feet), within a building footprint that covers 81,833 square feet, representing 23.5 percent of the total site area. The building is located 40.5 feet from the east property boundary, 40.5 feet from the northern property boundary, and 332.75 feet from the Azusa Avenue right-of-way. An 8-foot-wide landscape area is along the eastern property boundary and an 8-foot-wide landscape area is along the northern property boundary, next to the adjacent townhome community.

Figure 3.1-5 shows the existing interface along the eastern site boundary, which borders one-story, single-family homes along N. Conwell Avenue. ***Figure 3.1-6*** shows the interface along the northern site boundary that abuts a townhome community. In both cases, there is an existing block wall along the boundary and a landscape area within the project site side of that wall.

While there are a number of pole-mounted lighting fixtures within the existing parking lot, they have not been activated since the Albertsons store was closed. The project site does not currently generate any sources of night lighting. Ambient light sources near the project site include streetlamps along Azusa Avenue, Cypress Street, and N. Conwell Avenue, and a variety of building-mounted light fixtures on adjacent properties.

3.1.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

There are no federal regulations or planning frameworks that govern the aesthetic characteristics of the proposed project.

STATE

There are no state regulations or planning frameworks that govern the aesthetic characteristics of the proposed project. The project site is not located along a State-designated or eligible scenic highway.

LOCAL

City of Covina General Plan

The applicable objectives and policies from the City of Covina General Plan Land Use Element are listed below.

- Objective 3: A community that is attractive and maintains a good image and small-town atmosphere
    - Policy a: Achieve land use arrangements that provide for adequate separation and physical and visual buffers between land uses characterized by different functions, intensities, and/or densities to ensure their compatibility and to avoid conflicts.
    - Policy e: Preserve the predominantly low-rise, low- to medium-intensity character of Covina's residential neighborhoods and commercial and industrial districts.
    - Policy aa: Protect single-family detached neighborhoods from medium- and high-density residential and excessive non-residential encroachments through appropriate land use provisions and development standards.

City of Covina Zoning Ordinance

The entire project site is currently within the City's C-4 Highway Commercial zone district and is governed by the development standards established for this zone district. Development standards that directly affect the aesthetic character of site development in this zone are specified in Section 17.44 of the City's Municipal Code and are identified below.

- Building Height: Except when approved with a Conditional Use Permit, no building or structure shall be taller than 50 feet. When located closer than 50 feet to any abutting residential or agricultural zoned lands, such structure shall not exceed 35 feet in height.
- Building Setbacks/Yards: When the C-4 zone fronts, sides, or rears on a street, there shall be a yard abutting the street of not less than 10 feet. When the C-4 zone abuts a residential zone, there shall be a minimum building setback of 25 feet, consisting of a 10-foot landscaped strip and a minimum 15-foot driveway. A solid masonry wall not less than 5 feet, nor more than 6 feet high, shall be erected on the zone boundary line.
- Landscape Coverage: No specified minimum amount.
- Building Coverage: No specified maximum amount.

3.1.3 THRESHOLDS OF SIGNIFICANCE

The California Environmental Quality Guidelines, Appendix G, as amended through December 31, 2019, serve as the basis for identifying thresholds determining the significance of the environmental effects of a project. A project will have a significant environmental impact related to aesthetics if it would:

a) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.

b) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.







Michael Baker INTERNATIONAL

Source: Google Street View, May 2019

Views of Project Site From Azusa Avenue

Figure 3.1-1







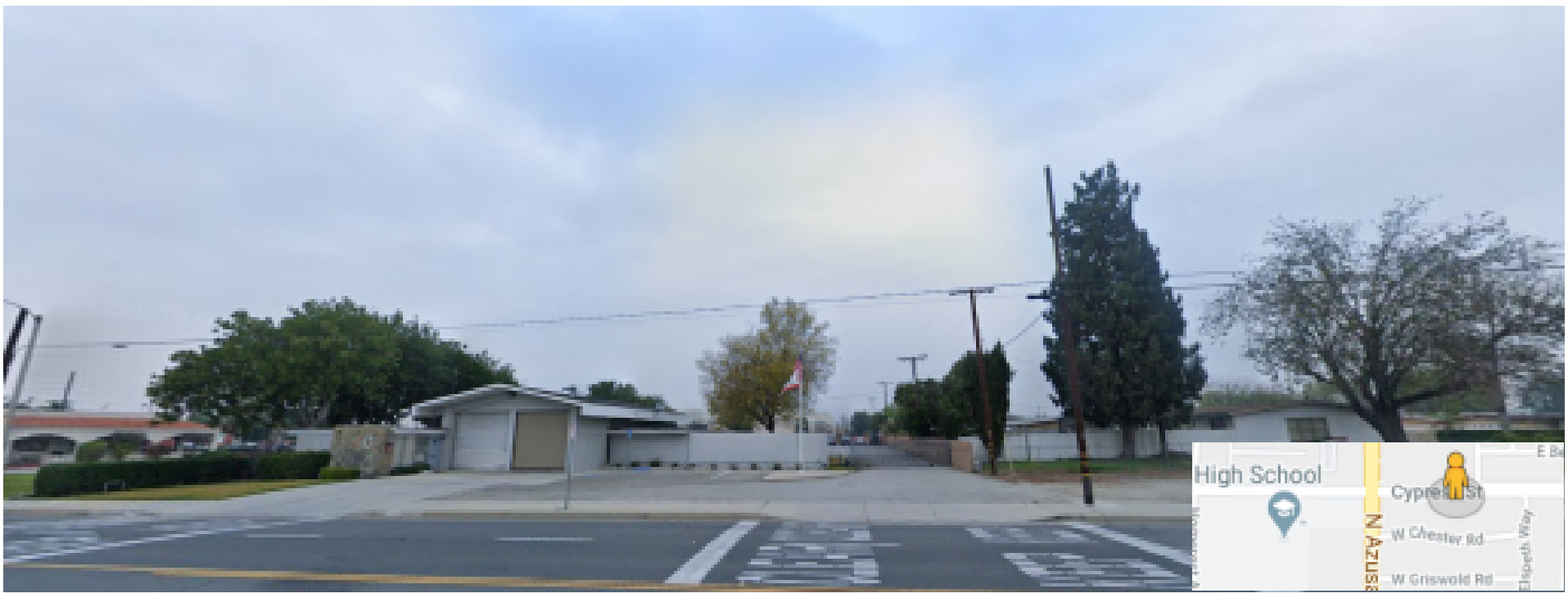
Michael Baker INTERNATIONAL

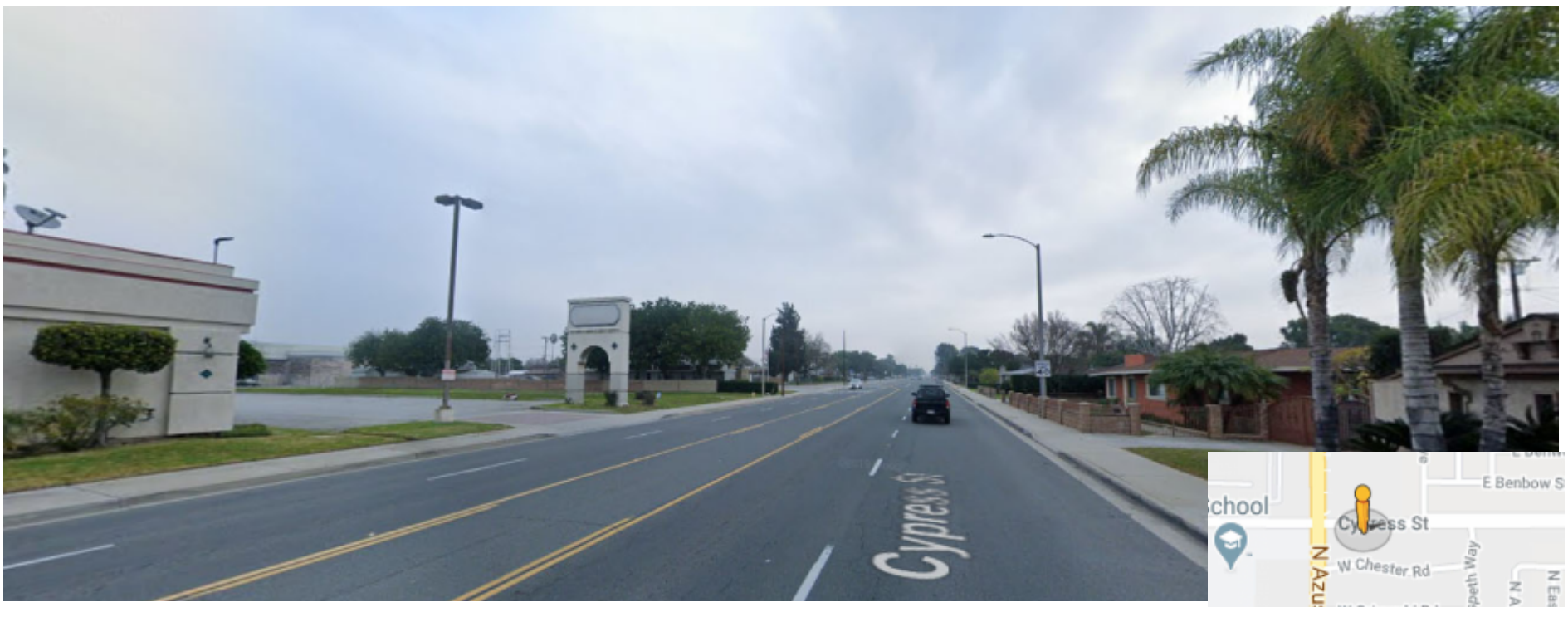
Source: Google Street View, May 2019

Views Along Opposite (West) Side of Azusa Avenue

Figure 3.1-2







Michael Baker INTERNATIONAL

Source: Google Street View, May 2019

Views Along Cypress Street

Figure 3.1-3





Michael Baker INTERNATIONAL

Source: 3.1-4 is Google Street View, February 2018

Views Along N. Conwell Avenue

Figure 3.1-4





Michael Baker INTERNATIONAL

Existing Interface Along Eastern Site Boundary

Source: Michael Baker International, June 27, 2019

Figure 3.1-5





Michael Baker INTERNATIONAL

Existing Interface Along Northern Site Boundary

Source: Michael Baker International, June 27, 2019

Figure 3.1-6

3.1.4 METHODOLOGY

Project impacts were evaluated by comparing existing visual conditions on and surrounding the project site with the proposed conditions as defined in the proposed site plan and the proposed Cypress Village Specific Plan development standards. A photographic survey was conducted to document the existing visual character on and surrounding the project site. Cross sections were prepared to depict existing and proposed spatial relationships between the project site and adjacent residential land uses to the east and north, focusing on changes in building heights and building setbacks (cross sections are provided in Appendix B). In addition, the current zoning development standards are compared to the proposed project development standards, with respect to building height and bulk, setbacks, and landscaping. To address outdoor lighting impacts, the existing site conditions are compared to proposed development conditions, and existing zoning controls for outdoor lighting are compared to proposed lighting features and controls set forth in the proposed development plan and specific plan.

3.1.5 ANALYSIS

Impact 3.1a The project would result in a substantial change in the visual character and quality of the site and surroundings, compared to existing conditions, and compared to the existing C-4 zone development standards. The proposed project would represent an increase in building intensity across the project site, and structural forms would occur closer to adjacent homes than in the existing condition. The proposed commercial part of the project is consistent with all C-4 zone development standards and would maintain the desired low-scale character of this major commercial corridor (Azusa Avenue). The proposed two- and three-story single-family homes in the residential side of the project would be closer to adjacent homes than the former grocery store structure within the project site and closer than would be permitted under the existing C-4 zone standards. Proposed two-story homes along the eastern edge would be taller than the adjacent single-story homes; however, these would be sufficiently separated from the adjacent homes by rear yards and a wall along the common boundary. Proposed three-story homes along the northern edge would be taller than the adjacent two-story townhomes; however, there would be a sufficient spatial separation to avoid a significant visual impact. In all cases, the new homes would be lower than the 35 feet height limit established under the existing C-4 zone standards. The proposed landscaping features within both the commercial and residential parts of the project would provide beneficial softening of structural forms, represent positive visual features as viewed from adjacent streets and private properties, and may be considered an improvement over existing conditions. Project impacts would be less than significant.

Discussion

All existing site improvements would be removed and replaced with new buildings, walls, fencing, landscaping, paving, and miscellaneous improvements within the commercial and residential parts of the project site.

Assessment of Impacts to Public Views from Adjacent Streets

The view from Azusa Avenue would change considerably compared to current conditions, with four low-rise buildings sited within 62.5 – to – 97.7 feet of the street frontage, designed with a common architectural theme with contemporary features. These features would include brick and light earth-tone color stucco finishes, aluminum storefronts, horizontal banding, awnings, and varied roof lines. All elements of the proposed commercial development area are consistent with the applicable development standards of the existing C-4 zone district. Landscape elements would be more extensive than in the current condition, including a 20-foot-wide landscape area along the sidewalk and additional elements around the buildings, within parking areas, and along the eastern edge that would border the proposed single-family homes in the eastern part of the site. With a significant increase in landscaping and low-rise commercial structures in a contemporary style, the primary views along Azusa Avenue could be considered to be an improvement compared to the current view, which is dominated by a large surface parking lot with numerous relatively small tree wells and light poles, and a non-maintained vegetation strip along the frontage.

As seen from Cypress Street, the view would also change substantially, from a scene dominated by a grass-covered open area and paved drive to a highly landscaped and gated driveway entrance feature in the foreground, with new two- and three-story structures and landscape elements in the background. While this scene would include structural forms that would contrast with the current open conditions, the combination of landscaping and modern building elements would not be considered an adverse aesthetic impact and could be considered to be an improvement to the existing condition.

The proposed residential structures would be narrower and taller in profile than the existing mostly one-story homes in this area; however, the new homes on the project site would have limited visibility from public streets and would be most visible from yards within adjacent residential properties. (Changes in the interface along the eastern and northern edges of the site are discussed below.) The character and quality of public views of the project site from the largest audiences, i.e., motorists traveling along Azusa Avenue and Cypress Street, would not be adversely impacted by the proposed project.

Assessment of Impacts to Private Residential Environments Along Northern and Eastern Edges

A community of two-story townhomes abuts the northern site boundary. The nearest townhomes are approximately 21 feet north of the boundary, and the proposed single-family homes within the project site would be located 12–20 feet from the boundary. Landscaped yards would occur in the spaces between the homes, on both sides of a 6-foot-high masonry wall. Proposed project homes would consist of a mixture of two-story and three-story structures, with heights of 25 feet, 5.5 inches to 34 feet, 4.5 inches in fairly narrow footprints, designed in contemporary building styles with Spanish accents, such as tile roofs. It is noted that landscaping within the proposed project residential yards will be provided at the discretion of the homeowners and the timing and scope of such future landscaping cannot be defined at this time.

A row of one-story, single-family homes abuts the eastern site boundary. These homes are set back from the boundary by varying distances, generally more than 30 feet, but a few less than 15 feet and one with a building projection that is as close as approximately 5 feet from the boundary. Proposed homes within the project site that are along the east boundary would be comprised entirely of two-story structures, 25 feet 5.5 inches high, designed in contemporary styles with Spanish accents such as tile roofs, with rear

yard setbacks generally ranging from approximately 13 feet to 17 feet. There would be one lot at the northeastern corner with a side yard setback of 8 feet. Landscaped yards and a 6-foot-high masonry wall would separate homes on both sides of the boundary. It is noted that landscaping within the proposed project residential yards may be provided at the discretion of the homeowners and the timing and scope of such future landscaping cannot be defined at this time.

As noted in Chapter 2 – Project Description, the proposed residential development would not be permitted under the current C-4 zone district standards. As such, the project proposes to change the zoning classification for the residential site to RD – Multi Family, and to adopt a Specific Plan to create custom development standards that support the proposed lot sizes, building heights and setbacks, common open areas, etc.

The proposed building setbacks within the project site, along the eastern and northern boundaries, are several feet less than the minimum 25 feet that would be required under the current C-4 zone standards. Each proposed residential lot would have sufficient yard space to provide at least a 10-foot-wide landscape area along the boundary line with adjoining homes, consistent with the existing C-4 zone standards. There would be one exception—the proposed lot at the northeastern corner, where the proposed side yard adjacent to the eastern boundary would be approximately 8 feet deep. The proposed building heights along the residential properties to the north and east are within the 35-foot maximum that would be allowed under the existing C-4 zone standards. All of the proposed homes along the eastern boundary would be limited to two stories/25 feet in height, and thus would be 10 feet below the height limit allowed under the current C-4 zone standards. Since the C-4 zone does not mandate any amount of landscaping or set a limit on building coverage, the proposed residential lots along the eastern and northern site boundaries would not conflict with any such existing standards.

Sunlight access into residential yards can be regarded as an aesthetic resource, as this enhances enjoyment of those private open spaces. With the proposed building setbacks and yard areas along the northern and eastern edges of the project site, there would continue to be full sunlight access for the adjoining residential yards.

Conclusion

While the proposed residential structures would be closer to the north and east boundaries than would be allowed under the current C-4 zone standards, there would be sufficient separation by yards to maintain full sunlight access into the adjacent residential yards. All proposed residential structures along these two boundaries would be under the maximum 35-foot height limit that is permitted under the existing C-4 zone standards and all homes proposed along the eastern boundary would be two-story structures, with maximum heights of 25 feet, 5.5 inches. The proposed developed conditions could result in some occasional and momentary visual intrusion from second- and third-level windows facing adjoining homes to the north and east that does not presently occur. This would not be considered to be a significant adverse aesthetic impact as this would not occur continuously over the course of a day or evening and interior privacy at adjacent homes can be protected through closing window coverings. Furthermore, there is no CEQA significance threshold pertaining to visual intrusion from one residential property to another. As noted earlier, the proposed commercial development is consistent with all current zoning standards and would represent an improvement over the current image of the site, which is dominated by a large expanse of a paved surface parking lot. It would be consistent with the City's General

Plan policies to preserve the low-rise character of the City's commercial corridors. Project impacts to the visual character and quality of the project site and surroundings would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Impact 3.1b With the outdoor lighting mitigation measures to be applied to the proposed residential development, there would not be significant light intrusion or glare impacts at neighboring homes. Project impacts would be less than significant.

Discussion

New sources of night lighting would result from the proposed commercial and residential site improvements, compared to the current vacant site conditions that have no night lighting sources. Lighting specifications have not been created for either project component at this time; however, it is anticipated that there would be a variety of building-mounted, ground-level, and possibly pole-mounted lighting fixtures to provide sufficient illumination for pedestrians and motorists as well as enough lighting to deter intruders and support security surveillance efforts. A lighted monument sign and community entrance feature is proposed at the gated Cypress Street driveway. All outdoor lighting throughout the project site, including any illuminated signs, would be governed by the existing glare restrictions set forth in Section 9.42.020B of the City's Municipal Code, which states:

> *B. Glare. No operation, activity, sign, or lighting fixture shall create illumination that exceeds five foot-candles on any adjacent property, whether the illumination is direct or indirect light from the source. Glare levels shall be measured with a photoelectric photometer following the standard spectral luminous efficiency curve adopted by the International Commission on Illumination. For purposes of this subsection, a foot-candle is the illumination produced by a light of one international candle upon a surface one foot away.*

Compliance with these restrictions is considered sufficient to avoid significant lighting impacts such as lighting intrusion onto adjacent properties or creation of glare conditions that could adversely affect motorists or other land uses.

Guidance for the proposed residential area lighting is provided in Section 6 of the proposed Cypress Villas Specific Plan, as follows:

> ***6. Lighting/Security***
>
> *The outdoor lighting system shall be compatible with the architectural theme of the units and shall enhance the building design and adjacent landscape. Lighting standards and building fixtures shall be of a design and size compatible with the building and adjacent areas. Common open space lighting shall be provided and maintained by the community Home Owners Association (HOA) to provide adequate lighting for security purposes.*
>
> *The security of all residents within this community is the highest priority. To deter uninvited habitants and guests, this community will be developed as a private, gated community with a code entry system. This same code entry system will carry over to the pedestrian connectivity man-gate to the retail development directly to the West.*

Although the project will introduce new sources of light in the area (exterior building illumination and pedestal lighting throughout the project), these sources of illumination are not anticipated to be significant. Lighting adjacent to guest parking areas and exterior building lighting shall be shielded and directed downward to prevent spillover lighting. Lighting shall be restrained in design and excessive brightness shall be avoided.

All proposed lighting shall be reviewed and approved by the Planning and Community Development Department and the Police Department prior to installation.

The guidance language identified in the proposed Specific Plan, noted above, together with the requirement for review and approval by the City's Planning and Community Development Department and the Police Department and required compliance with the Municipal Code glare restrictions cited earlier, are considered to be sufficient to prevent significant light and glare impacts from the residential part of the project. Nevertheless, Mitigation Measure 3.1-1 will be implemented to ensure that there are no light fixtures placed above the first-floor roof level of any home, to avoid possible off-site light intrusion or glare from upper-level fixtures that do not have appropriate shielding or are allowed to cast illumination beyond each residential lot or beyond the project site.

Mitigation Measures

MM 3.1-1 No outdoor lighting fixtures shall be permitted on any home above the first-floor roof line.

Timing/Implementation: *Include in building permit specifications and Conditions, Covenants and Restrictions established for the homeowners association.*

Enforcement/Monitoring: *City Planning and Community Development Department*

Level of Impact Significance Following Mitigation

Potential light and glare impacts from second- and third-story lighting fixtures would be avoided and project impacts would be less than significant.

3.2 AIR QUALITY

3.2 AIR QUALITY

This section addresses the air emissions generated by the construction and operation of the project and the potential impacts to air quality. The analysis also addresses the consistency of the project with the air quality policies set forth in the South Coast Air Quality Management District's (SCAQMD) *2016 Air Quality Management Plan* (2016 AQMP). The analysis of project-generated air emissions focuses on whether the project would cause an exceedance of an ambient air quality standard or SCAQMD significance thresholds.

For the purposes of modeling air emissions associated with mobile sources, traffic information contained in the *NEC Azusa/Cypress (Albertson's Site) Traffic Impact Analysis*, prepared by TJW Engineering and dated November 20, 2019, was used in this analysis (see **Appendix F**). Worksheets for calculations of criteria air pollutant emissions are provided in **Appendix C**.

3.2.1 EXISTING CONDITIONS

South Coast Air Basin

Geography

The City of Covina (City) is located in the South Coast Air Basin (Basin), a 6,600-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area of Riverside County.

The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of air pollutants throughout the Basin.

Climate

The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The climate consists of a semiarid environment with mild winters, warm summers, moderate temperatures, and comfortable humidity. Precipitation is limited to a few winter storms. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds.

The average annual temperature varies little throughout the Basin, averaging 75 degrees Fahrenheit (°F). However, with a less-pronounced oceanic influence, the eastern inland portions of the Basin show greater variability in annual minimum and maximum temperatures. All portions of the Basin have had recorded temperatures over 100°F in recent years.

Although the Basin has a semiarid climate, the air near the surface is moist due to the presence of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the Basin by offshore winds, the ocean effect is dominant. Periods with heavy fog are frequent, and low stratus clouds, occasionally referred to as "high fog," are a characteristic climate feature. Annual average relative humidity is 70 percent at the coast and 57 percent in the eastern part of the Basin. Precipitation in the Basin is typically 9 to 14 inches annually and is rarely in the form of snow or hail due to typically warm weather. The frequency and amount of rainfall is greater in the coastal areas of the Basin.

The height of the inversion[1] is important in determining pollutant concentration. When the inversion is approximately 2,500 feet above sea level, the sea breezes carry the pollutants inland to escape over the mountain slopes or through the passes. At a height of 1,200 feet, the terrain prevents the pollutants from entering the upper atmosphere, resulting in a settlement in the foothill communities. Below 1,200 feet, the inversion puts a tight lid on pollutants, concentrating them in a shallow layer over the entire coastal basin. Usually, inversions are lower before sunrise than during the day. Mixing heights for inversions are lower in the summer and more persistent, and are partly responsible for the high levels of ozone (O_3) observed during summer months in the Basin. Smog in Southern California is generally the result of these temperature inversions combining with coastal day winds and local mountains to contain the pollutants for long periods of time, allowing them to form secondary pollutants by reacting with sunlight. The Basin has a limited ability to disperse these pollutants due to typically low wind speeds.

The site vicinity offers clear skies and sunshine yet is still susceptible to air inversions. These inversions trap a layer of stagnant air near the ground, where it is then further loaded with pollutants. These inversions cause haziness, which is caused by moisture, suspended dust, and a variety of chemical aerosols emitted by trucks, automobiles, furnaces, and other sources.

The City experiences average high temperatures of up to 92°F during August, and average low temperatures of 42°F during December. The City gets approximately 17.32 inches of precipitation per year, with the most precipitation occurring in February (Weather Channel 2019).

Local Ambient Air Quality

The SCAQMD monitors air quality at 37 monitoring stations throughout the Basin. Each monitoring station is located within a Source Receptor Area (SRA). The communities within the same SRA are expected to have similar climatology and ambient air pollutant concentrations. The project site is located in the East San Gabriel Valley SRA (SRA 9). The monitoring station representative of SRA 9 is the Azusa station, which is located at 803 N. Loren Avenue, approximately 2.82 miles north of the site. The air pollutants measured at the Azusa station site include O_3, carbon monoxide (CO), particulate matter 2.5 microns in diameter or less ($PM_{2.5}$), particulate matter 10 microns in diameter or less (PM_{10}), and nitrogen dioxide (NO_2). The air quality data monitored at the Azusa station from 2016 to 2018 are presented in ***Table 3.2-1, Measured Air Quality Levels***.

Criteria pollutants are pollutants regulated through the development of human health-based and/or environmentally based criteria for setting permissible levels. Criteria pollutants, their typical sources, and effects are identified below:

Carbon Monoxide (CO). CO is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95 percent of all CO emissions.

[1] The inversion refers to weather conditions where warm air acts as a lid holding colder air as well as air pollutants closer to the ground.

Table 3.2-1
MEASURED AIR QUALITY LEVELS

Pollutant	Primary Standard		Year	Maximum Concentration[1]	Number of Days State/Federal Std. Exceeded[4]
	California	Federal			
Carbon Monoxide (CO) (1-Hour)	20 ppm for 1 hour	35 ppm for 1 hour	2016 2017 2018	1.347 ppm 1.771 1.447	0/0 0/0 0/0
Ozone (O_3) (1-Hour)	0.09 ppm for 1 hour	0.12 ppm for 1 hour (1979)	2016 2017 2018	0.146 ppm 0.152 0.139	30/4 38/7 24/3
Ozone (O_3) (8-Hour)	0.070 ppm for 8 hours	0.070 ppm for 8 hours	2016 2017 2018	0.107 ppm 0.114 0.100	40/39 64/62 43/42
Nitrogen Dioxide (NO_x)	0.18 ppm for 1 hour	0.100 ppm for 1 hour	2016 2017 2018	0.046 ppm 0.058 0.059	0/0 0/0 0/0
Particulate Matter (PM_{10}) [2, 3]	50 µg/m^3 for 24 hours	150 µg/m^3 for 24 hours	2016 2017 2018	74 µg/m^3 83.9 78.3	12/0 7/0 10/0
Fine Particulate Matter ($PM_{2.5}$) [3]	No Separate State Standard	35 µg/m^3 for 24 hours	2016 2017 2018	32.1 µg/m^3 24.9 41.8	0/0 0/0 3/1

Table Notes:
ppm = parts per million
µg/m^3 = micrograms per cubic meter
PM_{10} = particulate matter 10 microns in diameter or less
$PM_{2.5}$ = particulate matter 2.5 microns in diameter or less
1. Maximum concentration is measured over the same period as the California Standard.
2. PM_{10} exceedances are based on state thresholds established prior to amendments adopted on June 20, 2002.
3. PM_{10} and $PM_{2.5}$ exceedances are derived from the number of samples exceeded, not days.
4. Different number of exceedances for federal and state standards due to differences in statistical precision and reporting criteria
Sources:
California Air Resources Board, ADAM Air Quality Data Statistics, http://www.arb.ca.gov/adam/, accessed on August 23, 2019.
California Air Resources Board, AQMIS2: Air Quality Data, https://www.arb.ca.gov/aqmis2/aqdselect.php, accessed on August 23, 2019.

CO replaces oxygen in the body's red blood cells. Individuals with a deficient blood supply to the heart, patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes are most susceptible to the adverse effects of CO exposure. People with heart disease are also more susceptible to developing chest pains when exposed to low levels of carbon monoxide.

Ozone (O_3). Ozone occurs in two layers of the atmosphere. The layer surrounding the earth's surface is the troposphere. The troposphere extends up to approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric (the "good" ozone layer) extends upward from about 10 to 30 miles and protects life on earth from the sun's harmful ultraviolet rays. "Bad" ozone is a photochemical pollutant, and needs volatile organic compounds (VOCs), nitrogen oxides (NO_X), and sunlight to form; therefore, VOCs and NO_X are ozone precursors. To reduce ozone concentrations, it is necessary to control the emissions of these ozone precursors. Significant ozone formation generally requires an adequate amount of precursors in the atmosphere and a period of several hours in a stable

atmosphere with strong sunlight. High ozone concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

While ozone in the upper atmosphere (stratosphere) protects the earth from harmful ultraviolet radiation, high concentrations of ground-level ozone (in the troposphere) can adversely affect the human respiratory system and other tissues. Ozone is a strong irritant that can constrict the airways, forcing the respiratory system to work hard to deliver oxygen. Individuals exercising outdoors, children, and people with preexisting lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible to the health effects of ozone. Short-term exposure (lasting for a few hours) to ozone at elevated levels can result in aggravated respiratory diseases such as emphysema, bronchitis and asthma, shortness of breath, increased susceptibility to infections, inflammation of the lung tissue, and increased fatigue, as well as chest pain, dry throat, headache, and nausea.

Nitrogen Dioxide (NO_2). NO_X are a family of highly reactive gases that are a primary precursor to the formation of ground-level ozone and react in the atmosphere to form acid rain. NO_2 (often used interchangeably with NO_X) is a reddish-brown gas that can cause breathing difficulties at elevated levels. Peak readings of NO_2 occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). NO_2 can irritate and damage the lungs and lower resistance to respiratory infections such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to NO_2 concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to NO_2 may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

Coarse Particulate Matter (PM_{10}). PM_{10} refers to suspended particulate matter, which is smaller than 10 microns or ten one-millionths of a meter. PM_{10} arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms. PM_{10} scatters light and significantly reduces visibility. In addition, these particulates penetrate into lungs and can potentially damage the respiratory tract. On June 19, 2003, the California Air Resources Board (CARB) adopted amendments to the Statewide 24-hour particulate matter standards based upon requirements set forth in the Children's Environmental Health Protection Act (Senate Bill 25).

Fine Particulate Matter ($PM_{2.5}$). Due to increased concerns over health impacts related to fine particulate matter (particulate matter 2.5 microns in diameter or less), both state and federal $PM_{2.5}$ standards have been created. Particulate matter impacts primarily affect infants, children, the elderly, and those with preexisting cardiopulmonary disease. In 1997, the U.S. Environmental Protection Agency (EPA) announced new $PM_{2.5}$ standards. Industry groups challenged the new standard in court and the implementation of the standard was blocked. However, upon appeal by the EPA, the United States Supreme Court reversed this decision and upheld the EPA's new standards. On January 5, 2005, the EPA published a Final Rule in the Federal Register that designates the Basin as a nonattainment area for federal $PM_{2.5}$ standards. On June 20, 2002, CARB adopted amendments for statewide annual ambient PM air quality standards. These standards were revised/established due to increasing concerns by CARB that the previous standards were inadequate, as almost everyone in California is exposed to levels at or above the current state standards during some parts of the year, and the statewide potential for significant health impacts associated with

PM exposure was determined to be large and wide-ranging. The Basin is designated as nonattainment for the state $PM_{2.5}$ standards.

Sulfur Dioxide (SO_2). SO_2 is a colorless, irritating gas with a rotten egg smell; it is formed primarily by the combustion of sulfur-containing fossil fuels. Sulfur dioxide is often used interchangeably with SO_X and lead. Exposure of a few minutes to low levels of SO_2 can result in airway constriction in some asthmatics.

Volatile Organic Compounds (VOC). VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have an odor; some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a precursor to a criteria pollutant, O_3. The SCAQMD uses the terms VOC and ROG (see below) interchangeably.

Reactive Organic Gases (ROG). Similar to VOC, ROG are precursors in forming ozone and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NOx react in the presence of sunlight. ROGs are a precursor to a criteria pollutant since they are a precursor to O_3. The SCAQMD uses the terms ROG and VOC interchangeably.

Sensitive Receptors

Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive populations that are in proximity to localized sources of toxics and CO are of particular concern. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The following types of people are most likely to be adversely affected by air pollution, as identified by CARB: children under 14, elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. Locations that may contain a high concentration of these sensitive population groups are called sensitive receptors and include residential areas, hospitals, day-care facilities, elder-care facilities, elementary schools, and parks. The following receptors were identified as sensitive receptors in vicinity of the site:

- The proposed site is surrounded by adjacent residential receptors to the north, east, and south.
- The closest school is the Northview High School, located approximately 530 feet southwest.
- The closest child-care center is the Grace Lutheran Preschool, located approximately 0.28 miles northeast, on East Covina Boulevard.
- The closest assisted living facility is A Right Place for Seniors, located approximately 0.07 miles southeast, on West Cypress Street.
- The closest hospital is the Kindred Hospital San Gabriel Valley, located approximately 0.8 miles southwest, on Lark Ellen Avenue.

3.2.2 REGULATORY AND PLANNING FRAMEWORK

Federal

U.S. Environmental Protection Agency

The EPA is responsible for implementing the federal Clean Air Act (CAA), which was first enacted in 1955 and amended numerous times after. The CAA established federal air quality standards known as the National Ambient Air Quality Standards (NAAQS). These standards identify levels of air quality for "criteria" pollutants that are considered the maximum levels of ambient (background) air pollutants considered safe, with an adequate margin of safety, to protect the public health and welfare; refer to ***Table 3.2-2, National and California Ambient Air Quality Standards***.

State

California Air Resources Board

CARB administers the air quality policy in California. The California Ambient Air Quality Standards (CAAQS) were established in 1969 pursuant to the Mulford-Carrell Act. These standards, included with the NAAQS in ***Table 3.2-2***, are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates. The California Clean Air Act (CCAA), which was approved in 1988, requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with CAAQS. These AQMPs also serve as the basis for the preparation of the State Implementation Plan for the state of California.

Like the EPA, CARB designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data show that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment.

Regional

South Coast Air Quality Management District

The SCAQMD is one of 35 air quality management districts that have prepared AQMPs to accomplish a 5 percent annual reduction in emissions. On March 3, 2017, the SCAQMD Governing Board approved the 2016 AQMP, which is a regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies, while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) and updated emission inventory methodologies for various source categories.

Table 3.2-2
NATIONAL AND CALIFORNIA AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California[1]		Federal[2]	
		Standard[3]	Attainment Status	Standards[3,4]	Attainment Status
Ozone (O_3)	1 Hour	0.09 ppm (180 μg/m³)	**Nonattainment**	N/A	N/A[5]
	8 Hours	0.070 ppm (137 μg/m³)	**Nonattainment**	0.070 ppm (137 μg/m³)	**Nonattainment**
Particulate Matter (PM_{10})	24 Hours	50 μg/m³	**Nonattainment**	150 μg/m³	Attainment/Maintenance
	Annual Arithmetic Mean	20 μg/m³	**Nonattainment**	N/A	N/A
Fine Particulate Matter ($PM_{2.5}$)	24 Hours	No Separate State Standard		35 μg/m³	**Nonattainment**
	Annual Arithmetic Mean	12 μg/m³	**Nonattainment**	12.0 μg/m³	**Nonattainment**
Carbon Monoxide (CO)	8 Hours	9.0 ppm (10 mg/m³)	Attainment	9 ppm (10 mg/m³)	Attainment/Maintenance
	1 Hour	20 ppm (23 mg/m³)	Attainment	35 ppm (40 mg/m³)	Attainment/Maintenance
Nitrogen Dioxide (NO_2)[5]	Annual Arithmetic Mean	0.030 ppm (57 μg/m³)	N/A	53 ppb (100 μg/m³)	Attainment/Maintenance
	1 Hour	0.18 ppm (339 μg/m³)	Attainment	100 ppb (188 μg/m³)	Attainment/Maintenance
Lead (Pb)[7,8]	30 days Average	1.5 μg/m³	Attainment	N/A	N/A
	Calendar Quarter	N/A	N/A	1.5 μg/m³	**Nonattainment**
	Rolling 3-Month Average	N/A	N/A	0.15 μg/m³	**Nonattainment**
Sulfur Dioxide (SO_2)[6]	24 Hours	0.04 ppm (105 μg/m³)	Attainment	0.14 ppm (for certain areas)	Unclassified/Attainment
	3 Hours	N/A	N/A	N/A	N/A
	1 Hour	0.25 ppm (655 μg/m³)	Attainment	75 ppb (196 μg/m³)	N/A
	Annual Arithmetic Mean	N/A	N/A	0.30 ppm (for certain areas)	Unclassified/Attainment
Visibility-Reducing Particles[9]	8 Hours (10 a.m. to 6 p.m., PST)	Extinction coefficient = 0.23 km@<70 percent RH	Unclassified	**No Federal Standards**	
Sulfates	24 Hour	25 μg/m³	Attainment		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 μg/m³)	Unclassified		
Vinyl Chloride[7]	24 Hour	0.01 ppm (26 μg/m³)	N/A		

Notes: μg/m³ = micrograms per cubic meter; ppm = parts per million; ppb = parts per billion; km = kilometer(s); RH = relative humidity; PST = Pacific Standard Time; N/A = Not Applicable

California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μg/m³ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of ppb. California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

In 1989, CARB converted both the general Statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the Statewide and Lake Tahoe Air Basin standards, respectively.

Source: CARB 2016.

The 2016 AQMP relies on a multi-level partnership of governmental agencies at the federal, state, regional, and local level. These agencies (EPA, CARB, local governments, Southern California Association of Governments [SCAG] and the SCAQMD) are the primary agencies that implement the AQMP programs.

The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's latest RTP/SCS, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. The 2016 AQMP includes integrated strategies and measures to meet the NAAQS. To ensure air quality goals are met while maximizing benefits and minimizing adverse impacts to the regional economy, the following policy objectives have guided the development of the 2016 AQMP:

- Eliminate reliance on future technologies (CAA Section 182[e][5]) measures to the maximum extent feasible;
- Calculate and take credit for co-benefits from other planning efforts;
- Develop a strategy with fair-share emission reductions at the federal, state, and local levels;
- Invest in strategies and technologies meeting multiple objectives regarding air quality, climate change, air toxics exposure, energy, and transportation;
- Identify and secure significant funding for incentives to implement early deployment and commercialization of zero and near-zero technologies;
- Enhance the socioeconomic analysis and pursue the most efficient and cost-effective path to achieve multi-pollutant and multi-deadline targets; and
- Prioritize enforceable regulatory measures as well as non-regulatory, innovative, and "win-win" approaches for emission reductions.

In addition to the 2016 AQMP and its rules and regulations, the SCAQMD published the *CEQA Air Quality Handbook*. The SCAQMD *CEQA Air Quality Handbook* provides guidance to assist local government

agencies and consultants in developing the environmental documents required by CEQA. With the help of the *CEQA Air Quality Handbook*, local land use planners and other consultants are able to analyze and document how proposed and existing projects affect air quality and should be able to fulfill the requirements of the CEQA review process. The SCAQMD is in the process of developing an *Air Quality Analysis Guidance Handbook* to replace the current *CEQA Air Quality Handbook* approved by the SCAQMD Governing Board in 1993.

Local

City of Covina General Plan

Applicable goals and policies related to air quality from the *City of Covina General Plan* (General Plan) Land Use Element and Natural Resources and Open Space Element are listed below.

Land Use Element

- Goal: A physical environment that provides for the housing, employment, business, service, recreational, social, educational, cultural, and entertainment needs of and maintains and enhances a high quality of life for its residents.
    - Objective 1: A climate where moderate residential, commercial, and industrial development and redevelopment are accommodated.
        - General Land Use
            - Policy 14: Require that future growth, infill, and revitalization activities be consistent with City-adopted positions, policies, and programs regarding regional planning and growth management matters—such as air quality attainment, recycling, hazardous waste management, trip reduction, congestion management, stormwater runoff, water quality, housing, transportation, and circulation.

Natural Resources and Open Space Element

- Goals and Policies – Natural Resources: A setting in which a high environmental quality is achieved through the bona fide conservation and protection of existing natural resources.
    - Policy Area 1: Water Resources and Air Quality.
        - Policy o: Comply with applicable portions of Federal, State, regional, and County plans and programs pertaining to air pollution mitigation/air quality enhancement by following, in a manner that recognizes local needs, issues, views, and policy and financial constraints, various vehicular emissions-reducing and traffic congestion-reducing land use and transportation control and energy conservation measures, proposals, and policies outlined in the Land Use and Circulation Elements, to the greatest extent feasible and practical.
        - Policy t: Preclude the development of land uses and land use practices that would contribute significantly to air quality degradation.

- Programs/Implementation Measures
    - Natural Resources
        - Air Pollution Mitigation/Air Quality Enhancement Measures
            - The community will continue to follow in a reasonable manner various measures, proposals, and strategies outlined in the Land Use and Circulation Elements that comply with applicable portions of Federal, State, regional, and County plans and programs and aim to reduce vehicle emissions and traffic congestion as well as to provide alternative modes of transportation.

3.2.3 THRESHOLDS OF SIGNIFICANCE

Regional Air Quality

In its *CEQA Air Quality Handbook* (1993), the SCAQMD has established significance thresholds to assess the impact of project-related air pollutant emissions. ***Table 3.2-3, SCAQMD Regional Pollutant Emission Thresholds of Significance***, presents these significance thresholds. There are separate thresholds for short-term construction and long-term operational emissions. A project with daily emission rates below these thresholds is considered to have a less than significant effect on regional air quality from both a direct and cumulative impact standpoint.

Table 3.2-3
SCAQMD REGIONAL POLLUTANT EMISSION THRESHOLDS OF SIGNIFICANCE

Phase	Pollutant (pounds/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Construction	75	100	550	150	150	55
Operation	55	55	550	150	150	55

Notes: VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = particulate matter smaller than 10 microns; $PM_{2.5}$ = particulate matter smaller than 2.5 microns
Source: SCAQMD 1993.

Local Air Quality

Localized Significance Thresholds

Localized Significance Thresholds (LSTs) were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (revised July 2008) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with proposed projects. The SCAQMD provides the LST lookup tables for 1, 2, and 5-acre projects emitting CO, NO_X, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each SRA and the distance to the nearest sensitive receptor.

The SCAQMD recommends that any project disturbing over 5 acres during construction should perform air quality dispersion modeling to assess impacts to nearby sensitive receptors.

Localized CO

In addition, a project would result in a local air quality impact if the project resulted in increased traffic volumes and/or decreases in level of service (LOS) that would exceed the CO ambient air quality standards of 20 parts per million (ppm) for 1-hour CO concentration levels, and 9 ppm for 8-hour CO concentration levels. If the CO concentrations at potentially impacted intersections with the project are lower than the standards, then there is no significant impact. If future CO concentrations with the project are above the standard, then the project would have a significant local air quality impact.

Cumulative Emissions

The SCAQMD's 2016 AQMP was prepared to accommodate growth, meet state and federal air quality standards, and minimize the fiscal impact that pollution control measures have on the local economy. According to the *CEQA Air Quality Handbook*, project-related emissions that fall below the established construction and operational thresholds are considered less than significant.

SCAQMD rule development through the 1970s and 1980s resulted in dramatic improvement in Basin air quality. Nearly all control programs developed through the early 1990s relied on (i) the development and application of cleaner technology; (ii) add-on emission controls, and (iii) uniform CEQA review throughout the Basin. Industrial emission sources have been significantly reduced by this approach and vehicular emissions have been reduced by technologies implemented at the state level by CARB.

As discussed above, the SCAQMD is the lead agency charged with regulating air quality emission reductions for the entire Basin. The SCAQMD's AQMP represents a regional blueprint for achieving healthful air on behalf of the 16 million residents in the Basin. The historical improvement in air quality since the 1970s is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs and by utilizing uniform CEQA review throughout the Basin.

Although vehicle miles traveled in the Basin continue to increase, NO_x and VOC levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_x emissions from electric utilities have also decreased due to use of cleaner fuels and renewable energy. The overall trends of PM_{10} and $PM_{2.5}$ in the air (not emissions) show an overall improvement since 1975. Direct emissions of PM_{10} have remained somewhat constant in the Basin and direct emissions of $PM_{2.5}$ have decreased slightly since 1975. Area-wide sources (fugitive dust from roads, dust from construction and demolition, and other sources) contribute the greatest amount of direct PM emissions.

Part of the control process of the SCAQMD's duty to greatly improve the air quality in the Basin is the uniform CEQA review procedures required by the SCAQMD's *CEQA Handbook*. It is not practical or feasible to attempt a region-wide quantitative assessment of all potential new pollution sources, at any given point in time, to determine the precise contribution of an individual land use project as an element of the total combined emissions from hundreds of proposed new development, infrastructure, community facilities, etc. occurring throughout the Basin. Therefore, SCAQMD thresholds were established as indicators of a

cumulatively considerable contribution to an existing or potential violation of health-based air quality standards (SCAQMD 2003b).[2] In accordance with SCAQMD methodology, projects that do not exceed the SCAQMD's recommended significance thresholds or can be mitigated to less than significant levels at a project level do not contribute a cumulatively considerable level of emissions on a regional basis. The single threshold of significance used to assess direct and cumulative project impacts has in fact "worked" as evidenced by the track record of the air quality in the Basin dramatically improving over the course of the past decades. As stated by the SCAQMD, its thresholds of significance are based on factual and scientific data and are therefore appropriate thresholds of significance to use for this project.

CEQA Significance Criteria

Appendix G of the *CEQA Guidelines* (as amended through December 31, 2019) contains the Environmental Checklist form that was used during the preparation of this EIR. Accordingly, a project may create a significant adverse environmental impact if it would:

a) Conflict with or obstruct implementation of the applicable air quality plan.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

c) Expose sensitive receptors to substantial pollutant concentrations.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Based on these significance thresholds and criteria, the project's effects have been categorized as either "no impact," a "less than significant impact," or a "potentially significant impact." Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a significant unavoidable impact. The standards used to evaluate the significance of impacts are often qualitative rather than quantitative, since appropriate quantitative standards are either not available for many types of impacts or are not applicable for some types of projects.

3.2.4 METHODOLOGY

This analysis focuses on the potential change in the air quality environment due to implementation of the project. Air pollutant emissions would result from both construction and operation of the project. Specific methodologies used to evaluate these emissions are discussed below.

Construction

Daily regional and localized emissions during construction were forecasted based on the proposed construction schedule and applying the mobile-source and fugitive dust emissions factors derived from the SCAQMD-recommended California Emissions Estimator Model (CalEEMod) (Version 2016.3.2).

[2] SCAQMD "uses the same significance thresholds for project specific and cumulative impacts. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same." (SCAQMD 2003b).

Details of the modeling assumptions are provided in **Appendix C**. The calculations of the emissions generated during project construction activities reflect the type and quantities of construction equipment that would be used during demolition, grading, trenching, paving, building construction, and architectural coating applications. To determine if a significant air quality impact would occur, the daily regional and localized emissions generated by the proposed project were compared against the SCAQMD significance thresholds.

Operations

Analysis of the project's likely impact on regional and local air quality during project operations takes into consideration four types of sources: area, energy, mobile, and stationary. Similar to construction, the SCAQMD's CalEEMod software was used for the evaluation of project emissions during operation. CalEEMod was used to calculate on-road fugitive dust, architectural coatings, landscape equipment, energy use, mobile source, and stationary source emissions. To determine if a significant air quality impact would occur, the net increase in regional operational emissions generated by the project was compared against SCAQMD significance thresholds.

3.2.5 ANALYSIS

Impact 3.2a The project would not conflict with or obstruct implementation of the 2016 AQMP and impacts would be less than significant.

Discussion

On March 3, 2017, the SCAQMD Governing Board adopted the 2016 AQMP, which incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, RTP/SCS, and updated emission inventory methodologies for various source categories. According to the SCAQMD's *CEQA Air Quality Handbook*, two main criteria must be addressed:

Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

a) Would the project result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?

Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of a project's pollutant emissions relative to localized pollutant concentrations associated with the CAAQS and NAAQS is used as the basis for evaluating project consistency. As discussed under Impact 3.2b and Impact 3.2c, the project's short-term construction emissions, long-term operational emissions, and localized concentrations of CO, NO_X, PM_{10}, and $PM_{2.5}$ would be less than significant during project construction and less than significant during project operations. Therefore, the project would not result in an increase in the frequency or severity of existing air quality violations. Because VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOC plays in O_3 formation, it is classified as a precursor pollutant and only a regional

emissions threshold has been established. As such, the project would not cause or contribute to localized air quality violations or delay the attainment of air quality standard or interim emissions reductions specified in the AQMP.

Criterion 2:

With respect to the second criterion, it is important to recognize that air quality planning within the Basin focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether the project exceeds the assumptions utilized in preparing the forecasts presented in the 2016 AQMP. Determining whether a project exceeds the assumptions in the 2016 AQMP involves the evaluation of the following criterion:

a) Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?

In the case of the 2016 AQMP, three sources of data form the basis for the projections of air pollutant emissions: the General Plan, SCAG's Growth Management Chapter of the Regional Comprehensive Plan, and SCAG's RTP/SCS. The RTP/SCS also provides socioeconomic forecast projections of regional population growth. The City Municipal Code prohibits development of single-family residential homes in areas zoned C-4.[3] As such, the project conflicts with current zoning designations for the site. Therefore, the project is proposing the Cypress Villas Specific Plan to establish custom development standards corresponding to the proposed residential development plan, a General Plan amendment to redesignate the eastern portion of the project site from General Commercial to Medium-Density Residential, and a zone change to redesignate the eastern portion of the project site from Commercial Zone Highway to Multi-Family Zone. As discussed in Section 3.5, Population and Housing, of this EIR, the proposed project would not result in exceeding growth projections for Covina that are identified in the RTP/SCS. Therefore, the project's air emissions would not result in an exceedance of emissions forecasts for the Covina area that are included in the AQMP.

b) Would the project implement all feasible air quality mitigation measures?

The proposed project would result in less than significant air quality impacts. Compliance with all feasible emission reduction measures identified by the SCAQMD would be required as identified in Impacts 3.2b and 3.2c. As such, the proposed project meets this 2016 AQMP consistency criterion.

c) Would the project be consistent with the land use planning strategies set forth in the AQMP?

The proposed project is consistent with AQMP land use planning strategies aimed at directing growth to infill sites and encouraging mixed-use/compact forms of development that can reduce vehicle trips and trip lengths. As such, the proposed project meets this AQMP consistency criterion.

[3] City of Covina Municipal Code 17.44.040

In conclusion, the determination of 2016 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Basin. The proposed project would not result in a significant long-term impact on the region's ability to meet state and federal air quality standards. Also, the proposed project would be consistent with the goals and policies of the 2016 AQMP for control of fugitive dust and for mixed use/compact/infill development strategies. As discussed above, the proposed project's long-term influence would also be consistent with the SCAQMD and SCAG's goals and policies and is considered consistent with the 2016 AQMP.

Mitigation Measures

No mitigation measures are required.

Impact 3.2b *The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Therefore, impacts would be less than significant.*

Discussion

SHORT-TERM CONSTRUCTION AIR EMISSIONS

Short-term air quality impacts would occur during grading and construction operations associated with implementation of the project. Temporary air emissions would result from the following activities:

- Particulate (fugitive dust) emissions from grading and building construction.
- Exhaust emissions from the construction equipment and the motor vehicles of the construction crew.
- VOC/ROG emissions from construction architectural coatings and paving.

The project involves construction activities associated with demolition, grading, paving, building construction, and architectural coating applications. The project would be constructed in independent commercial and residential phases over approximately 29 months and is estimated to commence in October 2020. Grading activities would be balanced on-site and require approximately 3,150 cubic yards of cut and approximately 2,700 cubic yards of fill. Exhaust emission factors for typical diesel-powered heavy equipment are based on the CalEEMod program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. Emissions for each construction phase have been quantified based upon the phase durations and equipment types. Refer to **Appendix C** for the CalEEMod outputs and results. ***Table 3.2-4, Maximum Daily Peak Construction Emissions***, presents the anticipated daily unmitigated and mitigated short-term construction emissions.

Table 3.2-4
MAXIMUM DAILY PEAK CONSTRUCTION EMISSIONS

Emissions Source	Pollutant (pounds/day)[1,2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Emissions						
2020	3.68	41.33	23.09	0.06	9.55	5.11
2021	5.10	27.09	27.33	0.06	3.16	1.74
2022	4.82	24.77	26.63	0.06	2.98	1.57
2023	4.59	22.29	26.00	0.06	2.84	1.44
Maximum Daily Emissions	**5.10**	**41.33**	**27.33**	**0.06**	**9.55**	**5.11**
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Construction Emissions with SCAQMD Rules Applied[2]						
2020	3.68	41.33	23.09	0.06	4.70	2.91
2021	5.10	27.09	27.33	0.06	2.76	1.64
2022	4.82	24.77	26.63	0.06	2.58	1.47
2023	4.59	22.29	26.00	0.06	2.44	1.34
Maximum Daily Emissions	**5.10**	**41.33**	**27.33**	**0.06**	**4.70**	**2.91**
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:

1. *Emissions were calculated using CalEEMod version 2016.3.2, as recommended by the SCAQMD.*
2. *The reduction/credits for construction emissions are based on "mitigation" included in CalEEMod and are required by the SCAQMD Rules. The "mitigation" applied in CalEEMod includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. The emissions results in this table represent the "mitigated" emissions shown in Appendix C.*

*Refer to **Appendix C** for assumptions used in this analysis.*

Fugitive Dust Emissions

Fugitive dust (PM_{10} and $PM_{2.5}$) from grading and construction is expected to be short term and would cease following project completion. Most of this material is composed of inert silicates, which are less harmful to health than the complex organic particulates released from combustion sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO_X and SO_X combining with ammonia. The greatest amount of fugitive dust generated is expected to occur during site preparation and grading; refer to **Appendix C**. Dust generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particular concern is the amount of PM_{10} generated as a part of fugitive dust emissions.

CalEEMod was used to calculate PM_{10} and $PM_{2.5}$ fugitive dust emissions as part of the site earthwork activities; refer to ***Table 3.2-4***. Maximum particulate matter emissions would occur during the initial stages of construction, when demolition and grading activities would occur. As detailed in ***Table 3.2-4***,

total PM_{10} and $PM_{2.5}$ emissions would not exceed the SCAQMD thresholds during construction. Further, the project would implement all required SCAQMD dust control techniques (e.g., daily watering), limit construction hours, and adhere to SCAQMD Rules 402 and 403 (which require watering of inactive and perimeter areas, track out requirements, etc.) to reduce PM_{10} and $PM_{2.5}$ concentrations. Thus, fugitive dust emissions would be approximately 90 percent below the thresholds of 150 and 55 pounds per day for PM_{10} and $PM_{2.5}$, respectively, and impacts related to fugitive dust emissions would be less than significant.

Construction Exhaust Emissions

Exhaust emissions would be generated by the operation of vehicles and equipment on the construction site, such as tractors, dozers, backhoes, and trucks. The majority of construction equipment and vehicles would be diesel powered, which tends to be more efficient than gasoline-powered equipment. Diesel-powered equipment produces lower carbon monoxide and hydrocarbon emissions than gasoline equipment, but produces greater amounts of NO_X, SO_X, and particulates per hour of activity (Sullivan et al. 2004). The transportation of machinery, equipment, and materials to and from the site, as well as construction worker trips, would also generate vehicle emissions during construction. As presented in ***Table 3.2-4***, unmitigated construction equipment and worker vehicle exhaust emissions would not exceed the emissions thresholds and impacts would be less than significant.

VOC Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates VOC emissions, which are O_3 precursors. As required, all architectural coatings for the proposed project structures would comply with SCAQMD Regulation XI, Rule 1113 – Architectural Coating. Rule 1113 provides specifications on painting practices as well as regulating the ROG content of paint. ROG emissions associated with the proposed project would be less than significant; refer to ***Table 3.2-4***.

Total Daily Construction Emissions

CalEEMod was used to model construction emissions for VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. As indicated in ***Table 3.2-4***, unmitigated construction emissions would not exceed SCAQMD thresholds; therefore, impacts would be less than significant.

LONG-TERM OPERATIONAL AIR EMISSIONS

Operational emissions generated by both stationary and mobile sources would result from normal daily activities on the site after construction is complete (i.e., increased concentrations of O_3, PM_{10}, and CO). Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, the operation of landscape maintenance and on-site equipment, and the use of consumer products. Stationary energy emissions would result from energy consumption associated with the project buildings, as described below. Mobile emissions would be generated by the motor vehicles traveling to and from the site. Emissions associated with each of these sources were calculated and are discussed below.

Area Source Emissions

Area source emissions include those generated by architectural coatings, consumer products, and landscape maintenance equipment as described below.

- *Architectural Coatings:* As part of project maintenance, architectural coatings on the project buildings would emit emissions from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings.
- *Consumer Products:* Consumer products include, but are not limited to, detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds, which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants.
- *Landscape Maintenance Equipment:* Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the site.

Energy Source Emissions

Energy source emissions would be generated as a result of electricity and natural gas (non-hearth) usage associated with the proposed project. The primary use of electricity and natural gas by the project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. It should be noted that the project would comply with the 2019 Title 24 standards, which require more energy efficient lighting and rooftop solar panels for new residential projects (53 percent more efficient) and the nonresidential standards, which are 30 percent more energy efficient than the 2016 standards.

Mobile Source Emissions

Project-related operational air quality impacts are derived predominantly from mobile sources, i.e., vehicle trips generated by the project. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the project on peak hour traffic volumes and traffic operations in the site vicinity. According to the Traffic Impact Analysis (refer to **Appendix F**) the project would generate approximately 3,716 net new daily vehicle trips.

Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, SO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern (NO_X and ROG react with sunlight to form O_3 [photochemical smog], and wind currents readily transport SO_X, PM_{10}, and $PM_{2.5}$). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Operational Emissions Summary

The project's long-term operational emissions estimates were calculated using the CalEEMod model; refer to **Appendix C**. This model predicts ROG, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions from area, energy, and mobile traffic sources associated with the proposed land uses. ***Table 3.2-5, Long-Term Operational Air Emissions***, presents the anticipated operational source emissions for the project. As indicated, the

operational emissions from the project would be well below regional thresholds of significance established by the SCAQMD for criteria air emissions. Therefore, a less than significant impact would occur in this regard.

Table 3.2-5
LONG-TERM OPERATIONAL AIR EMISSIONS

Scenario	Emissions (pounds per day)[1,3]					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Project Summer Emissions[2]						
Area Source	3.24	0.97	5.44	0.01	0.10	0.10
Energy Source	0.07	0.64	0.44	0.00	0.05	0.05
Mobile	4.49	17.28	41.24	0.14	11.07	3.03
Total Maximum Daily Emissions	**7.90**	**18.89**	**47.12**	**0.15**	**11.22**	**3.18**
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Project Winter Emissions[2]						
Area Source	3.34	0.97	5.44	0.01	0.10	0.10
Energy Source	0.07	0.64	0.44	0.00	0.05	0.05
Mobile	4.34	17.43	40.72	0.13	11.07	3.03
Total Maximum Daily Emissions	**7.74**	**19.04**	**46.60**	**0.14**	**11.22**	**3.19**
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:

1 Emissions were calculated using CalEEMod version 2016.3.2, as recommended by the SCAQMD.

2 The reduction/credits for operational emissions are based on 2019 Title 24 standards, which include rooftop solar panel installation.

3 The numbers may be slightly off due to rounding.

*Refer to **Appendix C** for assumptions used in this analysis.*

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, ozone precursors VOCs and NO_X affect air quality on a regional scale. Health effects related to ozone are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

Further, as noted in the Brief of Amicus Curiae by the SCAQMD (April 6, 2015) for the *Sierra Club v. County of Fresno*, the SCAQMD acknowledged it would be extremely difficult, if not impossible, to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Furthermore, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Unified Air Pollution Control District (April 13, 2015) for the *Sierra Club vs. County of Fresno*, the district has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that health effects quantification from ozone, as an example, is correlated with the increases in ambient level of ozone in the air (concentration) that an individual person breathes. SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient ozone levels over the entire region. The SCAQMD states that based on its own modeling in the SCAQMD's 2012 AQMP, a reduction of 432 tons (864,000 pounds) per day of NO_X and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce ozone levels at the highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from projects that are local in nature and of comparatively limited scale and intensity due to photochemistry and regional model limitations. Thus, as the project would not exceed SCAQMD thresholds for construction or operational air emissions, the project would have a less than significant impact for air quality health impacts.

Mitigation Measures

No mitigation measures are required.

Impact 3.2c *The project would not expose sensitive receptors to substantial pollutant concentrations*.

Discussion

LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (revised July 2008) for guidance. The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST screening lookup tables for projects that disturb/grade 1, 2, or 5 acres per day emitting CO, NO_X, $PM_{2.5}$, or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD recommends that any project over 5 acres in size should perform air quality dispersion modeling to assess impacts to nearby sensitive receptors from area source emissions. For LST analysis purposes, SCAQMD is divided into 38 SRAs, each of which contain specific localized air quality emission thresholds for CO, NO_X, $PM_{2.5}$, and PM_{10} to determine local air quality impacts. The project is located within SRA 9, East San Gabriel Valley.

Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with preexisting respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise.

Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors"; they are also known to be locations where an individual can remain for 24 hours.

The closest existing sensitive receptor are residential uses adjacent to the northern and eastern project property lines. Other sensitive receptors in the vicinity at greater distances than these would experience lower air impacts due to the additional particle dispersion from distance and the shielding of intervening structures.

CONSTRUCTION IMPACTS

The SCAQMD guidance on applying CalEEMod to LSTs specifies the number of acres a particular piece of equipment would likely disturb per day. SCAQMD provides LST thresholds for 1-, 2-, and 5-acre site disturbance areas; SCAQMD does not provide LST thresholds for projects over 5 acres. Based on default information provided by CalEEMod, the project is anticipated to disturb up to 66 acres during the grading phase (this includes multiple disturbances of the same ground area). The grading phase would take approximately 44 days in total to complete. As such, the project would actively disturb approximately 1.5 acres per day (66 acres divided by 44 days). Therefore, the LST thresholds for 1 acre were conservatively utilized for the construction LST analysis.

Sensitive land uses may be potentially affected by air pollutant emissions generated during on-site construction activities. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. As the nearest sensitive uses adjoin the project site, the LST values for 25 meters (82 feet) were used.

Table 3.2-6, Construction Localized Significance Emissions Summary, shows the localized construction-related emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ compared to the LSTs for SRA 9. It is noted that the localized emissions presented in ***Table 3.2-6*** are less than those in ***Table 3.2-4*** because localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust), and do not include off-site emissions (i.e., from hauling activities). As shown in ***Table 3.2-6***, air pollutant emissions resulting from project construction with SCAQMD rules applied would be below the SCAQMD thresholds and impacts would be less than significant.

Asbestos

Pursuant to guidance issued by the Governor's Office of Planning and Research, State Clearinghouse, lead agencies are encouraged to analyze potential impacts related to naturally occurring asbestos. Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural

weathering and erosion processes can act on asbestos-bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed.

Serpentinite and/or ultramafic rock are known to be present in 44 of California's 58 counties. These rocks are particularly abundant in the counties of the Sierra Nevada foothills, the Klamath Mountains, and Coast Ranges. According to the Department of Conservation Division of Mines and Geology, the site is not located in an area where naturally occurring asbestos is likely to be present (Department of Conservation Division of Mines and Geology 2000). Therefore, no impacts are anticipated to result.

OPERATIONAL IMPACTS

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary emissions sources or attracts mobile sources, i.e. trucks, that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). The proposed residential and commercial uses would not include stationary emissions sources or require regular (daily) or substantial truck traffic. Occasional truck trash pickup (once per week for homes and possibly more frequently for commercial uses) would occur at the site. These truck trash pickup activities would be intermittent and would not include extended periods of idling time; therefore, idling emissions from truck deliveries would be minimal. Additionally, potential emergency vehicle trips to and from the site would be sporadic and would not idle on-site or along adjacent roadways for long periods of time. Thus, due to the lack of such emissions, no long-term LST analysis is needed. Operational LST impacts would be less than significant in this regard.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

The Basin is designated as an attainment/maintenance area for the federal CO standards and an attainment area for state standards. There has been a decline in CO emissions; even though VMT on U.S. urban and rural roads have increased nationwide, estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions (EPA 2019). Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

According to the SCAQMD *CEQA Air Quality Handbook*, a potential CO hotspot may occur at any location where the background CO concentration already exceeds 9.0 parts per million (ppm), which is the 8-hour California ambient air quality standard. As previously discussed, the site is located in SRA 9, East San Gabriel Valley. Communities within each SRA are expected to have similar climatology and ambient air pollutant concentrations. The monitoring station representative of SRA 9 is Azusa station, which is located approximately 2.82 miles southwest of the site. The highest CO concentration at the Azusa station was measured at 1.45 ppm in 2018. As such, the background CO concentration does not exceed 9.0 ppm and a CO hotspot would not occur. Therefore, CO hotspot impacts would be less than significant in this regard.

Table 3.2-6
CONSTRUCTION LOCALIZED SIGNIFICANCE EMISSIONS SUMMARY

Phase	Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction On-Site Emissions				
2020[1]	40.89	22.28	9.32	5.05
2021[2]	20.94	19.18	1.21	1.14
2022[3]	19.00	18.96	1.05	0.98
2023[4]	17.62	18.84	0.92	0.86
Maximum Daily Emissions	**40.89**	**22.28**	**9.32**	**5.05**
SCAQMD Significance Threshold[6]	*89*	*623*	*5*	*3*
Threshold Exceeded Before Mitigation?	***No***	***No***	***Yes***	***Yes***
Construction On-Site Emissions with SCAQMD Rules Applied[5]				
2020[1]	40.89	22.28	4.53	2.86
2021[2]	20.94	19.18	1.21	1.14
2022[3]	19.00	18.96	1.05	0.98
2023[4]	17.62	18.84	0.92	0.86
Maximum Daily Emissions	**40.89**	**22.28**	**4.53**	**2.86**
SCAQMD Localized Threshold[6]	*89*	*623*	*5*	*3*
Threshold Exceeded After Mitigation?	***No***	***No***	***No***	***No***

Notes:

1 The grading phase emissions would present the worst-case scenario for NOx, CO, PM_{10} and $PM_{2.5}$ in 2020.

2 The building construction phase emissions would present the worst-case scenario for NOx, CO, PM_{10}, and $PM_{2.5}$ in 2021.

3 The building construction phase emissions would present the worst-case scenario for NOx, CO, PM_{10}, and $PM_{2.5}$ in 2022.

4 The building construction phase emissions would present the worst-case scenario for NOx, CO, PM_{10}, and $PM_{2.5}$ in 2023.

5 The reduction/credits for construction emissions applied in CalEEMod are based on the application of dust control techniques as required by SCAQMD Rule 403. The dust control techniques include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces twice daily; cover stockpiles with tarps; water all haul roads three times daily; and limit speeds on unpaved roads to 15 miles per hour.

6 The LST was determined using Appendix C of the SCAQMD Final Localized Significant Threshold Methodology guidance document for pollutants NO_x, CO, PM_{10}, and $PM_{2.5}$. The LST was based on the anticipated daily acreage disturbance for construction (approximately 1.5 acres; therefore, the threshold for 1 acre was used), a distance of 82 feet (25) meters to the closest sensitive receptor, and the source receptor area (SRA 9).

*Refer to **Appendix C** for assumptions used in this analysis.*

On-Site Vehicle Idling

A detailed CO analysis was conducted in the *Federal Attainment Plan for Carbon Monoxide* (CO Plan) for the SCAQMD's *2003* AQMP. The 2003 AQMP is the most recent AQMP that addresses CO concentrations. The locations selected for microscale modeling in the CO Plan are worst-case intersections in the Basin and would likely experience the highest CO concentrations.

Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles experienced the highest CO concentration (4.6 parts per million [ppm]), which is well below the 35 parts per million (ppm) 1-hr CO federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day.

The proposed project would have two drive-through lanes -- one at Building A and the other at Building D in the commercial side). It is estimated that a total of 23 vehicles or more could be queuing at the drive-through lanes at one time. CO emissions from idling vehicles queuing would disperse quickly and within a short distance and would not adversely affect the nearest sensitive receptors on- or off-site. As noted above, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles (with over 100,000 ADT) experienced a CO concentration of 4.6 ppm, which is well below the 35 ppm 1-hr CO federal standard. As such, it can be reasonably inferred that the number of vehicles queuing at the project's drive-through lanes (23) and daily trip generation (3,716 net new daily trips) would not have the potential to create a CO hotspot and/or exceed the 1-hour CO federal standard. Furthermore, the highest CO concentration at the Azusa station was measured at 1.45 ppm in 2018. As such, impacts would be less than significant in this regard.

Air Quality Health Impacts

As evaluated above, the project's air emissions would not exceed the SCAQMD's LST thresholds, and CO hotpots would not occur as a result of the proposed project. Therefore, the project would not exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_X, PM_{10}, or $PM_{2.5}$. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons (e.g., children and the elderly) are protected. In other words, the ambient air quality standards are purposefully set in a stringent manner to protect children, elderly, and those with existing respiratory problems. Thus, an adverse air quality health impact is not anticipated.

Mitigation Measures

No mitigation measures are required.

Impact 3.2d *The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people and a less than significant impact would occur.*

Discussion

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. As the project proposes a residential development, along with small retail/commercial spaces and drive-through restaurants, the project would not include any uses identified by the SCAQMD as being associated with odors.

Project construction activities may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short term in nature and cease upon project completion. In addition, the project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction

equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would further reduce the detectable odors from heavy-duty equipment exhaust. The project would also be required to comply with the SCAQMD Regulation XI, Rule 1113 – Architectural Coating, which would limit the VOC content of architectural coatings and further minimize odor impacts from ROG emissions during architectural coating.

Further, adherence to SCAQMD Rules 402 and 1138 (which require the testing of specific cooking devices, a catalytic oxidizer control device or other control device or method found to be as or more effective, etc.) would reduce the nuisance of operational restaurant odors. All on-site trash enclosures would be equipped with lids to prevent rainwater intrusion or heating through solar exposure, both of which could lead to odor generation from trash wastes. Any odor impacts to existing adjacent land uses would be short term and not substantial. As such, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant in this regard.

Mitigation Measures

No mitigation measures are required.

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3.3 GREENHOUSE GAS EMISSIONS

3.3 GREENHOUSE GAS EMISSIONS

This section quantifies greenhouse gas (GHG) emissions associated with the project and analyzes consistency with applicable plans, policies, and regulations intended to reduce statewide and regional GHG emissions.

For the purposes of GHG emissions associated with mobile sources, traffic information contained in the *NEC Azusa/Cypress (Albertson's Site) Traffic Impact Analysis*, prepared by TJW Engineering and dated November 20, 2019, was used in this analysis (see **Appendix F**).

3.3.1 EXISTING CONDITIONS

Scope of Analysis for Climate Change

The study area for climate change and the analysis of GHG emissions is broad as climate change is influenced by worldwide emissions and their global effects. However, the study area is also limited by CEQA Guidelines Section 15064(d), which directs lead agencies to consider an "indirect physical change" only if that change is a reasonably foreseeable impact, which may be caused by the project.

The baseline against which to compare potential impacts of the project includes the natural and anthropogenic drivers of global climate change, including worldwide GHG emissions from human activities that have increased by about 90 percent from 1970 to 2011 (EPA 2019a). The State of California is leading the nation in managing GHG emissions. Accordingly, the impact analysis for this project relies on guidelines, analyses, policies, and plans for reducing GHG emissions established by the California Governor and State Legislature, along with implementing programs administered by the California Air Resources Board (CARB).

Global Climate Change – Greenhouse Gases

The natural process through which heat is retained in the troposphere is called the "greenhouse effect."[1] The greenhouse effect traps heat in the troposphere through a three-fold process as follows: short wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long wave radiation; and GHG in the upper atmosphere absorb this long wave radiation and emit this long wave radiation into space and toward the Earth. This "trapping" of the long wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect.

The most abundant GHGs are water vapor and carbon dioxide (CO_2). Many other trace gases have greater ability to absorb and re-radiate long wave radiation; however, these gases are not as plentiful. For this reason, and to gauge the potency of GHGs, scientists have established a Global Warming Potential (GWP) for each GHG based on its ability to absorb and re-radiate long wave radiation.

GHGs for which a GWP has been established include the following:[2]

[1] The troposphere is the bottom layer of the atmosphere, which varies in height from the Earth's surface up to approximately 10 miles.

[2] All GWPs are given as 100-year GWP. Unless noted otherwise, all GWPs were obtained from the Intergovernmental Panel on Climate Change.

- *Water Vapor (H_2O)*. Although water vapor has not received the scrutiny of other GHGs, it is the primary contributor to the greenhouse effect. Natural processes, such as evaporation from oceans and rivers, and transpiration from plants, contribute 90 percent and 10 percent of the water vapor in our atmosphere, respectively. The primary human-related source of water vapor comes from fuel combustion in motor vehicles; however, it does not contribute a significant amount (less than 1 percent) to atmospheric concentrations of water vapor. The Intergovernmental Panel on Climate Change (IPCC) has not determined a GWP for water vapor.
- *Carbon Dioxide (CO_2)*. CO_2 is primarily generated by fossil fuel combustion in stationary and mobile sources. Due to the emergence of industrial facilities and mobile sources over the past 250 years, CO_2 emissions from fossil fuel combustion increased by 3.7 percent between 1990 and 2017 (EPA 2019b). CO_2 is the most widely emitted GHG and is the reference gas (GWP of 1) for determining GWPs for other GHGs.
- *Methane (CH_4)*. Methane is emitted from biogenic sources, incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. The United States' top three methane sources are landfills, natural gas systems, and enteric fermentation. Methane is the primary component of natural gas, used for space and water heating, steam production, and power generation. The GWP of methane is 25.
- *Nitrous Oxide (N_2O)*. Nitrous oxide is produced by both natural and human-related sources. Primary human-related sources include agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. The GWP of nitrous oxide is 298.
- *Hydrofluorocarbons (HFCs)*. HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) gains momentum. The 100-year GWPs of HFCs range from 124 for HFC-152 to 14,800 for HFC-23 (EPA 2019b).
- *Perfluorocarbons (PFCs)*. PFCs are compounds consisting of carbon and fluorine and are primarily created as a byproduct of aluminum production and semiconductor manufacturing. PFCs are potent GHGs with a GWP several thousand times that of CO_2, depending on the specific PFC. Another area of concern regarding PFCs is their long atmospheric lifetime (up to 50,000 years). The GWP of PFCs ranges from 7,390 to 12,200 (EPA 2019c).
- *Sulfur hexafluoride (SF_6)*. SF_6 is a colorless, odorless, nontoxic, nonflammable gas. SF_6 is the most potent GHG that has been evaluated by the IPCC with a GWP of 22,800. However, its global warming contribution is not as high as the GWP would indicate due to its low mixing ratio compared to CO_2 (4 parts per trillion [ppt] in 1990 versus 365 parts per million [ppm], respectively) (EPA 2019c).

In addition to the six major GHGs discussed above (excluding water vapor), many other compounds have the potential to contribute to the greenhouse effect. Some of these substances were previously identified as stratospheric ozone (O_3) depletors; therefore, their gradual phase out is currently in effect. The following is a listing of these compounds:

- *Hydrochlorofluorocarbons (HCFCs)*. HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part

of the Montreal Protocol, all developed countries that adhere to the Montreal Protocol are subject to a consumption cap and gradual phase out of HCFCs. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year GWPs of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b (IPCC 2015).

- *1,1,1 trichloroethane*. 1,1,1 trichloroethane or methyl chloroform is a solvent and degreasing agent commonly used by manufacturers. The GWP of methyl chloroform is 146 times that of CO_2 (IPCC 2015).
- *Chlorofluorocarbons (CFCs)*. CFCs are used as refrigerants, cleaning solvents, and aerosol spray propellants. CFCs were also part of the US Environmental Protection Agency's (EPA) Final Rule (57 Federal Register [FR] 3374) for the phase out of ozone-depleting substances. Currently, CFCs have been replaced by HFCs in cooling systems and a variety of alternatives for cleaning solvents. Nevertheless, CFCs remain suspended in the atmosphere contributing to the greenhouse effect. CFCs are potent GHGs with 100-year GWPs ranging from 3,800 for CFC 11 to 14,400 for CFC 13 (IPCC 2015).

3.3.2 REGULATORY AND PLANNING FRAMEWORK

Federal

To date, no national standards have been established for GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the private project level. Various efforts have been promulgated at the federal level to improve fuel economy and building energy efficiency for federal agencies and federal building projects to address climate change and its associated effects.

Energy Independence and Security Act of 2007. The Energy Independence and Security Act of 2007, among other key measures, requires the following, which would help reduce national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel by 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

US Environmental Protection Agency Endangerment Finding. The EPA authority to regulate GHG emissions stems from the US Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Clean Air Act and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) constitute a threat to public health and welfare. Thus, it is the Supreme Court's

interpretation of the existing Act and the EPA's assessment of the scientific evidence that form the basis for the EPA's regulatory actions.

Clean Power Plan and New Source Performance Standards for Electric Generating Units. On October 23, 2015, the EPA published a final rule (effective December 22, 2015) establishing the carbon pollution emission guidelines for existing stationary sources: electric utility generating units (80 FR 64510–64660), also known as the Clean Power Plan. These guidelines prescribe how states must develop plans to reduce GHG emissions from existing fossil fuel-fired electric generating units. The guidelines establish CO_2 emission performance rates representing the best system of emission reduction for two subcategories of existing fossil fuel-fired electric generating units: (1) fossil fuel-fired electric utility steam-generating units and (2) stationary combustion turbines. Concurrently, the EPA published a final rule (effective October 23, 2015) establishing standards of performance for GHG emissions from new, modified, and reconstructed stationary sources: electric utility generating units (80 FR 64661–65120). The rule prescribes CO_2 emission standards for newly constructed, modified, and reconstructed affected fossil fuel-fired electric utility generating units. The US Supreme Court stayed implementation of the Clean Power Plan pending resolution of several lawsuits. Additionally, in March 2017, President Trump directed the EPA Administrator to review the Clean Power Plan in order to determine whether it is consistent with current executive policies concerning GHG emissions, climate change, and energy.

Presidential Executive Order 13783. Presidential Executive Order 13783, Promoting Energy Independence and Economic Growth (March 28, 2017), orders all federal agencies to apply cost-benefit analyses to regulations of GHG emissions and evaluations of the social cost of carbon, nitrous oxide, and methane.

State

Various statewide and local initiatives to reduce the state's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term.

Executive Order S-1-07. Executive Order S-1-07, which was enacted by Governor Schwarzenegger in 2007, proclaims that the transportation sector is the main source of GHG emissions in California, generating more than 40 percent of statewide emissions. It establishes a goal to reduce the carbon intensity of transportation fuels sold in California by at least 10 percent by 2020. This order also directs CARB to determine whether this Low Carbon Fuel Standard (LCFS) could be adopted as a discrete early-action measure as part of the effort to meet the mandates in Assembly Bill (AB) 32. The development of the 2017 LCFS Update has identified the LCFS Standard as a regulatory measure to reduce GHG emissions to meet the 2030 emissions target. In calculating statewide emissions and targets, the 2017 Update has assumed the LCFS be will be extended to an 18 percent reduction in carbon intensity beyond 2020. On September 27, 2018, CARB approved a rulemaking package that amended the LCFS to relax the 2020 carbon intensity reduction from 10 percent to 7.5 percent and to require a carbon intensity target reduction of 20 percent by 2030.

Executive Order S-3-05. Executive Order S-3-05, adopted in 2005, sets forth a series of target dates by which statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;

- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The Executive Order directed the secretary of the California Environmental Protection Agency (Cal/EPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The secretary also submits biannual reports to the governor and California legislature describing the progress made toward the emissions targets, the impacts of global climate change on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with the executive order, the secretary of Cal/EPA created the California Climate Action Team, made up of members from various state agencies and commissions. The team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of California businesses, local governments, and communities and through state incentive and regulatory programs.

Executive Order S-13-08. Executive Order S-13-08 was adopted in 2008 to enhance the state's management of climate impacts including sea level rise, increased temperatures, shifting precipitation, and extreme weather events by facilitating the development of the state's first climate adaptation strategy. This strategy results in consistent guidance from experts on how to address climate change impacts in the State of California.

Executive Order S-14-08. Executive Order S-14-08 was adopted in 2008 to expand the state's Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity sold in the state to come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

Assembly Bill 1493. AB 1493 (also known as the Pavley Bill) requires that CARB develop and adopt, by January 1, 2005, regulations that achieve "the maximum feasible reduction of GHG emitted by passenger vehicles and light-duty trucks and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the State." To meet the requirements of AB 1493, CARB approved amendments to the California Code of Regulations (CCR) in 2004 by adding GHG emissions standards to California's existing standards for motor vehicle emissions. Amendments to CCR Title 13, Sections 1900 and 1961 and adoption of 13 CCR Section 1961.1 require automobile manufacturers to meet fleet-average GHG emissions limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty weight classes for passenger vehicles (i.e., any medium-duty vehicle with a gross vehicle weight rating less than 10,000 pounds that is designed primarily to transport people), beginning with the 2009 model year. Emissions limits are reduced further in each model year through 2016. The near-term standards were intended to achieve a reduction of about 22 percent in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term standards were intended to achieve a reduction of about 30 percent.

Assembly Bill 32 (California Global Warming Solutions Act of 2006). California passed the California Global Warming Solutions Act of 2006 (AB 32; *California Health and Safety Code* Division 25.5, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in

response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32. As of 2017, California's GHG emissions were 424 million metric tons of CO_2 equivalent ($MMTCO_2e$), which is 7 $MMTCO_2e$ below the 2020 GHG limit of 431 $MMTCO_2e$ established by AB 32. (CARB 2019)

Senate Bill 32 (SB 32). Signed into law on September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

Senate Bill 100 (SB 100). SB 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, 60 percent by December 31, 2030, and 100 percent by December 31, 2045. The bill would require the California Public Utilities Commission (CPUC), California Energy Commission (CEC), State Air Resources Board, and all other state agencies to incorporate that policy into all relevant planning. In addition, SB 100 would require the CPUC, CEC, and state board to utilize programs authorized under existing statutes to achieve that policy and, as part of a public process, issue a joint report to the legislature by January 1, 2021, and every four years thereafter, that includes specified information relating to the implementation of the policy.

CARB Scoping Plan. On December 11, 2008, CARB adopted its Climate Change Scoping Plan, which functions as a road map to achieve the California GHG reductions required by AB 32 through subsequently enacted regulations. CARB's Scoping Plan contains the main strategies California would implement to reduce the projected 2020 "Business as Usual" (BAU) emissions to 1990 levels, as required by AB 32. These strategies are intended to reduce CO_2eq[3] emissions by 174 MMT. This reduction of 42 $MMTCO_2eq$, or almost 10 percent from 2002 to 2004 average emissions, would be required despite the population and economic growth forecasted through 2020.

CARB's Scoping Plan calculates 2020 BAU emissions as those expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, commercial and residential, industrial). CARB used three-year average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. When the Scoping Plan process was initiated, 2004 was the most recent year for which actual data was available. The measures described in the Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan summarizes recent science related to climate change, including anticipated impacts to California and the levels of GHG reduction

3 Carbon Dioxide Equivalent (CO_2eq) - A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

necessary to likely avoid risking irreparable damage. It identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The first Scoping Plan update also looks beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observes that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal." The Scoping Plan update did not establish or propose any specific post-2020 goals, but identified such goals in water, waste, natural resources, clean energy, transportation, and land use.

On January 20, 2017, CARB released the proposed Second Update to the Scoping Plan, which identifies the state's post-2020 reduction strategy. The Second Update was approved on December 14, 2017, and reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32 (CARB 2017). The 2017 Scoping Plan establishes a new emissions limit of 260 million $MTCO_2eq$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030. The 2017 Scoping Plan Update contains the following goals:

1. SB 350
   - Achieve 50 percent Renewables Portfolio Standard (RPS) by 2030.
   - Doubling of energy efficiency savings by 2030.

2. Low Carbon Fuel Standard (LCFS)
   - Increased stringency (reducing carbon intensity 18 percent by 2030, up from 10 percent in 2020).

3. Mobile Source Strategy (Cleaner Technology and Fuels Scenario)
   - Maintain existing GHG standards for light- and heavy-duty vehicles.
   - Put 4.2 million zero-emission vehicles (ZEVs) on the roads.
   - Increase ZEV buses and delivery and other trucks.

4. Sustainable Freight Action Plan
   - Improve freight system efficiency.
   - Maximize use of near-zero emission vehicles and equipment powered by renewable energy.
   - Deploy over 100,000 zero-emission trucks and equipment by 2030.

5. Short-Lived Climate Pollutant (SLCP) Reduction Strategy
   - Reduce emissions of methane and hydrofluorocarbons 40 percent below 2013 levels by 2030.
   - Reduce emissions of black carbon 50 percent below 2013 levels by 2030.

6. SB 375 Sustainable Communities Strategies
   - Increased stringency of 2035 targets.

7. Post-2020 Cap-and-Trade Program
   - Declining caps, continued linkage with Québec, and linkage to Ontario, Canada.
   - CARB will look for opportunities to strengthen the program to support more air quality co-benefits, including specific program design elements.

8. 20 percent reduction in GHG emissions from the refinery sector.

9. By 2018, develop Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Senate Bill 375. Acknowledging the relationship between land use planning and transportation sector GHG emissions, SB 375 was passed by the State Assembly on August 25, 2008, and signed by the governor on September 30, 2008. The legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32. Reductions in GHG emissions can be achieved by, for example, locating employment opportunities close to transit. Under SB 375, each Metropolitan Planning Organization (MPO) is required to adopt a Sustainable Communities Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled (VMT) and trips so the region can meet a target, created by CARB, for reducing GHG emissions. If the SCS is unable to achieve the regional GHG emissions reduction targets, then the MPO is required to prepare an alternative planning strategy that shows how the GHG emissions reduction target can be achieved through alternative development patterns, infrastructure, and/or transportation measures.

Local

The City has not adopted a plan, program, or regulations with GHG reduction targets. It has adopted the statewide building energy efficiency standards codified in Title 24 CCR Part 6, which is intended, in part, to reduce GHGs resulting from off-site generation of electrical power consumed by buildings. The City has also adopted the California Green Building Standards Code, which contains additional measures that are aimed at reducing statewide GHGs from the building and transportation sectors.

3.3.3 THRESHOLDS OF SIGNIFICANCE

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. This section recommends certain factors to be considered in the determination of significance (i.e., the extent to which a project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The California Natural Resources Agency (CNRA) has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (see CEQA Guidelines Section 15064(h)(3)) (CNRA 2009a, pp. 11-13, 14, 16; 2009b). A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project (14 CCR Section 15064(h)(3).

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Nor have the SCAQMD, CARB, or any other state or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the project's impacts related to GHG emissions focuses on its consistency with statewide, regional plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the project's GHG-related impacts on the environment.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the project using recommended air quality models, as described below. The primary purpose of quantifying the project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted for the reduction or mitigation of GHG emissions. However, the significance of the project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the project.

CEQA Significance Criteria

The issues presented in the Initial Study Environmental Checklist (CEQA Guidelines Appendix G) have been utilized as thresholds of significance in this section. Accordingly, a project may create a significant environmental impact if it causes one or more of the following to occur:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Based on these significance thresholds and criteria, the project's effects have been categorized as either "no impact," a "less than significant impact," or a "potentially significant impact." Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a significant unavoidable impact.

3.3.4 METHODOLOGY

Consistency with Plans

The project's GHG impacts are evaluated by assessing the project's consistency with applicable local, regional, and statewide GHG reduction plans and strategies. On a regional level, the SCAG 2016–2040 *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) contains measures to achieve VMT reductions required under SB 375. On a statewide level, the 2017 Scoping Plan provides measures to achieve SB 32 targets through broad actions within the major economic sectors. Thus, if the project complies with these plans, policies, regulations, and requirements, the project would result in a less than significant impact because it would be consistent with the overarching state, regional, and local plans for GHG emissions reduction. A consistency analysis is provided below and describes the project's compliance

with performance-based standards included in the regulations outlined in the applicable portions of the 2016–2040 RTP/SCS and 2017 Scoping Plan.

Quantification of Emissions

In view of the above considerations, this EIR quantifies the project's total annual GHG emissions for informational purposes, taking into account the GHG emissions reduction features that would be incorporated into the project's design. The California Emissions Estimator Model version 2016.3.2 (CalEEMod) is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, which provided data (e.g., emission factors, trip lengths, meteorology, source inventory) to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.

3.3.5 ANALYSIS

Impact 3.3a The project would not generate greenhouse gas emissions, either directly or indirectly, that would have a significant impact on the environment and impacts would be less than significant.

Impact 3.3b The project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases and impacts would be less than significant.

PROJECT-RELATED SOURCES OF GREENHOUSE GASES

The proposed development plan includes a mixture of residential (61 single-family detached homes) and commercial land uses (13,000 square feet) on the 7.92-acre project site. The project would result in direct and indirect GHG emissions, mainly consisting of CO_2, N_2O, and CH_4, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on CO_2, N_2O, and CH_4. Direct project-related GHG sources include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Operational GHG estimations are based on energy emissions from natural gas usage and automobile emissions (passenger cars and trucks). CalEEMod relies upon trip data in the project's Traffic Impact Analysis (refer to **Appendix F**) and project-specific land use data to calculate emissions. ***Table 3.3-1, Projected Annual Greenhouse Gas Emissions***, presents the estimated CO_2, N_2O, and CH_4 emissions of the project. CalEEMod outputs are contained in **Appendix C**.

Direct Project-Related Sources of Greenhouse Gases

Construction Emissions. In accordance with SCAQMD guidance, construction GHG emissions are typically summed and amortized over a 30-year period, then added to the operational emissions. As shown in ***Table 3.3-1***, the project would result in 54.17 $MTCO_2eq$/year (amortized over 30 years), which represents a total of 1,625.10 $MTCO_2eq$ from construction activities (54.17 $MTCO_2eq$/year multiplied by 30 years).

Area Source. Area source emissions were calculated using CalEEMod and project-specific land use data. Project-related area sources include natural gas usage and landscape maintenance equipment, such as lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the site. As noted in ***Table 3.3-1***, the project would result in 14.32 $MTCO_2eq$/year of area source GHG emissions.

Mobile Source. The CalEEMod model relies upon trip data in the Traffic Impact Analysis and project-specific land use data to calculate mobile source emissions. The project-related operational emissions are derived predominantly from mobile sources. According to the Traffic Impact Analysis, the project would generate approximately 3,716 net new daily vehicle trips; refer to **Appendix F**. Based on the project-generated daily vehicle trips, the project would result in approximately 2,284.60 $MTCO_2eq$/year of mobile source-generated GHG emissions; refer to ***Table 3.3-1***.

Table 3.3-1
PROJECTED ANNUAL GREENHOUSE GAS EMISSIONS

Source	CO_2	CH_4		N_2O		Total Metric Tons of CO_2eq[2,3]
	Metric Tons/yr[1]	Metric Tons/yr[1]	Metric Tons of CO_2eq[1]	Metric Tons/yr[1]	Metric Tons of CO_2eq[1]	
Direct Emissions						
Construction (amortized over 30 years)	53.95	0.01	0.22	0.00	0.00	54.17
Area Source[4]	14.22	0.00	0.03	0.00	0.07	14.32
Mobile Source	2,281.49	0.12	3.11	0.00	0.00	2,284.60
Total Direct Emissions[2]	*2,349.66*	*0.13*	*3.37*	*0.00*	*0.07*	*2,353.10*
Indirect Emissions						
Energy[4]	334.42	0.01	0.35	0.00	1.42	336.19
Water Demand	31.86	0.17	4.31	0.00	1.31	37.47
Waste[4]	16.08	0.95	23.76	0.00	0.00	39.84
Total Indirect Emissions[2]	*382.36*	*1.14*	*28.42*	*0.01*	*2.73*	*413.51*
Total Project-Related Emissions[2]	***2,766.61 $MTCO_2eq$/yr***					

Notes:

1. *Emissions were calculated using CalEEMod version 2016.3.2, as recommended by the SCAQMD.*
2. *Totals may be slightly off due to rounding.*
3. *Carbon dioxide equivalent values calculated using the US Environmental Protection Agency Website, Greenhouse Gas Equivalencies Calculator, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed February 3, 2020.*
4. *The reduction/credits for operational emissions are based on 2019 Title 24 standards which include rooftop solar panel installation for the new homes.*

*Refer to **Appendix C**, Air Quality, GHG and Energy Modeling Worksheets, for detailed model input/output data.*

Indirect Project-Related Sources of Greenhouse Gases

Energy Consumption. Energy consumption emissions due to off-site electrical power generation by Southern California Edison (SCE) were calculated using the CalEEMod model and emission coefficients for SCE's power sources and project-specific land use data. The project would indirectly result in 336.19 $MTCO_2eq$/year due to energy consumption; refer to ***Table 3.3-1***.

Water Demand. Emissions from indirect energy impacts due to water demand would result in 37.47 $MTCO_2eq$/year; refer to ***Table 3.3-1***. This would occur due to generation of energy required to treat and transmit water supplies.

Solid Waste. Solid waste associated with project operations would result in 39.84 $MTCO_2eq$/year; refer to ***Table 3.3-1***. This would occur primarily due to decomposition of wastes at landfills, with resulting generation of methane gas.

Total Project-Related Sources of Greenhouse Gases

As shown in ***Table 3.3-1***, the total amount of project-related GHG emissions from direct and indirect sources combined would be 2,766.61 $MTCO_2eq$/year.

GHG PLAN CONSISTENCY

2017 Scoping Plan Consistency

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the legislature as the 2006 Global Warming Solutions Act (AB 32). In 2008, CARB approved a Scoping Plan as required by AB 32. The Scoping Plan has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The 2017 Scoping Plan Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the Scoping Plan (2013). Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

Table 3.3-2 summarizes the project's consistency with the 2017 Scoping Plan. As summarized, the project would not conflict with any of the provisions of the 2017 Scoping Plan and, in fact, supports four of the action categories through energy efficiency, water conservation, recycling, and landscaping.

Table 3.3-2
PROJECT CONSISTENCY WITH THE 2017 SCOPING PLAN

Sector / Source	Category / Description	Project Consistency Analysis
Area		
SCAQMD Rule 445 (Wood Burning Devices)	Restricts the installation of wood-burning devices in new development.	**Consistent.** Approximately 15 percent of California's major anthropogenic sources of black carbon include fireplaces and woodstoves (CARB 2017, Figure 4). The project must comply with SCAQMD Rule 445, which prohibits installation of wood-burning hearths (woodstove and fireplaces) in the proposed residential development.
Energy		
California Renewables Portfolio Standard, Senate Bill	Increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020. SB 350 requires 50 percent by	**Not Applicable.** The project would utilize energy from SCE, which is required to meet the 2020, 2030, 2045, and 2050 performance standards. In 2017, 29 percent

Sector / Source	Category / Description	Project Consistency Analysis
350 (SB 350) and Senate Bill 100 (SB 100)	2030. SB 100 requires 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.	of SCE's electricity came from renewable resources (CEC 2017). By 2030, SCE plans to achieve 80 percent carbon-free energy (SCE 2017).
CCR, Title 24, Building Standards Code	Energy Efficiency Standards for Residential and Nonresidential Buildings.	**Consistent.** The project must demonstrate that it will meet the applicable requirements of the 2019 Title 24 Building Energy Efficiency Standards.
Assembly Bill 1109 (AB 1109)	The Lighting Efficiency and Toxics Reduction Act (AB 1109) prohibits manufacturing specified general purpose lights that contain levels of hazardous substances prohibited by the European Union. AB 1109 also requires a reduction in average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.	**Not Applicable.** According to the CEC, energy savings from AB 1109 are achieved through codes and standards. Energy savings from AB 1109 are calculated as part of codes and standards savings (CEC 2013). The project would incorporate energy-efficient lighting in the proposed commercial and residential structures.
California Green Building Standards (CALGreen) Code Requirements	All bathroom exhaust fans shall be ENERGY STAR compliant.	**Consistent.** The project construction plans must demonstrate that energy efficiency appliances, including bathroom exhaust fans, and equipment would meet the applicable energy standards in the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code.
	HVAC systems will be designed to meet American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) standards.	**Consistent.** The project construction plans must demonstrate that energy efficiency appliances and equipment would meet the applicable energy standards in ASHRAE 90.1-2013 Appendix G and the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code.
	Air filtration systems are required to meet a minimum efficiency reporting value (MERV) 13 or higher.	**Consistent.** The project must meet the requirement of MERV 13 for nonresidential buildings as part of its compliance with the CALGreen Code (Section 5.504) and for residential buildings in compliance with the 2019 Title 24 Building Energy Efficiency Standards (Section 150.M.12.C)
	Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	**Consistent.** The project must meet this nonresidential requirement as part of its compliance with the CALGreen Code (Section 5.508.1.1).
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to 6 percent of total residential parking spaces and up to 8 percent of the total nonresidential parking spaces will be designed for such vehicles.	**Consistent.** The project would meet this requirement as part of its compliance with the CALGreen Code. Specifically, the project would be required to comply with the CALGreen Residential Mandatory Measure 4.106.4 *Electric Vehicle (EV) Charging for New Construction*, the CALGreen Nonresidential Mandatory Measure 5.106.5.2 *Designated parking for clean air vehicles* and Mandatory Measure 5.106.5.3 *Electric Vehicle (EV) Charging.*

Sector / Source	Category / Description	Project Consistency Analysis
	Requires use of low VOC coatings consistent with SCAQMD Rule 1168.	**Consistent.** The project must comply with this regulation throughout construction of all commercial and residential structures.
SB 1368, CCR Title 20, Cap-and-Trade Program	The Cap-and-Trade Program places an economy-wide "cap" on major sources of GHG emissions (i.e., refineries, power plants, industrial facilities and transportation fuels) and minimizes the compliance costs of achieving AB 32 goals. Electricity generators and large industrial facilities emitting 25,000 $MTCO_2e$ or more annually are subject to the Cap-and-Trade Program. Each year the cap is lowered by approximately 3 percent, ensuring that California is reducing GHGs.	**Not Applicable.** As shown in ***Table 3.3-1***, the proposed project would generate approximately 2,766.61 $MTCO_2eq/yr$, which is below the 25,000 $MTCO_2e/yr$ Cap-and-Trade screening level for electricity generators and large industrial facilities. Moreover, this project does not include any such GHG sources. As such, the proposed project would not be subject to the requirements of the Cap-and-Trade Program.
Mobile Sources		
Mobile Source Strategy (Cleaner Technology and Fuels)	Reduce GHGs and other pollutants from the transportation sector through transition to zero-emission and low-emission vehicles, cleaner transit systems, and reduction of vehicle miles traveled.	**Consistent.** The project would be consistent with this strategy by supporting the use of zero-emission and low-emission vehicles through compliance with the 2016 CALGreen Mandatory Measures 4.106.4, 5.106.5.2, and 5.106.5.3, as noted above.
AB 1493 (Pavley Regulations)	Reduces GHG emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model years 2017–2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	**Not Applicable.** These regulations apply to automobile manufacturers, not individual land uses. Mobile emissions associated with the project in ***Table 3.3-1*** reflect compliance with this regulation.
Low Carbon Fuel Standard (Executive Order S-01-07)	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels. This executive order establishes a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.	**Not Applicable.** The LCFS applies to manufacturers of automotive fuels, not to individual land uses. Mobile emissions associated with the project in ***Table 3.3-1*** reflect compliance with this regulation.
Advanced Clean Cars Program	In 2012, CARB adopted the Advanced Clean Cars program to reduce criteria pollutants and GHG emissions for model year vehicles 2015 through 2025. This program includes the low-emission vehicle regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the zero-emission vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles in the 2018 through 2025 model years.	**Not Applicable.** The standards would apply to manufacturers of vehicles that may be used by residents, visitors, and employees associated with the project. Furthermore, the project would comply with the 2016 CALGreen code for EV charging and parking.
Senate Bill (SB) 375	SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the state's metropolitan planning organizations, to set regional GHG reduction targets for the	**Consistent.** The project would comply with the 2016–2040 RTP/SCS as the project would be a compact/mixed-use land use on an infill site that could reduce VMT, and therefore, the project would be consistent with SB 375. Consistency with the 2016–2040 RTP/SCS is discussed below in ***Table 3.3-3, Project Consistency with the 2016–2040 RTP/SCS.***

Sector / Source	Category / Description	Project Consistency Analysis
	passenger vehicle and light-duty truck sector for 2020 and 2035.	
Water		
CCR, Title 24, Building Standards Code	Title 24 includes water efficiency requirements for new residential and nonresidential uses.	**Consistent.** See discussion under 2019 Title 24 Building Standards Code and CALGreen Code above.
Senate Bill X7-7	The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.	**Consistent.** See discussion under 2019 Title 24 Building Standards Code and CALGreen Code. The project would reduce GHG emissions by complying with the 2019 Title 24 requirements, installing water-efficient irrigation systems and landscapes, and incorporating water-reducing features and fixtures into the buildings per CALGreen.
Solid Waste		
California Integrated Waste Management Act (IWMA) of 1989 and Assembly Bill (AB) 341	The IWMA mandated that state agencies develop and implement an integrated waste management plan which outlines the steps to be taken to divert at least 50 percent of their solid waste from disposal facilities. AB 341 directs CalRecycle to develop and adopt regulations for mandatory commercial recycling and sets a statewide goal for 75 percent disposal reduction by the year 2020.	**Not Applicable.** These regulations apply to municipal agencies who are responsible for reducing landfill disposal of solid wastes collected in their jurisdictions. Project-related GHG emissions from solid waste generation (see ***Table 3.3-1***) assume a 50 percent reduction in solid waste generation source emissions due to the City's continued compliance with this legislation.

Source: California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017. Assessment by Michael Baker International, February 2020.

2016–2040 RTP/SCS

SCAG is expected to achieve CARB's GHG reduction targets for the region (8 percent by 2020 and 13 percent by 2035 for per capita passenger vehicle GHG emissions)[4] through implementation of the 2016–2040 RTP/SCS (SCAG 2016, p. 15). Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040 (SCAG 2016, p. 153). The 2016–2040 RTP/SCS would result in an estimated 8 percent decrease in per capita passenger vehicle GHG emissions by 2020, 18 percent decrease in per capita passenger vehicle GHG emissions by 2035,[5] and 21 percent decrease in per capita passenger vehicle GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21 percent decrease in per capita passenger vehicle GHG emissions by 2040 (an additional 3 percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS is expected to fulfill

[4] These GHG reduction targets were established for SCAG by CARB and were effective through September 30, 2018. CARB has created new GHG reduction targets for SCAG, effective October 1, 2018, that will be addressed in the next iteration of the SCAG RTP/SCS (expected in December 2020).

[5] In March 2018, CARB adopted updated targets requiring a 19 percent decrease in VMT for the SCAG region by 2035. As the CARB targets were adopted after the 2016–2040 RTP/SCS, it is expected that the updated targets will be incorporated into the next RTP/SCS.

and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals.

At the regional level, the 2016–2040 RTP/SCS is an applicable plan adopted for the purpose of reducing GHGs. In order to assess the project's potential to conflict with the 2016–2040 RTP/SCS, this section also analyzes the project's land use assumptions for consistency with those utilized by SCAG. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

Table 3.3-3 demonstrates the project's consistency with the actions and strategies set forth in the 2016–2040 RTP/SCS.[6] As depicted, the project is consistent with the land use growth patterns and policies in the RTP/SCS to reduce VMT and reduce GHG emissions from the land use and transportation sectors required by SB 375. Subsequently, the project would also help advance the state's long-term climate policies.[7] By furthering implementation of SB 375, the project supports regional land use and transportation GHG reductions consistent with state regulatory requirements. Therefore, the project would be consistent with the GHG reduction-related actions and strategies contained in the 2016–2040 RTP/SCS.

Table 3.3-3
PROJECT CONSISTENCY WITH THE 2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Land Use Actions and Strategies		
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood oriented development, complete streets, and EV (and other alternative fuel) supply equipment in public parking lots.	Local Jurisdictions, Council of Government (COGs), SCAG, County Transportation Commission (CTCs)	**Consistent.** The project would be required to comply with the CALGreen Residential Mandatory Measure 4.106.4 *Electric Vehicle (EV) Charging for New Construction*, the CALGreen Nonresidential Mandatory Measure 5.106.5.2 *Designated parking for clean air vehicles,* and Mandatory Measure 5.106.5.3 *Electric Vehicle (EV) Charging.*
Support projects, programs, policies, and regulations that encourage the development of complete communities, which include a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full range of shopping, entertainment, and services all within a relatively short distance.	Local Jurisdictions, SCAG	**Consistent.** The project development plan includes a mixture of residential (61 single-family detached homes) and commercial land uses (13,000 square feet). Further, the proposed project is an infill development located within a quarter mile of the local public bus system and other land uses, including restaurants, retail, and educational (e.g., Northview High School), with which the future project residents could interact.
Transportation Network Actions and Strategies		
Prioritize transportation investments to support compact infill development that	SCAG,	**Consistent.** The project is a compact infill mixed-use development and would include a mixture of residential (61

[6] As discussed in the 2016–2040 RTP/SCS, the actions and strategies included in the 2016–2040 RTP/SCS remain unchanged from those adopted in the 2012–2035 RTP/SCS.

[7] As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
includes a mix of land uses, housing options, and open/park space, where appropriate, to maximize the benefits for existing communities, especially vulnerable populations, and to minimize any negative impacts.	CTCs, Local Jurisdictions	single-family detached homes) and commercial land uses (13,000 square feet). Further, the residential development side of the project would include three passive recreational open space amenities.
Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood EVs or other alternative fueled vehicles.	SCAG, CTCs, Local Jurisdictions	**Not Applicable.** The project is a mixed-use infill development located near multiple bus stops, restaurants, retail, and a high school, which would encourage walking and reduce VMT. The project would also provide EV charging spaces for residents. Therefore, although the project would not directly enhance mobility or air quality through any project design features, its locational and mixed-use features would reduce vehicle trips and trip lengths and thus VMT, thereby contributing to a reduction in air pollutant and GHG emissions.
Collaborate with local jurisdictions to provide a network of local community circulators that serve new transit-oriented development, High Quality Transit Areas (HQTAs), and neighborhood commercial centers, thus incentivizing residents and employees to make trips on transit.	SCAG, CTCs, Local Jurisdictions	**Not Applicable.** This strategy is to be implemented by local and regional government entities. The project would not conflict with any such efforts.
Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood EV or other ZEV options.	CTCs, Local Jurisdictions	**Not Applicable.** The project does not include any first-mile/last-mile strategies, but would not impair the CTCs' or the City's ability to develop first-mile/last-mile strategies.
Transportation Demand Management (TDM) Actions and Strategies		
Encourage the implementation of a Complete Streets policy that meets the needs of all users of the streets, roads and highways—including bicyclists, children, persons with disabilities, motorists, neighborhood EV users, movers of commercial goods, pedestrians, users of public transportation and seniors—for safe and convenient travel in a manner that is suitable to the suburban and urban contexts within the region.	Local Jurisdictions, COGs, SCAG, CTCs	**Not Applicable.** The project would not affect the design or uses of Azusa Avenue, Cypress Street, or any other streets in the vicinity.
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	**Not Applicable.** This strategy is to be implemented by regional and local government agencies. The project would not conflict with any such efforts.
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions, CTCs	**Not Applicable.** This strategy is to be implemented by local agencies and CTCs; however, the project would not impede the City's or CTCs' ability to encourage the development of telecommuting programs by employers.
Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358).	State, SCAG, Local Jurisdictions	**Not Applicable.** The project does not include any active transportation or alternative fueled vehicle elements; however, it would provide EV charging stations and conduits, as required by the CALGreen Residential Mandatory Measure 4.106.4 *Electric Vehicle (EV) Charging*

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		for New Construction, the CALGreen Nonresidential Mandatory Measure 5.106.5.2 *Designated parking for clean air vehicles,* and Mandatory Measure 5.106.5.3 *Electric Vehicle (EV) Charging.*
Transportation System Management (TSM) Actions and Strategies		
Work with relevant state and local transportation authorities to increase the efficiency of the existing transportation system.	SCAG, Local Jurisdictions, State	**Not Applicable.** This strategy is to be implemented by state, regional, and local agencies involved in planning, funding and construction improvements to the transportation system.

Source: SCAG 2016, Chapter 5: The Road to Greater Mobility and Sustainable Growth.

SB 32 Consistency

SB 32 requires the state to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving Executive Order S-3-05, which sets a statewide GHG reduction target of 80 percent below 1990 levels by 2050.

According to research conducted by the Lawrence Berkeley National Laboratory and supported by CARB, California, under its existing and proposed GHG reduction policies, is on track to meet the 2020 reduction targets under AB 32 and could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California Lawrence Berkeley National Laboratory (LBNL) GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG reducing policies. The CALGAPS model showed that GHG emissions through 2020 could range from 317 to 415 $MTCO_2eq$ per year, "indicating that existing State policies will likely allow California to meet its target [of 2020 levels under AB 32]." CALGAPS also showed that by 2030, emissions could range from 211 to 428 $MTCO_2eq$ per year, indicating that "even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40 percent below the 1990 level [of SB 32]." CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Though the research indicated that the emissions would not meet the state's 80 percent reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050.

The consistency analysis above demonstrates that the project complies with the plans, policies, regulations, and GHG reduction actions/strategies outlined in the 2017 Scoping Plan and the 2016–2040 RTP/SCS. Furthermore, the project would be required to install rooftop photovoltaic solar panels on all of the new homes per the 2019 Title 24 Code, which would provide a direct source of renewable electrical energy on-site, thus reducing potential GHGs that would be generated if all of the homes were powered by electricity produced at distant power generation plants fueled to some degree by GHG emitting fuels. Therefore, the project's impacts on GHG emissions in the 2030 and 2050 horizon years would be less than significant.

Conclusion

In summary, the project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the project is consistent and does not conflict with these plans, policies, and regulations, the project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, project-specific impacts with regard to GHG emissions would be less than significant.

Mitigation Measures

No mitigation measures are required.

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3.4 NOISE

3.4 NOISE

This section of the EIR evaluates impacts involving changes in the noise environment resulting from the proposed project. This includes short-term construction-related impacts, as well as future buildout conditions. Information in this section is based on the City of Covina General Plan and the Covina Municipal Code and measurements of ambient noise levels taken on August 14, 2019. As indicated in the Initial Study (**Appendix A**) prepared during the scoping process, the project's impact on exposing people residing or working in the project area to excessive noise levels from private or public airports was determined to be less than significant. Therefore, this topic is not further evaluated herein.

For the purposes of noise levels associated with mobile sources, traffic information contained in the *NEC Azusa/Cypress (Albertson's Site) Traffic Impact Analysis* (Traffic Impact Analysis), prepared by TJW Engineering, Inc. and dated November 20, 2019 was used; refer to **Appendix F**. Results of ambient noise measurements and noise measurement locations are provided in **Appendix D.**

3.4.1 EXISTING CONDITIONS

NOISE SCALES AND DEFINITIONS

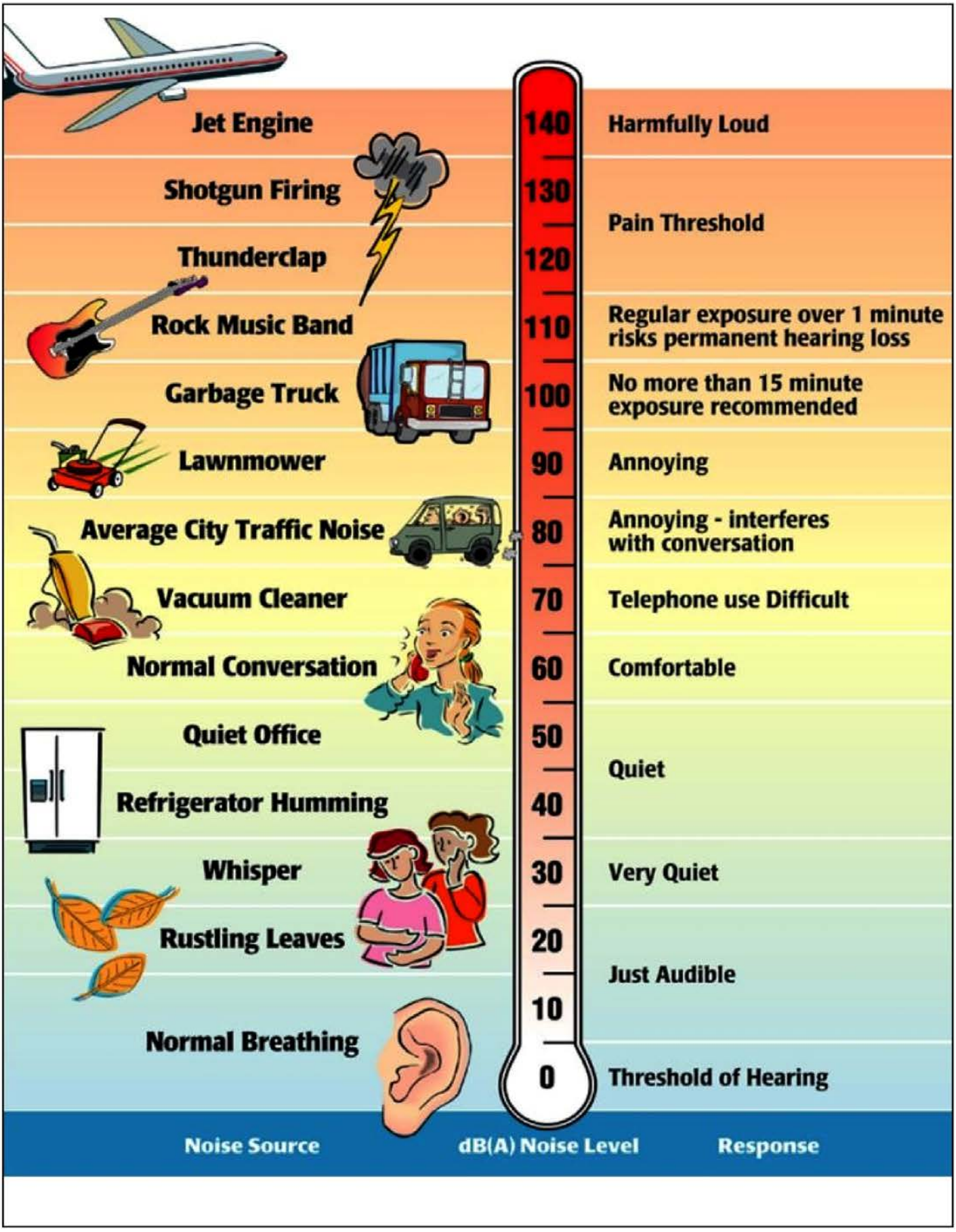
Sound is described in terms of the loudness (amplitude) of the sound and frequency (pitch) of the sound. The standard unit of measurement of the loudness of sound is the decibel (dB). Since the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Decibels are based on the logarithmic scale. The logarithmic scale compresses the wide range in sound pressure levels to a more usable range of numbers in a manner similar to the Richter scale used to measure earthquakes. In terms of human response to noise, a sound 10 dBA higher than another is judged to be twice as loud, and 20 dBA higher four times as loud, and so forth. Everyday sounds normally range from 30 dBA (very quiet) to 100 dBA (very loud). Examples of various sound levels in different environments are illustrated in ***Figure 3.4-1***, ***Common Environmental Noise Levels***.

Many methods have been developed for evaluating community noise to account for, among other things:

- The variation of noise levels over time;
- The influence of periodic individual loud events; and
- The community response to changes in the community noise environment.

Numerous methods have been developed to measure sound over a period of time; refer to ***Table 3.4-1, Noise Descriptors***.



Michael Baker INTERNATIONAL

NOT TO SCALE

Common Environmental Noise Levels

SOURCE: ENVIRONMENTAL PROTECTION AGENCY, INFORMATION ON LEVELS OF ENVIRONMENTAL NOISE REQUISITE TO PROTECT PUBLIC HEALTH AND WELFARE WITH AN ADEQUATE MARGIN OF SAFETY (EPA/ONAC 550/9-74-004), MARCH 1974

Figure 3.4-1

Table 3.4-1
NOISE DESCRIPTORS

Term	Definition
Decibel (dB)	The unit for measuring the volume of sound equal to 10 times the logarithm (base 10) of the ratio of the pressure of a measured sound to a reference pressure (20 micropascals).
A-Weighted Decibel (dBA)	A sound measurement scale that adjusts the pressure of individual frequencies according to human sensitivities. The scale accounts for the fact that the region of highest sensitivity for the human ear is between 2,000 and 4,000 cycles per second (hertz).
Equivalent Sound Level (L_{eq})	The sound level containing the same total energy as a time varying signal over a given time period. The L_{eq} is the value that expresses the time averaged total energy of a fluctuating sound level.
Maximum Sound Level (L_{max})	The highest individual sound level (dBA) occurring over a given time period.
Minimum Sound Level (L_{min})	The lowest individual sound level (dBA) occurring over a given time period.
Community Noise Equivalent Level (CNEL)	A rating of community noise exposure to all sources of sound that differentiates between daytime, evening, and nighttime noise exposure. CNEL is the average sound level taken over a 24-hour period with adjustments made during evening and nighttime hours. These adjustments are +5 dBA for the evening, 7:00 p.m. to 10:00 p.m., and +10 dBA for the night, 10:00 p.m. to 7:00 a.m.
Day/Night Average (L_{dn})	The L_{dn} is a measure of the 24-hour average noise level at a given location. It was adopted by the U.S. Environmental Protection Agency (EPA) for developing criteria for the evaluation of community noise exposure. It is based on a measure of the average noise level over a given time period called the L_{eq}. The L_{dn} is calculated by averaging the L_{eq} for each hour of the day at a given location after penalizing the "sleeping hours" (defined as 10:00 p.m. to 7:00 a.m.) by 10 dBA to account for the increased sensitivity of people to noises that occur at night.
Exceedance Level (L_n)	The A-weighted noise levels that are exceeded 1%, 10%, 50%, and 90% (L_{01}, L_{10}, L_{50}, L_{90}, respectively) of the time during the measurement period.

Source: Harris 1979.

HEALTH EFFECTS OF NOISE

Human response to sound is highly individualized. Annoyance is the most common issue regarding community noise. However, many factors influence people's response to noise. The factors can include the character of the noise, the variability of the sound level, the presence of tones or impulses, and the time of day of the occurrence. Additionally, non-acoustical factors, such as the person's opinion of the noise source, the ability to adapt to the noise, the attitude toward the source and those associated with it, and the predictability of the noise, all influence people's response. As such, response to noise varies widely from one person to another and with any particular noise, individual responses range from "not annoyed" to "highly annoyed."

The effects of noise are often only transitory, but adverse effects can be cumulative with prolonged or repeated exposure. The effects of noise on the community can be organized into six broad categories:

- Noise-induced hearing loss
- Interference with communication

- Effects of noise on sleep
- Effects on performance and behavior
- Extra-auditory health effects
- Annoyance

According to the US Public Health Service, nearly 10 million of the estimated 21 million Americans with hearing impairments owe their losses to noise exposure. Noise can mask important sounds and disrupt communication between individuals in a variety of settings. This process can cause anything from a slight irritation to a serious safety hazard, depending on the circumstance. Noise can disrupt face-to-face communication and telephone communication, and the enjoyment of music and television in the home. It can also disrupt effective communication between teachers and pupils in schools and can cause fatigue and vocal strain in those who need to communicate in spite of the noise.

Interference with communication has proved to be one of the most important components of noise-related annoyance. Noise-induced sleep interference is one of the critical components of community annoyance. Sound level, frequency distribution, duration, repetition, and variability can make it difficult to fall asleep and may cause momentary shifts in the natural sleep pattern, or level of sleep. It can produce short-term adverse effects on mood changes and job performance, with the possibility of more serious effects on health if it continues over long periods. Noise can cause adverse effects on task performance and behavior at work, and non-occupational and social settings. These effects are the subject of some controversy, since the presence and degree of effects depends on a variety of intervening variables. Most research in this area has focused mainly on occupational settings, where noise levels must be sufficiently high and the task sufficiently complex for effects on performance to occur.

Annoyance can be viewed as the expression of negative feelings resulting from interference with activities, as well as the disruption of one's peace of mind and the enjoyment of one's environment. Field evaluations of community annoyance are useful for predicting the consequences of planned actions involving highways, airports, road traffic, railroads, or other noise sources. The consequences of noise-induced annoyance are privately held dissatisfaction, publicly expressed complaints to authorities, and potential adverse health effects, as discussed above. In a study conducted by the EPA, the effects of annoyance to the community were quantified. In areas where noise levels were consistently above 60 dBA CNEL, approximately 9 percent of the community was highly annoyed. When levels exceeded 65 dBA CNEL, that percentage rose to 15 percent (EPA 1981). Although evidence for the various effects of noise have differing levels of certainty, it is clear that noise can affect human health. Most of the effects are, to a varying degree, stress related. Regarding increases in A-weighted noise levels (dBA), the following relationships should be noted in understanding this analysis (Caltrans 2013):

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived by humans.
- Outside of the laboratory, a 3 dBA change is considered a just-perceivable difference.
- A change in level of at least 5 dBA is required before any noticeable change in community response would be expected. An increase of 5 dBA is typically considered substantial.
- A 10 dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

GROUND-BORNE VIBRATION

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration amplitudes. PPV is defined as the maximum instantaneous peak or vibration signal, while RMS is defined as the square root of the average of the squared amplitude of the signal. PPV is typically used for evaluating potential building damage, whereas RMS is typically more suitable for evaluating human response. Typically, ground-borne vibration, generated by man-made activities, attenuates (decreases) rapidly with distance from the source of vibration. Man-made vibration issues are therefore usually confined to short distances (i.e., 500 feet or less) from the source.

Both construction and operation of development projects can generate ground-borne vibration. In general, demolition of structures preceding construction generates the highest vibrations. Construction equipment such as vibratory compactors or rollers, pile drivers, and pavement breakers can generate perceptible vibration during construction activities. Heavy trucks can also generate ground-borne vibrations that vary depending on vehicle type, weight, and pavement conditions.

SENSITIVE RECEPTORS

Human response to noise varies widely depending on the type of noise, time of day, and sensitivity of the receptor. The effects of noise on humans can range from temporary or permanent hearing loss to mild stress and annoyance due to such things as speech interference and sleep deprivation. Prolonged stress, regardless of the cause, is known to contribute to a variety of health disorders. Noise, or the lack thereof, is a factor in the aesthetic perception of some settings, particularly those with religious or cultural significance. Certain land uses are particularly sensitive to noise, including schools, hospitals, rest homes, long-term medical and mental care facilities, and parks and recreation areas. Residential areas are also considered noise sensitive, especially during the nighttime hours. The site vicinity is predominantly composed of commercial and residential uses. The following receptors were identified as sensitive receptors in vicinity of the site:

- The proposed site is surrounded by adjacent residential receptors to the north, east, and south.
- The closest school is the Northview High School, located approximately 530 feet southwest.
- The closest child-care center is the Grace Lutheran Preschool, located approximately 0.28 miles northeast, on East Covina Boulevard.
- The closest assisted living facility is A Right Place for Seniors, located approximately 0.07 miles southeast, on West Cypress Street.
- The closest hospital is the Kindred Hospital San Gabriel Valley, located approximately 0.8 miles southwest, on Lark Ellen Avenue.

AMBIENT NOISE MEASUREMENTS

To quantify existing ambient noise levels in the site vicinity, Michael Baker International conducted noise measurements on August 14, 2019; refer to ***Figure 3.4-2***, ***Noise Measurement Locations***, ***Table 3.4-2, Noise Measurements***, and **Appendix D**. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the site. Short-term measurements were

taken at each site between 10:30 a.m. and 12:00 p.m. Meteorological conditions were clear skies, warm temperatures, with light wind speeds (approximately 2 miles per hour), and low humidity.

Table 3.4-2
NOISE MEASUREMENTS

Site No.	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Peak (dBA)	Time
1	North of property limit	51.6	43.7	68.3	92.5	10:32 a.m.
2	4647 North Cromwell Avenue	55.5	37.5	76.7	98.8	11:41 a.m.
3	Along Cypress Street	64.5	44.7	79.6	99.8	11:07 a.m.
4	North of McDonalds in grassy area along Azusa Avenue	66.4	50.0	82.9	104.0	10:48 a.m.

Table Notes:

*See **Figure 3.4-2** for the noise level measurement locations.*

Source: Michael Baker International, August 14, 2019.

MOBILE SOURCES

The majority of the existing noise in the project area is generated from vehicle sources along Cypress Street and Azusa Avenue. According to the General Plan, traffic noise levels along Cypress Street and Azusa Avenue in the year 2000 ranged from 60 to 65 dBA (City of Covina 2000). Additionally, occasional aircraft overflights are a source of mobile noise.

STATIONARY NOISE SOURCES

The site vicinity consists of residential, commercial, and institutional (i.e., Northview High School) uses. The primary sources of stationary noise in the site vicinity are heating, ventilation, and air conditioning units, parking areas, and conversations. Since there are no seating areas to support large audiences at the Northview High School football or baseball fields, it is presumed there are no loudspeaker systems at those sports fields. The noise associated with these sources may represent a single-event or a continuous occurrence and occur intermittently during both daylight and night-time hours.

3.4.2 REGULATORY AND PLANNING FRAMEWORK

This section summarizes the laws, ordinances, regulations, and standards that are applicable to the project. Regulatory requirements related to environmental noise are typically promulgated at the local level. However, federal and state agencies provide standards and guidelines to the local jurisdictions.

FEDERAL

Highway Traffic Noise Analysis and Abatement Policy and Guidance

The Federal Highway Administration's guidance on highway traffic noise analysis and abatement assists in applying the United States Code of Federal Regulations Part 772 (23 CFR 772). The guidance highlights the most important issues and requirements of 23 CFR 772 and methods for measuring highway noise.



2/19/2020 JN H:\pdata\173379\GIS\MXD\NoiseMeasurementsExibit.mxd

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0 150 300 Feet

Source: esri basemap

Noise Measurement Locations

Figure 3.4-2

STATE

Title 24 – Building Code

The State's noise insulation standards are codified in the California Code of Regulations, Title 24, Part 1, Building Standards Administrative Code, and Part 2, California Building Code. These noise standards are applied to new construction in California for the purpose of interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 dBA CNEL or higher.

Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

California Government Code

California Government Code Section 65302(f) mandates that the legislative body of each county, town, and city adopt a noise element as part of their comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the former California Department of Health Services, as shown in ***Table 3.4-3, Land Use Compatibility for Community Noise Environments***. The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable" noise levels for various land use types. Single-family homes are "normally acceptable" in exterior noise environments up to 60 CNEL and "conditionally acceptable" up to 70 CNEL. Multiple-family residential uses are "normally acceptable" up to 65 CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries, and churches are "normally acceptable" up to 70 CNEL, as are office buildings and business, commercial, and professional uses.

Table 3.4-3
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS

Land Use Category	Community Noise Exposure (L_{dn} or CNEL, dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density, Single-Family, Duplex, Mobile Homes	50 – 60	55 – 70	70 – 75	75 – 85
Residential – Multiple Family	50 – 65	60 – 70	70 – 75	70 – 85
Transient Lodging - Motel, Hotels	50 – 65	60 – 70	70 – 80	80 – 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 70	60 – 70	70 – 80	80 – 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 – 70	NA	65 – 85
Sports Arenas, Outdoor Spectator Sports	NA	50 – 75	NA	70 – 85
Playgrounds, Neighborhood Parks	50 – 70	NA	67.5 – 75	72.5 – 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 – 70	NA	70 – 80	80 – 85

Land Use Category	Community Noise Exposure (L_{dn} or CNEL, dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Office Buildings, Business Commercial and Professional	50 – 70	67.5 – 77.5	75 – 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 – 75	70 – 80	75 – 85	NA

Notes: NA = Not Applicable; Ldn = Day/Night Average; CNEL = community noise equivalent level; dBA = A-weighted decibels

Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable - New Construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable – New construction or development should generally not be undertaken.

Source: OPR 2003.

LOCAL

City of Covina Municipal Code

The City's Noise Ordinance (Chapter 9.40 of the City's Municipal Code) serves to protect people from non-transportation noise sources such as construction activities, commercial operations, machinery, and nightlife. The City's Noise Ordinance outlines factors to be considered when determining whether a noise, sound or vibration is a prohibited noise source within the City (Section 9.40.080); provides examples of prohibited noises (Section 9.40.030); and discusses noise exemptions (Section 9.40.140).

The City's Noise Control Ordinance includes noise regulations (Section 9.40.110) regarding construction activities. It is unlawful to operate equipment or perform outside construction or repair work within 500 feet of a residential land use between the hours of 8:00 p.m. of any one day and 7:00 a.m. of the next day, or on Sundays or public holidays, such that a reasonable person of normal sensitivity residing in the area is caused discomfort or annoyance, unless a permit has been obtained in advance.

In addition, as part of the City's Noise Control Ordinance's examples of prohibited noises (Section 9.40.030, Loud Party), the City's Noise Control Ordinance states: "It is unlawful for any person or persons to make, continue or cause to be made or continued any unnecessary, loud or unusual noise which is a threat to the public peace, health, safety or general welfare of others due to a party, gathering or unruly assemblage at a premises." The noise standards for such activities (as well as other activities found to be disturbing per Section 9.40.080, General Guidelines) is dependent upon the associated land uses, as shown in ***Table 3.4-4, Exterior Noise Level Limits***.

Subsection J of Section 9.40.120 (Loud and Unusual Noises) prohibits the operation of any device that creates a vibration that is above the vibration perception threshold of an average individual at or beyond the property boundary of the source if on private property or at 150 feet from the source if on a public space or public right-of-way. The threshold of perception is defined as 0.01 inches per second (Section 9.40.020 (30)).

Table 3.4-4
EXTERIOR NOISE LEVEL LIMITS

Receiving Land Use Category	Time	Sound Level (A-Weighted Decibels)
Residential estate or agricultural	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	50 40
Residential low density	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	55 45
Residential medium and high density	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	60 50
Commercial	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	65 55
Industrial	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	70 60

Source: City of Covina Municipal Code

City of Covina General Plan Noise Element

The Noise Element of the Covina General Plan (City of Covina 2000) sets forth goals and policies related to noise and land use compatibility. Relevant portions of the goals and policies are listed here:

- Goal: An environment in which potential adverse impacts of noise on the City's residents and workers are identified and prevented and mitigated.
  - Policy Area 1: Transportation Noise Sources
    The City shall:
    - Policy 1: Examine the noise environment of proposed residential or other noise-sensitive uses located within all 60 L_{dn} noise contours to ensure compatibility and, pertaining to residential activities, adherence to applicable State noise insulation standards.
    - Policy 2: Attempt to mitigate or eliminate the possible noise problems of proposed residential or other noise-sensitive uses located within all 65 L_{dn} noise contours to ensure compatibility and, pertaining to residential activities, adherence to applicable State noise insulation standards.
    - Policy 3: Consider "noise-sensitive uses" to include, but not be limited to, all residential housing types, public and private primary and secondary schools, libraries, parks/recreation areas, hospitals/medical facilities, nursing homes, and churches.
    - Policy 4: Consider establishing acceptable limits of noise levels for various land uses throughout the community, in accordance with State guidelines, as a means of determining noise compatible land uses.
    - Policy 5: Ensure the inclusion of noise-mitigation measures and features in the design, orientation, and routing of new and improved streets and circulation and transportation facilities, where necessary and consistent with funding capability.
    - Policy 6: Require noise-reduction techniques and features in site planning, architectural design, project landscaping, building materials, and/or construction, where necessary or required by law.

- Policy 11: Ensure that any new or expanded major bus depots are located, designed, and oriented to impose minimal noise-related incursions on adjacent activities, particularly noise-sensitive uses, and work with bus providers to resolve any existing or potential problems.
- Policy 14: Require that new or expanded developments minimize the noise impacts of trips that they generate on residential neighborhoods by controlling the location of driveways and parking.
- Policy 30: Balance the City's obligation to protect local residents from excessive transportation noise with Covina's need to accommodate moderate growth and to continue with ongoing communitywide construction, economic development, code enforcement, neighborhood preservation, and affordable housing activities/programs.

o Policy Area 2: Commercial and Industrial Noise Sources
The City shall:

- Policy 1: Consider establishing acceptable limits of noise levels for various land uses throughout the community, in accordance with State guidelines, as a means of determining noise compatible land uses.
- Policy 2: Discourage the location of noise-sensitive land uses in noisy environments.
- Policy 3: Consider "noise-sensitive uses" to include, but not be limited to, all residential housing types, public and private primary and secondary schools, libraries, parks/recreation areas, hospitals/medical facilities, nursing homes, and churches.
- Policy 4: Require noise-reduction techniques and features in site planning, architectural design, project landscaping, building materials, and/or construction, where necessary or required by law.
- Policy 5: Require that parking lots and structures and loading areas be designed to minimize onsite noise impacts and off-site incursions by calling for the use of appropriate walls, buffers, and materials and by insisting upon the configuration of on-site or interior spaces that minimize sound amplification and transmission.
- Policy 6: Require that automobile and truck access to a commercial or industrial property situated adjacent to residential parcels be located at the maximum practical distance from the residential properties.
- Policy 7: Consider prohibiting truck deliveries to commercial and industrial properties abutting residential uses before 7:00 a.m. and after 11:00 p.m., unless there is no feasible alternative or there are overriding transportation benefits of scheduling deliveries at the other hours.
- Policy 12: Ensure that commercial or industrial buildings are constructed soundly to prevent adverse noise transmission onto adjacent businesses.
- Policy 13: Ensure that condominium/townhouse and apartment structures are constructed soundly to prevent adverse noise transmission onto adjacent dwelling units.

- Policy 22: Evaluate and make recommendations on potential noise impacts of permanent developments and uses through environmental or noise-related studies or analyses and, for minor work, by observing project plans as well as the potential noise impacts of temporary activities and special events.
- Policy 23: Balance the City's obligation to protect local residents and workers from excessive noise exposure with Covina's need to accommodate moderate growth and to continue with ongoing communitywide economic development, commercial revitalization, public improvement enhancement, residential construction, neighborhood preservation, code enforcement, and affordable housing activities/programs.
- Policy 27: Orient mixed use residential units away from major noise sources, to the greatest degree possible.
- Policy 28: Locate balconies and openable windows of residential units in mixed use projects away from major noise sources, to the greatest degree possible.

o Policy Area 3: Miscellaneous Stationary Noise Sources
The City shall:

- Policy 1: Continue implementing the Covina Noise Ordinance to regulate the hours of operation for, among other things, lawn equipment, domestic power tools, garbage trucks, and miscellaneous repair or maintenance equipment, when in or within 500 feet of a residential area.
- Policy 2: Encourage the installation of quiet residential air conditioners and outside appliances and devices, with proper installation procedures.

o Policy Area 4: Construction Noise Sources and General Matters
The City shall:

- Policy 1: Continue implementing the Covina Noise Ordinance to regulate the hours of operation and excessive noise associated with on-site construction activities, particularly activities occurring in or near residential uses, permitting exceptions only under special circumstances.
- Policy 2: Where necessary, require the construction of barriers to shield noise-sensitive uses from intrusive, construction-related noise.
- Policy 3: Require that construction activities incorporate feasible and practical techniques, measures, and procedures that minimize the noise impacts on all adjacent uses.
- Policy 4: Consider requiring sound attenuation devices on construction equipment to reduce noises associated with building activities.
- Policy 5: On a citywide basis, continue, where appropriate, accommodating vibrant, quality, and attractive commercial and industrial businesses that strengthen the City's economic base, image, and character, while minimizing adverse noise impacts.
- Policy 7: Best implement the Noise Element through the Zoning Ordinance and Design Guidelines, Capital Improvement Program, Subdivision Ordinance, Building and Safety

and Police provisions, general Code Enforcement, and any related Covina Municipal Code sections, City policies, plans, or proposals or through other matters.

- Policy 8: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alterations or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential noise impacts.

3.4.3 THRESHOLDS OF SIGNIFICANCE

The California Environmental Quality Guidelines, Appendix G, as amended through December 31, 2019, serve as the basis for identifying thresholds determining the significance of the environmental effects of a project. A project will have a significant noise impact if it would:

a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

b) Generate excessive groundborne vibration or groundborne noise levels.

Based on these standards, the effects of the project have been categorized as either a "less than significant impact" or a "potentially significant impact." Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a significant and unavoidable impact.

3.4.4 METHODOLOGY

EVALUATING CONSTRUCTION NOISE IMPACTS

The City does not have quantitative thresholds that apply to noise levels at active construction sites. Generally, as long as the construction occurs within the time periods allowed by the City's Municipal Code, the impacts are considered to be adverse, but less than significant.

EVALUATING CONSTRUCTION VIBRATION IMPACTS

The 2003 *Transportation and Construction Vibration Guidance Manual* prepared by the California Department of Transportation (Caltrans) identifies various vibration damage criteria for different building classes. As the nearest structures to project construction are residences, the architectural damage criterion for continuous vibrations at residential structures of 0.5 inch-per-second PPV is utilized.

Further, Covina Municipal Code Subsection J of Section 9.40.120 (Loud and/or Unusual Noises) prohibits the operation of any device that creates a vibration that is above the vibration perception threshold of an average individual at or beyond the property boundary of the source if on private property or at 150 feet from the source if on a public space or public right-of-way. The threshold of perception is defined as 0.01 inches per second (Section 9.40.020 (30)).

EVALUATING CHANGES IN TRAFFIC NOISE LEVELS

The 2011 Highway Traffic Noise: Analysis and Abatement Guidance prepared by the Federal Highway Administration (FHA) identifies methods and procedures for measuring and analyzing noise impacts due to adjacent or nearby roadways. Changes in traffic caused by the project would result in changes in noise

levels along the roadways in the vicinity of the project. An off-site traffic noise impact typically occurs when there is a discernable increase in traffic and the resulting noise level exceeds an established noise standard. In community noise considerations, changes in noise levels greater than 3 dB are often identified as substantial, while changes less than 1 dB would not be discernible to local residents. A 5 dB change is generally recognized as a clearly discernable difference.

As traffic noise levels at sensitive uses likely approach or exceed the 65 CNEL standard, a 3 dB increase as a result of the project is used as the increase threshold for the project. A doubling of traffic volume would result in a 3 dB increase in noise levels. Thus, the project would result in a significant noise impact if a permanent increase in ambient noise levels of 3 dB, or a doubling of traffic volume, occurs upon project implementation and the resulting noise level exceeds the applicable exterior standard at a noise-sensitive use.

3.4.5 ANALYSIS

Impact 3.4a The project would generate temporary construction noise levels that could result in adverse impacts to the nearest sensitive receptors. This impact would be reduced to less than significant through Mitigation Measure MM 3.4-1, requiring various construction control measures. The project's operational activities would not generate significant increases in local noise levels and mitigation would not be required.

Discussion

Short-Term Construction Noise Impacts

The proposed project would demolish the existing grocery store and parking lot to construct a mixture of retail shops and drive-through/fast food service businesses comprising approximately 13,000 square feet and 61 single-family detached homes. The project involves construction activities associated with demolition, grading, paving, building construction, and architectural coating applications. At this time, it is anticipated that commercial and residential components would be developed in two separate phases. Full build and occupancy of the commercial buildings is anticipated to occur in 2021. Depending on the pace of home sales and occupancy, completion and full occupancy of the new residential community and all of its elements is estimated to occur by late 2022 to sometime in 2023. Grading activities would be balanced on-site and require approximately 3,150 cubic yards of cut and approximately 2,700 cubic yards of fill.

Construction activities would generate perceptible noise levels during the demolition, grading, paving, building construction phases. High ground-borne noise levels and other miscellaneous noise levels can be created by the operation of heavy-duty trucks, backhoes, bulldozers, excavators, front-end loaders, scrapers, and other heavy-duty construction equipment. ***Table 3.4-5, Maximum Noise Levels Generated by Construction Equipment***, indicates the anticipated noise levels of construction equipment. These average noise levels are based on the quantity, type, and acoustical use factor for each type of equipment that is anticipated to be used.

The primary construction equipment noise sources used during construction would be during demolition activities (use of excavators, concrete saws, and dozers), earthwork activities (use of graders, excavators, dozers) and building construction (use of forklifts, tractors/loaders/backhoes, welders, and a crane).

Concrete saws typically generate the highest noise levels, emitting approximately 90 dBA at a distance of 50 feet (pile driving would not be required for this project). Point sources of noise emissions are atmospherically attenuated by a factor of 6 dBA per doubling of distance. This assumes a clear line-of-sight and no other machinery or equipment noise that would mask project construction noise. The shielding of buildings and other barriers that interrupt line-of-sight conditions further reduce noise levels from point sources.

Table 3.4-5
MAXIMUM NOISE LEVELS GENERATED BY CONSTRUCTION EQUIPMENT

Equipment Type	Actual L_{max} at 15 Feet (dBA)	Actual L_{max} at 50 Feet (dBA)
Backhoe	88	78
Bulldozer	92	82
Compactor	92	82
Compressor	88	78
Concrete Mixer	89	79
Concrete Pump	91	81
Concrete Saw	100	90
Crane, Mobile	91	81
Dump Truck	86	76
Excavator	95	81
Generator	89	81
Grader	87	85
Loader	91	79
Paver	90	77
Pump	94	81
Roller	84	80
Tractor	84	84
Flatbed Truck	88	74
Welder	92	74

Source: Federal Highway Administration 2006.

Construction noise impacts generally happen when construction activities occur in areas immediately adjoining noise-sensitive land uses, during noise-sensitive times of the day, or when construction durations last over extended periods of time. The closest sensitive receptors are residential uses located along the northern and eastern project property line and approximately 15 feet away from the planned construction area. As indicated in ***Table 3.4-5***, typical construction noise levels would range from approximately 84 to 100 dBA at this distance. These noise levels could intermittently occur for a few days when construction equipment is operating closest to the residential uses. The remainder of the time, the construction noise levels would be much less because the equipment would be working in a large area farther away from the existing sensitive uses.

Pursuant to Municipal Code Section 9.40.110, construction noise is prohibited between the hours of 8:00 p.m. and 7:00 a.m. Monday through Saturday and is prohibited on Sundays or public holidays. Project compliance with these restrictions is considered sufficient to prevent significant construction noise impacts. To reduce the level of temporary impacts at neighboring residential uses, Mitigation measure MM 3.4-1 would require all construction equipment to be equipped with properly operating and

maintained mufflers, locate stationary construction equipment so that emitted noise is directed away from the nearest noise-sensitive receptors, locate equipment staging in areas farthest away from sensitive receptors, and limit haul truck deliveries to the same hours specified for construction equipment (between the hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday, with no activity allowed on Sundays or public holidays). Compliance with mitigation measure MM 3.4-1 would reduce construction noise impacts at nearby sensitive receptors to ensure normal residential activities are not interfered with, and that the temporary impact is less than it otherwise would be.

Long-Term Operational Noise Impacts

Mobile Noise

Operation of the proposed project would result in additional traffic on adjacent roadways, thereby increasing vehicular noise in the vicinity of existing and proposed land uses. According to the *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, a doubling of traffic volumes would result in a 3 dB increase in traffic noise levels, which is barely detectable by the human ear (USDOT 2017). Based on the Traffic Impact Analysis, the proposed project would result in approximately 3,716 net new daily trips; refer to **Appendix F**. A large majority of the project's trips would occur on Azusa Avenue and Cypress Street; therefore, project traffic on other streets would be less than significant with respect to effects on roadway noise levels. Based on the *City of Covina Engineering and Traffic Survey*, dated March 2016, existing average daily traffic (ADT) along Azusa Avenue is approximately 21,915 vehicles per day and existing ADT along Cypress Street is approximately 15,171 vehicles per day. As such, the project's trip generation (approximately 3,059 net new trips per day) would not double existing traffic volumes and an increase in traffic noise along local roadways would be imperceptible. Therefore, project-related traffic noise would be less than significant.

Stationary Noise

Crowd Noise

Noise generated by groups of people (i.e., "crowds") is dependent on several factors including vocal effort, impulsiveness, and the random orientation of the crowd members. According to *Prediction of Crowd Noise* (M.J. Hayne 2006), crowd noise would be approximately 62 dBA at 1 meter from the source.[1] Noise has a decay rate due to distance attenuation, which is calculated based on the inverse-square law. Based upon the inverse-square law, sound levels decrease by 6 dBA for each doubling of distance from the source (Harris 1994). Within the proposed project boundaries, crowds have the potential to gather at the two passive recreational areas within the residential development. The nearest sensitive receptors are residential uses along the northern and eastern project property lines, located approximately 150 feet from the two recreational areas. Therefore, crowd noise at the nearest sensitive receptors would be 29 dBA, which would not exceed the City's noise standards and would be lower than existing ambient noise levels near the site. As such, project operational noise associated with outdoor recreation activities would not introduce an intrusive noise source over existing conditions. Thus, a less than significant impact would occur in this regard.

[1] Crowd noise is estimated at 60 dBA at 1 meter (3.28 feet) away for raised normal speaking. This noise level would have a +5 dBA adjustment for the impulsiveness of the noise source, and a -3 dBA adjustment for the random orientation of the crowd members. Therefore, crowd noise would be approximately 62 dBA at one meter from the source.

Garbage and Delivery Trucks

The project proposes a mixture of retail shops and drive-through/fast food service businesses comprising approximately 13,000 square feet, as well as 61 single-family detached homes. Therefore, the proposed project would involve occasional garbage and delivery truck operations. Typically, a medium two-axle garbage truck can generate a maximum noise level of 75 dBA at a distance of 50 feet (RBF 2006). These are levels generated by a truck that is operated by an experienced "reasonable" driver with typically applied accelerations. Higher noise levels may be generated by the excessive application of power. Lower levels may be achieved but would not be considered representative of normal truck operations. Trash bins within the commercial component of the project would be located along the eastern drive aisle, hundreds of feet from the nearest off-site home, and within 50 feet of the nearest proposed on-site homes. Trash trucks would pick up garbage containers placed in front of the proposed homes, along the private driveways. Garbage and delivery trucks currently service the project vicinity, and thus would not introduce a new source of noise to the site vicinity. As such, impacts would be less than significant in this regard.

Mechanical Equipment

Heating Ventilation and Air Conditioning (HVAC) units would be installed at the project site. This would likely include rooftop-mounted systems on the commercial buildings, and ground-level systems at the homes. HVAC systems can result in noise levels of approximately 52 dBA L_{eq} at 50 feet from the source (Berger, Neitzel, and Kladden 2010). Noise from mechanical equipment associated with operation of the project would be required to comply with the California Building Code requirements pertaining to noise attenuation. Furthermore, the surrounding area is currently developed with residential, commercial, and institutional (school) uses that utilize similar HVAC equipment. As such, operation of HVAC equipment at the project site is not expected to increase the ambient noise levels above existing conditions, and a less than significant impact would occur from this type of stationary noise source.

Parking Areas

Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the L_{dn} scale. However, the instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys may be an annoyance to adjacent noise-sensitive receptors. Estimates of the maximum noise levels associated with some parking lot activities are presented in ***Table 3.4-6, Typical Noise Levels Generated by Parking Lots***.

As shown in ***Table 3.4-6***, parking lot noise levels range between 53 dBA and 61 dBA at a distance of 50 feet. The project proposes a surface parking lot for the retail shops and drive-through/fast food service businesses on the western portion of the project site, along Azusa Avenue. The nearest off-site sensitive receptors would be the residential uses (i.e., townhomes), approximately 118 feet northeast of the proposed surface parking lot. At this distance, parking lot noise levels would range between 46 dBA and 54 dBA.

However, a solid wall separates the proposed surface parking lot and these existing residential uses, which would reduce noise levels by at least 10 dBA (NCHRP 1981). Therefore, parking lot noise levels would range between 36 dBA and 44 dBA. As such, parking lot noise levels would not exceed the City's residential

(medium and high density) noise standard of 60 dBA CNEL during the daytime and 50 dBA CNEL during the nighttime. A less than significant impact would occur this regard.

Table 3.4-6
TYPICAL NOISE LEVELS GENERATED BY PARKING LOTS

Noise Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	61 dBA L_{eq}
Car starting	60 dBA L_{eq}
Car idling	53 dBA L_{eq}

Source: Kariel 1991, pp. 3-10.

Drive-Through Operations

Based on ***Figure 2-4, Site Plan***, the project site may operate up to three drive-throughs at the proposed fast food service businesses. Noise levels from drive-through operations would be primarily from the drive-through speakerphone. The typical noise level associated with active drive-through operations is 54 dBA L_{eq} at a distance of 32 feet (HM Electronics 2016). The closest sensitive receptors to the drive-through operations are residential (i.e., townhomes) uses located approximately 182 feet northeast of the proposed Building A drive-through. Therefore, noise levels from drive-through operations would be approximately 39 dBA at the closest sensitive receptors. As such, drive-through operation noise levels would not exceed the City's residential (medium and high density) noise standard of 60 dBA CNEL during the daytime and 50 dBA CNEL during the nighttime. A less than significant impact would occur this regard.

Mitigation Measures

MM 3.4-1 **To reduce noise impacts due to construction, the project applicant must demonstrate, to the satisfaction of the City of Covina Community Development Director, that the project complies with the following:**

- Prior to approval of grading plans and/or issuance of building permits, plans shall include a note indicating that noise-generating project construction activities shall only occur between the hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday, with no activity allowed on Sundays or public holidays. The project construction supervisor shall ensure compliance with the note and the City of Covina shall conduct periodic inspection at its discretion.
- During all project construction, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receptors nearest the site.
- The construction contractor shall locate equipment staging in areas that would create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the site (i.e., to the center) during all project construction.

- Prior to the approval of the grading permit, construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective action shall be implemented and a report of the action provided to the reporting party.
- The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday, with no activity allowed on Sundays or public holidays). Further, the contractor shall submit proposed haul routes that avoid residential streets, for approval by the Director of Public Works, prior to any truck haul activities.

Timing/Implementation: *Include in building permit specifications and implement throughout construction activities.*

Enforcement/Monitoring: *City Community Development Department – Building and Safety Division*

Level of Impact Significance Following Mitigation:

With the implementation of mitigation measure MM 3.4-1, noise generated during project construction would result in a less than significant impact.

Impact 3.4b Project implementation would not result in significant vibration impacts to nearby sensitive receptors or any building damage.

Discussion

Operation of the project would not generate substantial levels of vibration due to the lack of vibration-generating sources and therefore is not analyzed below.

Project construction would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved. Vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. The effect on buildings in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach levels that damage structures.

Construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. The typical vibration produced by construction equipment is illustrated in ***Table 3.4-7, Typical Vibration Levels for Construction Equipment***.

Table 3.4-7
TYPICAL VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	PPV (inch-per-second) at 15 feet
Small bulldozer	0.006
Jackhammer	0.075
Loaded trucks	0.164
Large bulldozer	0.191
Vibratory roller	0.452

Notes:
1. *PPV = peak particle velocity*
2. *Calculated using the following formula:*
   PPV equip = PPVref x (25/D)1.5
   where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance
   PPV (ref) = the reference vibration level in in/sec from Table 12-2 of the FTA Transit Noise and Vibration Impact Assessment Guidelines
3. *D = the distance from the equipment to the receiver*

Source: Federal Transit Administration 2018.

Based on the *Transportation and Construction Vibration Guidance Manual* prepared by Caltrans, continuous vibrations at approximately 0.1 inch-per-second PPV begin to annoy people. The nearest sensitive receptors would be the residential uses along the northern and eastern project property lines, located approximately 15 feet from proposed construction areas. As shown in ***Table 3.4-7***, vibration velocities from typical heavy construction equipment operations typically used during construction range from 0.006 to 0.452 inch-per-second PPV at 15 feet from the source of activity. Therefore, heavy construction equipment vibration velocities would exceed the City of Covina's vibration threshold of perceptibility of 0.01 inch-per-second. Vibration is subjective, and some people may be annoyed at continuous vibration levels near the level of perception (or approximately 0.01 inch-per-second PPV). Although construction activities would not use construction equipment that would result in continuous vibration levels that typically annoy people, since the nearest sensitive receptors are approximately 15 feet from construction activities, sensitive receptors could be temporarily annoyed with the use of heavy construction equipment. This is not considered to be a significant impact. Nonetheless, implementation of mitigation measure MM 3.4-1 would ensure that residents are notified of construction activities and provided contact information in the event they wish to report a noise- or vibration-related complaint.

The main concern with regard to construction vibration is related to building damage. Construction vibration as a result of the proposed project would not result in structural building damage, which typically occurs at vibration levels of 0.5 inch-per-second or greater for residential structures (Caltrans 2013). As depicted in ***Table 3.4-7,*** vibration velocities from heavy construction equipment would not exceed 0.5 inch-per-second at the nearest sensitive receptors. Thus, there would not be a significant vibration impact involving potential building damage.

Mitigation Measures:

No mitigation measures are required.

3.5 POPULATION AND HOUSING

3.5 POPULATION AND HOUSING

This section of the EIR evaluates the project's population, housing, and employment characteristics with respect to adopted growth forecasts for the City of Covina. As indicated in the Initial Study (**Appendix A**) prepared during the EIR scoping process, there are no existing housing units or any people living in other types of shelter on the project site; therefore, there would be no impact involving displacement of people or housing and such impacts are not discussed herein.

3.5.1 EXISTING CONDITIONS AND GROWTH FORECASTS

As detailed in Section 2, Project Description of this Draft EIR, the project site is currently zoned C-4 Highway Commercial and is developed with a vacant building, with surface parking, landscaping and lighting improvements, which was previously utilized as an Albertsons supermarket. As such, the project site has no residential population and no housing units, and supports no jobs. The surrounding land uses include a mix of commercial and residential uses and the Northview High School campus.

Current population, housing, and employment levels in the City of Covina are listed in ***Table 3.5-1*** below.

Table 3.5-1
CURRENT (2019) POPULATION, HOUSING AND EMPLOYMENT FOR CITY OF COVINA

Total Population	48,876
Total Housing Units	16,708
Total Employment	22,800

Sources: DOF 2019b; EDD 2019

Growth forecasts for the City of Covina are presented in ***Table 3.5-2, City of Covina Near Term Growth Forecast*,** below. These forecasts are from the official regional forecasts developed for the Southern California Association of Governments' (SCAG) *2016–2040 Regional Transportation Plan/Sustainable Communities Plan* (RTP/SCS). Those forecasts are developed and updated on regular cycles, to inform regional planning efforts for investments in major transportation infrastructure and plans to demonstrate compliance with federal and state air quality attainment standards. They are calculated through complex socioeconomic analyses as well as input from local government agencies and their local planning programs. It is noted that the current (2019) city population reported by the California Department of Finance (DOF) is 76 more individuals than the SCAG forecast for 2020; total existing housing units reported by DOF are 408 more than the SCAG forecast for 2020; and the total current employment reported by the California Economic Development Department is substantially lower (4,500 jobs) than the SCAG forecast for 2020.

3.5.2 REGULATORY AND PLANNING FRAMEWORK

Federal

There are no federal statutes related to population, housing, or employment that would apply to the proposed project.

Table 3.5-2
CITY OF COVINA NEAR TERM GROWTH FORECAST

	Projected 2020	Projected 2025[1]	Projected 2035	Change 2020–2035	
				Total Growth	Average Annualized Increase[2]
Total Population	48,800	49,400	50,600	1,800	120
Total Housing Units	16,300	16,500	16,900	600	40
Total Employment	27,300	27,767	28,700	1,400	93

[1] *Sum of 2020 total plus five years of average annualized increase.*

[2] *Calculated as 2020–2035 growth divided by 15 years = annual growth, X five years.*

Source: SCAG 2016

State

California Housing Element Law

State housing law (Government Code Section 65580 et seq.) requires local government plans to address the existing and projected housing needs of all economic segments of the community through their housing elements. The housing element is one of seven state-mandated elements that every general plan must contain, and it is required to be updated every eight years and determined legally adequate by the state. The purpose of the housing element is to identify the community's housing needs, and state the community's goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs. In addition, the Housing Element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the allocation of regional housing needs consistent with the RTP/SCS.

REGIONAL

Regional Housing Needs Assessment

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of governments (COGs) are charged with making a determination of the existing and projected housing need as a share of the statewide housing need of their city or region.

SCAG is the COG for the region that includes cities in Los Angeles County and surrounding counties. The Regional Housing Needs Assessment (RHNA) for the 2014–2021 5th planning cycle for cities and counties in Southern California was adopted by the SCAG Regional Council and HCD in 2012. The RHNA quantifies the share of the regional housing need by income group allocated to each local jurisdiction for the specified planning period. The City of Covina's 2014–2021 RHNA allocations are 230 total units; this includes 60 for very low-income households, 35 for low-income households, 38 for moderate-income households and 97 for above-moderate income households (SCAG 2012).

Local

City of Covina General Plan

The applicable goals, objectives, and policies from the City of Covina General Plan.

Land Use Element

- Goal: A physical environment that provides for the housing, employment, business, service, recreational, social, educational, cultural, and entertainment needs of and maintains and enhances a high quality of life for its residents.
    - Objective 1: A climate where moderate residential, commercial, and industrial development and redevelopment are accommodated.
        - General Land Use
            - Policy 24: Balance the City's obligation to provide more housing with the need to maintain and bolster local economic development efforts in terms of attaining as high a jobs-to-housing ratio as feasible and as great a retail sales tax generation amount as possible.
        - Residential
            - Policy 3: Accommodate various new and rehabilitated housing types, such as single-family detached houses, apartments, and condominiums/townhouses, for a variety of existing and future economic segments, including lower and moderate-income households, at quantities that address the intent of State and regional/SCAG housing statutes and policies as well as meet Covina Redevelopment Agency affordable housing targets and that do not adversely affect the integrity of established residential areas.
            - Policy 8: Encourage the construction of owner-occupied housing
        - Commercial and Industrial
            - Policy 4: Maintain its variety of functional commercial office, retail, and service businesses for reasons pertaining to employment, sales tax generation, community image enhancement, and jobs-to housing ratio maximization.
            - Policy 13: Encourage the capturing of a greater variety of retail businesses, including stores, shops, and restaurants, so as to attract more patrons, generate more sales tax, and improve the community's image.
    - Objective 4: Economic and social vitality in all areas of the community.
            - Policy b: Retain and, wherever possible, expand commercial- and industrial-designated areas for sales tax generation, employment, and community name recognition purposes.

3.5.3 THRESHOLDS OF SIGNIFICANCE

The California Environmental Quality Guidelines, Appendix G, as amended through December 31, 2019, serve as the basis for identifying thresholds determining the significance of the environmental effects of

a project. A project will have a significant environmental impact related to population and housing if it would:

a) Induce substantial population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

3.5.4 METHODOLOGY

The project's increments of added housing, population, and employment are compared with the near-term growth forecasts for the City in the 2016–2040 RTP/SCS, as described earlier. Variations from the forecasts and assessment of consistency with key City growth policies are considered in the determination of impact significance. Physical impacts related to population growth are addressed in the transportation/traffic, air quality, noise, public services (parkland and school capacity) and utilities sections of this EIR.

3.5.5 ANALYSIS

Impact 3.5a: The project would directly induce population growth by providing new housing that would expand the City's population and by building new commercial space that would increase local jobs. This added residential population would worsen the existing city-wide deficit in total parkland. There are no feasible measures to mitigate that impact.

Discussion

Direct Impacts

The proposed project includes 61 single-family residential units and would introduce a new residential population into the area. Applying a citywide household factor of 3.0 persons per household for single-family units, the project would generate a population of 183 persons at full buildout (DOF 2019b). The proposed general retail buildings and two fast food/drive through restaurants would generate approximately 86 jobs, anticipated to be mainly part-time positions.[1]

As shown in ***Table 3.5-3, Project Share of Growth Forecast Between 2020–2025,*** the project would represent a 30.5 percent share of the forecast totals of citywide population and housing units and an 18 percent share of the forecast increase in employment.

The proposed 61 single-family homes would provide homeownership opportunities for above moderate-income households, which may include existing or new city residents. Development of such new housing opportunities is consistent with General Plan Land Use Objective 1 and related General Land Use Policy No. 24, Residential Policy No. 3 and No. 8.

[1] Calculated as 97 square feet of floor area for each fast food restaurant employee and 427 square feet of floor area for each retail shop employee, derived from research compiled for the Institute of Traffic Engineers' *Trip Generation Manual* (10th Edition, 2017).

Table 3.5-3
PROJECT SHARE OF GROWTH FORECAST BETWEEN 2020-2025

	Project	Covina Growth Forecast 2020-2025	Project Share of Growth[1] (%)
Population	183	600	30.5
Housing Units	61	200	30.5
Employment	86	467	18

[1] Calculated by dividing the project's volume by the 2020-2025 citywide growth projections.

Source: Michael Baker International 2019; SCAG 2016.

The proposed General Plan amendment and zone change to convert the current commercial land use designations on the eastern side of the project site to Medium Density Residential are in conflict with General Plan Land Use Objective 4, Commercial and Industrial Policy No. 13, which encourages the retention and expansion of commercial uses to support additional sales tax-generating land uses and to strengthen the City's economic base. These are issues of local planning policy and are not environmental impacts.

The environmental impacts associated with the project's unplanned residential growth, together with the proposed general retail and fast food restaurant uses, are examined in the other chapters of this EIR, with respect to aesthetics, air quality, greenhouse gas emissions, noise, public services, traffic, and utilities. As noted in Section 3.6, Public Services, the project's added residential population would worsen the existing deficiency in the citywide parkland/population ratio. There are no feasible measure to mitigate the project's incremental impact or the overall cumulative impact, at this time. Therefore, this is considered to be a significant and unavoidable impact involving the City's performance standards for its local parkland system.

Indirect Impacts

The project proposes infill development in an urban area with an established infrastructure system. The project would link with and tie into existing infrastructure in the project area. New infrastructure that would be required, such as service connections to local water and sewer network and electricity and natural gas utilities for the residential and commercial developments, would be sized to serve only the project's needs. Thus, other than connections between the project site and existing nearby infrastructure, no new infrastructure would be added in the area. No new public roadways would be created as part of the project, and the private internal drives would not provide access to any other properties. The project would not facilitate development of any sites in the fully developed surrounding area, and would not enable additional intensification of existing uses. Therefore, the project would not induce substantial population growth indirectly through the construction of capacity adding infrastructure. Impacts would be less than significant.

The proposed General Plan amendment and zone change to replace the commercial designation on the east side of the project site with a Medium-Density Residential land use designation, to allow for development of single-family homes at the proposed density, would only apply to that portion of the project site. It would not affect any of the surrounding properties, all of which are developed. As such, this policy change would not have indirect growth-inducing effects outside of the project site. It may,

however, establish a precedent for similar requests elsewhere in the City, at a subsequent time. It would be speculative to predict any circumstances associated with such a future request.

Mitigation Measures

No mitigation measures are feasible to reduce the impact involving the worsening of the city-wide deficit of public parkland to less than significant.

3.6 PUBLIC SERVICES

3.6 PUBLIC SERVICES

This section of the EIR addresses potential impacts to public services, including parks and schools, that could result from construction and/or operation of the proposed project. As indicated in the Initial Study (**Appendix A**) prepared during the scoping process, the project's impacts on fire, police, and other governmental services were determined to be less than significant; therefore, these topics are not further evaluated herein.

The following discussion addresses the existing conditions of public schools and parks; identifies and analyzes environmental impacts; and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the project, as applicable. The analysis in this section is based on review of the City of Covina's General Plan Land Use Element, Natural Resources and Open Space Element, City Parks Department website, and communications with the Covina-Valley Unified School District (CVUSD).

3.6.1 PUBLIC SCHOOLS

3.6.1.1 EXISTING CONDITIONS

The project site is located within the boundaries of CVUSD, which serves students in kindergarten through twelfth grade. CVUSD operates eight elementary, three middle school, and four high school campuses. The campuses that serve the project vicinity are Cypress Elementary School, Las Palmas Middle School, and Northview High School (Kennedy 2020).

Table 3.6-1, Current School Enrollment and Design Capacity *identifies the current enrollments and* design capacities for the three schools that would serve the project site. As shown, Cypress Elementary School has capacity to house 471 additional students; Las Palmas Middle School can house 726 additional students and Northview High School can house 444 additional students.

TABLE 3.6-1
CURRENT SCHOOL ENROLLMENT AND DESIGN CAPACITY

School	Current Enrollment[1]	School Capacity[2]
Cypress Elementary School (grades K-6)	597	1,068
Las Palmas Middle School (7-8 grade)	766	1,492
Northview High School	1,228	1,672

Sources:
1 Kennedy 2020
2 Wilson 2020

3.6.1.2 REGULATORY AND PLANNING FRAMEWORK

Federal

There are no federal regulations that are applicable to the provision of local school services and facilities.

State

California Senate Bill 50 (Leroy F. Greene School Facilities Act of 1998). The Leroy F. Greene School Facilities Act of 1998 established, through Senate Bill 50, Chapter 407, Statutes of 1998, the School Facility

Program. This program provides a per-pupil grant amount to qualifying school districts for purposes of constructing school facilities and modernizing existing school facilities.

California Code of Regulations (CCR) 65995, 65996, and the California Education Code Section 17620. CCR Section 65995 and California Education Code Section 17620 allow school districts to levy fees on residential and or commercial/industrial construction projects within a school district's boundaries. The purpose of the fees is for funding the construction or reconstruction of school facilities. The State Allocation Board sets the per-square-foot Level I school impact fees (developer fees) every two years. Each school district must then adopt the fee applicable within their district; this is generally implemented through a fee justification study.

In accordance with Government Code Section 65996, notwithstanding any other provision of state or local law, or a state or local agency, the payment of fees as instituted in Government Code Section 65995 are deemed to provide full and complete school facilities mitigation under CEQA. Further, a state or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property or any change in governmental organization or reorganization, as defined in Section 56021 or 56073, on the basis that school facilities are inadequate.

Local

City of Covina General Plan

Land Use Element

- Goal: A physical environment that provides for the housing, employment, business, service, recreational, social, educational, cultural, and entertainment needs of and maintains and enhances a high quality of life for its residents.
    - Objective 1: A climate where moderate residential, commercial, and industrial development and redevelopment are accommodated.
        - Other Uses
            - Policy 6: Ensure that school sites and educational facilities are adequate in number, type, and location for existing and future populations.
    - Objective 5: The provision of sufficient public facilities and services.
            - Policy q: Ensure that school sites and educational facilities are adequate in number, type, and location as well as site design and appearance for existing and future populations and, to the greatest extent possible, meet applicable City codes and standards.

3.6.1.3 THRESHOLDS OF SIGNIFICANCE

The California Environmental Quality Guidelines, Appendix G, as amended through December 31, 2019, serve as the basis for identifying thresholds determining the significance of the environmental effects of a project. A project will have a significant environmental impact related to public schools if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered public school services, need for new or physically altered school

facilities the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives established by the school district(s)that serve the site.

3.6.1.4 METHODOLOGY

CVUSD was contacted for information on affected school campuses, including existing enrollments and design capacities, and to estimate the number of students living in the proposed new homes that can be anticipated to attend local schools, to help determine the project's impacts on school facilities. The information from CVUSD provides the context for the impact analysis below. Communications with CVUSD are documented in **Chapter 7** of this EIR.

3.6.1.5 Analysis

Impact 3.6.1a The project would result in the addition of approximately 43 school-aged children who would attend elementary, junior and high schools that serve the project area. The schools would each have sufficient capacity, and payment of mandatory development impact fees to each affected school district would sufficiently offset the project's impacts involving added student enrollment to a level of less than significant.

Discussion

Statistics compiled from school district data across the state by the California Department of General Services indicate an average of 0.7 students per household. Since more specific household student factors have not been developed by CVUSD, this figure is applied to estimate the total number of school-aged children that would reside in the 61 new homes. As shown in ***Table 3.6-2, Project Student Enrollment Estimates***, the project would generate a total of approximately 43 students that would be spread across Cypress Elementary School, Las Palmas Middle School, and Northview High School. Presently, there is no indication from either the Department of General Services' State Allocation Board or CVUSD on how the student yield factor would be distributed across school levels in a unified school district. However, even in the unlikely scenario that all 43 new students generated by the proposed project attended a single school, all three schools would have sufficient capacity to handle the influx.

TABLE 3.6-2
PROJECT STUDENT ENROLLMENT ESTIMATES

Number of Housing Units	Generation Rate[1]	Total New Students for CVUSD
61 Single-Family Detached Homes	0.7	43

[1] Lueck 2020; DGS 2019

As set forth in Section 17620 of the California Education Code, school districts are authorized to collect fees for mitigation of the impact of new development on school facilities. These fees are imposed to finance construction or reconstruction of school facilities needed to accommodate students coming from new developments. Alternatively, developers have the option to (1) enter into mitigation agreements with

a district to provide funding that will offset the costs to provide capacity for the new students from the project or (2) request the formation of a community facilities district. For this project, payment of the current development impact fees would be required, prior to issuance of residential building permits.

Consistent with Section 17620 of the Education Code and Section 65996 of the Government Code, the payment or satisfaction of a fee, charge, or other requirement levied or imposed pursuant to Section 17620 of the Education Code in the amount specified in CCR Section 65995 and, if applicable, any amounts specified in CCR Section 65995.5 or 65995.7 are complete mitigation of the new development project impacts on the provision of adequate school facilities. Payment of CVUSD's development impact fees, as well as the current remaining capacity of each affected school, would sufficiently offset the project's impact involving the capacities of local school facilities to a level of less than significant.

Mitigation Measures

No mitigation measures are required.

3.6.2 PUBLIC PARKS

3.6.2.1 EXISTING CONDITIONS

Inventory of Local Parkland

The City provides 13 recreation and park facilities, including those at public schools, at which access is provided under agreements between the City and the CVUSD and the Charter Oak School District for the joint public use of school recreational facilities.

Parkland resources in the city include recreational facilities, senior centers, parks, open spaces, children's playgrounds, school parks, softball and other sport fields/courts, and community gardens. The names, locations, and acreages of these facilities are listed in ***Table 3.6-3, City of Covina Recreational Facilities and Parks.*** The City of Covina Public Works Department is responsible for providing maintenance for the City's parks, open space, medians, City facilities, and the Civic Center complex, as well as parks and recreation facilities, such as ball fields, courts, playgrounds, swimming pools, and gardens (Covina 2019b).

TABLE 3.6-3
CITY OF COVINA RECREATIONAL FACILITIES AND PARKS

Facility Name	Address	Size (Acres)[1]	Classification	Ownership
Heritage Plaza Park	400 N. Citrus Avenue	2	Neighborhood Park	City of Covina
Covina Park	301 North Fourth Avenue	10	Community Park	City of Covina
Edna Park	220 West Edna Place	2	Neighborhood Park	City of Covina
Hollenbeck Park	1250 North Hollenbeck Ave	10	Community Park	City of Covina
Jobe's Glen at Parque Xalapa	1321 East Garvey Ave. North	2	Neighborhood Park	City of Covina
Kelby Park	815 North Barranca Avenue	6	Neighborhood Park	City of Covina

Facility Name	Address	Size (Acres)[1]	Classification	Ownership
Three Oak Park	829 Oak Park Road	<1	Mini-Park	City of Covina
Wingate Park	735 North Glendora Avenue	17	Regional Park	City of Covina
Cougar Park	150 West Puente Street	1	Mini Park	City of Covina
Barranca Park	669 South Barranca Avenue	6	Neighborhood Park	Covina-Valley Unified School District
Cypress Park	320 West Covina Boulevard	4	Neighborhood Park	Covina-Valley Unified School District
Heyler Field	303 South Glendora Avenue	2	N/A	Charter Oak Unified School District
Savoy Field	1359 East Cypress Street	2	N/A	Charter Oak Unified School District
Total Acres		**63**		

Notes: Total may appear different due to rounding.

Sources: Covina 2019b; West Covina 2016; Los Angeles County 2016; Google Earth 2019

Recreational Facilities and Parks within 1 Mile of the Project Site

There are seven parks located within 1 mile of the project site (Covina 2019b). **Table 3.6-4, *Recreational Facilities and Parks within 1 Mile of Project Site*,** lists the recreational facility or park name, describes the services provided at the facility, and indicates the distance and direction of the facility from the project site.

TABLE 3.6-4
RECREATIONAL FACILITIES AND PARKS WITHIN 1 MILE OF PROJECT SITE

Facility Name	Address	Size (Acres)	Classification	Ownership	Distance (in miles) and Direction from Project Site
Hollenbeck Park	1250 North Hollenbeck Ave	10	Community Park	City of Covina	0.43 north northeast
Cypress Park	320 West Covina Boulevard	4	Neighborhood Park	Covina-Valley Unified S. D.	0.52 east
Edna Park	220 West Edna Place	2	Neighborhood Park	City of Covina	0.75 east northeast
Heritage Plaza Park	400 N. Citrus Ave	2	Neighborhood Park	City of Covina	0.99 east southeast
Covina Park	301 North Fourth Avenue	10	Community Park	City of Covina	0.72 east southeast

Facility Name	Address	Size (Acres)	Classification	Ownership	Distance (in miles) and Direction from Project Site
Palm View Park	1340 E. Puente Ave	9.1	Neighborhood Park	City of West Covina	1.09 southwest
Valleydale Park	5525 N. Lark Ellen	9.13	N/A	Los Angeles County (park is unincorporated County land in City of Azusa)	1.08 northwest
Total Acres		**46.23**			

Sources: Michael Baker International 2019; Covina 2019b; West Covina 2016; Los Angeles County 2016; Google Earth 2019

3.6.2.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

There are no federal policies or regulations that apply to local public parkland.

STATE

Quimby Act

The Quimby Act of 1975 (California Government Code Section 66477), commonly called the Quimby Act, allows a city or county to pass an ordinance that requires, as a condition of approval of a subdivision, either the dedication of land, the payment of a fee in lieu of dedication, or a combination of both for park and recreational purposes. It allows a city or county to require a maximum parkland dedication standard of 3 acres of parkland per 1,000 residents for new subdivision development unless the jurisdiction can demonstrate that the amount of existing neighborhood and community parkland exceeds that limit. In accordance with Section 66477, a jurisdiction may establish a parkland dedication standard based on its existing parkland ratio, provided required dedications do not exceed 5 acres per 1,000 persons.

Local

General Plan

Land Use Element

The Land Use Element (Covina 2000a) addresses parkland needs and strategies, as identified below.

- Goal: A physical environment that provides for the housing, employment, business, service, recreational, social, educational, cultural, and entertainment needs of and maintains and enhances a high quality of life for its residents.
    - Objective 1 - A climate where moderate residential, commercial, and industrial development and redevelopment are accommodated.
        - General Land Use
            - Policy 12: Preserve all existing parks and open space from conversion to other uses and from incompatible encroachments.

- Policy 27: Address its park/open space deficiency and attempt to mitigate the problem to the greatest extent.

▪ Other Uses

- Policy 2: Preserve existing parklands and discourage possibly incompatible land uses or inappropriate encroachments upon parks and open space resources.
- Policy 3: Consider developing additional parks of all types and sizes at various areas, with an emphasis placed on locating new facilities in the eastern and western portions of the City and in neighborhoods in and around medium- to high-density developments.
- Policy 4: Consider preparing and implementing financial mechanisms to develop additional parklands, targeting future and/or existing residents.

Natural Resources and Open Space Element

The Natural Resources and Open Space Element (NROS Element) provides objectives and policies for the purpose of establishing a long-range vision for the future development of parks and open space within the city. The NROS Element outlines objectives and policies related to the preservation of open space, development of new areas of open space, and open space connectivity (Covina 2000b.) Policies aimed at preserving and expanding parkland and recreational opportunities are identified below.

- Goal: A setting in which a high environmental quality is achieved through the bona fide conservation and protection of existing natural resources.
  - Policy Area 1: Retention, Development, and Enhancement of Park and Recreational Facilities

    The City shall:

    ▪ Policy a: Preserve all existing local parks, ball fields, and schools through appropriate General Plan and Zoning designations and any other reasonable measures to best maintain recreational opportunities as well as community appearance and image.

    ▪ Policy c: Maintain joint-use agreements with school districts to provide Covina residents with open space lands that supplement the City's park system and attempt to ensure, to the greatest degree possible, that such agreements afford local residents with maximum accessibility to school campus facilities.

    ▪ Policy h: Endeavor to provide for its citizens a total park acreage equal to 2.0 acres for every 1,000 population at the time of General Plan buildout.

City of Covina Municipal Code

Chapter 16.28 Park Dedication and In Lieu Fee Regulations

16.28.030 Payment of impact fees or park dedication required.

As a condition of approval of a tentative or final tract map or parcel map for a residential subdivision, or for a building permit within a subdivision, the subdivider shall be required to pay an impact fee, offer for

dedication parkland in lieu thereof or both, at the sole and exclusive option of the city, in the amount provided in this chapter, for park and recreational purposes, unless the subdivider is exempted from this requirement by the express provisions of this chapter. The payment of an impact fee and/or offering for dedication of land shall be at the time and according to the standards and formula contained in this chapter. (Ord. 05-1915 § 1, 2005.)

16.28.040 Standards for determining dedication – Maximum requirement.

A. General. If the park dedication is required under CMC 16.28.030, the park area required shall be determined in accordance with the standards provided in this section.

B. Standard of Park Area to Population. It is found and determined that the public interest, convenience, health, safety and welfare of the residents of the city require that three acres of property for every 1,000 persons residing within the city be devoted to local park and recreational purposes, and that such park area is necessary to provide for the needs of the current and future persons residing and working in the city. Said ratio of 0.003 is hereafter referred to as the "park area standard."

C. Dwelling Unit Occupancy Factor. Based upon the latest available census data, the dwelling unit occupancy factors shall be as follows: 3.02 for owner-occupied dwelling units and 2.72 for rental dwelling units. These figures may be revised from time to time by resolution of the city council.

D. Computation of Maximum Area of Park to Be Dedicated. The maximum amount of parkland required for any subdivision shall be determined by multiplying the number of dwelling units in the subdivision for each housing type by the occupancy factor for each housing type by 0.003 (i.e., the ratio of the maximum park area standard of three acres per 1,000 population). This is represented as follows:

   i. (No. of dwelling units) x (occupancy factor) x (.003) = Area of park to be dedicated

   ii. The city council, by resolution, may require a dedication of parkland less than the maximum amount set forth above if the city finds that a smaller dedication will serve the public interest, convenience, health, safety and welfare of the residents of the city.

E. Qualification of Land Being Dedicated. In addition to meeting the requirements set forth in this section, any land offered for park dedication shall meet the criteria specified in CMC 16.28.060(D). (Ord. 05-1915 § 1, 2005.)

3.6.2.3 THRESHOLDS OF SIGNIFICANCE

The California Environmental Quality Guidelines, Appendix G, as amended through December 31, 2019, serve as the basis for identifying thresholds to assess the significance of the environmental effects of a project. A project will have a significant impact involving public parkland if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered parks, need for new or physically altered park facilities - the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives established by the City.

3.6.2.4 METHODOLOGY

The project's incremental effect on the City's inventory of public parks and recreational facilities is evaluated by quantifying the reduction in the citywide ratio of parkland per 1,000 residents and considering the requirements of the City's Municipal Code concerning dedication of land or payment of in-lieu fees to help fund additional parkland acquisition or development.

3.6.2.5 ANALYSIS

Impact 3.6.2-a The project would add approximately 183 new residents to the City's population who would utilize local public parks and recreation facilities. This would worsen the existing citywide deficit in public parkland. Payment of mandatory in-lieu fees to support acquisition of additional parkland, as specified in the Covina Municipal Code, would not sufficiently offset the project's impacts, which would be significant and unavoidable.

Discussion

As shown in ***Table 3.6-3***, above, the current acreage of city parkland is approximately 63 acres with an estimated population of 48,876 residents (DOF 2019); this reveals that the City has 1.29 acres of open space per 1,000 residents. This ratio is significantly below the General Plan guideline of 2.0 acres of parkland for every 1,000 residents (Covina 2000b) as well as the national guideline (established by the National Park and Recreation Association, or NPRA) of 2.5 to 4.0 acres of parkland for every 1,000 people. According to the NROS Element, "this deficiency has hampered the City for many years and, unless corrective policies and measures are adopted and followed, the shortfall would be exacerbated in the future because of various demographic, socio-economic, and housing development trends" (Covina 2000b, p. D-20).

The proposed project would add approximately 183 new residents who would likely utilize local parks and recreation facilities at varying frequencies, and at different times and places. The levels and frequency of activities by project residents at specific public parks in or near Covina cannot be quantified. It is presumed that the residents would visit parks in small groups, rather than as the entire community of new residents, and would not engage in intensive activities not suitable for such parks that could result in physical deterioration or degradation of those parks. The existing parkland citywide is 63 acres and the existing parkland deficit would increase by 0.9 percent, thereby increasing the deficit of parkland from 34.8 acres to 35.1 acres. This is considered to be a significant impact.

The proposed retail and fast food businesses are not expected to result in any significant usage of local parks or recreation facilities. The patrons will arrive and depart quickly, many enroute to another destination. The employees would not be leaving this site to go to a park and then return to their job. As such, no impact on local parks is anticipated from the commercial component of this project.

TABLE 3.6-5
PARKLAND NEEDS

Year	Population	2019 Park Acreage1[1]	Park Acreage Goal 2.0 Acres Parkland / 1,000 People[2]	Shortage of Parkland/ Additional Park Acreage Needed
2019 Citywide Population	48,876	63	97.8	34.8
Project Buildout[3]	49,059	63	98.1	35.1

Notes:
1. Includes City-owned parks and parks operated by non-City entities.
2. Park acreage of 2.0 acres per 1,000 people as per General Plan NROS Element policy h.
3. Project buildout would add 183 residents.
Source: Michael Baker International 2019; DOF 2019.

The project includes 0.28 acres of private pocket parks and passive open space within its residential component. It is expected that project residents will utilize these private on-site amenities for some of their outdoor recreational activities. For organized sports and outdoor recreational activities that require more space, project residents would likely frequent local municipal parks and recreation facilities, both within and beyond the city limits.

The residential component of the proposed project is subject to the City's Quimby Act ordinance, which requires the project developer to either dedicate parkland or make an in-lieu payment of park impact fees to mitigate an increase in service demands upon the City's existing park facilities. Payment of in-lieu fees is required prior to issuance of any building permits. The required acreage of parkland to be dedicated is 0.549 acre, based on a formula that equates to 3 acres per 1,000 residents (DTA 2019), or an in-lieu payment of park impact fees equivalent to the fair market value of that amount of land. Pursuant to Covina Municipal Code Section 16.28.070B, a development project with private open space may receive a credit against its park dedication requirement, but such credit shall not exceed one-third of such impact fee payment or park dedication requirement.

The project developer is proposing payment of an in-lieu fee, rather than dedication of land, and is also requesting a one-third fee credit based upon the comparability of the private open space to public park area and the adequacy of such private open space to serve the needs of the project for active recreational uses. The City Planning Commission and City Council will determine whether to grant the requested fee credit. Payment of the required parkland fee would not likely result in immediate acquisition of additional city parkland due to difficulties in acquiring appropriately located sites with sufficient land area to support a viable park layout. Even if some parkland acquisition were to occur shortly after the project is built, the project's payment of parkland fees would not result in reducing the current severe shortage of local parkland by a meaningful level. As such, the project's impact on public parkland would be significant and unavoidable.

Mitigation Measures

No mitigation measures are proposed beyond payment of the required parkland dedication in-lieu fee for the residential component of the project. Resolution of the current shortage of local parkland is considered to be beyond the scope of this project.

3.7 TRANSPORTATION

3.7 TRANSPORTATION

Pursuant to the environmental scoping process conducted during the initial phase of this EIR (see Initial Study and Notice of Preparation documentation in **Appendix A**), this section of the EIR evaluates the potential transportation impacts that may result from the proposed project. Transportation impacts are addressed primarily with respect to the vehicle miles traveled (VMT) characteristics of the project. Other issues discussed include consistency with transportation plans and programs involving roadways, transit, bicycles, and pedestrian mobility, and also with respect to potential impacts involving design features. For information only, this section also discusses potential congestion effects during peak hours at several intersections adjacent to and surrounding the project site. Impacts involving emergency access were determined in the Initial Study to have a less than significant impact.

The analysis of VMT in this section was prepared by Michael Baker International. The informational discussion of congestion impacts is based on the "Covina Commons and Cypress Village Traffic Impact Analysis" (Traffic Study) prepared by TJW Engineering, Inc., dated November 2019 and updated in July 2020, and a focused analysis of queuing at the northernmost Azusa Avenue driveway, also prepared by TJW Engineering, dated March 3, 2020. The Traffic Study and queuing analysis are included as **Appendix F** of this Draft EIR.

3.7.1 EXISTING CONDITIONS

EXISTING CIRCULATION NETWORK

Figure 3.7-1 shows existing conditions for the study area intersection and roadway geometry, including identification of the number of through lanes for existing roadways and intersection traffic controls.

CITY OF COVINA GENERAL PLAN CIRCULATION ELEMENT

The City of Covina utilizes roadway categories recognized by regional, state and federal transportation agencies. There are four general categories in the roadway hierarchy, ranging from freeways with the highest capacity to two-lane undivided roadways with the lowest capacity. The roadway categories are summarized as follows:

- *Freeways* are limited-access and high-speed travel ways included in the state and federal highway systems. Their purpose is to carry regional through-traffic. Access is provided by interchanges with typical spacing of one mile or greater. No local access is provided to adjacent land uses.
- *Arterial roadways* are major streets that primarily serve through-traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with two to six travel lanes and their major intersections are signalized. This roadway type is divided into two categories: principal and minor arterials. Principal arterials are typically four-or-more lane roadways and serve both local and regional through-traffic. Minor arterials are typically two-to-four lane streets that service local and commuter traffic.
- *Collector roadways* are streets that provide access and traffic circulation within residential and nonresidential (e.g., commercial and industrial) areas. Collector roadways connect local streets to arterials and are typically designed with two through travel lanes (i.e., one through travel lane in each direction) that may accommodate on-street parking. They may also provide access to abutting properties.

- *Local roadways* distribute traffic within a neighborhood, or similar adjacent neighborhoods, and are not intended for use as a through-street or a link between higher capacity facilities such as collector or arterial roadways. Brief descriptions of the roadways within the study area follow.

Arrow Highway is a four-lane, east–west Primary Arterial Street with a two-way left-turn lane. On-street parking is generally permitted on Arrow Highway and the posted speed limit is 45 miles per hour.

Azusa Avenue is a four-lane, north–south Primary Arterial Street with a raised median. On-street parking is generally permitted on Azusa Avenue and the posted speed limit is 40 miles per hour.

Badillo Street is a four-lane, east–west Secondary Arterial Street with a two-way left-turn lane. On-street parking is generally permitted on Badillo Street and the posted speed limit is 30 miles per hour.

Citrus Avenue is generally a four-lane, north–south, Secondary Arterial Street with a mixture of raised median, two-way left-turn lane, painted median, and no median. On-street parking is generally permitted on Citrus Avenue and the posted speed limit varies between 25 and 40 miles per hour.

Covina Boulevard is a four-lane, east–west Collector Street with a mixture of raised median, two-way left-turn lane, painted median, and no median. On-street parking is generally permitted on Covina Boulevard and the posted speed limit varies between 35 and 40 miles per hour.

Cypress Street is a four-lane, east–west Collector Street with a two-way left-turn lane in the study area. On-street parking is generally not permitted on Cypress Street except for a few locations east of Hollenbeck Avenue and the posted speed limit in the study area is 35 miles per hour.

Gladstone Street is a four-lane, east–west Secondary Arterial Street with no median in the study area. On-street parking is generally permitted on Gladstone Street and the posted speed limit in the study area is 40 miles per hour.

Hollenbeck Avenue is a four-lane, north–south, Collector Street with no median. On-street parking is generally permitted on Hollenbeck Avenue and the posted speed limit is 35 miles per hour.

Lark Ellen Avenue is a four-lane, north–south, Collector Street with no median. On-street parking is generally permitted on Lark Ellen Avenue and the posted speed limit is 40 miles per hour.

San Bernardino Road is a four-lane, east–west Collector Street in the vicinity of Azusa Avenue. On-street parking is generally permitted on San Bernardino Road and the posted speed limit in the study area is 35 miles per hour.

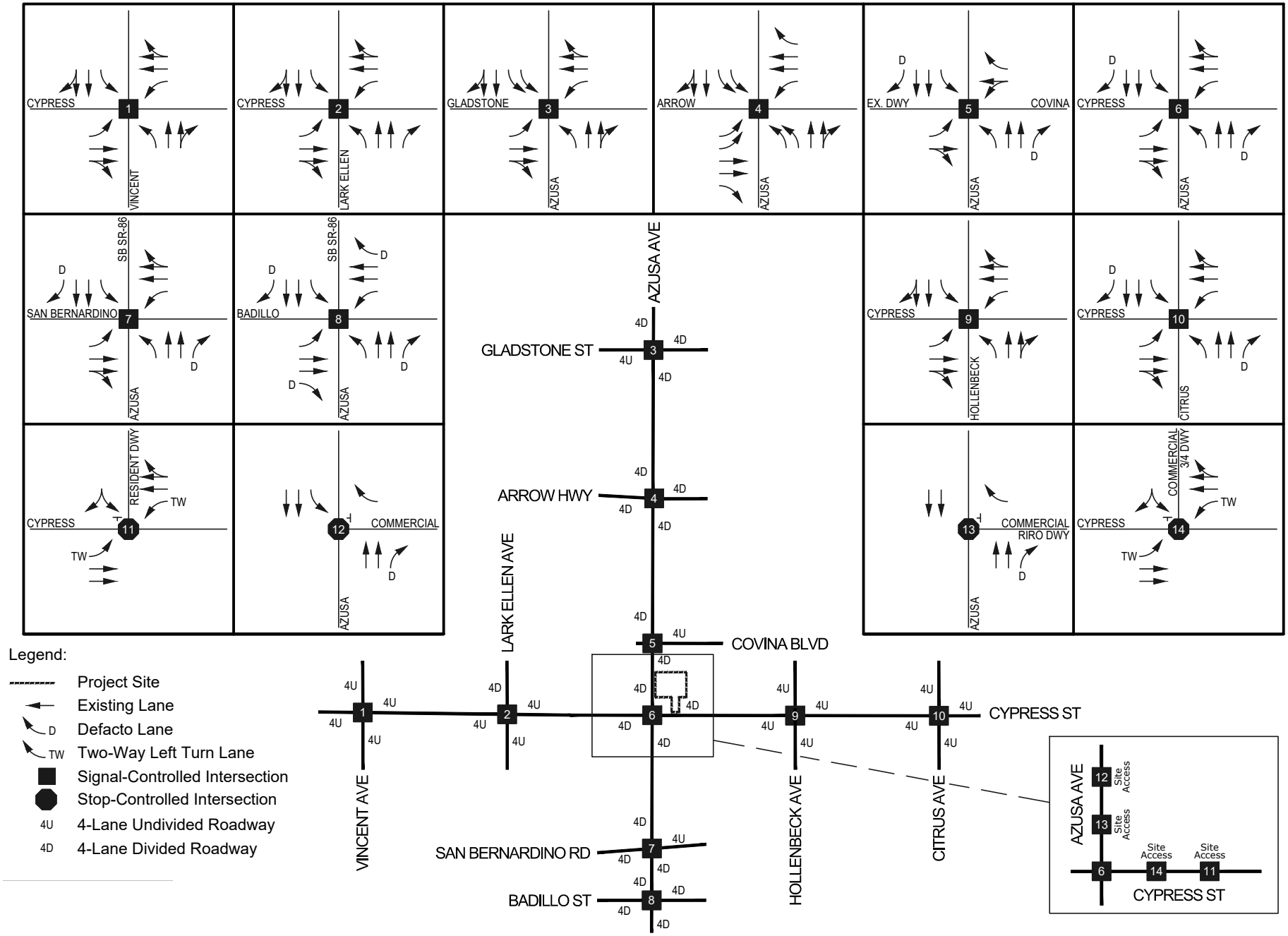
Vincent Avenue is a four-lane, north–south, Collector Street with no median. On-street parking is generally permitted on Vincent Avenue and the posted speed limit is 45 miles per hour.

Appendix A of the Traffic Study shows the adopted City of Covina General Circulation Plan.

EXISTING BICYCLE AND PEDESTRIAN FACILITIES

There are currently no dedicated bicycle facilities within the project area. The City of Covina Bicycle Master Plan proposes the following future bicycle facilities within the study area:

- Class II on-street bicycle lanes on Azusa Avenue, Vincent Avenue, Lark Ellen Avenue, Hollenbeck Avenue, Citrus Avenue, Arrow Highway, Covina Boulevard, Cypress Street, San Bernardino Road, and Badillo Street.



Source: TJW Engineering, March 2020

Existing Conditions in Study Area and Roadway Geometry

Figure 3.7-1

Pedestrian facilities such as sidewalks, and curb ramps and crosswalks at intersections, are generally complete along the project site frontages and nearby.

Appendix A of the Traffic Study contains the City of Covina Bicycle Master Plan map.

EXISTING PUBLIC TRANSIT SERVICES

The City of Covina is served by the Foothill Transit Agency, which provides bus service throughout the San Gabriel Valley.

There is one Foothill transit bus line within one-quarter mile of the project site. **Foothill Transit Route 280** provides service between Azusa and the Puente Hills Mall. Route 280 runs from 5:00 a.m. to 11:00 p.m. on weekdays with headways of 15-20 minutes throughout the morning, afternoon, and early evening. Route 280 runs from 6:00 a.m. to 10:00 p.m. on weekends with headways of 30 minutes throughout the day. In the vicinity of the proposed project site, there are bus stops for Route 280 at the Azusa Avenue/Cypress Street intersection. Appendix A of the Traffic Study contains detailed transit route information.

EXISTING TRAFFIC VOLUMES

To determine the existing operation of the local street network, AM and PM peak period traffic counts were collected at key intersections on Thursday, May 24, 2018. The traffic volumes used in this analysis are from the highest hour within the peak period counted. Detailed traffic count data is provided in Appendix B of the Traffic Study.

Figure 3.7-2 shows existing AM and PM peak hour volumes at the study intersections.

Existing Conditions Intersection Level of Service Analysis

Level of service (LOS) is commonly used to describe the quality of flow on roadways and at intersections using a range from LOS A (free flow with little congestion) to LOS F (severely congested conditions). The Intersection Capacity Utilization (ICU) methodology expresses the LOS of an intersection in terms of the remaining capacity at an intersection (or lack thereof). The ICU methodology compares the volume-to-capacity (V/C) ratios of conflicting turn movements at an intersection, sums the critical conflicting V/C ratios for each intersection approach, and determines the intersection's overall capacity utilization. The resulting V/C ratio is converted to an LOS as shown in ***Table 3.7-1***.

Table 3.7-1
LOS AND V/C RANGES

Level of Service	Description	ICU
A	Very favorable progression; most vehicles arrive during green signal and do not stop. Short cycle lengths.	0.000-0.600
B	Good progression, short cycle lengths. More vehicles stop than for LOS A.	0.601-0.700
C	Fair progression; longer cycle lengths. Individual cycle failures may begin to appear. The number of vehicles stopping is significant, though many vehicles still pass through without stopping.	0.701-0.800

Level of Service	Description	ICU
D	Progression less favorable, longer cycle length and high flow/capacity ratio. The proportion of vehicles that pass through without stopping diminishes. Individual cycle failures are obvious.	0.801-0.900
E	Severe congestion with some long-standing queues on critical approaches. Poor progression, long cycle lengths and high flow/capacity ratio. Individual cycle failures are frequent.	0.901-1.000
F	Very poor progression, long cycle lengths and many individual cycle failures. Arrival flow rates exceed capacity of intersection.	>1.000

Source: TJW Engineering 2019; see Appendix F

Existing conditions AM and PM peak hour intersection analysis results are shown in ***Table 3.7-2***. Calculations are based on the existing geometrics at the study area intersections as shown in ***Figure 3.7-1***. ICU analysis sheets are provided in Appendix C of the Traffic Study.

Table 3.7-2
INTERSECTION ANALYSIS – EXISTING CONDITIONS

#	Intersection	AM Peak Hour	PM Peak Hour
		ICU - LOS	ICU - LOS
1	Vincent Ave/Cypress St	0.704 – C	0.722 – C
2	Lark Ellen Ave/Cypress St	0.745 – C	0.728 – C
3	Azusa Ave/Gladstone St	0.714 – C	0.774 – C
4	Azusa Ave/Arrow Hwy	0.809 – D	0.815 – D
5	Azusa Ave/Covina Blvd	0.481 – A	0.514 – A
6	Azusa Ave/Cypress St	0.767 – C	0.780 – C
7	Azusa Ave/San Bernardino Rd	0.662 – B	0.700 – B
8	Azusa Ave/Badillo St	0.784 – C	0.783 – C
9	Hollenbeck Ave/Cypress St	0.668 – C	0.640 – C
10	Citrus Ave/Cypress St	0.452 – A	0.473 – A

Source: TJW Engineering, November 2019

As shown in ***Table 3.7-2***, all of the study area intersections are currently operating at acceptable levels of service (LOS D or better) during the AM and PM peak hours.

EXISTING CONDITIONS PERTINENT TO VEHICLE MILES TRAVELED ANALYSIS

The project site is located in a fully urbanized area, with a mixture of land uses, all types of urban infrastructure in place and a well-established street network that includes Azusa Avenue, State Highway 39, along the western site frontage. The site was formerly developed with an Albertson's grocery store and is surrounded on all sides with some form of developed land use. As such, this is considered to be an "infill site," which is defined in Section 21099(a) of Public Resources Code as "… a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses."

There are existing bus stops located at the intersection of Azusa Avenue and Cypress Street that are part of the Foothill Transit Route 280, which provides regular service between Azusa and the Puente Hills Mall. This stop is approximately 460 feet from the proposed driveway entrance to the residential part of the project and 350 feet from the nearest corner of the proposed commercial part of the project. Route 280 runs from 5:00 am to 11:00 pm on weekdays, with headways of 15-20 minutes throughout the morning, afternoon and early evening periods. On the weekends, Route 280 runs from 6:00 am to 10:00 pm, with 30 minute headways. There are numerous other regular transit stops along Azusa Avenue and the Azusa Avenue corridor in Covina has been classified by the Southern California Association of Governments as a Transit Priority Area, or "TPA." A TPA is defined in Section 21099(a) of the Public Resources Code as "… an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."

There are multiple shopping opportunities located within a convenient distance of the project site, along Azusa Avenue, Badillo Street, Arrow Highway, and Citrus Avenue. There is a large employment center comprised of a concentration of light industrial and industrial uses, approximately 7 miles to the south, between Valley Boulevard and the SR 60 Freeway, and a number of large employers, such universities and medical centers, within a 10 mile radius. Another employment center is located in Irwindale, approximately 2 miles to the northwest.

Based on these locational features, the project site is well suited for shorter and possibly less frequent automobile trips, compared to a site on the edge of a community, in a low density residential neighborhood or a sprawling suburban area comprised of single use zoning districts, with distant employment centers, commercial uses located along selected nodes, and a transportation network dominated by high speed arterial roadways to accommodate automobile trips for most needs.

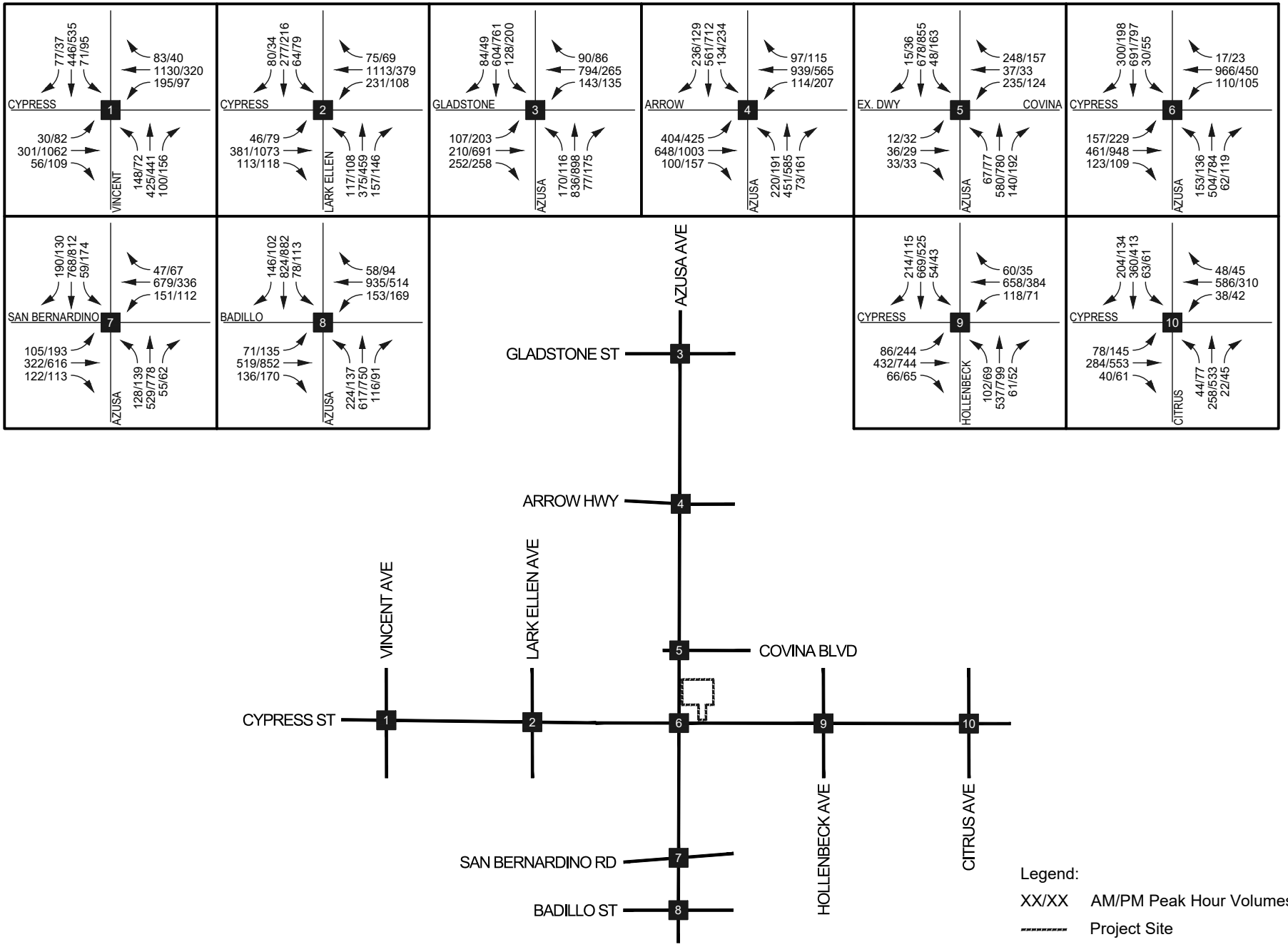
3.7.2 REGULATORY AND PLANNING FRAMEWORK

STATE

Senate Bill 743

Senate Bill (SB) 743 added Section 21099 to CEQA, which directed the Office of Planning and Research (OPR) to prepare guidelines establishing criteria for determining the significance of transportation impacts that promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. SB 743 and CEQA Section 21099 further required that, upon certification of such guidelines, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" pursuant to CEQA. Instead, measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."[1] According to SB743, projects should aim to reduce VMT and mitigate potential VMT impacts through the implementation of Transportation Demand Management or other vehicle trip reduction strategies.

[1] Public Resources Code Section 21099(b)(1



Michael Baker INTERNATIONAL

Source: TJW Engineering, March 2020

AM and PM Peak Hour Volumes

Figure 3.7-2

Pursuant to SB 743, In December 2018, new California Environmental Quality Act (CEQA) guidelines were adopted that shift traffic analysis from delay and operations to vehicle miles traveled ("VMT") as the primary consideration for assessment of transportation impacts. As part of the development of the new CEQA guidelines, OPR prepared a Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018 (Technical Advisory). The Technical Advisory provides guidance for local jurisdictions in developing methodologies and thresholds for evaluating VMT. The Technical Advisory provides VMT thresholds for residential, employment and other uses. For all projects, the Technical Advisory recommends establishing the VMT threshold at 85% or less of an adopted VMT baseline including VMT/capita for residential projects, VMT/employee for employment projects and total VMT for all other uses.

OPR fulfilled its SB 743 mandate in December 2018, with the publication of its "Technical Advisory on Evaluating Transportation Impacts in CEQA" (Technical Advisory) and with the addition of Section 15064.3 to the State CEQA Guidelines. The Technical Advisory and Section 15064.3 identify VMT as generally the most appropriate measure of transportation impacts. The Technical Advisory provides VMT thresholds for residential, employment and other uses. For all projects, the Technical Advisory recommends establishing the VMT threshold at 85% or less of an adopted VMT baseline including VMT/capita for residential projects, VMT/employee for employment projects and total VMT for all other uses. Subdivision (b) of Section 15064.3 identifies the criteria for analyzing transportation impacts and subdivision (c) specifies that the provisions of Section 15064.3 become effective statewide on July 1, 2020 (although a lead agency may elect to be governed by the provisions of this section immediately).

California Complete Streets Act

The California Complete Streets Act of 2008 required cities and counties to incorporate balanced and multimodal transportation networks in circulation elements whenever the circulation element underwent a substantive revision. These transportation networks are required to meet the needs of all users of the networks, whether motorists, passengers on public transportation, bicyclists, pedestrians, children, persons with disabilities, seniors, commercial interests, or more. These networks should also be suitable for the location of the local government, whether urban, suburban, or rural.

REGIONAL

Regional Transportation Improvement Program

The Regional Transportation Improvement Program (RTIP) is SCAG's compilation of transportation projects that have been funded federally, through the state, or locally. All projects that are proposed during a six-year period in the region covered by SCAG are included in the RTIP and include projects such as highway improvements; transit, rail, and bus facilities; intersection improvements; and signal synchronization.

2016-2040 Regional Transportation Plan/Sustainability Communities Strategy

SCAG develops the Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS) and updates it every four years. The most recent RTP/SCS was adopted in 2016. The RTP/SCS is a long-range transportation and land use plan that uses growth forecasts and economic trends over a 20-year period to evaluate the role of transportation in the region covered by SCAG, with goals to reduce VMT and achieve regional housing needs objectives. The RTP/SCS also identifies regional strategies designed to

address mobility needs in the region. The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents of the region.

LOCAL

City of Covina General Plan

The applicable goals, objectives, and policies from the City of Covina General Plan Circulation Element (City of Covina 2000) are listed below.

Circulation Element

- Goal: A well-balanced infrastructure system and related circulation network that provide functional, viable, safe, efficient, economical and attractive transportation, movement, and transmission and applicable services for current and future Covina residents, employers, workers, business partners and service recipients, visitors, and passers-by.
    - Policy Area 1: Maintenance and improvement of public rights-of-way and related infrastructure to accommodate future growth.
      The City shall:
        - Policy 4: Where necessary and feasible, conduct traffic circulation improvements and congestion mitigation measures, including, but not limited to, traffic signal installation, synchronization, or upgrade, land restriping or modification, and/or speed limit, stop sign, or streetlight installation.
        - Policy 8: In conjunction with major development proposals or other situations on the most congested streets, consider to require the detailed analysis of specific intersections at peak hours as a means of clarifying the operations of and better identifying acceptable or sufficient mitigation for particular roadway segments.
        - Policy 12: Ensure, where applicable, that private as well as public parking, drive-through, and drop-off/pick-up ingress/egress locations off of public rights-of-way provide for sufficient access, circulation, maneuverability, visibility, and safety as well as separation from any residential or other sensitive adjacent use and that all on-site parking facilities adequately serve their accompanying uses and are designed to facilitate safe, functionable, and viable circulation and maneuverability.
        - Policy 25: Make efficient use of existing Covina infrastructure and circulation resources and facilities.
        - Policy 26: Ensure that all new and modified public streets and appurtenant components thereof and other infrastructure are designed in accordance with all applicable City standards, except where community goals, objectives, and policies are best furthered, and are designed so as to minimize construction and maintenance costs.
    - Policy Area 5: General circulation and infrastructure matters.
      The City shall:
        - Policy 1: For major developments, continue requiring builders/developers to incorporate various traffic congestion mitigation/reduction and additional infrastructure-related amenities and features into their projects, in accordance with the Covina Municipal Code and any other City or Redevelopment Agency provisions.

- Policy 12: Recognize and appropriately handle and coordinate the interrelationship between transportation and circulation systems and land use matters in accommodating desired growth and in evaluating development impacts.
- Policy 13: Continue accommodating pedestrian circulation, to the greatest degree possible, in terms of adequately-sized, conveniently located, safe, functional, unobstructed, and disable-accessible major-and small-street public sidewalks, public crosswalks, private walkways and access routes, private walkways/access route linkages to public sidewalks, and sufficient connections between public sidewalks and crosswalks.
- Policy 18: Encourage streets, appurtenant components thereof, and related infrastructure in private developments to be maintained by private associations, whenever possible.
- Policy 24: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alteration or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential traffic, circulation, and/or infrastructure impacts.

City VMT Standards

On March 17, 2020, the City of Covina approved a Memorandum of Agreement (MOA) with the San Gabriel Valley Council of Governments (SGVCOG) to participate in the San Gabriel Valley Regional VMT Analysis Model, along with 25 other cities in the San Gabriel Valley. Fehr & Peers was selected by SGVCOG to complete the San Gabriel Valley Regional VMT Analysis Model. The City of Covina is located in the Southeast Subarea of this regional model.

On June 16, 2020, the Covina City Council adopted Resolution No. 2020-56 to establish VMT thresholds of significance for the purposes of analyzing transportation impacts under CEQA, and to implement the analysis methodologies developed by SGVCOG. The City adopted the Southeast Subarea VMT profile calculated by SGVCOG as the baseline metric for assessment of impacts addressed under CEQA.

3.7.3 THRESHOLDS OF SIGNIFICANCE

The California Environmental Quality Guidelines, Appendix G, as amended through December 31, 2019, serve as the basis for identifying thresholds determining the significance of the environmental effects of a project. A project will have a significant environmental impact related to transportation if it would:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

3.7.4 METHODOLOGY

VEHICLE MILES TRAVELED

Vehicle Miles Traveled ("VMT") is a metric used to express travel behavior in terms of trip lengths. It refers to the total roadway miles traveled by passenger vehicles and light duty trucks for a particular type of trip or for aggregated "tours" that account for a series of trips in a day. There are a variety of trip purposes and thus different travel lengths, such as commuting from home to a job and back, home-to-shopping destinations, home to school, home to recreation, or combinations thereof over the course of a day. Total daily or annual VMT can be calculated for specific types of land uses, specific types of trips, for a community at large, for a commercial vehicle fleet, or expressed as a ratio, such as VMT per capita or per employee in a particular geographic area.

VMT Screening Analysis

The City of Covina uses VMT screening criteria to streamline land use project review for VMT impacts. If a project does not pass the initial screening test, a full VMT analysis is warranted. Three screening criteria have been established:

- Project Type Screening
- Transit Priority Area (TPA) Screening, and
- Low VMT Area Screening

If the project is "screened out" based on any one of the three criteria, a full VMT analysis is not required and the project is presumed to have a less than significant VMT impact. Since the project includes both residential and retail uses, each of the land uses were evaluated separately.

Evaluation of Residential VMT Profile

Since the screening analysis determined that the commercial component of the proposed project would not result in significant VMT impacts, but the residential component could not be screened out, further evaluation of the residential VMT characteristics was conducted. This evaluation focused on the potential VMT reduction associated with project location and design features and transportation demand management strategies, which were quantified through methods provided in the California Air Pollution Control Officers Association (CAPCOA) report *Quantifying Greenhouse Gas Mitigation Measures.*[2] Such measures pertaining to potential reduction of a land use project's VMT are categorized as follows:

- Land Use/Location (LUT)
- Neighborhood/Site Enhancements (SDT)
- Parking Policy/Pricing (PDT), Commute Trip Reduction Programs (TRT)
- Transit Systems Improvements (TST)
- Road Pricing/Management (RPT)
- Vehicles (VT)

[2] California Air Pollution Control Officers Association, *Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Mitigation Measures*. August 2010.

Based on the location of the project, the land use and project features, Michael Baker determined that LUT and SDT measures are most appropriate and consistent with objective of reducing residential VMT. Please refer to the following impact analysis for further explanation of the application of the screening criteria and the assessment of the VMT-reducing aspects of the proposed residential project component.

ROADWAY PERFORMANCE LEVEL OF SERVICE ANALYSIS (INFORMATION-ONLY)

As of July 1, 2020, assessment of traffic impacts that focuses on congestion and vehicle delay is no longer applied as a threshold of impact significance for the City's CEQA documents. Nonetheless, to provide the public and the City's decision makers with an understanding of the project's effects on the operational performance of the surrounding street network, an analysis of the project's effects in terms of levels of service, i.e. vehicle delay at the affected intersections, was completed. This section discusses level of service impacts for existing-plus-project conditions. Cumulative impacts for the opening year scenario are discussed in Section 4.7. The methods applied in that analysis are summarized below.

Study Area

Based on an assessment of the project's trip generation and distribution characteristics, and the ingress/egress locations along the project site frontages, the following 10 intersections were selected for analysis of the project's potential peak hour congestion impacts:

- Vincent Avenue/Cypress Street
- Lark Ellen Avenue/Cypress Street
- Azusa Avenue/Gladstone Street
- Azusa Avenue/Arrow Highway
- Azusa Avenue/Covina Boulevard
- Azusa Avenue/Cypress Street
- Azusa Avenue/San Bernardino Road
- Azusa Avenue/Badillo Street
- Hollenbeck Avenue/Cypress Street
- Citrus Avenue/Cypress Street

Additionally, the project's unsignalized driveways on Azusa Avenue and Cypress Street were analyzed for with project conditions.

This traffic analysis follows applicable City of Covina and Los Angeles County Congestion Management Program guidelines for traffic impact analysis.

Figure 3.7-3 shows the location of the study intersections, which are analyzed for the following study scenarios:

- Existing Conditions
- Existing Plus Project Conditions

- Project Opening Year (2023) Without Project Conditions[3]
- Project Opening Year (2023) With Project Conditions[4]
- Traffic operations are evaluated for the following time periods:
- Weekday AM peak hour occurring within 7:00 a.m. to 9:00 a.m.
- Weekday PM peak hour occurring within 4:00 p.m. to 6:00 p.m.

Intersection Analysis

LOS is commonly used to describe the quality of flow on roadways and at intersections using a range of LOS from LOS A (free flow with little congestion) to LOS F (severely congested conditions). The ICU methodology expresses the LOS of an intersection in terms of the remaining capacity at an intersection (or lack thereof). The ICU methodology compares the V/C ratios of conflicting turn movements at an intersection, sums the critical conflicting V/C ratios for each intersection approach, and determines the intersection's overall capacity utilization. The resulting V/C ratio is converted to an LOS as described previously in ***Table 3.7-1***.

The Traffic Study utilized a 1,600 vehicle per lane per hour saturation flow rate (1,440 vehicles per lane for dual left-turn lanes) and a clearance interval of 5 percent.

Project driveways were analyzed using the Highway Capacity Manual (HCM) delay-based methodology.

Level of Service

The City of Covina has established LOS D or better as the acceptable performance metric for intersections in the City.

To determine whether the addition of project-generated trips at a signalized study intersection results in a significant impact, the City of Covina utilizes the following threshold of significance:

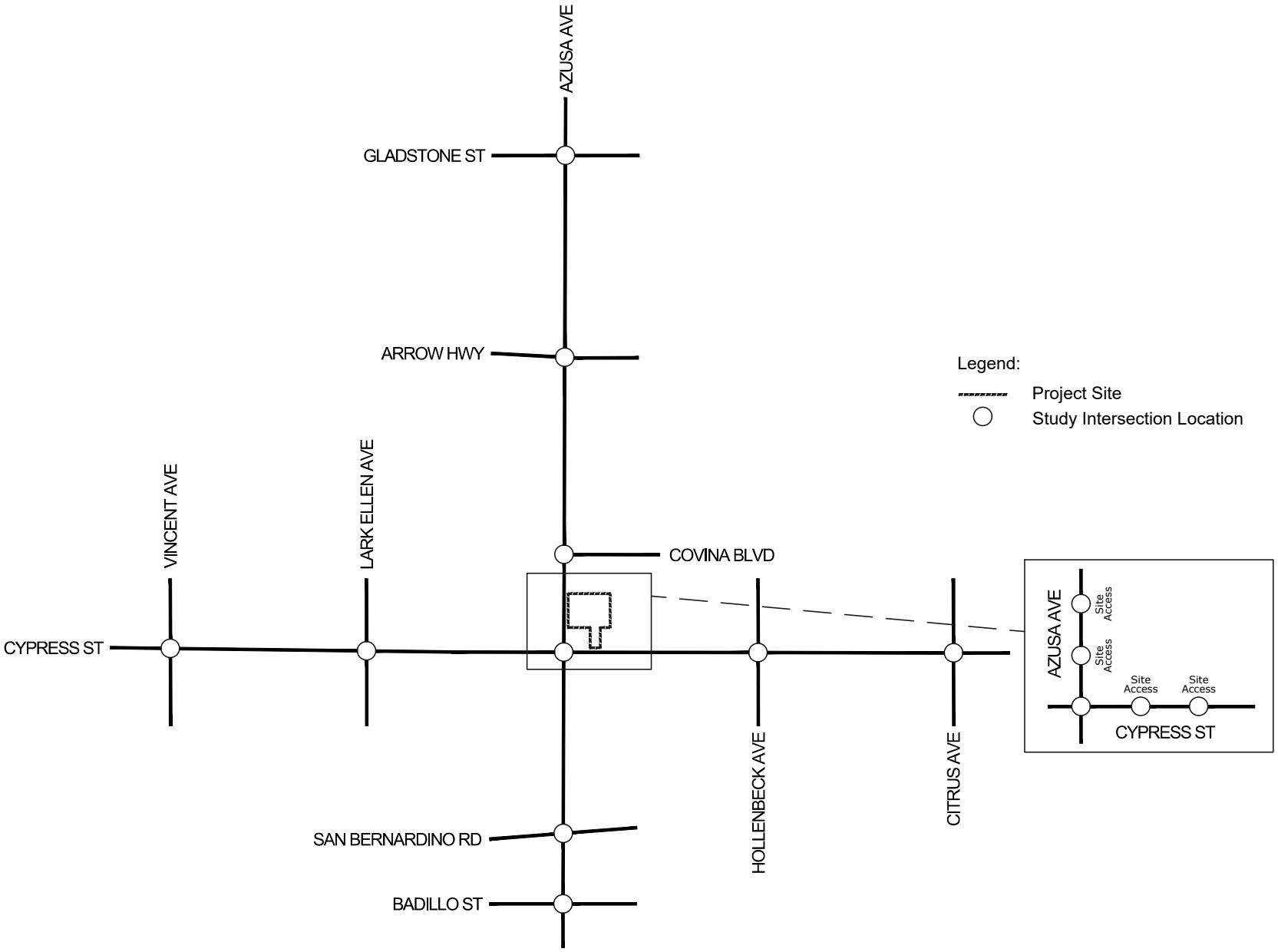
- A significant traffic impact occurs at a signalized study intersection when a proposed project increases traffic demand by 1 percent or more of capacity (V/C increase > 0.010), causing or worsening LOS E or F.

Project Trip Generation

Trip generation represents the amount of traffic, both inbound and outbound, produced by a development. Determining trip generation for a proposed project is based on projecting the amount of traffic that the specific land uses being proposed will produce. Trip generation for the proposed project land use has been calculated using industry standard ITE trip generation rates from *Trip Generation Manual*, 10th edition (Institute of Transportation Engineers 2017) along with pass-by rates from the ITE *Trip Generation Handbook*, 3rd edition (2014).

[3] This analysis is located in Section 4.7 of this Draft EIR.

[4] This analysis is located in Section 4.7 of this Draft EIR.



Michael Baker INTERNATIONAL

Source: TJW Engineering, March 2020

Study Intersection Locations

Figure 3.7-3

Pass-by Trip Adjustment

ITE trip generation rates allow for a pass-by trip adjustment for certain land uses such as restaurants and retail. A pass-by trip adjustment is applicable to land uses located along busy arterial roadways attracting vehicle trips already on the roadway, particularly when the roadway is experiencing peak operating conditions. For example, a motorist traveling along Azusa Avenue or Cypress Street between work and home may stop at the proposed project site. A pass-by adjustment under this example would reduce/eliminate both the inbound trip and the outbound trip from the surrounding roadway circulation system since the vehicle was already traveling on the roadway.

The ITE *Trip Generation Handbook* typically lists AM and PM peak hour pass-by rates but does not provide guidance regarding daily pass-by rates. To determine an appropriate daily pass-by rate for the proposed project land uses with peak hour pass-by discounts, TJW consulted the *San Diego Municipal Code Land Development Code Trip Generation Manual* (May 2003), which is a regularly used source for trip generation information in Southern California for land uses where ITE data is incomplete, as well as the *Los Angeles Department of Transportation (LADOT) Traffic Study Policies and Procedures* (January 2017), which lists pass-by trip discount rates for specific land uses.

Table 3.7-3 shows the *Trip Generation Manual* edition trip generation rates used in this analysis.

Table 3.7-3
TRIP GENERATION RATES FOR PROPOSED PROJECT LAND USE

Land Use (ITE Code)	Unit	AM Peak Hour		PM Peak Hour		Daily Trip Rate
		In:Out Split	Trip Rate	In:Out Split	Trip Rate	
Supermarket	TSF	60:40	3.82	51:49	9.24	106.78
Single-Family Residence (210)	DU	25:75	0.74	63:37	0.99	9.44
High-Turnover Sit-Down Restaurant (932)	TSF	55:45	9.94	62:38	9.77	112.18
High-Turnover Restaurant Pass-by Percentages		25%		25%		25%
Fast Food w/Drive Through (934)	TSF	51:49	40.19	52:48	32.67	470.95
Fast Food Pass-by Percentages		19%		50%		40%

Source: ITE 2014, 2017

Notes: TSF = thousand square feet; DU = dwelling unit

Table 3.7-4
PROJECTED TRIP GENERATION

Land Use	Quantity	AM Peak Hour			PM Peak Hour			Daily Trips
		In	Out	Total	In	Out	Total	
Single-Family Residential	61 DU	11	34	45	38	22	60	576
High-Turnover Sit-Down Restaurant	6.0 TSF	33	27	60	37	22	59	673
Pass-by (25% AM, 25% OM & 25% Daily)		-8	-7	-15	-9	-6	-15	-168
High- Turnover Restaurant – Net New Trips		*25*	*20*	*45*	*28*	*16*	*44*	*505*
Fast Food With Drive-Thru	7.0 TSF	143	138	281	119	110	229	3,297

Land Use	Quantity	AM Peak Hour			PM Peak Hour			Daily Trips
		In	Out	Total	In	Out	Total	
Pass-by (49% AM, 50% PM & 40% Daily		-70	-68	-138	-60	-55	-115	-1,319
Fast Food Restaurant Total		*73*	*70*	*143*	*59*	*55*	*114*	*1,978*
Total Gross Trips at Project Driveways		**187**	**199**	***386***	**194**	**154**	***348***	**4,546**
Total Net New Trips on Roadway Network		**109**	**124**	***233***	**125**	**93**	***218***	**3,059**

Source: TJW Engineering 2019; see Appendix F.

Notes: TSF = thousand square feet; DU = dwelling unit

As shown in ***Table 3.7-4***, the proposed project is projected to generate 386 AM peak hour trips, 348 PM peak hour trips, and 4,546 daily trips at the project driveways. After accounting for pass-by trips associated with the proposed fast food and drive-through food/beverage businesses, the proposed project is projected to generate 233 net new AM peak hour trips, 218 net new PM peak hour trips, and 3,059 net new daily trips on the surrounding roadway network.

Project Trip Distribution

Projecting trip distribution involves the process of identifying probable destinations and traffic routes that will be utilized by the proposed project's traffic. The potential interactions between the proposed land use and surrounding regional access routes are considered to identify the probable routes onto which project traffic would be distributed. Project trip distribution was reviewed by City staff as part of the scoping letter process.

Figure 3.7-4 shows the projected distribution of proposed project residential trips. ***Figure 3.7-5*** shows the projected distribution of proposed project net new commercial trips.

Modal Split

As existing bicycle, pedestrian, and transit opportunities in the vicinity of the project site are very limited, the traffic reducing potential of public transit, walking, and bicycling has been deemed negligible for the proposed project.

Project Trip Assignment

Figure 3.7-6 shows the projected peak hour trip assignment of the project's net new traffic at the study area intersections.

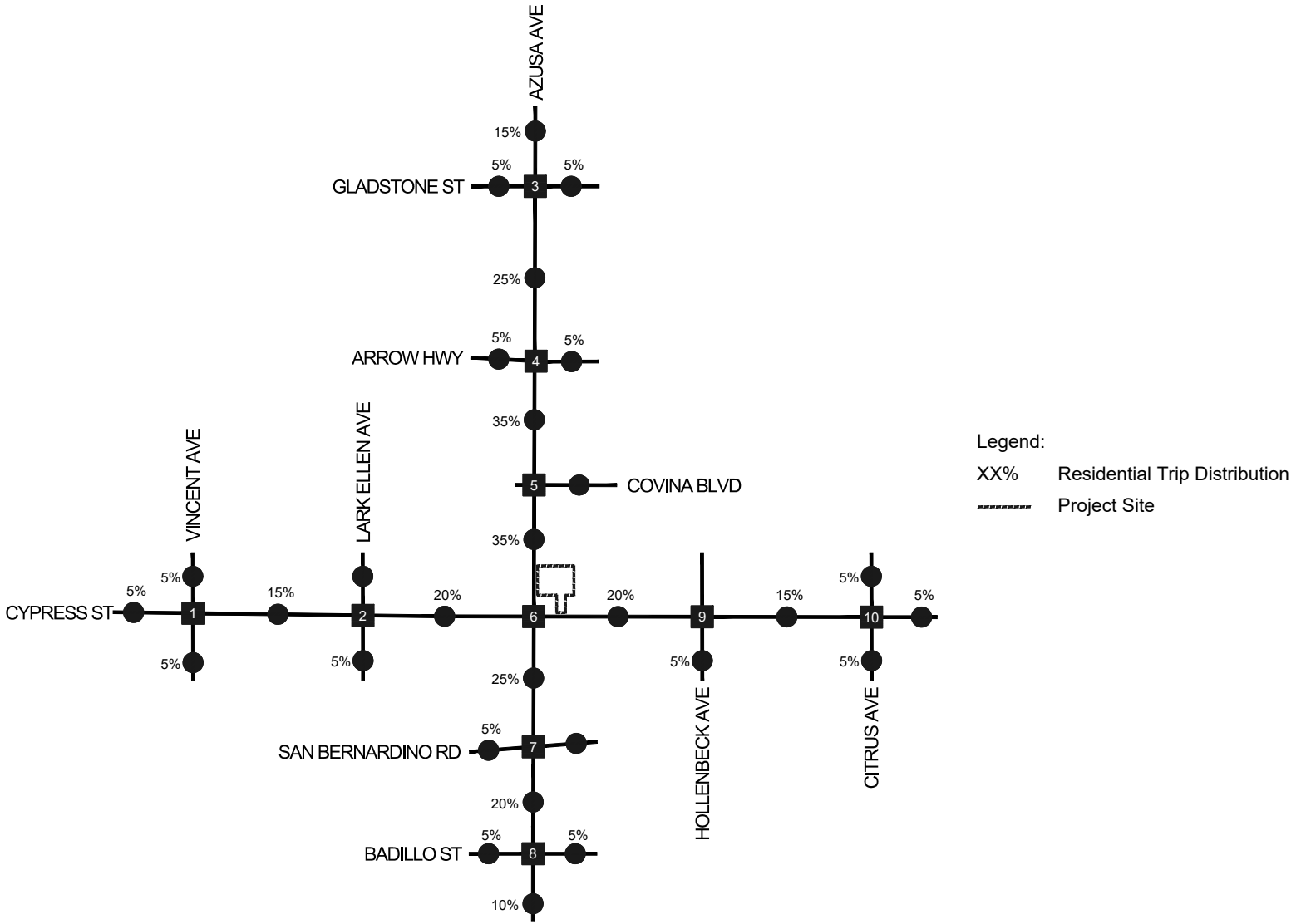
3.7.5 ANALYSIS

Impact 3.7a The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Discussion

EXISTING PLUS PROJECT TRAFFIC VOLUMES

The lane configurations and traffic controls assumed to be in place for the existing plus ambient growth scenario are consistent with those previously shown in ***Figure 3.7-1***.



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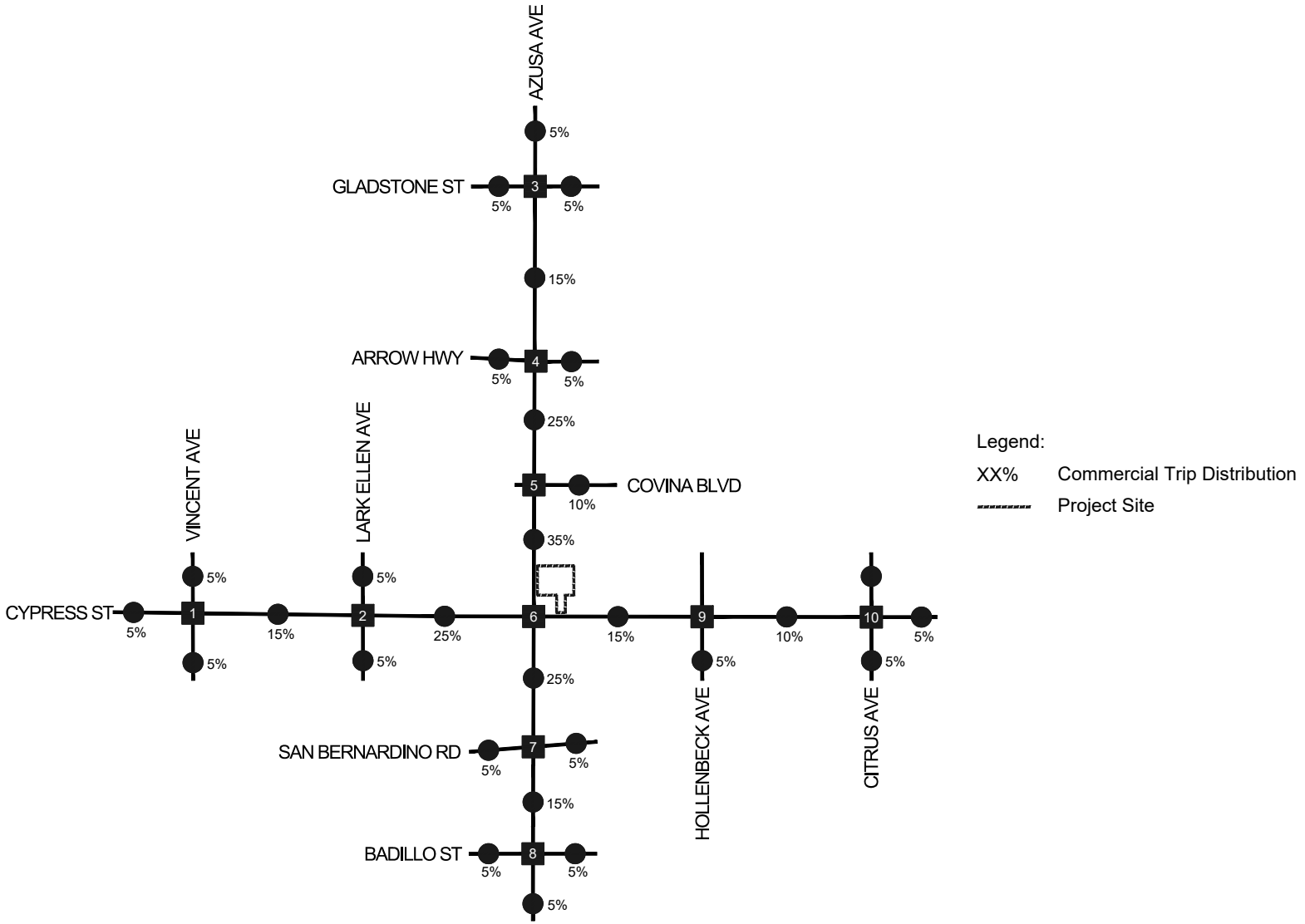
Source: TJW Engineering, March 2020

Projected Distribution of Proposed Project Residential Trips

Figure 3.7-4



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Source: TJW Engineering, March 2020

Projected Distribution of Proposed Project Net New Commercial Trips

Figure 3.7-5

Existing plus project volumes consist of existing volumes plus the addition of project-generated trips in the study area, plus the addition of trips associated with the existing restaurant on the site (Manny's El Loco) which uses the same driveways. The 4,800-square-foot restaurant was assumed to be a high-turnover sit-down restaurant and to have the same trip distribution around the site as the proposed project.

Figure 3.7-7 shows existing plus project AM and PM peak hour volumes at the study intersections.

EXISTING PLUS PROJECT INTERSECTION LEVELS OF SERVICE ANALYSIS

Existing plus project conditions AM and PM peak hour intersection analysis results are shown in ***Table 3.7-5***. Calculations are based on the existing geometrics at the study area intersections as shown in ***Figure 3.7-1***. ICU and HCM analysis sheets are provided in Appendix C of the Traffic Study.

Table 3.7-5
INTERSECTION ANALYSIS – EXISTING PLUS PROJECT CONDITIONS

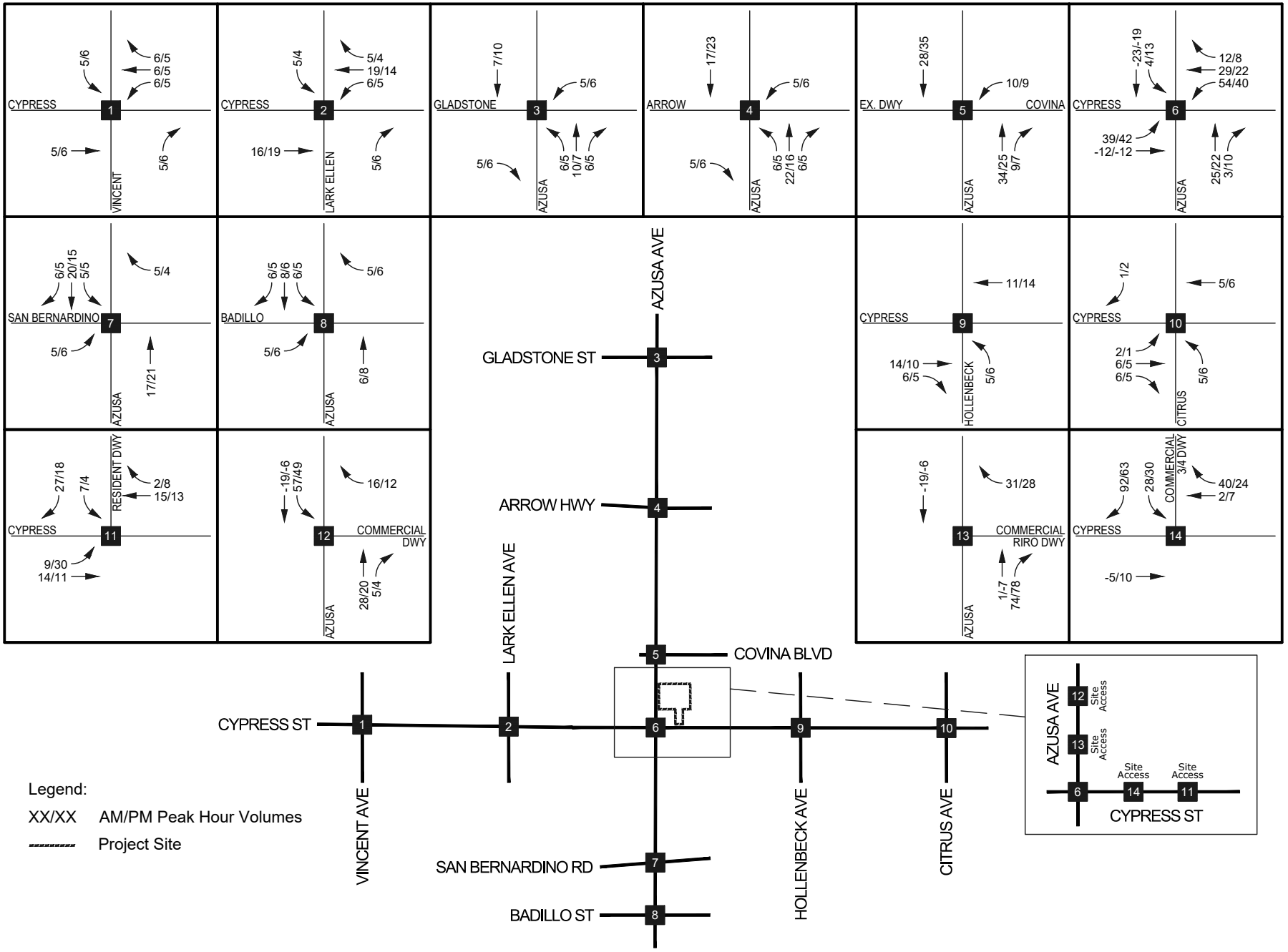
#	Intersection	Existing		Existing Plus Project		Significant Impact?
		ICU - LOS		ICU (Delay) - LOS		
		AM	PM	AM	PM	
1	Vincent Ave/Cypress St	0.704 – C	0.722 – C	0.708 – C	0.733 – C	No
2	Lark Ellen Ave/Cypress St	0.745 – C	0.728 – C	0.759 – C	0.742 – C	No
3	Azusa Ave/Gladstone St	0.714 – C	0.774 – C	0.720 – C	0.768 – C	No
4	Azusa Ave/Arrow Hwy	0.809 – D	0.815 – D	0.817 – D	0.828 – D	No
5	Azusa Ave/Covina Blvd	0.481 – A	0.514 – A	0.496 – A	0.527 – A	No
6	Azusa Ave/Cypress St	0.767 – C	0.780 – C	0.797 – C	0.795 – C	No
7	Azusa Ave/San Bernardino Rd	0.662 – B	0.700 – B	0.673 – B	0.709 – C	No
8	Azusa Ave/Badillo St	0.784 – C	0.783 – C	0.790 – C	0.785 – C	No
9	Hollenbeck Ave/Cypress St	0.668 – C	0.640 – C	0.674 – C	0.645 – C	No
10	Citrus Ave/Cypress St	0.452 – A	0.473 – A	0.458 – A	0.476 – A	No
11	Residential Full Access Driveway/Cypress St	Project Driveways Analyzed for With Project Conditions Only		(18.1) – C	(13.4) – B	No
12	Azusa Ave/North Access Driveway			(8.4) – A	(12.4) – B	No
13	Azusa Ave/South Access Driveway			(11.2) – B	(13.1) – B	No
14	Commercial Driveway/Cypress Street			(26.4) – D	(18.1) – C	No

Source: TJW Engineering 2019; see Appendix F

Notes: ICU = Intersection Capacity Utilization. Delay shown in seconds for worst-performing stop-controlled movement at driveways.

As shown in ***Table 3.7-5***, the intersections are projected to continue to operate at an acceptable LOS (LOS D or better) overall during the AM and PM peak hours for *existing plus project* conditions.

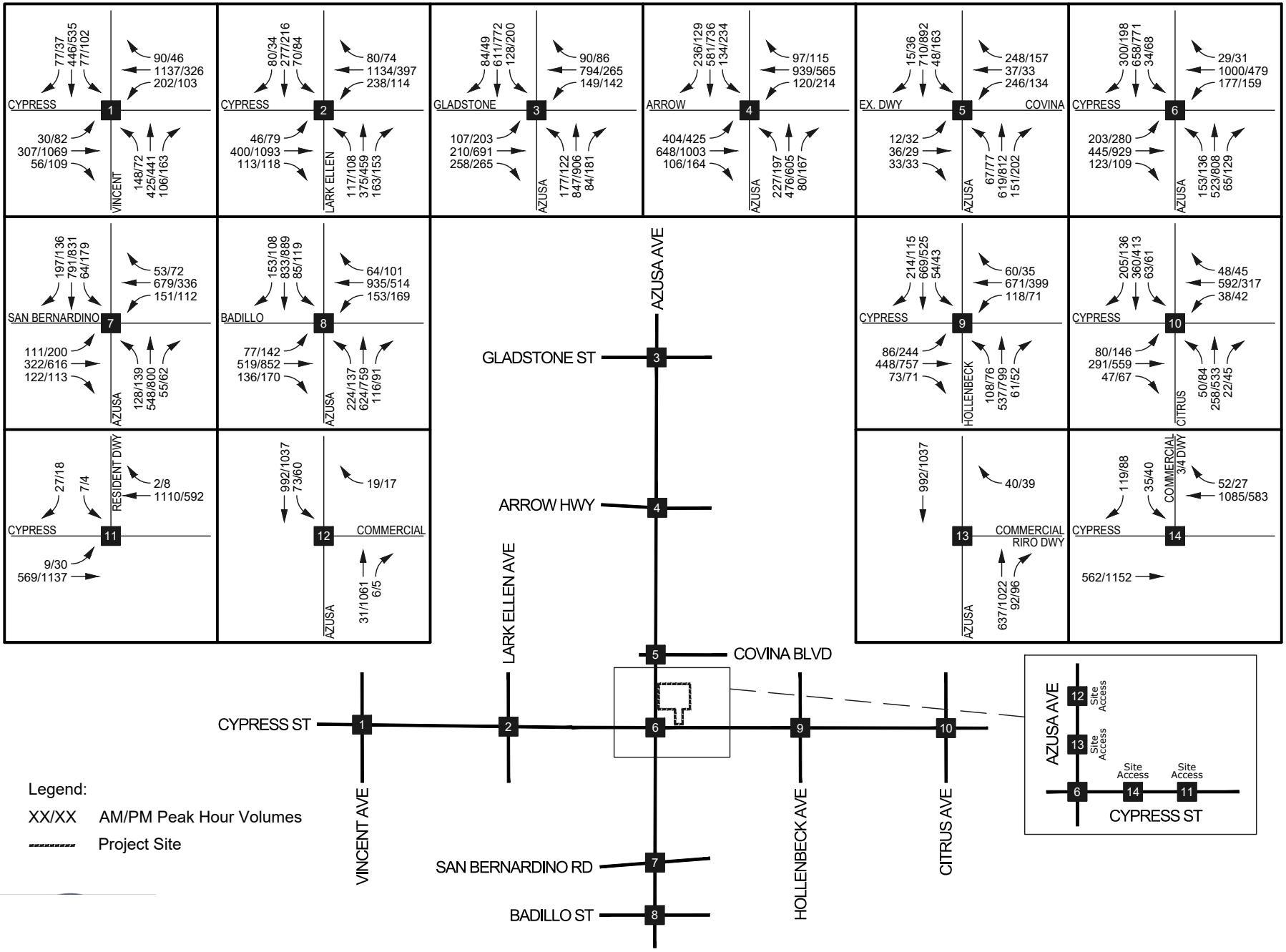
Based on the thresholds of significance for *existing plus project* conditions previously discussed in **Section 3.7.4**, the addition of project-generated trips is not projected to have a significant direct impact at any of the study intersections.



Source: TJW Engineering, March 2020

Projected Trip Assignment of Proposed Project Trips

Figure 3.7-6



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Source: TJW Engineering, March 2020

Existing Plus Project AM and PM Peak Hour Volumes

Figure 3.7-7

SITE ACCESS ANALYSIS

Site access for the proposed project would generally remain at the driveways serving the former Albertsons building on the site as detailed below:

Commercial Site Access

1) Three-quarters (right-in/right-out and left-in) access driveway on Azusa Avenue (existing northernmost driveway)
2) Right-in/right-out only driveway on Azusa Avenue (new driveway)
3) Right-in/right-out only driveway on Azusa Avenue (existing driveway)
4) Full access driveway on Cypress Street (existing – serves existing 4,800+ square foot restaurant)

Residential Site Access

1) Full access driveway on Cypress Street (existing), formerly served Albertsons/loading dock area
2) Emergency-only fire access through the Covina Commons parking field

Based on the LOS analysis in Sections 5.0 and 7.0 of the Traffic Study, the unsignalized project driveways are projected to operate at an acceptable level of service with the addition of project trips, as well as trips associated with the existing 4,800-square-foot high-turnover sit-down restaurant that is in operation.

NORTHERN SHARED DRIVEWAY QUEUE ANALYSIS

A special queue analysis was performed at the northern commercial driveway, which is shared with the adjacent U-Haul business, to determine if the southbound left-turn pocket on Azusa Avenue into the site has an appropriate storage capacity. The results of the queuing and blocking report are summarized as follows:

- AM Peak Hour Southbound Left-Turn Queue:
  - Average Queue: 32 feet
  - 95th Percentile Queue: 60 feet
  - Maximum Queue: 73 feet
- PM Peak Hour Southbound Left-Turn Queue:
  - Average Queue: 29 feet
  - 95th Percentile Queue: 55 feet
  - Maximum Queue: 62 feet

The existing southbound left-turn pocket is 150 feet in length. Based on the results of the queue analysis, the existing turn pocket is more than adequate to accommodate projected queues resulting from the combined volumes of the proposed project and existing U-Haul Center.

COMPARISON OF TRIP GENERATION OF FORMER ALBERTSONS STORE AND PROPOSED PROJECT

As an additional point of information, the trip generation between the former grocery store and the proposed project was compared. Based on ITE trip generation rates, the proposed project is projected to generate fewer trips at the site access points than the former 81,000-square-foot Albertsons on the site. The Albertsons included a pharmacy, photo center, Starbucks, and small food court in addition to its grocery functions.

Table 3.7-6 compares the ITE trip generation of the previously entitled land use to the currently proposed land use.

Table 3.7-6
PREVIOUSLY ENTITLED LAND USE TRIP GENERATION VS. PROPOSED PROJECT

Land Use	Quantity	AM Peak Hour			PM Peak Hour			Daily Trips
		In	Out	Total	In	Out	Total	
Supermarket – Gross Trips at Driveways	81.0 TSF	185	124	*309*	381	367	*748*	8,649
Proposed Land Uses on the Site								
Land Use	**Quantity**	**AM Peak Hour**			**PM Peak Hour**			**Daily Trips**
		In	**Out**	**Total**	**In**	**Out**	**Total**	
Single-Family Residential	61 DU	11	34	45	38	22	60	576
High-Turnover Sit-Down Restaurant	6.0 TSF	33	27	60	37	22	59	673
Pass-by (25% AM, 25% PM & 25% Daily)		-8	-7	-15	-9	-6	-15	-168
High- Turnover Restaurant – Net New Trips		*25*	*20*	*45*	*28*	*16*	*44*	*505*
Fast Food With Drive-Thru	7.0 TSF	143	138	281	119	110	229	3297
Pass-by (49% AM, 50% PM & 40% Daily		-70	-68	-138	-60	-55	-115	-1319
Fast Food Restaurant Total		*73*	*70*	*143*	*59*	*55*	*114*	*1978*
Total Gross Trips at Project Driveways		**187**	**199**	***386***	**194**	**154**	***348***	**4,546**

Source: TJW Engineering 2019; see Appendix F

As shown in ***Table 3.7-6***, the proposed Covina Commons/Cypress Villas project is projected to generate fewer trips at the project driveways during its peak hour (AM peak hour) than the former use generated during its peak hour (PM peak hour). Therefore, the site access designed for the former use is expected to adequate for the proposed project.

Mitigation Measures

Mitigation measures would not be required.

Impact 3.7b The proposed commercial component is considered to be a "low VMT" land use, given its relatively small size. The proposed residential component has locational and design features that result in substantial reductions the VMT. As such, project impacts would be less than significant.

Discussion

A. Screening Analysis

Project Type Screening

Consistent with OPR's guidance, the City of Covina has identified local serving project types that may be presumed to have a less than significant impact. Local serving projects are more likely to serve the local population and reduce the need for people to drive further away, thus reduce VMT. Examples include local serving K-12 schools, local parks, day care centers, new retail buildings less than 50,000 square-feet, projects that generate less than 110 daily vehicle trips, community institutions (public libraries, fire stations), etc.

Residential: Based on the trip generation included in the Traffic Impact Analysis report (November 2019) prepared by TJW Engineering, Inc. for the Covina Commons and Cypress Villas project, the project will generate 3,059 net new trips per day and includes a combination of single family dwelling units and fast-food/high-turnover sit-down restaurants. The residential component of the project generates 576 net new daily trips which exceeds the 110 daily vehicle trip screening threshold. Therefore, the residential component of this project would not be screened out based on the Project Type Screening.

Project Type Screening Criteria Met (Residential): NO

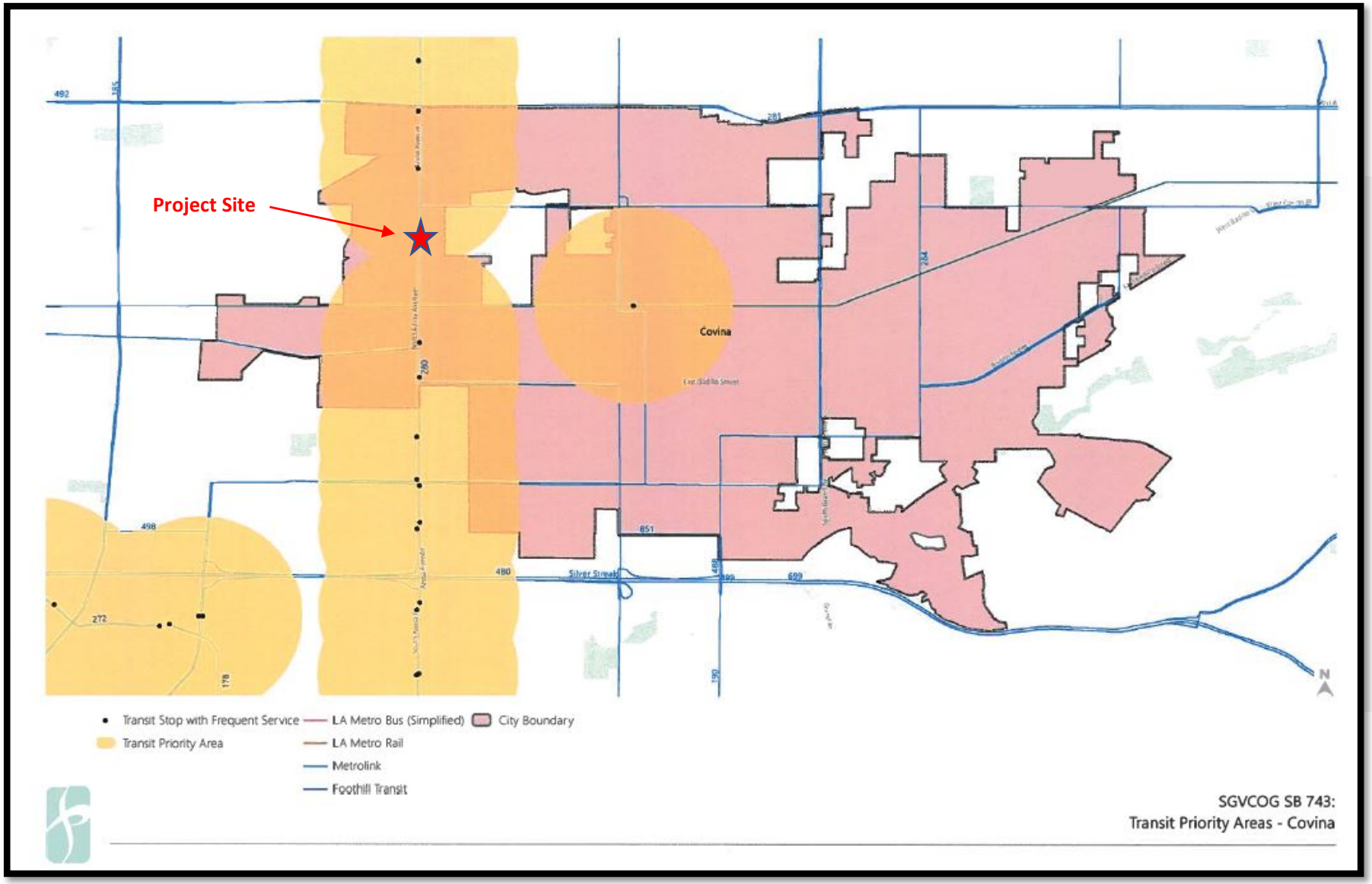
Retail: According to the site plan, the retail portion of the project includes 6,000 square feet of high-turnover sit-down restaurant and 7,000 square feet of fast food with drive through for a total of 13,000 square feet of retail. As this falls below the 50,000 square foot Project Type Screening criteria for new retail buildings, the retail component of the project would be screened out and determined to have a less than significant impact.

Project Type Screening Criteria Met (Retail): YES

Transit Priority Area (TPA) Screening:

Projects located within a Transit Priority Area (TPA) may be presumed to have a less than significant impact and would not be required to prepare a full VMT analysis. TPA's are defined as locations within ½ mile of a transit stop or station with a minimum of 15-minute headways during peak commute hours. As shown in the **Figure 3.7-8**, the proposed project is located within a TPA.

Foothill Transit operates the local bus service in the City of Covina. Foothill Transit Route 280 travels along Azusa Avenue adjacent to the project site. The nearest bus stop is located on the northeast corner of Azusa Avenue / Cypress Street approximately 300-foot walking distance from the project site. Service is provided Monday through Friday, weekends and holidays. According to the Foothill Transit website, the average headway during the weekday are 15 minutes from 7:00 AM to 9:00 AM and from 2:00 PM to 7:00 PM with 20 to 30 minutes headways outside the peak periods.



Source: Fehr and Peers/SGVCOG, June 2020

City of Covina Transit Priority Area

Figure 3.7-8

For the proposed project, if any of the following criteria are met (response is Yes), then the project may not be screened out despite being located within a TPA:

1) Does the project have a Floor Area Ratio (FAR) of less than 0.75?

Response: *Yes. The project has a FAR of 0.41 (139,905 SF / 344,786 SF).*

2) Does the project include more parking for use by residents, customers, or employees of the project than required by the City?

Response: *Yes. As shown in the table below, the project is required to provide 274 parking spaces and is providing 298 spaces. The project is providing 24 more parking spaces than required.*

Land Use	Quantity	City Parking Code (CMC Section 17.62)	Parking Required	Parking Provided
Residential (4-bedroom)	20 units	2-car garage plus ½ space for each bedroom in excess of 3 bedrooms plus 1 guest parking per 5 units	54	64
Residential (3-bedroom)	41 units	2-car garage plus 1 guest parking per 5 units	90	100
Commercial (Restaurant including drive-thru)	13,000 SF	1 space per 100 square feet of gross floor area	130	134
TOTAL PARKING			**274**	**298**

3) Is the project inconsistent with the applicable Sustainable Communities Strategy?

Response: *No. The project is consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), adopted April 2016 by the Southern California Association of Governments (SCAG). For example, one of the RTP/SCS strategies is to "Plan for additional housing and jobs near transit." This project is located along a transit corridor and within walking distance to nearby retail and commercial uses.*

1) Does the project replace affordable residential units with a smaller number of moderate or high-income residential units?

Response: No. *The existing site is vacant and contains remnant site improvements including an 81,333 SF building formerly occupied by an Albertson's grocery store*.

The project is located within a TPA, however the project does not meet the TPA screening criteria as outlined in the OPR Technical Advisory (e.g. minimum FAR requirement is not met and the project provides more parking spaces than required by the City). Therefore, the TPA screening criteria is not fully met.

TPA Screening Criteria Met: NO

Low VMT Area Screening

Projects that are located within a low VMT areas would be screened out and a full VMT analysis would not be required. In addition, projects within these low VMT areas may be presumed to have a less than significant impact. Low VMT is defined as areas of the City where the VMT falls below the City's adopted threshold of significance.

The San Gabriel Valley Regional VMT Analysis Model was used to measure VMT performance for individual traffic analysis zones (TAZ) within the City of Covina. TAZ's are geographic polygons similar to Census block groups used to represent areas of homogenous travel behavior. Based on the results of the model, TAZ's within the City are categorized as follows:

- 15% or more below Subarea Average VMT
- 0 to 15% below Subarea Average VMT, or
- higher than Subarea Average VMT

Maps were prepared for the City of Covina that show these three different VMT categories for the daily residential home-based VMT per capita and daily VMT per service population. 15% or more below the Subarea Average VMT is determined to be "less than significant" as it falls below the City's established threshold of significance.

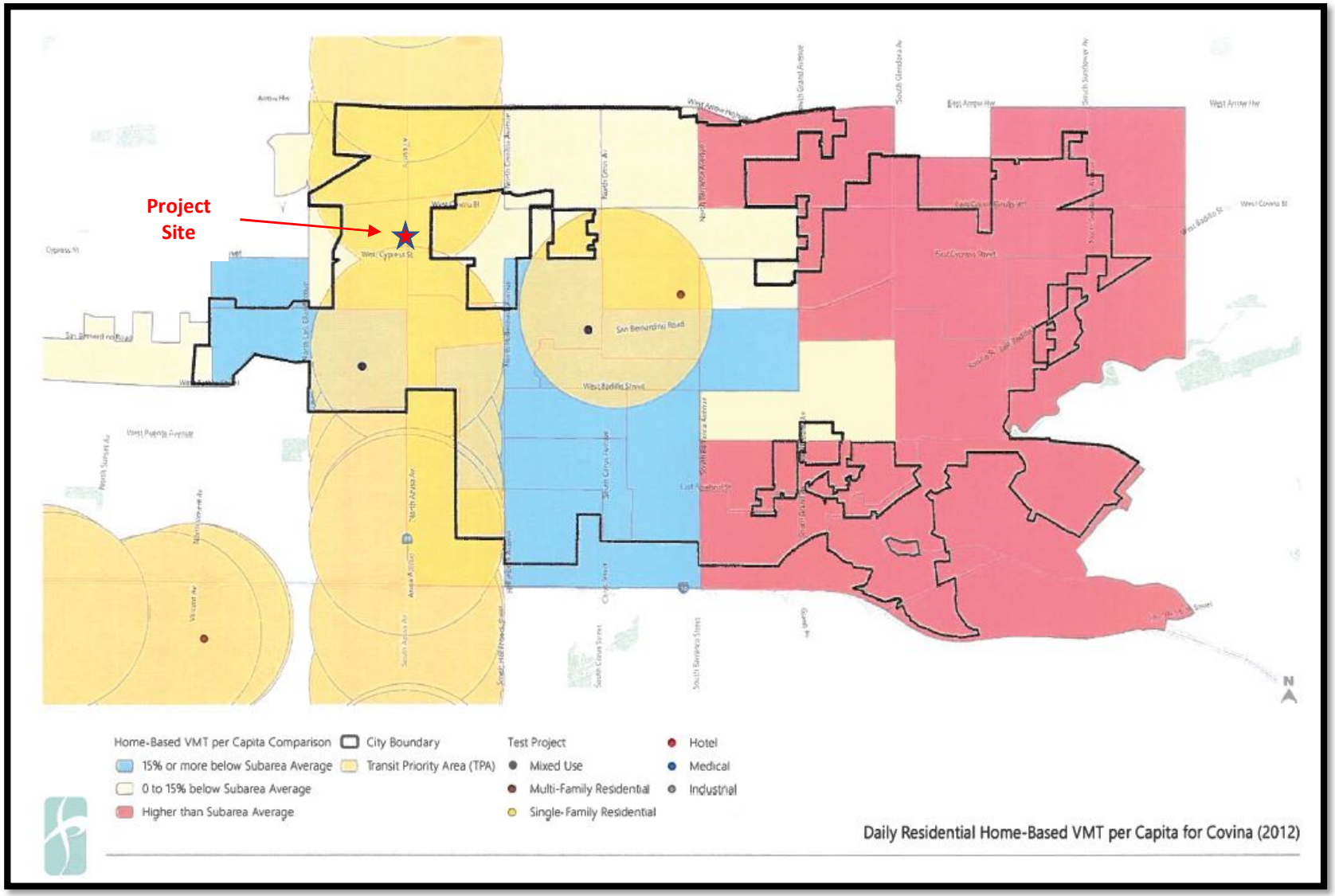
Since the Covina Commons and Cypress Villas project consists of both residential and retail, the residential component of the project was compared to the daily residential home-based VMT per capita map and the retail component of the project was compared to the daily home-based work VMT per service population map.

Residential: Figure 3.7-9 shows the project location on the daily residential home-based VMT per capita map for the City of Covina. As shown, the project is located in a 0 to 15% below Subarea Average VMT area which is not considered to be a low VMT area based on the residential VMT per capita map. Therefore, the residential component of the project would not be screened out.

Low VMT Area Screening Criteria Met (Residential Component): NO

Retail: Figure 3.7-10 shows the project location on the daily VMT per service population map for the City of Covina. As shown, the project is located in a 15% or more below Subarea Average VMT area, which is considered to be a low VMT area. Therefore, the retail component of the project would be screened out.

Low VMT Area Screening Criteria Met (Retail Component): YES



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Daily Residential Home-Based VMT Per Capita Map

Source: Fehr and Peers/SGVCOG, June 2020

Figure 3.7-9

Conclusion-Screening Analysis

Based on the findings that the Project Type, TPA and Low VMT Area screening criteria are met, the retail component of the Covina Commons and Cypress Villas project is considered to have a less than significant VMT impact and no mitigation measures or further analysis are required.

The residential component of the project does not meet the Project Type, TPA, or Low VMT area screening criteria. Therefore, the residential portion of the project would be required to identify mitigation measures to identify the project significant transportation impact.

B. Evaluation of Residential VMT Profile

As noted above in the screening analysis, it was determined that the commercial component of the proposed project would not result in significant VMT impacts, but the residential component could not be screened out. Further evaluation of the potentially positive VMT characteristics of that project component, therefore, was undertaken, in accordance with quantitative methods developed by CAPCOA, to help identify appropriate GHG reductions through transportation demand management and other factors related to a project's location, land use and design features. Based on the descriptions of each category found in the CAPCOA report, the project would fall within the "Compact Infill" category, because the project is located on a previously developed site within the central city, with high-frequency transit service.

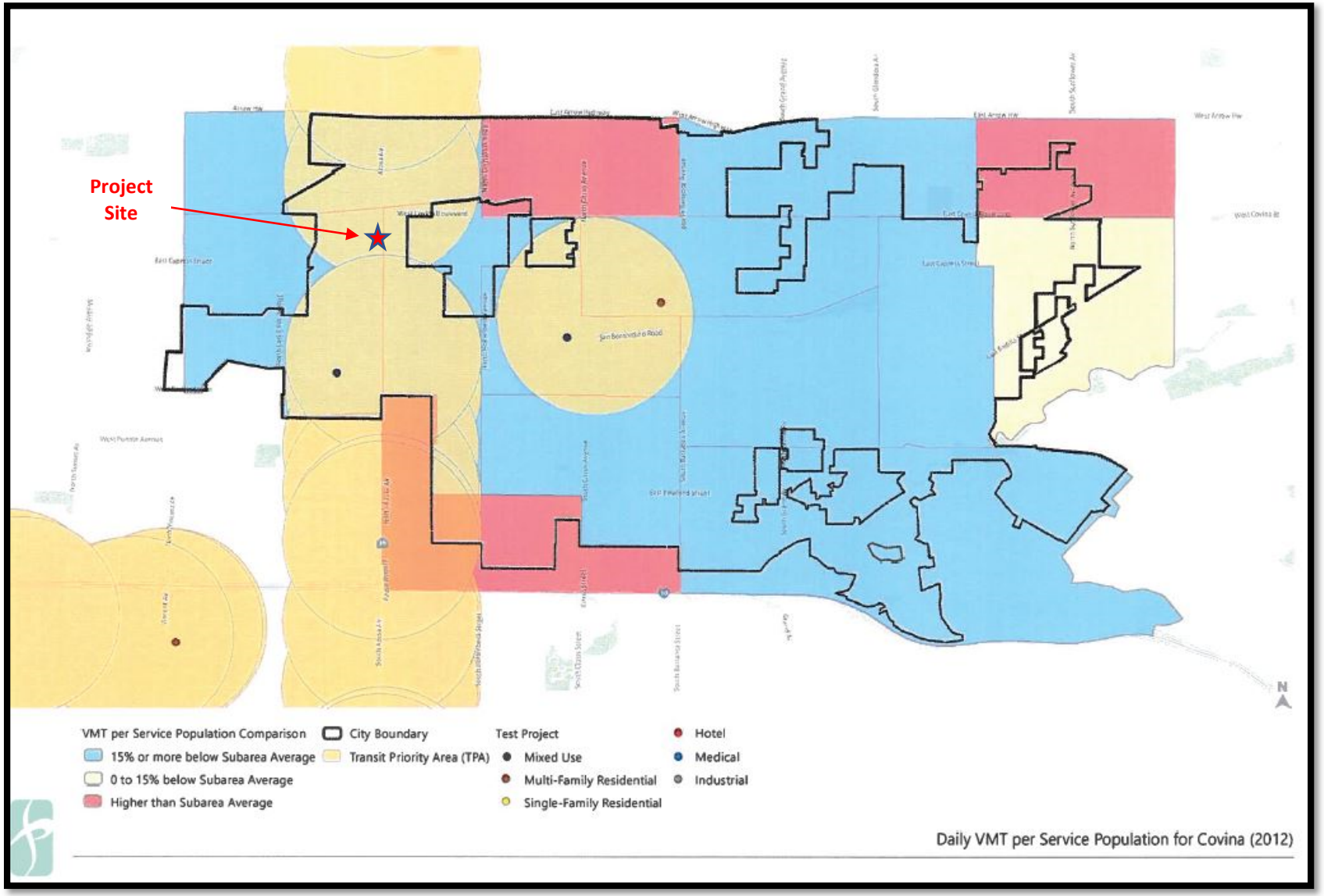
The combination of transportation-related mitigation measures found in CAPCOA can impact the quantification of associated emissions reductions. Therefore, CAPCOA developed maximum VMT reduction values across the four location/development type categories (urban, compact infill, suburban center, and suburban). *The maximum VMT reduction for Compact Infill development projects identified by CAPCOA is 35%.*

The following is a summary of the project features associated with each of the particular CAPCOA VMT reduction strategies that are applicable to the project and the estimated VMT reduction associated with each strategy.

- **LUT-1 (3.1.1) for Increase Density**

  Why appropriate for this project:

  - Density of the 61 detached single-family homes is 12.25 units per acre. According to the City's General Plan, densities ranging from 7 to 14 units per acre are considered Medium-Density Residential.
  - The proposed project is considered an "Infill" development since its located on a previously developed site in a fully urbanized setting, with access to high-frequency transit service.
  - Replaces commercial/retail with residential increasing overall housing supply.



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Daily VMT Per Service Population Map

Source: Fehr and Peers/SGVCOG, June 2020

Figure 3.7-10

Discussion:

- The proposed project is located within an urban area and is a mixed-use project consisting of both retail and residential.
- The percent reduction in VMT is calculated based on the percentage increase in housing units per acre (A) and elasticity (B): [(Number of housing units/acre – 7.6)/7.6] X (B).
- Number of housing units per acre is equal to 61 units divided by 4.986 acres.
- Elasticity (B) for project site is 0.07 based on guidance in the CAPCOA report.
- Percent VMT Reduction for project = ((12.25 - 7.6)/7.6) x 0.07 = 4.3% VMT Reduction.

VMT REDUCTION: 4.3%

❖ **LUT-3 (3.1.3) Increase Diversity of Urban and Suburban Developments (Mixed Use)**

Why appropriate for this project:

- The proposed project includes development of a mix of restaurant, general commercial and single-family residential units on a single site.
- Walking and other non-auto modes of transportation are encouraged as a result of the pedestrian network provided onsite, existing sidewalks along both site frontages and the proximity to transit.
- For an urban setting, the project, the residential units should be within ¼-mile of parks, schools, or other civic uses according to CAPCOA. The residential units for this project are within ¼ mile of Northview High School
- CAPCOA suggests that the project should minimize the need for external trips by including services/facilities for day care, banking/ATM, restaurants, vehicle refueling, and shopping. The project has restaurant uses on site and is within walking distance of other retail/commercial centers.

Discussion:

- The percent reduction in VMT is calculated based on the percentage increase in land use index versus single use development: % VMT Reduction = Land Use x B
- Land Use = (land use index – 0.15) / 0.15 where land use index = -a / ln(6)
- Elasticity (B) for Covina Mixed-Use site is 0.09 based on guidance in the CAPCOA report.
- Residential site area is 63% (4.986 AC/7.915 AC) & retail site area is 37% (2.929 AC/7.915).
- As such, land use index = -[0.63*ln(0.56) + 0.37*ln(0.10) + 4*0.01*ln(0.01)] / ln(6) = 0.78
- Percent VMT Reduction for project = (0.78 – 0.15)/0.15) x 0.09 = *37%. Since this is greater than 30%, set to a maximum of 30% VMT Reduction.*

VMT REDUCTION: 30%

❖ **LUT-4 (3.1.4) Increase Destination Accessibility**

Why appropriate for this project:

- The project is located in an area with high accessibility to local schools, retail shops and employment centers.
- An existing employment center is located approximately 6.5 miles south of the project site and accessible via Transit Route 280 and other transit routes, thus reducing VMT.
- Retail shopping and local schools such as Gladstone High School, Northview High School and Cypress Elementary School are all within ½ mile radius of the project site.

Discussion:

- The proposed project is located along North Azusa Avenue which is approximately 6.5 miles from an employment center located north of SR-60.
- The percent reduction in VMT is calculated based on the distance to job center from the project and elasticity (B): [(12-distance)/12] x (B)
- Elasticity for the project site is 0.20 based on guidance in the CAPCOA report
- Percent VMT Reduction for Covina Mixed-Use = ((12 – 6.5) / 12) x 0.20 = *9.2% VMT Reduction.*

VMT REDUCTION: 9.2%

❖ **LUT-5 (3.1.5) Increase Transit Accessibility**

Why appropriate for this project:

- The proposed project is located within a 5 to 10-minute walk (less than ¼ mile) to transit stops served by Foothill Transit Route 280. Route 280 is a high frequency bus route, i.e., 15-minute headways during peak commute hours. The stop is located on the northeast corner of Azusa Avenue/ Cypress Street.

Discussion:

- The percent reduction in VMT is calculated based on the distance to transit from the project site and transit mode share calculation equation: % VMT = Transit * B
- Transit = increase in transit mode share = % transit mode share for project - % transit mode share for typical ITE development (1.3% based on guidance in CAPCOA report).
- If the distance to transit is 0 to 0.5 miles, the following transit mode share equation should be used: -50*x + 38, where x = distance of project to transit. The project site is 0.09 miles from the nearest transit stop for Route 280.
- Therefore, transit mode share is equal to -50*(.09) + 38 = -33.5
- B = adjustments from transit ridership increase to VMT (used 0.67 based on guidance in CAPCOA report).

- Percent VMT Reduction for project = [(-50*0.09+38) – 1.3%]*0.67 = *23.3% VMT Reduction.*

VMT REDUCTION: 23.3%

❖ **SDT-1 (3.2.1) Neighborhood/Site Enhancements**

Why appropriate for this project:

- The proposed project provides a pedestrian access network within the development to encourage people to walk instead of drive.
- A pedestrian gate is proposed to provide direct walking access to connect the residential units to the retail/restaurant buildings onsite.
- A proposed pedestrian gate at the main site entrance along Cypress Street would provide an immediate walking connection to the existing public sidewalk along Cypress Street.

Discussion:

- The proposed project is providing both pedestrian network improvements on-site and connections to the larger off-site network along Cypress Street.
- The extent of pedestrian accommodations provided by the project is both within the project site and connecting off-site.
- Therefore, the estimated percent reduction in VMT is 2.0%
- Percent VMT Reduction for the project = *2.0% VMT Reduction*

VMT REDUCTION: 2.0%

As discussed above, a cross-category maximum VMT reduction is provided for any combination of land use, neighborhood enhancements, parking, and transit strategies which includes a maximum VMT reduction of 35% for Compact Infill development projects such as this one.

For this project:

VMT reduction = LUT-1 (4.3%) + LUT-3 (30%) + LUT-4 (9.2%) + LUT-5 (23.3%) + SDT-1 (2.0%) = 68.8% > 35% max.

In addition to the transportation category cap, specific rules apply for subcategories within Transportation, which for this project include:

- **Land Use/Location Strategies (LUT):** VMT reduction measures are capped based on empirical evidence for location setting types. VMT reductions for Compact Infill projects are capped at 30%. The Land Use Strategies (LUT) for the proposed project is calculated to be 66.8% (4.3%+30.0%+9.2%+23.3%), which is higher than the 30% cap. Therefore, the VMT reduction per the LUT strategies is reduced to 30% per the CAPCOA report.
- **Neighborhood Enhancement Strategies (SDT)**, VMT reduction measures are capped at 5% for sites without Neighborhood Electric Vehicles (NEVs). The VMT reduction for the proposed project in the SDT category is 2.0%, which is less than the 5.0% cap. Therefore, the project maintains the VMT reduction of 2.0% for the SDT strategy.

Based on these caps, the total VMT reductions for Covina Mixed-Use is determined to be 32%. This exceeds the 15% reduction target identify in the City's VMT thresholds and thus the residential component of the project's VMT impact would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Impact 3.7c The project would not increase hazards due to geometric design features or uses that are incompatible with the surrounding circulation network.

Discussion

Site access would occur via existing drive entrances along Azusa Avenue and from a new drive entrance roughly midway along the Azusa Avenue frontage. The new drive entrance would be restricted to right-turns in/out only and must maintain adequate sight distance to allow motorists to safely exit the site. The traffic study included a special analysis of queueing considerations at the northernmost driveway along the Azusa Avenue site frontage, which is shared with the adjacent U-Haul business. That analysis determined that there is sufficient storage length in the southbound left-turn lane to accommodate the estimated volume of vehicles arriving at that drive during peak traffic periods. As such, hazards due to excessive vehicle queuing on southbound Azusa Avenue are not anticipated. The traffic study also evaluated the performance of all other site access driveways and determined that all would operate at acceptable levels of service. As such, hazards due to vehicle stacking or turning conflicts are not anticipated. Since the project traffic would not result in any significant LOS impacts, no mitigation measures to modify existing intersection geometrics are warranted. The project would not increase traffic hazards due to geometric design features on- or off-site.

All of the project's vehicular traffic would consist of passenger vehicles and light-to-medium duty trucks that are typical of the mix of vehicles that currently occur on the surrounding street network. There would be no other types of vehicles, such as farm equipment or large construction machinery, that could create conflicts with normal traffic movements along the public streets. As such, project impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

3.8 TRIBAL CULTURAL RESOURCES

3.8 TRIBAL CULTURAL RESOURCES

This section of the EIR addresses potential effects on tribal cultural resources (TCRs) that could result from the land alterations proposed by the project. Such resources are defined in Public Resources Code Section 21074 as a site, feature, place, cultural landscape (that is geographically defined in terms of the size and scope of the landscape), sacred place, or object with cultural value to a California Native American tribe.

3.8.1 EXISTING CONDITIONS

GABRIELEÑO BAND OF MISSION INDIANS KIZH-NATION

The Gabrieleño Band of Mission Indians-Kizh Nation historically inhabited much of the Los Angeles basin. The San Gabriel area, including the project site, was the location of multiple tribal villages, especially along waterways and trails used for travel throughout and beyond the area. The Gabrieleño Band of Mission Indians-Kizh Nation have identified three villages that existed to the north, southeast, and southwest of the project site. Additionally, there was a water way, identified by the Tribe as the San Dimas Wash, and a travel route, identified as the Old San Bernardino Road, that both pass directly to the north of the project site.

Due to the project's location between the villages and proximity to the routes of travel presented by the San Dimas Wash and the Old San Bernardino Road, it is likely that ancestral tribal activities occurred on or near the project site. These activities could result in the presence of Tribal Cultural Resources being present in or near the project site.

RECORDS SEARCHES, SITE FIELD SURVEY, AND COMMUNICATIONS WITH NATIVE AMERICAN REPRESENTATIVES

A search of cultural resources research materials at the South Coast Central Information Center determined that there are no recorded historic resources on-site, and two cultural resources studies completed within a quarter mile of the site did not identify any resources. As such, there are no recorded findings of TCRs associated with historic resources on-site.

Pursuant to the provisions of Sections 21080.3.1 and 21080.3.2 of the California Environmental Quality Act, in July of 2019, the City of Covina notified seven tribal entities located in and beyond the San Gabriel Valley of the proposed project and the ongoing CEQA review process and requested a response expressing any interest in further consultation. The Gabrieleño Band of Mission Indians-Kizh Nation and the Gabrielino Tongva Tribe both responded with a request for further consultation, after which the City met with both tribal representatives. Information concerning the project's geologic and soils characteristics and proposed grading plan, along with results of the cultural resources records search noted above, were share with both tribes. Following this consultation, Kizh Nation submitted proposed mitigation measure language involving monitoring of grading by their tribal specialists. There was no further communication from the Gabrielino Tongva Tribe.

3.8.2 REGULATORY AND PLANNING FRAMEWORK

STATE

Assembly Bill 52

AB 52 was approved by Governor Jerry Brown Jr. on September 25, 2014. It amended Public Resources Code Section 5097.94 as well as adding Public Resources Code Sections 210073, 21074, 21080.3.1,

21080.3.2, 21082.4, 21083.09, 21084.2, and 21084.3. This bill applies to projects where a Notice of Preparation of a Draft EIR or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration is filed on or after July 1, 2015. This legislation requires notification and an opportunity for consultation with affected Native American representatives who can demonstrate cultural affiliations in the project area. This notification must be provided within 14 days to the designated contact or tribal representative of California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project and who have requested in writing to be informed by the lead agency.

LOCAL

City of Covina General Plan – Land Use Element

- Goal: A physical environment that provides for the housing, employment, business, service, recreational, social, educational, cultural, and entertainment needs of and maintains and enhances a high quality of life for its residents.
    - Objective 2: An ade3quate amount and distribution of and compatibility of adjacent land uses throughout the community.
        - Policy LU 1.a.17: Identify and encourage the retention and preservation of significant architectural, historical, and/or cultural resources.

3.8.3 THRESHOLDS OF SIGNIFICANCE

The California Environmental Quality Act Guidelines, Appendix G, as amended through December 31, 2019, serve as the basis for identifying thresholds determining the significance of the environmental effects of a project. Accordingly, a project will have a significant impact on tribal cultural resources if it would cause a substantial adverse change in the significance of a TCR, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.8.4 METHODOLOGY

A records search was conducted at the South Central Coastal Information Center (SCCIC) to determine whether there have been any documented findings of historic resources containing TCRs found on or near the project site. Notification of the proposed project and an invitation to request further consultation was provided by the City of Covina to the Gabrieleño Band of Mission Indians-Kizh Nation and to the Gabrielino Tongva Tribe. A consultation was conducted with representatives of both tribes, resulting in an agreement to conduct targeted monitoring of grading activities to avoid destruction of TCRs that may be uncovered.

3.8.5 ANALYSIS

Impact 3.13a The proposed project site is not currently listed nor eligible for listing in the California Register of Historical Resources, or in a local register of historical resources. Therefore, the project would have no impact on tribal cultural resources associated with a known historic resource.

Discussion

As discussed in the IS/NOP (found in Appendix A of this ADEIR), based on the results of the cultural resources records searches and field surveys, and evaluation of potential resources found during the surveys, there are no known historic resources that have been recorded on the project site. This project would have no effect on any listed or potentially eligible historic resources that consist of TCRs.

Mitigation Measures

Mitigation measures would not be required.

Impact 3.13b The proposed project site is located within ancestral tribal territory of the Gabrieleño Band of Mission Indians-Kizh Nation. Consultation with that tribal entity determined that they consider this site to be sensitive and the City and the applicant have agreed to implement construction control measures to prevent accidental damage or destruction to tribal cultural resources. With those measures, as specified in mitigation measure **MM 3.8-1**, potential impacts would be avoided or reduced to less than significant.

Discussion

Although tribal representatives of the Kizh Nation and the Gabrieleno-Tongva did not identify specific TCRs within the project site and there are no recorded resources on the project site, the Gabrieleño Band of Mission Indians-Kizh Nation did determine that the site is considered to be sensitive, with a potential for uncovering previously unknown TCRs associate with their ancestral territory that may occur in the near surface or subsurface areas that would be impacted by grading. The Kizh Nation submitted proposed mitigation measures that would address the tribal concerns by providing for grading monitoring by a qualified tribal representative, with responsibility to identify potential TCRs, divert construction work while resources are being evaluated, and determine appropriate methods for recovery and disposition of any TCRs that might be found. Mitigation measure MM 3.8-1 is the mitigation language developed in consultation with the Gabrieleño Band of Mission Indians-Kizh Nation and agreed to by the City and the project applicant. Through implementation of mitigation measure MM 3.8-1, impacts to TCRs would be avoided or reduced to less than significant.

Mitigation Measures

MM 3.8-1 Tribal Cultural Resources Mitigation Plan

a. **Retain a Native American Monitor/Consultant**: The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the

project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may 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 Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

b. **Unanticipated Discovery of Tribal Cultural and Archaeological Resources**: Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5(f)). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. 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 historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

c. **Unanticipated Discovery of Human Remains and Associated Funerary Objects**: Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries

of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.

d. **Resource Assessment & Continuation of Work Protocol**: Upon discovery, the tribal and/or archaeological monitor/consultant will immediately divert work at minimum 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).

e. **Kizh-Gabrieleño Procedures for burials and funerary remains**: If the Gabrieleño 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 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.

f. **Treatment Measures**: 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 will 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 will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe 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 for data recovery purposes. Cremations will 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 NAHC. 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 will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will 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 the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

g. **Professional Standards**: Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 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.

Timing/Implementation: *Retain monitor prior to site clearing/grading. Conduct monitoring during site clearing/grading.*

Enforcement/Monitoring: *City of Covina, Planning Division*

Level of Impact Significance Following Mitigation

Implementation of mitigation measure MM 3.8-1 would avoid significant impacts to tribal cultural resources during construction.

3.9 UTILITIES

3.9 UTILITIES AND SERVICES SYSTEMS

Pursuant to the preliminary analysis contained within the Initial Study (see Appendix A), this section of the Draft EIR evaluates the potential impacts related to the connection and/or extension of water, wastewater treatment, storm drain, and dry utilities (electricity, gas, and telecommunications) infrastructure to the project site. This section also evaluates the proposed project's potential impacts to wastewater treatment capacity and water supply resources. As discussed in the Initial Study, potential impacts related to solid waste collection and disposal were determined to be less than significant; therefore, that topic will not be addressed in this section.

3.9.1 WATER SUPPLY AND INFRASTRUCTURE

3.9.1.1 EXISTING CONDITIONS

The project site is within the 14.2-square-mile water service area of the Azusa Light and Water Department (ALW), which includes the entire City of Azusa, portions of the Cities of Glendora, Covina, West Covina, and Irwindale, and unincorporated areas of Los Angeles County (ALW 2016). Sixty percent of ALW's service area and population is located outside of the City of Azusa's municipal boundaries. ALW's water supply is derived primarily from local groundwater and surface water supplies. Specifically, surface water is derived from diversion of San Gabriel River water from either the San Gabriel or the Morris Reservoir (which is treated at the Joseph F. Hsu Filtration Plant), accounting for approximately one-third of the total water supply. Groundwater is retrieved through 11 groundwater wells that range in capacity between 900 gallons per minute (gpm) and 3,000 gpm, accounting for approximately 65 percent of the water supply. Water is distributed via a 281-mile network of distribution mains between 2 inches and 30 inches in size. The distribution system consists of five pressure zones, with the project site located in zone 715 (ALW 2016). Domestic and irrigation water supply and fire flow for the project site is provided by an existing 10-inch underground water line located in Cypress Street to the south of the project site. Currently, the project site is characterized by a grocery store building, which has been vacant since November 2012, and unmaintained landscape planters, neither of which generate water demand.

3.9.1.2 REGULATORY AND PLANNING FRAMEWORK

STATE

California Water Plan

The California Water Plan is the state's blueprint for integrated water management and sustainability. The California Department of Water Resources (DWR) updates the plan approximately every five years. The California Water Plan is a statewide strategic plan for water management through the year 2050. The plan includes a framework and resource management strategies promoting two major initiatives: integrated regional water management that enables regions to implement strategies appropriate for their own needs and helps them become more self-sufficient, and improved statewide water management systems that provide for upgrades to large physical facilities, such as the California State Water Project (SWP), and statewide management programs essential to California's economy.

Urban Water Management Planning Act

In 1983, the California legislature enacted the Urban Water Management Planning Act (UWMPA) to create Water Code Sections 10610–10656. The UWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet of water annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The UWMPA describes the contents of urban water management plans as well as how urban water suppliers should adopt and implement the plans. It is the UWMPA's intention to permit levels of water management planning commensurate with the numbers of customers served and the volume of water supplied.

Senate Bill 610

Senate Bill (SB) 610 (Water Code Section 10910[c][2]) makes changes to the UWMPA to require additional information in urban water management plans if groundwater is identified as a source available to the supplier. Required information includes a copy of any groundwater management plan adopted by the supplier, a copy of the adjudication order or decree for adjudicated basins, and if non-adjudicated, whether the basin has been identified as being overdrafted or projected to be overdrafted in the most current DWR publication on that basin. If the basin is in overdraft, the plan must include current efforts to eliminate any long-term overdraft. A key provision in SB 610 requires that any project subject to the California Environmental Quality Act (CEQA) supplied with water from a public water system be provided a specified water supply assessment (WSA), except as specified in the law. WSAs are required under SB 610 for projects that include 500 units of residential development (would demand an amount of water equivalent to, or greater than, the amount of water required by a project with 500 dwelling units) and for projects that would increase the number of the public water system's existing service connections by 10 percent. In accordance with Water Code Section 10912, projects subject to CEQA requiring submittal of a WSA include the following:

- Residential developments of more than 500 dwelling units;
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plant, or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- Mixed-use projects that include one or more of the above-identified categories; or
- A project that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project.

As proposed, the project would result in the development of 61 residential units and 13,000 square feet of commercial square footage; thus, the provisions of SB 610 are not applicable and preparation of a WSA is not required.

Assembly Bill 901

Assembly Bill (AB) 901 requires urban water management plans to include information relating to the quality of existing sources of water available to an urban water supplier over given time periods and the manner in which water quality affects water management strategies and supply.

Senate Bill x7-7 (Chapter 4, Statutes of 2009)

SBx7-7, the Water Conservation Act of 2009, requires the state to achieve a 20 percent reduction in urban per capita water use by December 31, 2020. The responsibility for this conservation falls to local water agencies, which must increase water use efficiency through promotion of water conservation standards that are consistent with the California Urban Water Conservation Council's best management practices. Each urban retail water supplier was also required to develop urban water use targets and an interim urban water use target by July 1, 2011, based on the alternative methods set out in the 2009 act. The agencies must meet those targets by the 2020 deadline. As stated in the 2015 ALW Urban Water Management Plan, the 20 percent water conservation target for ALW is 168 gallons per capita daily (GPCD), which ALW has already met as of reporting available in the 2015 UWMP (ALW 2016).

California Plumbing Code

Title 24, Part 5 of the California Code of Regulations establishes the California Plumbing Code, which sets efficiency standards, such as maximum flow rates, for all new federally regulated plumbing fittings and fixtures, including showerheads and lavatory faucets.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act of 2014 comprised several assembly and senate bills (AB 1739, SB 1168, and SB 1319), and requires local agencies to adopt groundwater management plans that are tailored to the resources and needs of their communities. The act requires formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans for basins and subbasins that are identified as high and medium priority by DWR. The City of Covina lies within the San Gabriel Valley groundwater basin. Because the basin is identified by DWR as a low-priority basin, there is no groundwater sustainability agency that has been established for this area.

State Model Water Efficient Landscape Ordinance

The State Model Water Efficient Landscape Ordinance (MWELO) promotes the efficient use of water in new or retrofitted landscapes by establishing irrigation system efficiency standards that include greywater usage; on-site stormwater capture; limiting the percentage of turf planted in new landscapes; and required reporting on the implementation and enforcement of the ordinance by local agencies. Local agencies are required to adopt the MWELO or to adopt a local ordinance which must be at least as effective in conserving water as MWELO. Section 17.82.050 of the City of Covina Municipal Code, as discussed below, implements the provisions of the MWELO at the local level.

LOCAL

2015 Azusa Light and Water Urban Water Management Plan

The 2015 ALW Urban Water Management Plan (2015 UWMP) was adopted in June 2016. The 2015 UWMP provides a broad perspective on a number of water supply issues and is a planning tool that generally guides water supply and resource management in the ALW service area. The 2015 UWMP includes water supply and demand forecasts that are based on population projections for the 14.2-square-mile water service area. These population projections were completed using a generalized land use map of the service area, which classified the project site as commercial, neighborhood center, transit center. The 2015 UWMP also discusses the implementation of water conservation measures.

Water Demand

The population of the ALW service area was listed as 106,332 persons in the 2015 UWMP, with an estimated annual growth of 0.4 percent (derived from the observed population growth between 1995 and 2015; see ***Table 3.9-1***). As shown, the water service area is estimated to have a population of 119,200 by 2040. The 2015 UWMP states that in 2014, ALW maintained a total of 22,957 service connections. Of these service connections, approximately 89 percent are residential, approximately 7 percent commercial, approximately 3 percent are industrial, and approximately 1 percent are related to agricultural irrigation (ALW 2016).

Table 3.9-1
CURRENT AND PROJECTED WATER SERVICE AREA POPULATION

Year	2015	2020	2025	2030	2035	2040
Population	106,332	109,200	111,600	114,100	116,600	119,200

Source: ALW 2016, Table 1.4

Table 3.9-2 presents the projection of ALW's service area water demands for the next 20 years.

Table 3.9-2
PROJECTED WATER DEMAND – ALW SERVICE AREA

Use Type	Water Demand by Year (acre-feet)				
	2020	2025	2030	2035	2040
Single-Family / Multi-Family Residential	9,658	9,871	10,092	10,313	10,543
Commercial / Institutional	4,110	4,200	4,294	4,388	4,486
Industrial	3,904	3,990	4,080	4,169	4,262
Agricultural / Landscape Irrigation	411	420	429	439	449
Other	2	2	2	2	2
Total Water Sales	18,084	18,481	18,895	19,309	19,740
Unaccounted for Water (e.g, water loss)	2,466	2,520	2,577	2,633	2,692
Total Water Consumption	**20,550**	**21,001**	**21,472**	**21,942**	**22,432**

Source: ALW 2016, Table 4.8

Water Supply and Demand Assessment

The water supply available to ALW is identified in the 2015 UWMP and is based on three water supply condition scenarios: average/normal water year, single dry water year, and multiple dry water years. The UWMP assumes that during times of drought, demand is expected to increase, while supplies are expected to decrease. Projected groundwater supply capacities are not expected to be significantly affected during times of low rainfall and over short-term dry periods of up to three years; however, imported water supply capacity, which accounts for a small percentage of the overall ALW water supply, may be reduced significantly. ***Table 3.9-3*** lists the anticipated water supply for each of the scenarios described above. Based on the data in this table, ALW anticipates meeting future demands through 2040 for all climatologic scenarios.

ALW's projected normal year water demands over the next 20 years in five-year increments were based on the per capita water use target for the year 2020, which was established in the 2010 UWMP as 168 GPCD, in compliance with SBx7-7. The demand for each year was calculated by multiplying 168 GPCD by the population projections to estimate a total demand; however, the UWMP states that water demand would likely be below this SBx7-7 limit as water conservation trends are implemented at a local level. The total supply listed for each five-year increment, 38,450 AFY, represents the imported water supply available to ALW on an as-needed basis (4,000 AFY); groundwater supply available to ALW based on its adjudicated groundwater basin pumping right (24,350 AFY); and surface water supply based on the capacity of the ALW's Canyon Filtration Plant (10,100 AFY).

Table 3.9-3
PROJECTED WATER SUPPLY AND DEMAND – ALW SERVICE AREA

		Water Supply by Year (acre-feet)				
		2020	**2025**	**2030**	**2035**	**2040**
Normal Year Scenario						
Supply		38,450	38,450	38,450	38,450	38,450
Demand		20,550	21,001	21,472	21,942	22,432
Single Dry Year Scenario						
Supply		38,450	38,450	38,450	38,450	38,450
Demand		21,310	21,778	22,266	22,754	23,262
Multiple Dry Years Scenario						
First Year	Supply	38,450	38,450	38,450	38,450	38,450
	Demand	21,543	22,070	22,561	23,059	23,558
Second Year	Supply	38,450	38,450	38,450	38,450	38,450
	Demand	21,459	21,957	22,447	22,941	23,435
Third Year	Supply	38,450	38,450	38,450	38,450	38,450
	Demand	20,550	21,001	21,472	21,942	22,432

Source: ALW 2016, Tables 7-2, 7-3, and 7-4

As displayed in ***Table 3.9-3***, the UWMP estimates that under multiple dry year scenarios, demand would increase in the first year, but would return to normal levels by the third year of the dry scenario. As stated above, under each climatic scenario, supply is forecast to exceed demand by between 14,892 AFY and 17,990 AFY.

During water shortage emergencies, ALW will implement its Water Conservation Ordinance (adopted by ALW in 2016), which may impose a 0, 10, 20, or 30 percent mandatory reduction in water use for the service area. During such water shortages, ALW declares an appropriate water conservation stage, based on predicted or actual water supply reductions, and enacts mandatory water restrictions for existing users. Examples of such mandatory reduction measures are included in the UWMP and include restrictions such as no watering between 9 a.m. and 6 p.m., no hosing or washing sidewalks or driveways, no washing of motor vehicles or other type of mobile equipment, no water used in decorative fountains, and restrictions on excessive irrigation.

Due to surface and subsurface flows of source water for ALW, the primary water source (the Main San Gabriel Basin) is not as affected by dry seasons as other neighboring groundwater basins (ALW 2016). Further, lack of pumping restrictions from the Main Basin Judgement means that ALW may exceed its annual pumping right, so long as it provides replenishment water. This ability to exceed annual pumping rights, with proper replenishment, greatly increases the reliability of the water supply during dry seasons. Surface water from the San Gabriel River is more susceptible to impacts resulting from climatic conditions; however, the UWMP states that ALW may import water from the Metropolitan Water District on an as-needed basis to supplement surface water supplies to meet or exceed ALW's water demands.

City of Covina Municipal Code Section 17.82.080 Development Standards – Water Efficient Landscape Regulations

The City of Covina Municipal Code Section 17.82.080 sets forth the landscaping and irrigation standards for all new development in the City and codifies the implementation of the State MWELO. Specifically, the purpose of this section is to encourage the efficient use of water through appropriate low water-using plant materials, water-conserving irrigation design, and regular maintenance of landscaped areas. Further, the intent of this section is to encourage the appropriate design, installation, maintenance, and management of landscapes so that water demand can be decreased, runoff can be retained, and flooding can be reduced without a decline in the quality or quantity of landscapes.

City of Covina General Plan

The applicable goals, objectives, and policies from the City of Covina General Plan Land Use Element (City of Covina 2000a) and Natural Resources and Open Space Element (City of Covina 2000b) are listed below.

Land Use Element – Infrastructure

- Goal: A physical environment that provides for the housing, employment, business, service, recreational, social, educational, cultural, and entertainment needs of and maintains and enhances a high quality of life for its residents.
    - Objective 1*:* A climate where moderate residential, commercial, and industrial development and redevelopment are accommodated.
        - Residential
          The City shall:
            - Policy 1): Permit development at density ranges and quantities that reflect existing and desired scales of building construction and revitalization in the community, as well as physical and environmental constraints, that address the intent of regional housing obligations, that will allow for moderate future growth, and that will not

inhibit the City's ability to meet street capacities and to provide other infrastructure, adequate community services, and utilities.

- Policy 6): Ensure that the overall amount, locations, and timing of development reflect community desires and needs as well as physical and environmental constraints and will not inhibit the City's ability to meet street capacities and to provide other infrastructure, utilities, and adequate community services.

▪ Commercial and Industrial
The City shall:

- Policy 1): Permit development at intensity ranges, site locations, and quantities that reflect existing and desired scales of building construction and revitalization in the community, as well as physical and environmental constraints, that will allow for moderate future growth, and that will not inhibit the City's ability to meet street capacities and to provide other infrastructure, adequate community services, and utilities.

- Policy 7): Accommodate new and expanded commercial and industrial developments, for community economic betterment and image enhancement and related reasons, in a fashion that neither adversely affects the integrity of established commercial and/or industrial areas nor unreasonably encroaches into residential neighborhoods and that does not impose an undue burden on local infrastructure or services.

o Objective 5: The provision of sufficient public facilities and services.
The City shall:

▪ Policy c: Achieve an adequately designed and functional street system and other infrastructure, including utility and storm drainage systems plus an adequate distribution of public and quasi-public facilities, in accommodating future growth to best maintain the community's visual, economic, and spiritual vitality.

▪ Policy d: Provide all new and improved infrastructure in the most cost-effective manner.

▪ Policy e: Consider the provision of infrastructure and services in all land use decisions.

Natural Resources and Open Space Element

- Goal: A setting in which a high environmental quality is achieved through the bona fide conservation and protection of existing natural resources.

o Policy Area 1 - Water Resources and Air Quality
The City shall:

▪ Policy i: Ensure the adequacy of water supplies to meet all existing and future demands and applications, particularly public safety.

▪ Policy l: Follow the Covina Water Conservation Ordinance, when necessary, and provide conservation kits and general information to best promote water conservation.

▪ Policy m: Follow the City's Water-Efficient Landscape Ordinance for the sites of new and significantly expanded/ remodeled developments as a viable conservation tool.

▪ Policy n: Encourage the incorporation of water conservation features in the design of all new and significantly expanded/ remodeled developments and in the installation of

conservation devices in existing developments, including, but not limited to, low-flow toilets and shower registers.

3.9.1.3 THRESHOLDS OF SIGNIFICANCE

The CEQA Guidelines, Appendix G, as amended through December 31, 2019, serve as the basis for identifying thresholds determining the significance of the environmental effects of a project. A project will have a significant impact involving water supply and water infrastructure if it would:

a) Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.

b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple years.

3.9.1.4 METHODOLOGY

The analysis of potential impacts to water infrastructure is based on the proposed connections to the existing water transmission system. Analysis of impacts to water supply is based on calculations of the project's residential and commercial water demand as derived from sewer loading factors, compared to water demand from only general commercial uses, which is the land use currently assumed for the entire site in the ALW 2015 UWMP.

3.9.1.5 ANALYSIS

Impact 3.9.1a The project would require installation of new off-site public water mains on Azusa Avenue and Cypress Street, which would connect to an existing water main in Cypress Street, as well as on-site water meters, service lines, and backflows for residential, commercial, and irrigation areas. Construction impacts would be short term, common, and less than significant. Upgrades to the existing water main in Cypress Street would not be required.

Discussion

ALW has indicated that it will require the installation of a new Class 350 ductile iron, 8-inch public water main on Azusa Avenue from the northern property line to Cypress Street and on Cypress Street from Azusa Avenue to the eastern property line, including the entire intersection of Azusa Avenue and Cypress Street. This will be the project developer's responsibility. Construction and installation of these water mains would occur during the site improvements phase of construction and may require temporary closures of one or more travel lanes along Cypress Street or Azusa Avenue while the work is underway. The new water line construction would represent a minor aspect of the overall construction footprint and would not add a significant or unique level of noise, air quality, traffic, or other types of construction impacts. The modeling of construction period air quality impacts and the assessment of temporary construction noise impacts presented in the Air Quality and Noise sections of this EIR both account for the construction of water lines in the adjacent street segments. Any temporary impacts to traffic flow due to temporary street closure while the street is impacted by the water line construction would be addressed through routine construction traffic control measures, to be developed as part of final plans and specifications, to ensure that emergency access will be maintained and that adequate provisions to maintain through traffic are provided.

Determination of appropriate temporary traffic control measures is a routine part of the final plan check and permitting process and does not require a mitigation measure to enforce.

The design and installation of these new service connections would require coordination with ALW to ensure compliance with applicable construction standards and avoid disruption of water service to other, existing customers. In addition, during construction of the proposed project, water would be required primarily for dust control, cleaning of equipment, and other related construction activities; however, the water demand would be temporary and intermittent. Water for construction-related purposes could be provided by water trucks and/or through connections to nearby water distribution lines. The amount of water required during this phase would be well below the total water demand of the fully developed project and would not require expansions of existing or construction of new water transmission infrastructure.

In addition to the ALW-required installation of a new water main within Azusa Avenue and Cypress Street, ALW requires payment of a water system development fee to mitigate the proposed project's service demands on existing water infrastructure maintained by ALW. The project's total fee is currently estimated at $244,659.

In summary, temporary construction impacts associated with installation of the new water main on Azusa Avenue and Cypress Street would be less than significant; construction-related water demand would be temporary and intermittent; and the project would mitigate adverse impacts to the ALW water supply infrastructure through payment of a water system development fee. As such, while the project would require the relocation or construction of new or expanded water facilities in the form of water mains within Azusa Avenue and Cypress Street, the construction or relocation of said infrastructure would not cause significant environmental effects.

Mitigation Measures

Mitigation measures would not be required.

Impact 3.9.1b The project would include 61 new residential units with private and common landscape areas on the project site and 13,000 square feet of commercial development. This would result in less water demand than would the project site if it were entirely developed with commercial uses, as is currently planned for in the UWMP. As the demand would be less, the project would not conflict with the UWMP. As such, impacts on water supply would be less than significant.

Discussion

The 7.99-acre project site is categorized as commercial, neighborhood center, transit center in the 2015 UWMP (ALW 2016, Figure 1.5). The proposed project includes a General Plan amendment and zone change to convert the eastern portion from general commercial to medium density residential, to allow for the proposed development of 61 new residential units with private and common irrigated landscape areas. The project also includes 13,000 square feet of commercial building space, plus irrigated landscape areas. The UWMP provides estimates of water demand by sector, but the calculation for commercial demand is extrapolated from past demand for the entire service area rather than calculated using a per unit or per acre water demand factor (Roesch 2019).

As such, the estimated water demand for the proposed project was estimated by calculating the sewage generation for the proposed project and multiplying it by 110 percent, where the additional 10 percent accounts for irrigation of outdoor landscape areas. This is considered a reasonable method, since the project site is located in a fully urbanized area, where landscape areas represent a minor share of land coverage. The proposed development plan also has relatively little landscape area, with a large majority of the site to be covered by various impervious surfaces. This method also reasonably assumes that all of the interior potable water used by a commercial or residential use is discharged into the wastewater system through plumbing fixtures.

The Los Angeles County Department of Public Works (LACDPW) Sanitary Sewer Procedural Manual provides estimated average daily sewage flows for various occupancies by area (LDC 2019). Under current conditions, if the entire site were to be developed as a commercial use, as is anticipated in the UWMP, the total water demand would be 238.6 acre-feet per year (AFY), based on the LACDPW sewer loading factors.[1] Under proposed conditions, the total water demand for the residential component of the project (4.99 acres) would be 39.73 AFY and the total water demand for the commercial component of the project (2.93 acres) would be 87.51 AFY, based on the LACDPW sewer loading factors.[2] Therefore, the estimated total water demand for the proposed project would be 127.24 AFY as compared with 238.6 AFY of estimated water demand as a developed commercial site.[3] As such, the project would represent a decrease in water demand when compared with what is evaluated in the 2015 UWMP. Because the UWMP states that water supply would be greater than demand under various climate scenarios out to 2040, as described above, the proposed project would have a less than significant impact on water supplies under normal, dry, and multiple dry year scenarios.

Mitigation Measures

Mitigation measures would not be required.

3.9.2 WASTEWATER AND SEWER INFRASTRUCTURE

3.9.2.1 EXISTING CONDITIONS

The project site is currently improved with an 81,333-square-foot grocery store building, constructed in 1991, and a large surface parking lot with numerous small landscape planters. The grocery store building has been vacant since 2012 and has thus not produced any sewer loading since that time. The project site is within the jurisdictional boundaries of the Sanitation Districts of Los Angeles County (SDLAC), which encompasses a service area of approximately 824 square miles, consisting of 24 independent sanitation districts serving approximately 5.5 million people within 78 cities and unincorporated territory in Los

[1] The generation factor for Commercial (C-1 through C-4) is 0.015 cubic feet per second (cfs) per acre. Peak factor is 2.5, per LACDPW. 0.015 cfs / acre x 7.99 acres = 0.1198 cfs; 0.1198 cfs x 2.5 peak factor = 0.299 cfs; 0.299 cfs x 448.83 = 134.48 gallons per minute (gpm); 134.48 gpm sewage flow x 110% = 147.28 gpm water demand = 238.6 acre-feet per year (AFY) water demand.

[2] The generation factor for Residential (R-1) is 0.004 cfs per acre. Peak factor is 2.5, per LACDPW. 0.004 cfs / acre x 4.99 acres = 0.0199 cfs; 0.0199 cfs x 2.5 peak factor = 0.0499 cfs; 0.0499 cfs x 448.83 = 22.39 gpm; 22.39 gpm sewage flow x 110% = 24.629 gpm water demand = 39.73 AFY water demand. The generation factor for Commercial (C-1 through C-4) is 0.015 cfs per acre. Peak factor is 2.5, per LACDPW. 0.015 cfs / acre x 2.93 acres = 0.04395 cfs; 0.04395 cfs x 2.5 peak factor = 0.109 cfs; 0.109 cfs x 448.83 = 49.32 gpm; 49.32 gpm sewage flow x 110% = 54.25 gpm water demand = 87.51 AFY water demand.

[3] An estimated 39.73 AFY water demand for the residential component + 87.51 AFY water demand for the commercial component = 127.24 AFY for the proposed project.

Angeles County (SDLAC 2019). The project site is located within SDLAC District 22, which is one of 17 districts that form the Joint Outfall System (JOS). The JOS provides sewage treatment, reuse, and disposal for residential, commercial, and industrial users and includes seven water reclamation plants (WRPs). The nearest water treatment plant to the project site is the San Jose Creek WRP, approximately 8 miles southwest of the project site (near the intersection of State Route 60 and Interstate 605). The San Jose Creek WRP provides primary, secondary, and tertiary treatment for 100 million gallons of wastewater per day (mgd), serving a total population of approximately 1 million people. The WRP generates 42 mgd of reclaimed water, with the remaining treated water discharged to the San Gabriel River (SDLAC 2019).

The City owns and operates its local wastewater collection system consisting of approximately 120.5 miles of gravity flow sewer pipelines ranging in size from 6 inches to 21 inches in diameter, and 2,666 manholes. The existing sewer system discharges to trunk sewers within the community that are owned and operated by the SDLAC and to adjacent unincorporated areas and the City of West Covina sewer systems which discharge into SDLAC trunk sewers (Covina 2014).

The project site is currently served by an existing 8-inch vitrified clay pipe (VCP) sewer line near the northwest corner of the project site, which is maintained by the City of Covina Public Works Department. This is a local collection sewer that discharges into an 8-inch VCP sewer main maintained by the Los Angeles County Sewer Maintenance District that runs westerly through Azusa Avenue to a service road and easement, then southerly down Homerest Avenue, connecting to the 11.3-inch Cypress Street Trunk Line maintained by the SDLAC (DTA 2019; SDLAC 2019). This 11.3-inch trunk sewer has a capacity of 1.7 mgd and conveyed a peak flow of 0.7 mgd when last measured in 2015 (SDLAC 2019). The connection point with the SDLAC trunk sewer, located at the intersection of Homerest Avenue and Cypress Street, is approximately 1,500 feet west of the project site.

3.9.2.2 REGULATORY AND PLANNING FRAMEWORK

STATE

Porter-Cologne Water Quality Control Act

This legislation, enacted as the California Water Code, includes regulations to govern the manner in which wastewater is discharged from various point sources such as municipal wastewater treatment facilities, and is focused on eliminating the concentrations of pollutants in wastewater discharges to maintain water quality objectives. This act also established the State Water Resources Control Board to provide administrative oversight of matters pertaining to the orderly and efficient administration of the state's water resources. As such, this law does not govern or provide standards for connections to local wastewater collection and treatment systems that serve new development.

LOCAL

City of Covina General Plan

The applicable goals, objectives, and policies from the City of Covina General Plan Land Use Element (City of Covina 2000a) and Natural Resources and Open Space Element (City of Covina 2000b) are listed below.

Land Use Element

- Goal: A physical environment that provides for the housing, employment, business, service, recreational, social, educational, cultural, and entertainment needs of and maintains and enhances a high quality of life for its residents.
    - Objective 1: A climate where moderate residential, commercial, and industrial development and redevelopment are accommodated.
        - General Land Use
          The City shall:
            - Policy 9): Provide for the continuation of existing and development of new or expanded public streets and facilities, storm drains and other infrastructure, parking amenities, and utilities to support the City's land sues and meet all needs.
        - Residential
          The City shall:
            - Policy 1): Permit development at density ranges and quantities that reflect existing and desired scales of building construction and revitalization in the community, as well as physical and environmental constraints, that address the intent of regional housing obligations, that will allow for moderate future growth, and that will not inhibit the City's ability to meet street capacities and to provide other infrastructure, adequate community services, and utilities.
            - Policy 6): Ensure that the overall amount, locations, and timing of development reflect community desires and needs as well as physical and environmental constraints and will not inhibit the City's ability to meet street capacities and to provide other infrastructure, utilities, and adequate community services.
        - Commercial and Industrial
          The City shall:
            - Policy 1): Permit development at intensity ranges, site locations, and quantities that reflect existing and desired scales of building construction and revitalization in the community, as well as physical and environmental constraints, that will allow for moderate future growth, and that will not inhibit the City's ability to meet street capacities and to provide other infrastructure, adequate community services, and utilities.
            - Policy 7): Accommodate new and expanded commercial and industrial developments, for community economic betterment and image enhancement and related reasons, in a fashion that neither adversely affects the integrity of established commercial and/or industrial areas, nor unreasonably encroaches into residential neighborhoods and that does not impose an undue burden on local infrastructure or services.

3.9.2.3 THRESHOLDS OF SIGNIFICANCE

The CEQA Guidelines, Appendix G, as amended through January 1, 2019, serve as the basis for identifying thresholds determining the significance of the environmental effects of a project. A project will have a significant impact involving wastewater infrastructure if it would:

a) Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects.

b) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

3.9.2.4 METHODOLOGY

The analysis of potential impacts to wastewater treatment facilities is based on the proposed connections to off-site wastewater conveyance and wastewater treatment facilities. The proposed project's estimated wastewater flows are analyzed relative to the capacity of the regional collection sewers and wastewater treatment plants that would receive the project's wastewater flows.

3.9.2.5 ANALYSIS

Impact 3.9.2a Wastewater flows from the project site would be conveyed to the Los Angeles County Sanitation District's Cypress Street Sewer, then conveyed to the San Jose Creek Water Reclamation Plant (WRP) for treatment. The Cypress Street trunk sewer and San Jose Creek WRP would have sufficient capacity to convey and treat the flows generated by the fully developed project. Therefore, the project would not require the construction of new or expanded wastewater collection or treatment facilities and impacts would be less than significant.

Discussion

The residential and commercial portions of the project would both develop on-site, underground wastewater infrastructure. Both the residential and commercial portions of the project would discharge wastewater into the existing sewer line located near the northwest corner of the project site, which is maintained by the City. This line runs west, traveling under Azusa Avenue and along a service road, and turns to the south and runs along Homerest Avenue before discharging into the Cypress Street trunk sewer, which is maintained by the SDLAC.

Since the project's estimated wastewater generation would be less than the generation if the site were to be fully developed with commercial uses (see discussion under Impact 3.9.2b, following), this project would not require replacement/upgrade to the existing VCP sewer line that runs from the project site to the Cypress Street trunk sewer and would not result in or require the construction or relocation of new or expanded wastewater treatment facilities. Therefore, impacts would be less than significant and no mitigation would be required.

Impact 3.9.2b Wastewater flows from the project site would be conveyed to the Los Angeles County Sanitation District's Cypress Street Sewer, then conveyed to the San Jose Creek Water Reclamation Plant (WRP) for treatment. The Cypress Street trunk sewer and San Jose

Creek WRP have sufficient capacity to treat the flows generated by the fully developed project. As such, impacts would be less than significant.

Discussion

A sewer area study (LDC 2019) was prepared for the proposed project to compare potential sewage generation for potential commercial development based on the current zoning and land use designation and the proposed project. As demonstrated in ***Table 3.9-4***, below, the estimated peak wastewater flow that would be generated by the proposed project at buildout is approximately 47 percent lower than if the site were to be developed with commercial uses in accordance with the site's current General Plan Land Use Designation (General Commercial) and City Zone District classification of C-4 (Highway Commercial). This comparison demonstrates that the proposed development will not exceed the existing capacity, based on zoning coefficients and calculations, of either the City's sanitary sewer collection system or the SDLAC's sewer collection system and WRP.

Table 3.9-4
COMPARISON OF PEAK SEWAGE GENERATION - ALL COMMERCIAL VS. PROPOSED PROJECT

Condition	Commercial Component		Residential Component		Totals	
	Total ft^3/s	*Total Gallons/Min*	*Total ft^3/s*	*Total Gallons/Min*	*Total ft^3/s*	*Total Gallons/Min*
Existing C-4 Zoning	0.299	134.48	NA	NA	0.299	134.48
Proposed Project	0.109	49.32	0.049	22.39	0.158	71.71
Change	NA	NA	NA	NA	(0.141)	(62.77)
% Change	NA	NA	NA	NA	-47.16%	-46.68%

Source: LDC 2019
Notes:
1 *Ft^3/s = cubic feet per second*
2 *Sewer generation factors for C-4 (0.015 cfs per acre) and R-1 (0.004 cfs/acre) are factors developed by the Los Angeles County Department of Public Works (LDC 2019).*

In addition to the peak flows calculated by the sewer area study, the SDLAC issued a Will Serve Letter providing calculations of daily wastewater generation as well as remaining capacity for both the SDLAC Cypress Street Trunk Sewer and the San Jose Creek WRP (SDLAC 2019). To determine the wastewater generation, loading factors of 260 gallons per day per dwelling unit for residential and 325 gallons per day per 1000 square feet were used (SDLAC 2019). The residential portion of the project is estimated to produce 15,860 gallons per day (gpd) of wastewater and the commercial portion of the project is estimated to produce 4,225 gpd of wastewater, resulting in a total of 20,085 gpd (0.02 million gallons per day (mgd)) of wastewater generated by the project. The Cypress Street Trunk Sewer has a capacity of 1.7 mgd and has a current peak flow of 0.7 mgd (SDLAC 2019). The proposed project represents 1.2 percent of the total capacity of the trunk sewer and would leave 0.98 mgd capacity when combined with the existing peak flow. The San Jose Creek WRP has a capacity of 100 mgd and an average flow of 58.5 mgd (SDLAC 2019). The proposed project represents 0.02 percent of the total capacity of the WRP and would leave a remaining capacity of 41.3 mgd when combined with the existing average flow.

The sewer area study and the Will Serve Letter from SDLAC demonstrate that the proposed project is well within the capacity of both the Cypress Street Sewer Trunk and the San Jose Creek WRP. Therefore, impacts would be less than significant and no mitigation measures would be required.

3.9.3 STORMWATER DRAINAGE

The following section is based in part on the Hydrology & Hydraulic Study for Tract Map No. 82315 City of Covina, CA, and the Low Impact Development Plan, both found in Appendix E of this Draft EIR.

3.9.3.1 EXISTING CONDITIONS

The project site currently consists of 7.92 acres of developed land, with remnant improvements from a former grocery store that was constructed in 1991 and vacated in November 2012. The remainder of the project site is developed with a large surface parking lot with numerous small landscape planters and pole-mounted lights. The southern 'leg' of the project site that connects to Cypress Street is currently maintained with low grass cover. As stated in the Hydrology & Hydraulic Study prepared for this project, 5.64 acres of the project site sheet flows westward toward Azusa Avenue and 2.19 acres sheet flows southward toward Cypress Street. Once the water sheet flows off of the project site, it enters into a storm drain system on either Azusa Avenue to the west or Cypress Street to the south. The storm drain system in the project vicinity is maintained by the Los Angeles County Flood Control District (LACFCD) except for catch basins along Azusa Avenue, which are maintained by the City (LACDPW 2020).

3.9.3.2 REGULATORY AND PLANNING FRAMEWORK

REGIONAL

Los Angeles County MS4 Permit

The Los Angeles County Regional Water Quality Control Board issued a revised NPDES permit in 2012, promulgated under the federal Clean Water Act and the State Porter-Cologne Act, which regulates discharges of urban runoff in public storm drains in Los Angeles County. This includes regulations governing the quality and the quantity of wastewater discharges. The MS4 permit includes project performance criteria for new development and redevelopment projects that include guidance for managing water quality and quantity. Water quality performance criteria include controlling runoff volume from the project site by minimizing impervious surfaces and controlling runoff through infiltration, bioretention, and/or rainfall harvest and use. Further, the MS4 permit states that projects that discharge to natural drainage systems must implement control measures to ensure that downstream stream habitats are not impacted by accelerated project runoff. The City of Covina is a co-permittee under the countywide MS4 permit and subject to all of its obligations for controlling drainage into the local municipal storm drain system.

Los Angeles County LID Standards Manual

Los Angeles County's Low Impact Development Standards manual outlines stormwater quality and quantity control design standards. These design standards are also outlined in Covina Municipal Code Section 8.50.120 and require certain projects to retain stormwater on-site, to the extent feasible, through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use. Under Section 8.50.120, development projects must retain stormwater runoff on-site for the stormwater quality design volume,

defined as runoff from either the 85th percentile 24-hour runoff event as determined by the Los Angeles County 85th percentile precipitation isohyetal map, or the volume of runoff produced from a three-quarter-inch, 24-hour rain event, whichever is greater. New single-family hillside home developments and street construction of 10,000 square feet or more have extra requirements, but these are not applicable to this project.

LOCAL

City of Covina Municipal Code

The City of Covina Municipal Code Chapter 8.50 contains stormwater quality and urban runoff controls for development projects, including Section 8.50.120, which implements the County's Low Impact Development standards. The purpose of this chapter is to regulate non-stormwater discharge to the municipal stormwater system; provide for the control of spillage, dumping, or disposal of materials into the municipal stormwater system; and reduce pollutants in stormwater and urban runoff to the maximum extent practicable.

City of Covina General Plan

The applicable goals, objectives, and policies from the City of Covina General Plan Circulation, Land Use, and Safety Elements (City of Covina 2000a, 2000c, 2000d) are listed below.

Land Use Element

- Goal: A physical environment that provides for the housing, employment, business, service, recreational, social, educational, cultural, and entertainment needs of and maintains and enhances a high quality of life for its residents.
    - Objective 5: The provision of sufficient public facilities and services. The City shall:
        - Policy c): Achieve an adequately designed and functional street system and other infrastructure, including utility and storm drainage systems plus an adequate distribution of public and quasi-public facilities, in accommodating future growth to best maintain the community's visual, economic, and spiritual vitality.
        - Policy r): Monitor storm water runoff conditions and ensure that all areas, particularly in and around Walnut Creek in Covina Hills, are free from major flooding problems, and address and, to the greatest extent possible, remedy any identified deficiencies in the storm drain system, including possibly by working with Los Angeles County and/or other jurisdictions.

Circulation Element

- Goal: A well-balanced infrastructure system and related circulation network that provide functional, viable, safe, efficient, economical, and attractive transportation, movement, and transmission and applicable services for current and future Covina residents, employers, workers, business patrons and service recipients, visitors and passers-by.
    - Policy Area 4: Sewer, storm drainage, and public utilities and related systems. The City shall:

- Policy 3): Ensure, to the greatest extent feasible, through direct or liaison efforts, the continued maintenance and adequacy and, where necessary, improvement of Covina's storm drains and storm drainage system to prevent or minimize flooding and soil erosion and to accommodate future growth and revitalization.
- Policy 4): Continue to reasonably accommodate stormwater runoff programs, in accordance with applicable Federal, State, and other standards.

Safety Element

- Goal: A community in which the loss of lives, serious injuries, major damages to public and private structures/properties, the loss of natural resources, economic, and social dislocation, and the disruption of vital services associated with a potential natural or man-made disaster are prevented.
  - Policy Area 2: Potential Flooding Hazards
    The City shall:
    - Policy c): Continue to require that all new and significantly expanded developments incorporate sufficient measures to mitigate flood hazards, including the design of on-site drainage systems to link with citywide flood control infrastructure, the gradation of sites such that runoff does not impact adjacent private properties or structures and the location of structures above and away from any flooding elevation.
  - Policy Area 4: Hazardous Materials
    The City shall:
    - Policy j): Minimize, to the greatest extent practicable, the impacts form storm water runoff on the biological integrity of natural drainage systems and water bodies.
    - Policy l): Maximize, to the greatest extent practicable, the percentage of permeable surfaces to allow more percolation of storm water runoff into the ground.
    - Policy m): Minimize, to the greatest extent practicable, the amount of storm water directed to impermeable areas and to the storm drainage system.

3.9.3.3 THRESHOLDS OF SIGNIFICANCE

The CEQA Guidelines, Appendix G, as amended through January 1, 2019, serve as the basis for identifying thresholds determining the significance of the environmental effects of a project. A project will have a significant environmental impact related to stormwater drainage and treatment infrastructure if it would:

a) Require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects.

3.9.3.4 METHODOLOGY

The analysis of potential impacts involving construction of new stormwater drainage facilities is based on the proposed development plans for the project site, as well as the Hydrology & Hydraulic Study and Low Impact Development Plan prepared for Tract Map No. 82315 (see Appendix E of this EIR).

3.9.3.5 ANALYSIS

Impact 3.9.3a The stormwater drainage facilities developed on-site would be designed to contain a 25-year storm event. The subsurface basins are designed to hold a greater capacity than the water quality volume required by the County of Los Angeles, while two of the subsurface basins would also have expanded capacity to reduce the outflow rate to within LACDPW requirements. As such, the project would not require new or expanded stormwater drainage facilities outside of the project limits; therefore, the project would have a less than significant impact on existing municipal storm drain facilities. No unique impacts would result from the proposed on-site drainage improvements beyond the impacts evaluated for the overall project footprint.

Discussion

All existing surface drainage improvements would be removed and a new engineered storm drainage system would be constructed, in accordance with countywide and City of Covina Low Impact Development design standards. The proposed stormwater drainage system would collect on-site flows via curb and gutters, catch basins, and subsurface storm drains. These on-site flows would be conveyed to three subsurface basins that would be installed within the project site. One of these subsurface basins would be designed to retain the water quality volume for the proposed commercial center.[4] The other two subsurface basins would be within the residential area and would be sized to store the required volume necessary to mitigate for increased runoff associated with the 25-year storm event and limit outflow to the allowable flow rate specified by the LACDPW. Further details regarding the proposed elements of the on-site storm drainage network are provided below.

Catch Basins and Inlets

There are a total of eight catch basins/grate inlets to intercept the on-site runoff and convey the flows to one of the three subsurface basins. These eight catch basins are divided up among five drain areas (subareas 1A, 1B, 2B, 3B, 1C). Subareas 1A and 2B have one inlet each; the other subareas have two inlets each. For a map of these inlets and the drainage areas, see Exhibit B of the preliminary Hydrology & Hydraulic Study (Appendix E of this EIR).

The catch basins and subareas were divided up so that they could handle the runoff associated with a 25-year storm event, as required in LACDPW Hydrology Manual Sections 4.2 and 4.3. The flow rates for the subareas and catch basins were determined based on several factors, including acreage and the fraction of the area that would be covered with impervious material.[5] ***Table 3.9-5*** depicts the breakdown of each subarea and the flow rate that could occur in the event of a 25-year storm.

[4] Water quality volume is the stormwater runoff storage volume that is required to capture suspended sediment and pollutants before it is transported to other waters.

[5] Calculations can be found in Appendix A of the Hydrology & Hydraulic Study for Tract Map No. 82315 (see Appendix E in this EIR).

Table 3.9-5
PROPOSED CATCH BASINS AND SUBAREAS 25-YEAR FLOW RATES

Subarea	Drainage Area (acres)	Catch Basin/Inlet Designation	Impervious Fraction	25-Year Flow Rate (ft^3/s)[1]
1A	2.93	1A	0.96	8.47
1B	1.94	1B	0.67	5.13
2B	1.19	2B	0.67	3.37
3B	0.65	3B	0.67	2.18
1C	1.12	1C	0.67	3.76

Source: JLC 2019; see Appendix E
Notes:
1. Ft^3/s = cubic feet per second

Subsurface Basins

The three proposed subsurface basins—Basin A, Basin B, and Basin C—would be constructed as 96-inch corrugated metal pipe (CMP) devices designed to retain the water quality volume and mitigate increased runoff for the project. Each CMP would be perforated, with a gravel bed to allow runoff to infiltrate into the subsurface soil materials as a pollutant filtering mechanism. Basins A and C would be single CMP basin systems that would store up to 74.2 cubic feet per foot of system. Basin B would be a double CMP basin system that would store up to 148.4 cubic feet per foot of system.

The proposed project would not impact the storm drain system along Azusa Avenue since Basin A would be the only basin to discharge into Azusa Avenue and Basin A would receive runoff from 2.93 acres of the newly developed commercial area, which is less than the 5.64 acres that currently sheet flows off the project site and into the storm drain system along Azusa Avenue. Because of this, the main constraint on the size and output of Basin A is the water quality volume.

Basins B and C would be located within the residential portion of the project and would discharge into an existing 69-inch storm drain located within Cypress Street that is maintained by the LACFCD. The basins are designed to restrict the flow rate entering the Cypress Street drain to no more than 0.77 cubic feet per second per acre (ft^3/s per acre), as specified by LACDPW.

Table 3.9-6 summarizes the volume required for each basin, the flow rate from each basin, the proposed design volume of the basin, and more. The volume required for Basin A is the water quality volume. The volume required for Basins B and C are the water quality volumes for each basin combined with the necessary volume to reduce the outflow flow rate per LACDPW restrictions. For complete calculations, see Appendix E of this EIR, Hydrology & Hydraulic Study for Tract Map No. 82315 City of Covina, CA.

As described above, the storm drain system for the proposed project is designed so that the site runoff into the existing municipal storm drainage systems along Azusa Avenue and Cypress Street will not exceed the capacity of those systems. Therefore, the proposed stormwater drainage facilities would have less than significant impacts and mitigation would not be required.

Table 3.9-6
PROPOSED STORM DRAINAGE BASINS DESIGN SUMMARY

Subsurface Basin	Subareas	Drainage Area (acres)	Allowable Outflow Flow Rate (ft^3/s)[1]	Design Outflow Flow Rate (ft^3/s)[1]	Required Volume (ft^3)[2]	Design Volume (ft^3)[2]
A	1A	2.93	N/A[3]	N/A[3]	7,002	7,416
B	1B, 2B, 3B	3.78	2.91	2.8	17,294.7	17,502
C	1C	1.12	0.86	0.7	5,548.2	5,995

Source: JLC 2019; see Appendix E
Notes:

[1] *Ft^3/s = cubic feet per second*

[2] *Ft^3 = cubic feet*

[3] *Basin A did not have restrictions on its allowable outflow flow rate as it would be less than the current flow rate due to the amount of impervious surface staying the same, but total acreage flowing to Azusa Avenue decreasing.*

Mitigation Measures

No mitigation measures would be required.

3.9.4 DRY UTILITIES

3.9.4.1 EXISTING CONDITIONS

ELECTRICITY

Southern California Edison (SCE), a division of Edison International, provides electricity service to the project area and all of Covina, with overhead and underground transmission facilities located near the project site along Azusa Avenue and Cypress Street.

NATURAL GAS

Natural gas service to the project area is provided by the Southern California Gas Company (SoCalGas), which maintains underground transmission lines located in Cypress Street and Azusa Ave.

TELECOMMUNICATIONS

Frontier Communications is the current service provider of landline telephones in the city. Spectrum and Frontier are the current providers of cable television and cable-based internet services in this area.

3.9.4.2 REGULATORY AND PLANNING FRAMEWORK

STATE

California Public Utilities Commission (CPUC)

The CPUC regulates investor-owned electric and natural gas utilities operators (such as SCE and SoCalGas) in California. This includes in-state transportation over the utilities' transmission and distribution systems, storage, procurement, metering, and billing. Specifically, the CPUC has primary rate-making jurisdiction over the funding of distribution-related expenditures associated with 66 kilovolt powerlines and has a significant role in permitting transmission and substation facilities. The CPUC also specifies a variety of

design, construction, inspection, and notification requirements for these utilities and conducts annual audits of natural gas pipeline operations to ensure compliance with safety standards. The CPUC operates Tariff Rule 20, which requires utilities to allocate certain amounts of funding each year for projects converting aboveground utility lines to underground utility lines. The CPUC then authorizes the utility to recover the costs of undergrounding utilities from ratepayers if the commission determines that the project was in the "public interest," such as elimination of an unusually heavy concentration of overhead lines, undergrounding utilities along a road or street with high traffic volumes, or undergrounding utilities in recreation areas or other areas of scenic interest.

The CPUC also develops and implements policies regulating the telecommunications industry. These regulations are designed to ensure fair and affordable universal access to necessary services and removing barriers preventing a competitive market. The CPUC communications division is responsible for licensing, registration, and the processing tariffs of local exchange carriers, competitive local carriers, and non-dominant interexchange carriers. It is also responsible for registration of wireless service providers and franchising of video service providers. The division tracks compliance with commission decisions and monitors consumer protection and service issues and commission reliability standards for safe and adequate service. The CPUC also administers the Broadband Infrastructure Grant Account, which provides funding for broadband infrastructure that provides the "last mile" connection to households that are unserved by an existing broadband provider.

California Energy Commission (CEC)

The CEC is the state's principal energy planning organization, charged with six basic functions: 1) forecasting electrical needs statewide, 2) licensing power plants to meet those needs, 3) promoting energy conservation and efficiency measures, 4) promoting research, development, and demonstration projects, 5) developing renewable energy resources and alternative energy techniques, and 6) planning for and directing response to state energy emergencies.

Since the proposed project does not include any new energy generation facilities for either the electricity or natural gas networks and would construct connections to existing mainline natural gas and electricity grid infrastructure, the project is not subject to regulation by the CPUC or the CEC with respect to its energy infrastructure.

LOCAL

City of Covina Municipal Code

Section 17.26.300 Underground Utilities

Utility lines including but not limited to electric, communications, street lighting, and cable television shall be placed underground in accordance with City of Covina Municipal Code Section 17.64.030(E), unless special permission to construct said lines above the ground is granted.

City of Covina General Plan

The applicable goal and policies from the City of Covina General Plan Circulation Element (City of Covina 2000c) are listed below.

Circulation Element

- Goal: A well-balanced infrastructure system and related circulation network that provide functional, viable, safe, efficient, economical, and attractive transportation, movement, and transmission and applicable services for current and future Covina residents, employers, workers, business patrons and service recipients, visitors, and passers-by.
    - Policy Area 4: Sewer, storm drainage, and public utilities and related systems.
      The City shall:
        - Policy 9: Accommodate the necessity of utility companies and similar entities to obtain rights-of-way and easements, while attempting to maintain appropriate community standards.
        - Policy 10: Continue to require that utility company and related new transmission and supply lines, including those for streetlights, be placed underground.
        - Policy 12: Ensure that any ground-mounted utility company facilities and manholes are located in areas that are, to the greatest extent feasible, safe, unobtrusive, inconspicuous, and aesthetically harmonious with road or building location and/or site design.

3.9.4.3 THRESHOLDS OF SIGNIFICANCE

The CEQA Guidelines, Appendix G, as amended through January 1, 2019, serve as the basis for identifying thresholds determining the significance of the environmental effects of a project. A project will have a significant environmental impact related to energy and telecommunications infrastructure if it would:

a) Require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects.

3.9.4.4 METHODOLOGY

Analysis of potential project impacts was based on locations and extent of proposed connections to existing off-site utility infrastructure and the potential for disruptions to traffic flow or utility services, or potential for additional impacts of other kinds during construction of those connections. Regional demand forecasts for electricity and natural gas services were examined to determine if there could be potential impacts involving expanding the supplies of these energy sources.

3.9.4.5 ANALYSIS

Impact 3.9.4a The project area is already served by electricity, natural gas, and telecommunication service providers, with local infrastructure in place to serve the project site. As such, the proposed project would require connections to existing local infrastructure in adjacent roadways, and the project would not require construction or expansion of dry utility facilities. Impacts would be less than significant.

Discussion

The proposed project would include connections to the existing electrical energy infrastructure maintained by SCE. Connections to existing electrical transmission facilities located on adjacent properties

on the north side of Cypress Street are anticipated to be sufficient to meet the project's electrical loads (Ashurst 2020). No construction work within any public right-of-way is anticipated for the project's electrical connections. One or more connections to SoCalGas lines located in Azusa Avenue and/or Cypress Street would be sufficient to meet the project's demands for natural gas. Connection points to telecommunications infrastructure have not been identified; however, there appears to be no need for any replacements/upgrades to existing infrastructure serving this area.

The construction associated with utility service connections would result in temporary and minor air quality, noise, and/or circulation impacts. These impacts occur only for portions of a normal construction workday and only in those areas and during those times where utility improvements are being constructed. Impacts related to construction of dry utility connections would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

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4. CUMULATIVE IMPACTS

4. CUMULATIVE IMPACTS

4.1 INTRODUCTION AND APPROACH

"Cumulative impacts" are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355; see also Public Resources Code Section 21083(b)). Stated another way, "a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts" (CEQA Guidelines Section 15130(a)(1).

"[I]ndividual effects may be changes resulting from a single project or a number of separate projects" (CEQA Guidelines Section 15355(a)). "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (CEQA Guidelines Section 15355(b)). Past and present projects are considered to be inherent in the baseline conditions.

A project's cumulative impact is, generally, the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects (CEQA Guidelines Section 15355(b)). Determining a project's influence on cumulative impacts is imperative because although a project may cause an "individually limited" or "individually minor" incremental impact that, by itself, is not significant, the increment may be "cumulatively considerable," and thus significant, when viewed together with environmental changes anticipated from past, present, and probable future projects (CEQA Guidelines Sections 15064(h)(1), 15065(c), 15355(b)).

In order to set the framework for a cumulative impact assessment, it is useful to define a relevant geographic area of analysis and a discrete universe "of past, present, and probable future projects producing related or cumulative impacts" relevant to the impact area (CEQA Guidelines Section 15130(b)(3)). The relevant geographic area of analysis varies depending on the type of impact under consideration. For example, construction noise impacts associated with the proposed project would be temporary and limited to the project area. If project A, several miles away from the project site, is also undertaking construction activities that generate noise, the projects would likely be far enough away from one another such that noise impacts would not be additive, and would not result in compounding, cumulative impacts. As a similar example, impacts related to geology and soils, such as impacts resulting from land alterations on sites exposed to rupture from a known earthquake fault, seismic ground shaking, or landslides, are site specific and would not directly interact with similar effects involving a project located miles away. In these cases, the geographic area of analysis for cumulative effects would be limited to the immediate area of the proposed project. Thus, for impacts involving effects that occur only within or close to the project site, the probable future projects that would be evaluated for potential impacts that could add or combine with the proposed project's impacts would be limited to those projects in the immediate project area.

Other impact areas require larger geographic areas of analysis. For example, if projects A, B, and C are located at some distance from the project site, and are also within the Azusa Light and Water Department's service area, each project could have an individually minor impact on the capacity of

existing water infrastructure; however, the projects could have a combined, cumulatively considerable impact if the combined project water demand is greater than the available water supplies or local infrastructure can provide.

Pursuant to Section 15130 of the State CEQA Guidelines, an assessment of cumulative impacts is to be based on review of either:

A. A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or

B. A summary of projections contained in an adopted local, regional or statewide plan, or related planning document that describes or evaluates conditions contributing to the cumulative effect.

Give the relatively local and small-scale character of the proposed project, the first approach is applied in this chapter. A list of other pending projects within a three-mile radius of the project site has been compiled. This consists of development projects that have been approved, are under construction, or are under consideration as part of a formal local government review process, based on information obtained from the City of Covina Community Development Department and from neighboring jurisdictions, including the Cities of West Covina, Irwindale, Baldwin Park, Azusa, and Glendora. This list is presented in ***Table 4-1*** and the project locations are shown on ***Figure 4-1***. As noted therein, many of these projects were addressed in the Traffic Impact Analysis prepared for this project, based on their locations and potential to generate traffic that could affect the same intersections that would be impacted by the proposed project.

Table 4-1

OTHER PENDING DEVELOPMENT PROJECTS WITHIN THREE MILES OF PROJECT SITE

Project Identification	Location	Land Use Characteristics	Land Use Intensity *DU=Dwelling Units TSF=Thousand Square Feet*
1-Porto's Restaurant	1360 W. Garvey West Covina, CA	Dine-In Restaurant	21.94 TSF
2-Merrill Gardens	1400 W. Covina Parkway West Covina, CA	Assisted Living Facility	111 rooms
3-1920 W. Pacific Lane	1920 W. Pacific Lane West Covina, CA	Single Family DU	7 DU
4-1530 W. Cameron	1530 W. Cameron Ave. West Covina, CA	Townhomes	56 DU
5-Reliance II Specific Plan (Irwindale)	Irwindale, CA	Various	Various
6-Dawson Community Care Facility	333 W. Dawson Ave. Glendora, CA	Senior Facility	150 beds
7-Gables at 66	350-436 W. Route 66 401-427 W. Colorado Ave. Glendora, CA	Townhomes Single Family DU Retail	106 DU 20 DU 2.0 TSF
8-Grand/Route 66 Commercial Remodel	Grand Ave and Route 66 Glendora, CA	Fast Food Outparcel	Not Specified

Project Identification	Location	Land Use Characteristics	Land Use Intensity *DU=Dwelling Units TSF=Thousand Square Feet*
9-Azusa/9th St.	Azusa and 9th St. Azusa, CA	Retail Multi-Family Residential	4.6 TSF 102 DU
10-525 N. Azusa Ave.	525 N. Azusa Ave. Azusa, CA	Retail Multi-Family Residential	4.6 TSF 102 DU
11-670 E. Foothill Blvd.	670 E. Foothill Blvd. Azusa, CA	Retail/Medical Office	0.5 TSF/8.9 TSF
12-198 S. Peckham Rd.	198 S. Peckham Rd. Irwindale, CA	Warehouse	12.184 TSF
13-Raising Cane's	855 E. Alosta Ave. Azusa, CA	Fast Food Restaurant	4.086 TSF
14-In-N-Out Burger	988 E. Alosta Ave. Azusa, CA	Fast Food with Drive-Through	9.11 TSF
15-Starbucks	Near Azusa Ave and 210 Intersection Azusa, CA	Coffee Shop with Drive-Through	1.85 TSF
16-Metro Walk	805 N. Dalton Ave. Azusa, CA	Single-Family DU	30 DU
17-The Orchard	Azusa Ave and Foothill Blvd. Azusa, CA	Retail Multi-Family Residential	31.566 TSF 163 DU
18-301 E. Aerojet Ave.	301 E. Aerojet Ave. Azusa, CA	Light Industrial	181.8 TSF
19-The Promenade at Citrus	890 The Promenade Azusa, CA	Retail Multi-Family Residential	8.2 TSF 112 DU
20-Popeye's	994 E. Alosta Ave. Azusa, CA	Fast Food with Drive-Through	2.279 TSF
21-475 E. Arrow Hwy	475 E. Arrow Hwy Azusa, CA	Multi-Family Residential	70 DU
22-601 S. Vincent	601 S. Vincent Ave. Azusa, CA	Light Industrial	146.0 TSF
23-Gladstone Senior Villas	360, 410, and 416 E. Gladstone Street Azusa, CA	Multi-Family Senior Housing	60 DU
24-ITEC	1162 N. Citrus Ave. Covina, CA	Park-and-Ride Office/Retail Condominiums/Townhomes Events Center	400 parking 17.2 TSF/4.8 TSF 120 DU 700 attendees
25-Hassen Developments	401 N. Citrus Ave. 129-137 W. Orange St. 155 W. San Bernardino Rd. Covina, CA	Office/Retail Townhomes	1.03 TSF/3.37 TSF 18 DU
26-14827-14839 Pacific	14827 – 14839 Pacific Ave. Baldwin Park, CA	Single Family Residential	47 DU

Project Identification	Location	Land Use Characteristics	Land Use Intensity *DU=Dwelling Units TSF=Thousand Square Feet*
27-Fortin St. Development	4923-4929 Fortin St. 15138 Nubia St. Baldwin Park, CA	Single Family Residential	15 DU
28-City Ventures	156 W. San Bernardino Rd. Covina, CA	Townhomes Urban Lofts Live-work Lofts Mixed Use – office/retail/gallery	52 DU 12 DU 4 DU 5.794 TSF
29-Gran Covina, LLC	777 Edna Place Covina, CA	Industrial Units	26 units 99.272 TSF
30-Masonic Homes	1650 E. Old Badillo Covina, CA	Nursing Facility Memory-care Facility	16 beds 16 beds
31-Michael Cirrito	276 W. Dexter Covina, CA	Condominiums	3 DU
32-AFT One, LLC	172 E. Center Covina, CA	Apartments	5 DU
33-Oakmont Assisted Living/Memory Care Facility	Park View Drive and Holt St. Covina, CA	Assisted Living/Memory Care Facility	94 units
34-Kaiser Permanente, Covina MOB	1154 & 1164 S. Park View Dr. Covina, CA	Medical Office Building Parking	58.8 TSF 344 spaces
35-NFW Venture Inc.	1680 W. San Bernardino Rd. Covina, CA	Gas station Convenience store Auto service	 2.35 TSF 2 bays
36-Covina Bowl – Trumark Homes	1060 W. San Bernardino Rd. Covina, CA	Residential Townhomes	113 DU
37-Avid Hotel	578 N. Azusa Ave. Covina, CA	Hotel	31.5 TSF
38-McIntyre Group	135 E. Badillo Covina, CA	Commercial Parking Residential	3.821 TSF 5.609 TSF 11.238 TSF
39-Bradford Park Properties	1201 W. Badillo Covina, CA	Residential Apartment	28 DU
40-Faith Church	529 Cutter Way Covina, CA	Residential Live-work Units	39 DU 11 DU
41-Circle K	731 N. Grand Ave. Covina, CA	Commercial Gas Car Wash	6.514 TSF 10-pump 1.269 TSF

Sources: TJW Engineering, Inc. 2019. Lisette Sanchez-Mendoza, Planning Consultant, City of Covina. 2020.

After determining the appropriate geographic area of analysis for each impact area, the process for determining whether a project's impacts would be cumulatively considerable is done through two steps. First, there is an assessment as to whether the combined effects from the proposed project, as well as other projects, could be cumulatively significant. Second, if the combined effects could be cumulatively significant, there is an assessment to determine if "the proposed project's incremental effects are

cumulative considerable" (*Communities for a Better Environment*, supra, 103 Cal.App.4th at p. 120). Therefore, the analysis would compare the incremental effect of a proposed project against the collective impacts from other projects, and also add the proposed project's incremental impact to the anticipated impacts of other projects (*Communities for a Better Environment*, supra, 103 Cal.App.4th at pp. 117-121). For example, if a lead agency determines that a proposed project's cumulative impacts would be significant when considering the combined impacts from projects A, B, and C, the lead agency must then determine if the proposed project's incremental contribution to the combined significant, cumulative impact would be "cumulatively considerable."

When evaluating the cumulative effects for various types of impacts, consideration is also given to any regulatory programs that require project design or operational measures that would reduce project-level contributions to that cumulative impact. An example of such a program is the set of air pollutant reduction rules established and administered by the South Coast Air Quality Management District to compel individual projects to implement construction controls or design/operational controls to limit emissions of criteria air pollutants. Another example of a programmatic mitigation measure to reduce cumulative impacts is the regional General Construction Permit, administered by the Los Angeles Regional Water Quality Control Boards to require various standardized construction control measures to prevent the release of water pollutants from active construction sites.

4.2 CUMULATIVE IMPACT ANALYSIS

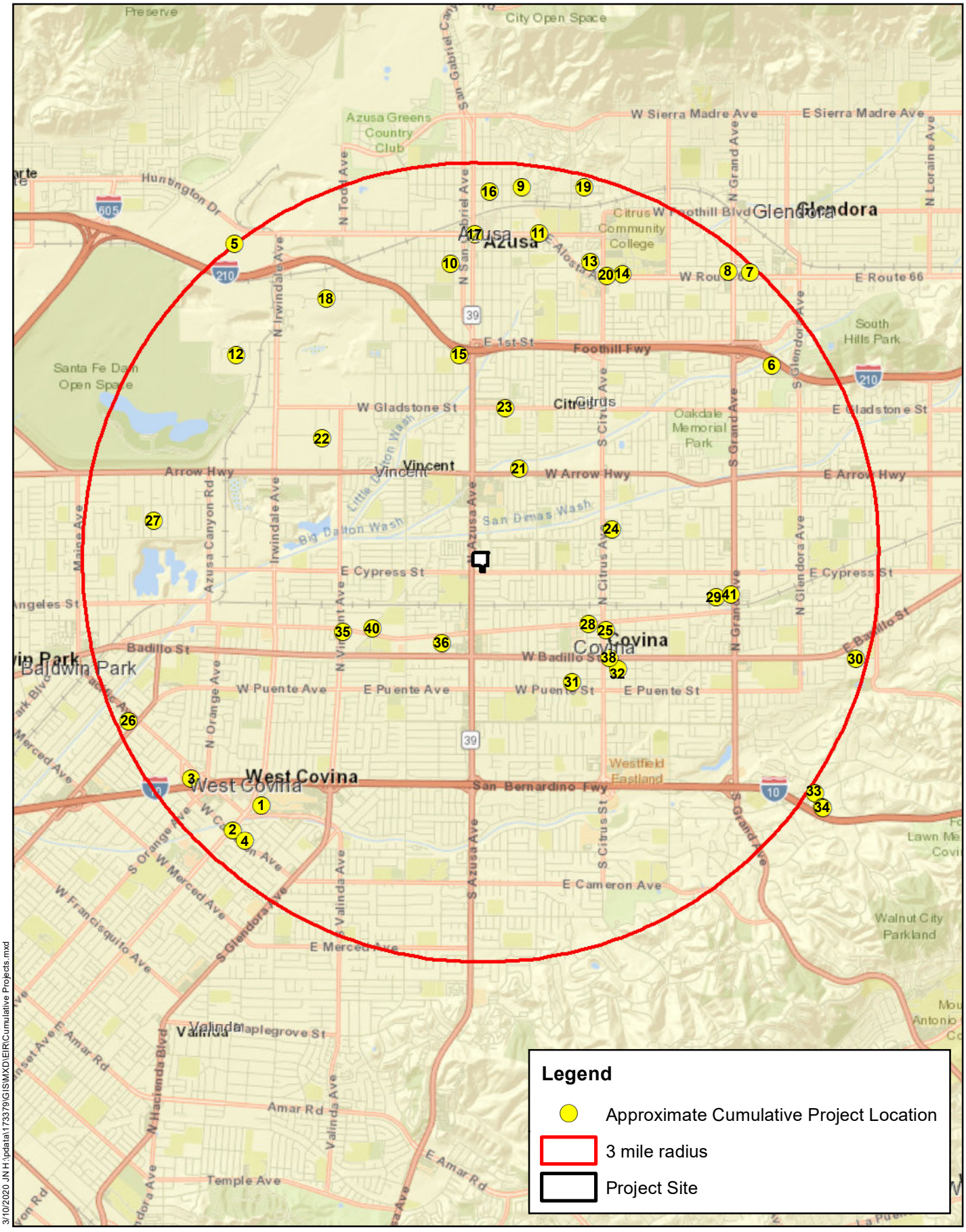
The following sections provide a cumulative impacts analysis for each of the impact topics addressed in this EIR. Each section begins with a definition of the geographic area of concern for the impact area, and a description of reasonably foreseeable projects within the geographic area of concern. The combined effects of these projects with those of the proposed project are assessed to determine whether those effects could be cumulatively significant. If so, the proposed project's incremental effects are examined to determine whether they could be cumulatively considerable and, if so, to identify measures to reduce or mitigate the project's incremental impact to less than cumulatively considerable.

4.2.1 AESTHETICS

Conclusion: Aesthetic impacts associated with the proposed project, when combined with past, present, and future projects, would not be cumulatively significant given the localized nature of aesthetic impacts, the distance between the proposed project and other identified projects, and the absence of any notable visual landmarks or scenic vistas on or in the vicinity of the project site.

Discussion

The project would transform the visual character of the previously developed project site through demolition of the former Albertson's grocery story building, parking, landscaping and lighting improvements, and replacement of those visual features with a mixture of low-rise and small-scale commercial buildings and a neighborhood of two- and three-story single-family homes, with related landscaping, walls and fences, and outdoor lighting fixtures. As discussed in Section 3.1 of this EIR, the project-level aesthetic impacts were determined to be less than significant.



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Michael Baker INTERNATIONAL

Source: TJW Engineering (2019), City of Covina (2020), ArcGIS Online

Cumulative Projects Map

Figure 4-1

None of the pending projects identified in ***Table 4-1*** and ***Figure 4-1*** are near enough to the project site to affect the same local aesthetic conditions and thus there would be no cumulative impact involving the project's changes to the visual character of the site and surroundings. The project site is not part of any recognized scenic vista and the former Albertson's building is not considered to be an important local visual landmark. The project would not, therefore, contribute to any impacts from other pending projects that might affect scenic vistas or scenic features that are enjoyed by the entire community. Further, aesthetic impacts associated with other pending projects that are located hundreds or thousands of feet away from the project site would not contribute to aesthetic impacts due to development of the proposed project. The project would have less than cumulatively considerable aesthetic impacts.

Mitigation Measures

No mitigation is required.

4.2.2 AIR QUALITY

Conclusion: The project's emissions of criteria air pollutants would be below all South Coast Air Quality Management District (SCAQMD) regional thresholds for the nonattainment pollutants, which are established for evaluating project-specific and cumulative impacts; therefore, the proposed project would not result in a cumulatively considerable contribution of these pollutant emissions.

Discussion

As discussed in Section 3.2 of this EIR, the project site is within the South Coast Air Basin (SCAB), which is designated as nonattainment for ozone, PM_{10}, and $PM_{2.5}$. Nonattainment means that the background levels of these pollutants are at times higher than the ambient air quality standards, which were set to protect public health, including the health of sensitive individuals (elderly, children, and the sick). Therefore, when the concentrations of those pollutants exceed the standard, it is likely that some sensitive individuals in the population would experience health effects. Cumulative impacts for air quality consider the effects of the project in combination with similar projects within the South Coast Air Basin boundaries; however, it is impractical to estimate the combined emissions of projects throughout the entire air basin given the large size of the area and the extensive number of projects that take place within it. Further, as described in Section 3.2 of this EIR, the SCAQMD established thresholds of significance for VOC and NOx (which are precursors to ozone), PM_{10}, and $PM_{2.5}$. These thresholds were established as indicators of a cumulatively considerable contribution to an existing or potential violation of health-based air quality standards and are the same as project-specific thresholds. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable; therefore, SCAQMD uses the same significance thresholds for project-specific and cumulative impacts. As discussed in Section 3.2 of this EIR, the project's emissions would be below all SCAQMD regional thresholds for the nonattainment pollutants; therefore, the proposed project would not result in a cumulatively considerable contribution of these pollutant emissions.

Further, the various pollution control strategies set forth in the regional Air Quality Management Plan are designed to reduce regional emissions of those pollutants over time, while ongoing regional growth occurs as forecast in the Southern California Association of Government's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). To the extent the SCAQMD's control strategies are

successful, regional growth can occur, including new land development projects, such as the proposed project, and eventually the region can achieve the District's key objective, which is attainment status for the four criteria pollutants that are currently in a nonattainment status.

Mitigation Measures

No mitigation is required.

4.2.3 GREENHOUSE GAS EMISSIONS

Conclusion: Greenhouse gas (GHG) emissions from the proposed project, combined with GHG emissions of all other pending development projects listed in ***Table 4-1***, would increase the levels of GHG emissions generated in the Covina area, but this is not expected to cumulatively have a significant impact on the environment due to required compliance with state and local regulations adopted for the purpose of reducing GHG emissions.

Discussion

GHG emissions accumulate in the atmosphere from sources around the globe; as concentrations increase, so do the adverse environment impacts associated with global climate change. Because the effects associated with GHG emissions and climate change occur on a global scale, all sources of GHG emissions, including the proposed project, have an incremental environmental impact. If all of the pending development projects identified in ***Table 4-1*** are implemented as proposed, there would be a substantial increase in the annual levels of GHG emissions generated in this area from both mobile and stationary sources, even with required compliance with state and local regulations related to GHG reductions on a case-by-case basis. While a single project may contribute GHG emissions to global GHG concentrations in the atmosphere, it is currently not possible to determine the significance of the project's individual contribution to the cumulative adverse environmental effects. The sheer magnitude of GHG emitting activities in the U.S. and in California suggests that the project's GHG emissions in addition to the GHG emissions from related projects in ***Table 4-1*** would represent a relatively very small proportion of nation- or statewide GHG emissions.

A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project.[1] The proposed project, and all of the other pending projects identified in ***Table 4-1***, would be required to comply with federal, state, and local regulations that aim to reduce the generation of GHG emissions, such as those regulations identified in Section 3.3 of this EIR, as well as required compliance with Title 24, Part 6 of the California Code of Regulations, CALGreen, and the energy efficiency/GHG reduction measures in the City's Energy Action Plan.

Further, as noted in Section 3.3.5 of this EIR, the project land use and design features were found to be consistent with the plans, policies, regulations, and GHG emissions reduction actions/strategies outlined in the statewide 2017 Scoping Plan and the 2016-2040 RTP/SCS. Since the project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of

[1] See 14 CCR Section 15064(h)(3), which is discussed further in Section 3.3 of this EIR.

GHGs, the project's incremental contribution to the cumulative impact of GHG emissions increases would not be cumulatively considerable.

Mitigation Measures

No mitigation is required.

4.2.4 NOISE

Conclusion: Noise impacts are primarily localized to any one project site and effects dissipate as the distance from the project site increases. As there are no other pending projects in the immediate vicinity of the project site, and since the time and intensity of construction activities are regulated by local regulations, there would not be a cumulatively significant impact involving short-term construction noise and vibrations. The cumulative impacts associated with long-term operation of the proposed project and related projects would lead to increased traffic on local roadways and a subsequent increase in traffic noise. While the combined impact of the proposed project and related projects would exceed the combined effect threshold of 3.0 dBA (the level at which people with a normal hearing capability can detect a noise level change) at one segment of Golden Valley Road, the proposed project's small incremental effect would not be cumulatively considerable.

Discussion

The cumulative impact analysis for noise considers the proposed project in combination with other development projects in the immediate vicinity. Noise and groundborne vibration impacts from construction activities and typical operational activities at a fully developed site are primarily localized to any one project site and effects dissipate rapidly as the distance from the project site increases. Therefore, only projects in the immediate vicinity of the project site could combine with the proposed project to result in cumulative significant noise impacts. The nearest other pending project (#36 as shown on ***Figure 4-1***) is located approximately 0.7 miles from the project site and there are numerous intervening land uses and streets between the sites; therefore, it is both too far away and separated by numerous structures and roadway noise sources to generate construction or operational noise or ground vibrations that would combine with the localized noise and ground vibrations generated by the proposed project.

As discussed further in **Section 3.4** of this EIR, no unique or exceptionally loud construction machinery is proposed to construct the proposed project improvements, and all work would be conducted during those days and hours specified the City's Municipal Code. Further, Mitigation Measure **MM 3.4-1** identifies noise reduction measures to be implemented during project construction, including restricted hours for noise-generating construction activities on the project site; equipping construction machinery (fixed or mobile) with mufflers; and staging construction equipment in areas that would create the greatest distance between the equipment and nearby, noise-sensitive receivers.

The fully built and operational project site would generate additional noise sources that do not occur in the existing vacant site condition. However, as discussed in Section 3.4 of this EIR, neither the proposed residential neighborhood nor the proposed commercial uses would result in a significant increase in local ambient noise levels. Again, given the considerable distances between the project site and pending projects identified in ***Table 4-1***, there would be little or no combined operational noise impacts involving on-site activities. As discussed in Section 3.4, the project's traffic would incrementally affect local roadway

noise levels, primarily along the adjacent segments of Azusa Avenue and Cypress Street. Because the project's added traffic volume represents a minor percentage of the total daily traffic on both streets, it would not affect roadway noise levels in a perceptible way. As such, there would be a less than cumulatively considerable effect involving both daily activities for the proposed land uses and project-related roadway noise.

Mitigation Measures

No mitigation is required.

4.2.5 POPULATION AND HOUSING

Conclusion: The proposed project would have no effect on any existing housing units and would not, therefore, contribute to any cumulative impacts involving removal of existing housing units or displacement of households. The project would directly increase the City's housing stock and residential population and would generate part-time and full-time jobs that do not presently occur on-site. This would add to cumulative residential and employment growth in the Covina area resulting from implementation of other pending development projects. No significant impacts have been identified regarding the modest employment growth from this project. The new homes, however, represent unplanned residential growth and would exacerbate cumulative impacts involving a worsening of the current city-wide deficit in public parkland. This would be a significant and unavoidable cumulative impact.

Discussion

Since there are no households or any housing units located on the project site, there would be no contribution to any cumulative effects involving loss of housing or displacement of households. As discussed in Section 3.5, the project would not result in significant growth-inducing impacts as a result of the unplanned residential land uses or construction of infrastructure that would be sized and located to serve only the proposed project. The project's proposed 61 new single-family homes would result in a direct increase in the City's residential population of approximately 183, based on an average household size of three persons. Combined with other pending residential projects in the City of Covina, the total number of new housing units in Covina would increase by 249 units, and the total residential population would increase by 747 persons (excluding senior and assisted living facilities). This total exceeds the forecast citywide growth between 2020 and 2025 by 147 persons and 49 housing units. As noted in Table 3.5.4 of this EIR, the project's proposed housing units would represent just over 30 percent of the total forecast citywide residential growth for 2020-2025. The project's estimated 86 jobs, primarily consisting of part-time employees filling positions in fast food restaurants and retail shops, would add to employment increases from other pending nonresidential projects listed in ***Table 4-1***. This represents 18 percent of the total citywide increase in jobs forecast for the 2020-2025 period. The combined growth resulting from the proposed project and other pending projects would result in increased demand for local public services and utilities, and generate additional traffic, noise, air pollutants, and greenhouse gas emissions. As discussed under those topics herein, no significant cumulative impacts have been identified as a result of this combined growth, except with respect to public parkland. The project's unplanned residential growth would contribute to a worsening of the city-wide deficit of public parkland. There are currently no feasible measures to mitigate this impact. As such, the project's population and housing impacts would be less than cumulatively considerable, and this is considered to be a significant and unavoidable cumulative impact.

Mitigation Measures

No mitigation is required.

4.2.6 PUBLIC SERVICES

Conclusion: There are adequate public school facilities to accommodate the demands of the proposed project and other pending projects, without reducing the level of service to existing neighborhoods and communities to the extent that construction of additional facilities would be needed. With a significant existing deficiency on the inventory of local parkland, the project's residential growth, together with other pending residential development, would further exacerbate this deficiency and there would be a significant cumulative impact involving the City's parkland resources.

Discussion

Schools

As stated in Section 3.6.1.1 of this EIR, the Covina-Valley Unified School District (CVUSD) provides public education services and facilities to students in elementary, middle, and high school age groups. The three campuses that serve the project area are Cypress Elementary School, Las Palmas Middle School, and Northview High School. As discussed in Section 3.6.1.1, all of these schools have available capacity for additional students. A review of the other pending residential projects listed in ***Table 4-1*** indicates there are nine other projects located within the CVUSD, totaling 387 dwelling units, that could generate a total of 271 additional students of various grade levels.[2] This total, added to the project's estimated total of 43 students, equals 314 total additional students that could live in the new homes of all pending residential projects located within the CVUSD. This total would be distributed in some percentage among elementary, middle, and high schools and it is not possible to accurately estimate how many might attend Cypress Elementary School, Las Palmas Middle School, and Northview High School campuses. The number for each school would certainly be less than 314, and since each school currently has available capacity for at least 444 more students, there would be a less than significant cumulative impact on school facilities resulting from the combined residential growth of the proposed project and other pending residential projects.

As discussed in Section 3.6.1.5 of this EIR, California Education Code Section 17620 and Government Code Section 65995 state that school districts are authorized to collect fees for mitigation of the impact of new development on enrollment and that these fees are sufficient to offset project impacts on school resources. Therefore, required payment of the amounts specified in these regulations by projects located within the CVUSD would sufficiently mitigate the cumulative impact of these projects on the capacities of local school facilities to a less than significant level.

[2] As noted in Section 3.6, statistics compiled from school district data across the state by the California Department of General Services indicate an overall average of 0.7 students per household.

Parks

As discussed in Section 3.6.2.5, the proposed project would result in the addition of approximately 183 new residents that would use the parks and recreation facilities owned and maintained by the City. The City currently provides approximately 1.29 acres of local parkland per 1,000 residents, which is below the City's General Plan goal of 2 acres per 1,000 residents. The addition of proposed project residents would decrease the citywide ratio of park acres by 0.9 percent and increase the total acreage deficit from 34.8 to 35.1 acres.

The other pending residential projects in the City of Covina, listed in ***Table 4-1***, would generate a total population of 749 residents, which translates to a parkland demand of 1.49 acres, based on the City's General Plan target of 2 acres per 1,000 residents. This total, added to the project's demand, would increase the existing local parkland deficiency to 36.6 acres. As noted in Section 3.6.2.5 of this EIR, the project and the other residential projects would be required to dedicate land for parkland purposes, or to pay in-lieu parkland dedication fees, which would partially offset project impacts on the supply of neighborhood and community parks in the city. The total amount of parkland dedication associated with all of the pending residential projects would be well below 36.6 acres, and it is likely that few, if any, of these projects would actually dedicate land, but would instead pay an in-lieu fee toward acquisition of additional parkland. At this time, there is no program identified that would result in acquisition and improvement of sufficient acres of additional local parkland to alleviate the existing or future citywide deficiency. Therefore, the project would contribute to significant cumulative impacts involving the citywide inventory of public parkland. Because the project's individual in-lieu fee contribution would not result in a meaningful reduction in the existing parkland deficiency, the project's impact would be cumulatively considerable. This impact is considered to be significant and unavoidable.

Mitigation Measures

No feasible mitigation has been identified.

4.2.7 TRANSPORTATION AND TRAFFIC

Conclusion: Traffic generated by the proposed project, together with traffic forecast from other pending projects and ambient growth conditions, would not result in significant congestion impacts at any of the 10 intersections analyzed in the Traffic Impact Analysis prepared for this EIR. Since the project site is located in a Low-VMT Commercial Area and the proposed residential component would have a low-VMT profile that exceeds the City's target for 15% reduction below the baseline condition, the project would not have cumulatively considerable VMT impacts. No mitigation measures would be required for project-level or cumulative transportation/traffic impacts.

Discussion

The Traffic Impact Analysis (TIA) prepared for this EIR evaluated cumulative impacts involving traffic congestion at 14 intersections adjacent to and in the vicinity of the project site. This is referred to as the "*project opening year with project*" scenario. This assessment accounted for trips that would be generated by 27 other pending projects (projects 1-27 shown in ***Table 4-1*** and on ***Figure 4-1***) that would distribute traffic to the same intersections affected by the proposed project. This list of projects was developed specifically for the TIA, based on a review of development applications on file with the Cities of Covina,

West Covina, Irwindale, Baldwin Park, Azusa, and Glendora. This assessment also included a 1 percent annual growth factor for other general growth that might occur between 2018 and 2023. The 1 percent factor is higher than the 0.82 percent factor identified for the Covina area in the 2010 Los Angeles County Congestion Management Plan and may be considered somewhat conservative. Year 2018 represents baseline traffic conditions and Year 2023 represents approximate full buildout year of the project, for purposes of the TIA.

The lane configurations and traffic controls assumed to be in place for the *project opening year with project* scenario are consistent with existing conditions, with the exception of project access locations expected to be constructed as part of the proposed project. *Project opening year with project* volumes include project opening year without project volumes plus the addition of the traffic projected to be generated by the proposed project plus the addition of trips associated with the existing restaurant on the site (Manny's El Loco), which uses the same driveways. This 4,800-square-foot restaurant was assumed to be a high-turnover sit-down restaurant and to have the same trip distribution around the site as the proposed project.

Cumulative level of service impacts were evaluated with respect to the following significance criteria:

- A significant traffic impact occurs at a signalized study intersection (outside of the CMP network) when a proposed project increases traffic demand by 1 percent or more of capacity (V/C increase > 0.010), causing or worsening LOS E or F.
- For CMP intersections (Azusa Avenue at Arrow Highway), a significant impact occurs if the project increases traffic demand by 1 percent or more (V/C increase > 0.010), involving a worsening of intersection performance from LOS E to LOS F.

Project opening year with project conditions AM and PM peak hour intersection analysis results are shown in ***Table 4-2***. Intersection capacity utilization and Highway Capacity Manual analysis sheets are contained in Appendix C of the TIA; the TIA is provided as Appendix F of this EIR.

TABLE 4-2
CUMULATIVE TRAFFIC LEVEL OF SERVICE IMPACTS

Intersection Number	Intersection Location	Project Opening Year-Without Project		Project Opening Year-With Project		Significant Impact?
		ICU-LOS		ICU-LOS		
		AM	PM	AM	PM	
1	Vincent Ave/Cypress St	0.770 – C	0.792 – C	0.773 – C	0.803 – D	No
2	Lark Ellen Ave/Cypress St	0.694 – B	0.771 – C	0.706 – C	0.784 – C	No
3	Azusa Ave/Gladstone St	0.776 – C	0.857 – D	0.782 – C	0.865 – D	No
4	Azusa Ave/Arrow Hwy	0.849 – D	0.902 – E	0.856 – D	0.915 – E	No
5	Azusa Ave/Covina Blvd	0.523 – A	0.573 – A	0.538 – A	0.584 – A	No
6	Azusa Ave/Cypress St	0.824 – D	0.835 – D	0.854 – D	0.851 – D	No
7	Azusa Ave/San Bernardino Rd	0.711 – C	0.753 – C	0.722 – C	0.762 – C	No
8	Azusa Ave/Badillo St	0.835 – D	0.831 – D	0.840 – D	0.832 – D	No
9	Hollenbeck Ave/Cypress St	0.706 – C	0.677 – B	0.712 – C	0.682 – B	No

Intersection Number	Intersection Location	Project Opening Year-Without Project		Project Opening Year-With Project		Significant Impact?
		ICU-LOS		ICU-LOS		
		AM	PM	AM	PM	
10	Citrus Ave/Cypress St	0.478 – A	0.512 – A	0.485 – A	0.515 – A	No
11	Residential Full Access Driveway/Cypress St	Project Driveways Analyzed for With Project Conditions Only		(19.6) – C	(14.1) – B	No
12	Azusa Ave/North Access Driveway			(11.2) – B	(13.1) – B	No
13	Azusa Ave/South Access Driveway			(11.7) – B	(14.0) – B	No
14	Commercial Driveway/Cypress Street			(30.4) – D	(19.5) – C	No

Source: TJW Engineering, July 2020

As shown in ***Table 4-2***, the intersections are projected to continue to operate at an acceptable LOS (LOS D or better) overall during the AM and PM peak hours for *project opening year with project* conditions. Based on the thresholds of significance identified above, the addition of project-generated trips is not projected to have a significant cumulative impact at any of the study intersections.

According to the TIA, based on factors identified in the Los Angeles County Congestion Management Plan, the project could generate up to 150 daily transit (bus) trips, with 11 in both the AM and PM peak hours. This is expected to have a beneficial effect on the Foothill Transit services, which have been experiencing a decline in ridership. To the extent that other pending projects also generate transit trips, there would be a beneficial cumulative impact for Foothill Transit services. No environmental impacts are anticipated with respect to transit services.

Vehicle Miles Traveled

As discussed in Section 3.7, the project site is located in a Low-VMT Commercial Area. Further, the residential component has a low-VMT profile that represents a substantial improvement (estimated at approximately 32%) over the baseline residential conditions for the Southeast Subarea of the San Gabriel Valley Council of Governments regional VMT model area. As such, the project would not result in a cumulatively considerable impact to the VMT profile of this area.

Mitigation Measures

No mitigation measures are required.

4.2.8 TRIBAL CULTURAL RESOURCES

Conclusion: The proposed project would not result in significant cumulative impacts to tribal cultural resources.

Discussion

If project-related excavations should encounter potential tribal cultural resources, that would not affect any resources that might be located outside of the project site on any of the sites listed in Table 4.1. In any event, with tribal monitoring of excavations as required by Mitigation Measure 3.8-1, potential

damage to or destruction of such resources would be avoided. Therefore, the project would not result in cumulatively considerable impacts to tribal cultural resources.

4.2.9 UTILITIES AND SERVICE SYSTEMS

Conclusion: The proposed project would not require construction or expansion of a utility system, because the sewer system (Cypress Street Trunk Sewer and Joint Outfall System), stormwater drainage system (LACFCD and the City of Covina), water supply system (Azusa Light and Water Department), and dry utility system (Southern California Edison, Southern California Gas Company, and telecommunications systems) have adequate capacity to serve the project. While the project would contribute to increases for utility infrastructure due to general areawide growth, including other pending projects identified in **Table 4.1**, these systems would likely also have adequate capacity to serve pending future projects within their service areas, which would be confirmed through City- and utility provider-managed design review processes and through collection of impact fees, if necessary. If a proposed project is inconsistent with City or utility provider planning documents, then an analysis of the utility demand compared to the demand of what would be allowed under existing planning documents would be required, and if the projected utility demand would substantially exceed what would normally occur, mitigation measures or a project alternative could be imposed to reduce or offset that additional demand impact. No significant project-level impacts have been identified for any utilities and the project's incremental impact would be less than cumulatively considerable. Therefore, cumulative impacts associated from the combined effects of the proposed project and other pending projects on utilities would be less than significant.

Discussion

Water Supply and Infrastructure

As stated in Section 3.8.1 of this EIR, water supply for the project site and surroundings within a 14.2-square-mile service area is provided by Azusa Light and Water (ALW). ALW's 2015 Urban Water Management Plan (UWMP) forecasts sufficient water supplies during normal and dry periods to meet the demands of the entire service area, through year 2040. The project's water demand would be lower than the potential demand that could result from an all-commercial development plan, which was contemplated in the UWMP. If a proposed project is inconsistent with the City's land use policies or land use assumptions in the UWMP, then an analysis of the water demand compared to the demand of what would be allowed under the adopted land use policies would be required, and if the projected water demand would substantially exceed what would normally occur, mitigation measures or a project alternative could be imposed to reduce or offset that additional water demand impact. Each individual project's interior and exterior water systems must comply with the City's water conservation standards, as set forth in the Municipal Code and administered through the City's building permit process. ALW is obligated to update the UWMP on five-year planning cycles, to update growth forecasts and address new water supply and delivery challenges that occur over time. Through this existing planning process, cumulative impacts throughout the entire service area are addressed in a comprehensive manner. All new development projects must be examined with respect to conformance with the UWMP, as part of each Lead Agency CEQA review process. As such, the existing planning programs for ALW and the local lead agencies within its service area provide adequate assurances and verifications to avoid significant cumulative impacts on water supplies and infrastructure.

Wastewater Treatment and Infrastructure

As discussed in Section 3.8.2 of this EIR, the project's wastewater would be conveyed into the Sanitation Districts of Los Angeles County (SDLAC) wastewater collection and treatment system, which services a large territory throughout Los Angeles County. As noted in Section 3.8.2.5, the Cypress Street trunk sewer has substantial remaining capacity to handle the project's wastewater flows and continued increases in flows from other development sites. There is also substantial remaining capacity in the San Jose Wastewater Reclamation Plant, which would receive the wastewater discharged from the project site. SDLAC regularly monitors flows throughout the wastewater collection and treatment system to document current conditions and implements an ongoing development review program to help plan for incremental expansions to the system capacity, when needed. In comments regarding the proposed project, SDLAC did not identify any projected impacts involving construction of new or replacement of existing wastewater collection or treatment facilities. Every new development project must pay a connection fee to SDLAC, to help pay for incremental upgrades to the wastewater conveyance and treatment systems. This ongoing program is considered adequate to address potential cumulative impacts due to regional growth and increasing volumes of wastewater discharged into the SDLAC system. As such, cumulative impacts involving wastewater treatment and infrastructure would be less than significant.

Stormwater Drainage

Given the considerable distances between the project site and other pending projects listed in ***Table 4-1*** and shown on ***Figure 4-1***, there would be no cumulative impact on the same local municipal storm drain facilities that would receive runoff from the project site. There may be some cumulative effect on larger, areawide and regional drainage and flood control facilities; however, like the proposed project, other pending projects that would discharge to Los Angeles County drainage facilities would be required to adhere to the limits on flow rates so that site runoff does not exceed the available capacity of the affected facilities. All new development projects in Los Angeles County must design storm drainage systems that comply with the low-impact development standards that are implemented countywide and verified through local building permit review. The project would not contribute to adverse cumulative impacts involving municipal storm drainage facilities.

Dry Utilities

The project's demand for electricity, natural gas, and telecommunications services would combine with additional demands generated by all other pending projects listed in ***Table 4-1***, and throughout the respective service areas of each utility purveyor. As discussed in Section 3.8.4.5, the project's dry utilities demands can be met through localized connections to existing infrastructure facilities and impacts associated with those connections would be less than significant. Given the distances between the project site and the other pending projects, it is unlikely than any of the same localized service connections would be affected.

Over time, Southern California Edison, Southern California Gas Company, and the telecommunications purveyors may determine that upgrades, replacements, or expansions to regional infrastructure are required to meet growing demand, including the demand from the proposed project. Should any of the affected utility purveyors determine that upgrades to existing infrastructure are necessary to meet the cumulative demand increases in their service areas, such off-site upgrade projects would be undertaken by those purveyors and would be subject to environmental review pursuant to CEQA. Attempting to

estimate what environmental impacts may result from such utility infrastructure improvements without knowledge of when and where the improvements would take place would be speculative. Construction associated with service connections to existing utility infrastructure could result in air quality (dust), noise, and/or traffic and circulation impacts, which would be addressed through project-specific control measures.

Cumulative impacts involving dry utilities are anticipated to be less than significant.

Mitigation Measures

No mitigation is required.

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5. ALTERNATIVES

5. ALTERNATIVES

5.1 PURPOSE AND SCOPE

Section 15126.6 of the CEQA Guidelines requires an evaluation of a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the proposed project but would avoid or substantially lessen any of the significant effects of the project. This evaluation shall include an assessment of the comparative merits of the alternatives. Infeasible alternatives need not be considered.

In line with the primary purpose of an EIR, which is to examine the environmental consequences of a proposed project and to identify ways to mitigate or avoid the significant effects of that project, the discussion in this chapter is focused on project alternatives that are capable of avoiding or substantially lessening any significant effects of the proposed project, even if the alternatives would impede, to some degree, the attainment of the project objectives or would be more costly. The project's objectives were identified in Chapter 2, Project Description, and are repeated below:

a) Revitalize and redevelop a non-performing property with land uses that respond to current market opportunities and expand the City's tax base.

b) Respond effectively to changing economic conditions indicating a declining demand for larger retail buildings.

c) Provide new, single-family ownership housing next to existing residential uses.

d) Provide small-scale commercial spaces along the Azusa Avenue frontage that are designed to take advantage of significant pass-by traffic volumes.

e) Create an attractive development site that integrates comfortably with adjacent land uses.

f) Establish new zoning standards to accommodate innovate single-family housing designed for urban infill settings.

5.2 SUMMARY OF POTENTIALLY SIGNIFICANT PROJECT IMPACTS

Environmental impacts that could occur as a result of building the proposed project are examined throughout Chapter 3 of this EIR. The analyses presented in the various topics in Chapter 3 determined that the proposed project would result in less than significant impacts for all topics except for Public Services. In Section 3.6, it was determined that the project's residential population would worsen an existing citywide deficit of public parkland and that payment of required parkland dedication fees would not sufficiently offset the project's impacts. This is considered to be a significant and unavoidable impact, both at the project level and with respect to cumulative impacts. Mitigation measures are recommended to address potential adverse effects of outdoor lighting and to reduce noise during project construction activities.

5.3 ALTERNATIVES CONSIDERED AND REJECTED

ALL RESIDENTIAL LAND USE

An alternative development plan that consists solely of new homes, which could be all for-sale units, all for-rent units, or some mixture of the two and in a variety of building configurations, is considered to be

inappropriate for the project site, based on the City's General Plan land use policies that currently designate the project site for commercial uses, as well as other policies that express objectives to retain existing commercial sites to help maintain the City's economic base, which is supported by businesses that generate sales and other taxes, as well as jobs. Furthermore, any alternative that includes more than the proposed number of homes or more than the estimated residential population of 183 persons would increase the level of significant impact to the existing citywide deficit of public parkland. There is currently no program in place that provides a mechanism to cure the parkland deficit while allowing for more residential growth, and especially unplanned residential growth. Accordingly, an all-residential land use alternative is considered to be in serious conflict with the City's land use planning policies and objectives and will not be evaluated in this chapter.

INDUSTRIAL LAND USES

The project site is located along Azusa Avenue, a designated truck route, and is large enough and of a useful shape to support some sort of industrial land use, which could vary considerably within a general classification of light industrial, and still maintain some sensitivity to neighboring residential land uses. There could be a single business in one building, or a variety of tenants occupying space in several buildings. Some businesses might rely extensively on trucks for delivery of raw materials for further assembly and crafting, or simply for temporary storage, and transport of finished products to customers. Others may have little need for large trucks and would be engaged in activities that require a small work force and machinery for assembly, light manufacturing, repair, etc., but do not engage in much shipping. Based on the project objectives and the City's land use policies that govern the project site, however, an industrial use would not represent an appropriate alternative land use. An industrial use would be inconsistent with the City's General Plan land use designation and zoning regulations and could be incompatible with neighboring residential and commercial uses, depending on the specific characteristics and design of such a project. An industrial use would also be inconsistent with the commercial character of this Azusa Avenue commercial corridor and would not support the City's economic base to the same extent as retail uses, for example, which provide sales tax revenues for the City's general fund. Based on all of these considerations, an industrial land use alternative will not be evaluated in this chapter.

ALTERNATIVE LOCATIONS

An alternative location to build the proposed project could be considered, if there were a physically suitable site that could support the same basic development plan while avoiding or substantially lessening the significant impacts of the proposed project. As noted earlier, the analyses provided in Chapter 3 of this EIR determined that the project would have two impacts warranting mitigation measures, i.e., potential nuisance effects from outdoor lighting fixtures mounted on second or third levels of the proposed homes, and temporary construction noise. A significant unavoidable impact would occur due to construction of the proposed 61 homes, because it would create an unplanned population growth that would worsen the City's existing deficit of public parkland. Development of the proposed project at any other site in Covina, whether or not it would require a similar general plan amendment and rezoning, would also exacerbate the public parkland deficit. The same outdoor lighting controls and construction noise controls identified for this project would have the same level of effectiveness at an alternative site. Developing this project at an alternative site in Covina, therefore, would not avoid the significant and unavoidable impact involving the City's deficit of public parkland.

The project applicant owns or has written permission to act on behalf of the property owners for properties within the project site, but no other properties in the City of Covina. The applicant has proposed a development plan that would achieve the objectives identified earlier, in Section 5.1, which pertain solely to development objectives for this site. The proposed development plan is designed to support the specific types of commercial and single-family residential land uses shown in this plan and to respond to the applicant's understanding of the current real estate market in the Covina area.

Since an alternative site in the City of Covina would not avoid the significant impact to public parkland resources and since the project applicant does not own or control another suitable site in this area, further consideration of an alternative site is not warranted.

5.4 ALTERNATIVES SELECTED FOR EVALUATION

ALTERNATIVE 1: NO-PROJECT/NO BUILD

A "No-Project" Alternative is identified in Section 15126.6(e) of the CEQA Guidelines as a scenario that must be considered in an EIR, as a way of comparing the consequences of building the proposed project versus not building the project. If the project under consideration involves a change in a land use or regulatory plan, then the No-Project alternative consists of maintaining the existing plan into the future and anticipated projects that could be or are likely to be built under the existing plan. The proposed project does not involve comprehensive changes to any land use or regulatory plan; rather, it involves limited changes in the City's General Plan land use map and zone district classification that would only pertain to the project site. If the project is a site-specific development project, the No-Project alternative is the circumstance under which the project does not proceed. In some cases, this means no changes in the existing conditions of the project site, i.e., a "No-Build" scenario, which would avoid all of the environmental impacts associated with the proposed project. If a No-Build scenario is unlikely, given the project setting and economic factors, the No-Project alternative would consist of a more practical scenario where the site is redeveloped in some other fashion that responds to the locational attributes, existing land use regulations, and economic factors. Two potential scenarios that could represent this scenario are identified as Alternatives 2 and 3. It is considered unlikely that the project site would remain in its current vacant condition on a desirable site along a major commercial corridor, in a fully urbanized area supported by a well-developed transportation network and all major utility infrastructure in place. If that were to occur, further deterioration of the site is anticipated, along with an increased potential for vandalism and vagrancy.

ALTERNATIVE 2: RETAIN EXISTING BUILDING FOR RETAIL TENANT(S)

In this alternative, the former Albertsons grocery store structure would be retained and refurbished to specifications for one or more retail tenants permitted in the City's C-4 Zone that would operate seven days a week, from mornings to mid-evening. This would require extensive interior modifications and would also likely include exterior changes such as different paint, signage, and possibly the addition of windows and other architectural accents. All building modifications would be required to comply with current building code standards, including those pertaining to energy efficiency, water conservation, lighting, etc. The existing parking lot area may or may not be rebuilt with a different pattern and/or number of parking spaces and drive aisles, new landscaping in the same or different planter areas, the same or different parking lot light fixtures, etc. The existing water and sewer connections would likely be sufficient and would not require replacement or upgrading. Since regulations governing stormwater

discharge have been significantly strengthened since the Albertsons store was constructed in 1990, this alternative would include removal and replacement of the on-site storm drainage system to comply with current regulations requiring a low-impact design for water quality control and retention of stormwater so as to limit discharges to the capacity of the outlying municipal storm drainage system. For the purpose of analysis, it is assumed that all existing drive approaches providing ingress/egress for the site would be retained to support the new retail tenant(s).

ALTERNATIVE 3: MIXED COMMERCIAL

The City's C-4 Zone standards permit a wide range of commercial uses, including many types of retail establishments, offices (not to exceed a total of 10,000 square feet), dining and fast food services, motels, indoor recreation such as bowling alleys and skating rinks, banks, laboratories, automotive repair, lumber yards, etc. Other potential uses are allowed, subject to approval of a conditional use permit, including auditoriums, automobile service stations, batting cages, billiard parlors, body and fender shops, liquor stores, massage establishments, car washes, towing services, and vocational schools.

For purposes of analysis, this alternative is defined to include a mixture of permitted commercial uses that would not require approval of a conditional use permit, and more specifically, consisting of retail, fast food/drive through restaurants, and 10,000 square feet of professional office space (for dental, medical, or other professional services). Except for the office spaces, all businesses would operate seven days a week, from mornings to mid- or late evening (drive-through restaurants). The total building area would increase from the existing 81,833 square feet to approximately 100,000 square feet. The former Albertsons store building would be retained and refurbished to support a variety of tenants. Additional one- and/or two-story buildings would be built closer to Azusa Avenue and/or adjacent to the existing building, to house the fast food/drive through restaurants and professional offices. Any additional building space adjacent to the existing building would be constructed on the southern side and maintain the same setback distance from the eastern boundary. All modifications to the existing building and all new building space would be designed and built to comply with currently adopted building code standards, including those pertaining to energy efficiency, water conservation, lighting, etc. The existing parking spaces and drive aisles would be modified to accommodate the new mix of businesses and to provide circulation for the fast food/drive-through restaurants that would not interfere with other parking areas or result in queuing onto Azusa Avenue. New signage, landscaping, and outdoor lighting fixtures would be provided. Existing water and sewer connections may require replacement to handle higher loads. The existing storm drainage system would be replaced with a new one, designed to comply with current, more stringent standards regarding water quality control features and on-site retention so as to limit discharges to the outlying municipal storm drain system. For the purpose of analysis, it is assumed that all existing drive approaches providing ingress/egress for the site would be retained to support the new retail and commercial tenants.

5.5 COMPARATIVE ASSESSMENT OF IMPACTS

The following assessment compares the impacts identified for the proposed project with the impacts of the three alternatives defined above, for all impact topics examined in Chapter 3 and with respect to cumulative impacts, as discussed in Chapter 4. This provides a comprehensive comparative assessment and recognizes that there can be benefits or disadvantages concerning impact topics, even if it doesn't involve a significant impact, per se.

Aesthetics

Alternative 1 would result in no changes to the existing aesthetics conditions of the project site and surroundings.

As discussed in Section 3.1 of this EIR, no significant impacts were identified for the proposed project, with respect to changes in the visual character and quality of the site and surroundings. This discussion, therefore, is intended to identify and contrast the visual qualities of the proposed project and the two build alternatives, with each other and with respect to existing conditions.

In Alternative 2, there would be relatively minor changes in the visual character of the site, compared to existing conditions, since the existing structure would remain in place, there would be no other structures built, and the large parking field facing Azusa Avenue would continue to dominate the foreground views of the project site. This alternative would have less overall building intensity, compared to the proposed project that adds 61 two- and three-story homes to the eastern side of the site, and would have more open area (wider building setbacks) next to the adjacent homes to the north and east, compared to the proposed project. There might be more total landscaping or a similar amount than in the current conditions; however, the landscaping would be new and likely be better maintained as part of an active commercial center, compared to the current unmaintained character. Alternative 2 would eliminate all of the outdoor lighting associated with the residential component of the proposed project; therefore, night lighting levels near the Los Angeles County Fire Station and the existing homes to the east and north would likely be lower than with the proposed project. Lighting in the parking lot facing Azusa Avenue and at the building would be more apparent than with the current vacant conditions, but would consist of parking area and building-mounted lighting that is typical of other commercial sites along Azusa Avenue and which would likely be similar to the lighting that would be provided on the commercial side of the proposed project. The visual impact would be similar to that of the proposed project as viewed from Azusa Avenue and less than significant.

In Alternative 3, there would be a higher level of building intensity across the site compared to Alternative 2, but less compared to the proposed project, which adds 61 two- and three-story homes to the eastern side of the site. Alternative3 would maintain the same building setback distances as Alternative 2 along the eastern and northern boundaries and thus would have larger setbacks than the proposed project along those edges, which abut residential land uses. New, small-scale buildings for fast food/drive-through restaurants could be built along the Azusa Avenue frontage, which would present a different image of the site compared to the parking lot-dominated view associated with Alternative 2, and a similar image to what would occur with the proposed project, which also sites low-rise buildings along the Azusa Avenue frontage. New and possibly additional landscaping would be provided in Alternative 3, compared to the existing conditions, and the landscaping would likely be similar in coverage and application as would occur with Alternative 2. It is likely that this new landscaping would be better maintained as part of an active commercial center, compared to the current unmaintained character. Alternative 3 would also eliminate all of the outdoor lighting associated with the residential component of the proposed project; therefore, night lighting levels near the Los Angeles County Fire Station and the existing homes to the east and north would likely be lower than with the proposed project. Lighting associated with the parking lot and building areas would be similar to what would occur with Alternative 2 and in the commercial part of the proposed project; therefore, the visual impact would also be similar and less than significant.

Air Quality

Alternative 1 would result in no changes to the vacant site conditions and thus no air quality impacts.

As discussed in Section 3.2 of this EIR, no significant air quality impacts were identified for the proposed project, with respect to generation of criteria air pollutants or odors during construction or over the operating life of the project. The following analysis, therefore, is intended to identify and contrast the air pollution characteristics of the proposed project and the two build alternatives.

Alternative 2 would result in fewer air quality impacts than the proposed project during construction because of a less intensive construction program. Alternative 2 would have less demolition work due to retention of the existing structure and also less work involving replacement of water and sewer lines. The entire parking area would likely be removed and replaced to facilitate replacement of the surface drainage system to meet current, more stringent standards. Grading and related dust and exhaust emissions to remove existing site improvements and establish new building pads and drainage patterns would be less extensive for Alternative 2 or 3, compared to the proposed project, which would require complete clearance of all existing site improvements and grading of the entire site for construction of buildings and new utility systems. While there would be a considerable amount of interior construction to refurbish the existing building for Alternative 2 or 3, this would result in less atmospheric emissions compared to the emissions associated with the proposed project's more extensive demolition and new building construction activities. Alternative 3 would also result in lower construction period emissions than the proposed project due to retention of the existing structure but would have higher emissions than Alternative 2 due to construction of new building spaces and possibly replacement of existing water and sewer lines. Alternative 3 would also likely generate particulate matter and exhaust emissions associated with removal and replacement of the parking areas, due to replacement of the storm drainage system to meet today's more stringent standards. Alternatives 2 and 3 would generate much higher traffic volumes than the proposed project because of the more intensive daily and peak hour trip generation characteristics of retail, office, and fast food businesses, compared to single-family homes, which would comprise the majority of the proposed project. Accordingly, vehicular emissions of criteria pollutants would be higher for both Alternatives 2 and 3 than for the proposed project, including emissions from passenger cars and various size trucks. Indirect air pollutant emissions associated with off-site generation of electricity could be comparable or vary between Alternatives 2 and 3 and the proposed project, depending on the total energy loads for each of these land use scenarios. Neither of the alternatives nor the proposed project would include any stationary sources of air pollution for daily operations that would require some form of permitting to prevent air quality impacts.

Greenhouse Gas Emissions

Alternative 1 would result in no changes to the vacant site conditions and thus impacts involving greenhouse gas emissions.

As discussed in Section 3.3 of this EIR, no significant greenhouse gas emissions (GHG) impacts were identified for the proposed project. The following analysis, therefore, is intended to identify and contrast the GHG emissions characteristics of the proposed project and the two build alternatives.

The largest source of GHGs that would be generated by Alternatives 2 and 3 or the proposed project would be from the automotive traffic exhausts associated with the fully operational land uses. Since Alternatives

2 and 3 would consist solely of commercial uses, they would generate a higher level of traffic than the proposed project and thus higher levels of automotive sources of GHG, compared to the proposed project. The second largest source of GHGs would be associated with energy consumption and the GHGs generated at remote power generation facilities that burn fossil fuels in the energy generation process. The amount of energy consumption and the allocation of such consumption between electricity and natural gas could vary considerably between the alternatives and the proposed project, depending upon the specific energy loads involved. This analysis assumes that neither of the all-commercial alternatives would include on-site solar photovoltaic panels to generate electricity for the building spaces, whereas the proposed project would include rooftop solar PV panels on all of the 61 single-family homes, as required by the 2019 California Building Energy Efficiency Standards. The proposed project may, therefore, generate lower energy consumption-based GHGs than either commercial alternative because a significant share of the electricity would be produced by the residential rooftop solar systems which would not generate any GHGs when generating electricity. Use of natural gas for space and water heating systems and for home cooking appliances in the 61 homes would generate GHGs, and therefore would offset the benefits of the rooftop solar PV to some extent.

Noise

Alternative 1 would result in no changes in the vacant site conditions and thus no noise impacts.

As discussed in Section 3.4 of this EIR, the project's construction noise could result in adverse impacts to neighboring land uses; a variety of construction control measures are proposed to mitigate those impacts to less than significant. The fully operational project would result in less than significant noise impacts from on-site activities as well as the vehicular traffic generated along the surrounding roadway network. The following analysis, therefore, is intended to identify and contrast the noise characteristics of the proposed project and the two alternatives.

In Alternative 2, the existing building would remain in place and no other structures or site alterations would be constructed in the eastern and northern parts of the project site. The proposed project, on the other hand, would construct new homes at closer distances to the northern and eastern boundaries and thus would generate construction and operational noise affecting adjacent homes that would not occur with Alternative 2. Alternative 3 could include construction of additional building structures parallel to the eastern boundary, as an extension of or separate from the existing building but would maintain the same building setback as the existing building and would not include any new noise sources between the buildings and those boundaries. As such, construction and operational noise impacts near those edges that abut existing homes would be less than with the proposed project. Construction noise would be generated throughout the balance of the site to the west of the existing building for both all-commercial alternatives and for the proposed project. There might be different kinds of construction equipment and different levels of intensities for various construction phases between the two commercial alternatives and the proposed project, because the homes would likely be built with different methods and materials; however, the range of construction noise levels would likely be similar and all construction work would occur on the same days and during the same hours. Since construction noise impacts would be similar for all scenarios, the same construction noise control measures identified to mitigate the project's noise impacts would also be applied to and be as effective for both all-commercial alternatives.

Because the all-commercial alternatives would allow tenants to operate into the evening hours, those alternatives would likely generate more night-time noise from parking lot activities than the proposed

project, which would have homes in the eastern part of the site that would have limited outdoor activities at night. The all-commercial alternatives would retain the existing loading area on the eastern side of the former Albertsons store, which would become an intermittent noise source during the time periods when trucks arrive and depart from that area. That could include some night-time activities in the loading area which could potentially result in some nuisance impacts at the existing homes to the east and north that would not occur with the proposed project. Noise from the commercial parking lot and vehicular circulation areas for both commercial alternatives and the commercial portion of the proposed project would be similar, in terms of types, intensities, and time frames. The proposed project might generate more night-time noise because of the two drive-through fast food restaurants; however, Alternative 2 could also possibly have two drive-through facilities developed in similar locations.

Population and Housing

Alternative 1 would result in no changes in the vacant site conditions and thus no impacts involving population and housing.

As discussed in Section 3.5 of this EIR, the proposed project would result in unplanned population growth in the eastern part of the site; however, this growth would not exceed adopted regional growth forecasts for the City of Covina. Alternatives 2 and 3 would not create any new housing and thus no additional residential population. Alternatives 2 and 3 would generate a higher number of part-time and full-time jobs than the proposed project, due to a much larger amount of building space that would support a larger work force.

Public Services

Alternative 1 would result in no changes in the vacant site conditions and thus no impacts involving public services.

As discussed in Section 3.6 of this EIR, the proposed project would result in a significant and unavoidable impact due to worsening the existing citywide deficit in public parkland. There would be no other significant public services impacts. Alternatives 2 and 23 would avoid any impacts related to residential-based demand for public parkland and have a similar, less than significant impact with respect to fire protection, law enforcement, and public schools, compared to the proposed project.

Transportation and Traffic

Alternative 1 would result in no changes in the vacant site conditions and thus no impacts involving transportation and traffic.

As discussed in Section 3.7 of this EIR, no significant traffic impacts were identified for the proposed project. The following analysis, therefore, identifies and contrasts the trip generation characteristics of the proposed project and the two all-commercial alternatives. Table 3.7-6 estimates that the daily and peak hour traffic associated with a supermarket tenant in the existing structure would be significantly higher than the volumes generated by the proposed project (8,649 total daily trips versus 4,546 daily trips and 748 PM peak hour trips versus 348 PM peak hour trips). Total AM peak hour trips would be slightly lower for a supermarket tenant compared to the total trips generated by the proposed project (309 versus 386). Alternative 2 would also consist of one or possibly two retail tenants, and this could include a supermarket tenant. Thus, this alternative could also generate substantially higher peak period and total

daily trips, which could result in significant congestion impacts that would not occur with the proposed project. It is also possible that Alternative 2, which would not include fast food/drive through restaurants or high-turnover sit-down restaurants, could generate lower peak hour and daily trips than the proposed project, which generates a large majority of its traffic from these types of commercial uses. Alternative 3, with nearly 20,000 square feet of additional building space compared to Alternative 2, would include a mix of retail tenants, up to 10,000 square feet of professional offices, and possibly one or two fast food/drive through businesses. Such a mix of tenants could generate more daily and peak hour traffic than an all-supermarket tenant and more than another all-retail occupancy with no fast food/drive through businesses, both of which could occur with Alternative 2. Alternative 3 could generate higher or lower peak hour and daily trips, compared to the proposed project, depending on the specific mix of tenants and the trip generation characteristics of those tenants. If there are no fast food/drive through businesses generating high levels of pass-by trips, the total daily and peak period trips to/from the project site could actually be lower for Alternative 3 than for the proposed project. If there were higher peak period trips, there could be one or more significant congestion impacts that would not occur with the proposed project.

Since the project site is located in a "Low VMT Commercial Area", any commercial land use alternative would not create a significant VMT, based on the City's VMT screening criteria. The analysis provided in Section 3.7 determined that the project's residential component would not result in a significant VMT impact. As such, Alternatives 2 and 3 would have a less than significant impact with respect to VMT and would not result in a higher or lower level of impact, compared to the proposed project.

Tribal Cultural Resources

Alternative 1 would result in no changes in the vacant site conditions and thus no impacts involving tribal cultural resources (TCRs). Both Alternatives 2 and 3 would entail some level of excavation for parking lot re-surfacing and modifications to existing drainage systems. As such, to the extent that excavations could disturb native soil materials, there would be a potential to damage unknown TCRs that might occur in such materials. The same mitigation to monitor excavations by a Native American representative would be required for these two alternatives or the proposed project. Potential significant impacts would be avoided thereby, for any of the build alternatives.

Utilities

Alternative 1 would result in no changes in the site conditions and thus no impacts involving wet or dry utilities.

As discussed in Section 3.9 of this EIR, no significant impacts involving utility infrastructure and resources have been identified for the proposed project. The following analysis, therefore, identifies and contrasts the utility needs for the two all-commercial alternatives and the proposed project.

Alternatives2 and 3 would have similar requirements for water, sewer, storm drainage, energy and telecommunications infrastructure, given the similarity in land uses and a relatively minor difference in total building area. While Alternative 3 could have higher levels of demand for capacity in water and sewer facilities than Alternative 2, due to a larger square footage, it would not likely require more extensive connections to existing infrastructure facilities that are already in place and which were adequate to support the previous supermarket for a number of years, before Albertsons vacated this site. Construction

of new utility infrastructure on-site would result in similar types and intensities of temporary construction impacts for both all-commercial alternatives and the proposed project. Significant impacts are not anticipated for any of these scenarios. As discussed in Section 3.9, the estimated water demand with an all-commercial land use would be substantially higher than for the proposed project (roughly 239 acre-feet/year for all commercial and roughly 127 acre-feet/year for the proposed project). Since most of the water consumption results in a discharge into the on-site wastewater system, the sewage generation associated with either all-commercial alternative would also be much higher than for the proposed project. Because the existing water and sewer infrastructure were designed and sized to handle demand from an all-commercial land use, there would not be a significant impact involving water supply resources or the capacities of affected wastewater collection and treatment systems for Alternatives 2 and 3 or for the proposed project.

Cumulative Impacts

Alternative 1 would result in no changes to the existing vacant site conditions and would not, therefore, contribute to any cumulative impacts.

As discussed in Section 4.0 of this EIR, the proposed project would result in a cumulatively considerable impact by worsening the existing citywide deficit of public parkland available for the residential population. No other significant cumulative impacts were identified. The following analysis, therefore, identifies and contrasts the manner in which Alternatives 2 and 3 would contribute to cumulative effects, compared to the proposed project.

Aesthetics impacts associated with this project site are highly localized and there are no scenic resources or scenic vistas associated with the project site. Accordingly, neither Alternative 2 nor3 nor the proposed project would result in cumulatively considerable aesthetic impacts. Construction period emissions of particulate matter and exhaust from machinery and vehicles might vary between the three scenarios, but since more demolition and grading is anticipated for the proposed project, it would generate a higher amount of emissions that would temporarily affect regional air quality. Air pollutant and GHG emissions generated at remote power generation facilities would likely be higher for Alternatives 2 and 3, which would not have any on-site solar power-generating systems, and thus would contribute to higher levels of regional emissions occurring at remote power generation sites. With potentially higher traffic volumes, both Alternatives 2 and 3 could generate more criteria pollutants and GHGs from automotive exhaust than the proposed project; however, this would depend upon the specific tenant mix and the trip-generating characteristics thereof. Construction and operational noise impacts would be highly localized and would thus not result in significant cumulative impacts for Alternatives 2 and 3 or the proposed project.

Alternatives 2 and 3 would not contribute to cumulative increases in the city's residential population but would add more jobs to the local employment base. The two all-commercial alternatives would contribute to citywide demand for fire protection and law enforcement services, but little or no demand for public parkland and public schools. The same volume of additional traffic forecast for other pending development projects and general area growth would occur in any development alternative. The contribution to cumulative congestion impacts could vary between the two commercial alternatives and the proposed project, depending on the specific mix of commercial tenants and the peak period volumes of traffic that have the most impact on traffic flow and congestion levels. Alternative 3 would likely generate the most traffic, especially if it included fast food/drive through and/or high-turnover sit-down

restaurant tenants, which could contribute to significant cumulative congestion impacts that would not occur with the proposed project. Because the demand potential of the two all-commercial alternatives are anticipated in the design and sizing of the existing local water and sewer infrastructure mainline facilities, no significant cumulative impacts would be anticipated for either of those alternatives. Any new storm drainage system would have to be designed to comply with the City's current regulations governing storm drainage and urban runoff controls; therefore, neither alternative nor the proposed project would result in cumulatively considerable impacts to the municipal storm drainage system. Existing energy and telecommunications infrastructure exist in this area to serve needs at the project site, for either alternative or the proposed project. Physical upgrades to existing service systems would not be anticipated for the proposed project or the two alternatives and the affected energy and telecommunications purveyors would determine when and where to upgrade facilities to respond to continuing growth pressures in their service areas.

Table 5-1
SUMMARY COMPARISON OF THE IMPACTS OF ALTERNATIVES

Impact Topics	Proposed Project	Alternative 1 No-Project/No-Build	Alternative 1- All Retail	Alternative 2-Mixed Commercial
Aesthetics	LSM	Ø	<	<
Air Quality	LS	Ø	=	=
Greenhouse Gas Emissions	LS	Ø	< or = or >	< or = or >
Noise	LSM	Ø	< or =	< or =
Population and Housing	SU	Ø	<	<
Public Services	SU	Ø	<	<
Transportation/Traffic	LS	Ø	< or = or >	< or = or >
Utilities	LS	Ø	>	>
Cumulative Impacts	LS	Ø	=	=

Acronyms: Ø = No Impact. LS = Less Than Significant. LSM = Less Than Significant with Mitigation. SU = Significant and Unavoidable. Symbols: = is similar to project impact, > is greater than project impact, < is less than project impact

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based on the preceding analysis, Alternative 1 – No Project/No Build would have the least environmental impact, as it would not change the existing vacant site conditions. This alternative would not accomplish any of the project objectives and may result in further deterioration of the site and possibly increased vandalism and vagrancy. Alternative 2 - Retain Existing Building for Retail Tenant(s) would have the least impact of the two 'build' alternatives, as it would avoid the proposed project's significant and unavoidable impact of exacerbating the citywide deficit of public parkland and would involve fewer site alterations, compared to the proposed project or Alternative 3. It would also likely generate less traffic than Alternative 3, reduce aesthetic and noise impacts along the northern and eastern edges compared to the proposed project, and have a smaller utilities impact than Alternative 3. Alternatives 2 and 3 would not accomplish the project's housing-related objectives; however, the City's General Plan designates the entire site for commercial land uses and thus the housing related objectives for the proposed project are not considered as important as the other objectives. Given these considerations, Alternative 2 is considered to be the environmentally superior alternative.

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6. OTHER REQUIRED TOPICS

6. OTHER REQUIRED TOPICS

6.1 GROWTH INDUCING EFFECTS

Section 15126.2(e) of the State CEQA Guidelines requires an EIR to discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth.

Economic or population growth can be induced directly, through construction of new housing or a major employment or transportation center, or indirectly, through removal of impediments to growth. Removing impediments to growth occurs as a result of improving, extending, or installing infrastructure, such as streets and highways, water, sewage, gas, or electrical lines in areas where none of this exists, or by expanding the capacity of such existing infrastructure, which can support increased development in the area. Changing existing land use policy can also potentially induce growth. For example, amending a local General Plan to allow for conversion of open space land to some form of urbanized land use removes a policy "impediment" that can foster growth in the affected area.

Growth inducement is not regarded as necessarily beneficial or detrimental. The purpose of examining growth inducing potential is to determine whether that growth inducement could result in extensive new growth that had not been planned and which could result in significant direct or indirect environmental impacts.

Direct Effects

Construction and occupancy of the proposed 61 single family homes would increase the total population of the City by approximately 183 people. Construction and occupancy of the proposed commercial structures would provide and estimated total of 86 part-time and full-time job opportunities. This represents direct growth inducing effects.

Indirect Effects

Infrastructure Improvements

The project would not induce growth through extension or expansion of major infrastructure facilities in this fully urbanized area, where all land surrounding the project site is currently developed with a variety of land uses, public streets and infrastructure. The only modifications to infrastructure by the proposed project would be service connections within or adjacent to the project site that would be sized to serve only the project's needs. Additionally, no new roadways would be created as part of the project. The project's infrastructure improvements would not facilitate growth of any surrounding land.

Economic Stimulus

The proposed commercial and residential land uses are too small in scale to represent a major new economic center in the City that could induce development of additional commercial, residential, industrial or other types of land uses due to the economic stimulus provided by the proposed project. It is considered more likely that existing businesses that cater to residential land uses would benefit from the buying power of the proposed homes and that the proposed retail and fast-food businesses on site would attract mostly pass-by traffic and local residents, workers and business owners.

Change in Land Use Policy

The change in existing policy, which involves a General Plan Amendment, a Zone Change, and a Specific Plan, would induce new residential growth by allowing for the development of single-family homes in an area currently zoned for commercial uses. However, this change in existing policy would only affect the project site and would not induce growth elsewhere.

The environmental impacts of this new residential growth have been addressed throughout this EIR. No significant environmental effects have been identified because of this new growth. The project's unplanned new residential population would, however, worsen the City's existing deficit of public parkland, and that is considered to be a significant and unavoidable impact, because there is currently no program in place that would alleviate this deficit.

6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

As required by the State CEQA Guidelines, Section 15126.2(d), this section examines the potential for significant and irreversible environmental changes that could result from implementation of the proposed project, during the initial and continued phases over time. This includes potential effects involving the use of nonrenewable resources, the permanent commitment of the site and the proposed improvements to establish the proposed land use, irreversible damage from environmental accidents that could be associated with the project, and whether the commitment of resources for the proposed project is justified.

6.2.1 USE OF NON-RENEWABLE RESOURCES

Non-renewable resources are resources that are finite or are renewed so slowly as to be considered finite. Residential development projects with typical construction materials and methods and of a similar size and building intensity commonly consume non-renewable resources during construction in the form of fossil fuels to power construction equipment and vehicles; copper, aluminum, and other metals; sand and gravel; construction materials that contain petroleum products such as plastics; and wood. Wood, converted into lumber for construction purposes, is a slowly renewable resource, however the rate of renewal is so slow as to consider it nonrenewable for purposes of the discussion in this section.

Non-renewable resources would also be consumed throughout the long-term operating life of the proposed project. Petroleum-based fuels would be used to power automobiles, natural gas would be used to power water and space heating and cooking devices, and coal and petroleum-based fuels may be burned to generate a portion of the electricity in the electrical grid that would service the project site and its surroundings. Each of the proposed homes would be required to have rooftop solar photovoltaic panels to produce a portion of each home's electricity; this is a clean and renewable energy source.

Water, while an important natural resource, is not considered to be a non-renewable resource. Water is regularly replenished by the natural hydrological cycle. Because Covina and most of California is subject to recurring drought cycles, water is regarded as a limited resource that requires strong conservation measures to maintain adequate water supplies for normal and emergency applications. The proposed project, as all other new development projects, must comply with the City's current building standards, which include a variety of state-mandated water conservation measures to conserve water used for interior plumbing and outdoor irrigation purposes.

6.2.2 COMMITMENT OF FUTURE GENERATIONS TO SIMILAR USE OF THE SITE

The proposed project represents a significant commitment of capital resources to create the proposed mixture of commercial and residential land uses. As such, it is likely that if the project proceeds to completion and becomes fully functional and economically sustainable, that this use of the land would remain in place for an extended period of time, possibly for several generations.

6.2.3 POTENTIAL ENVIRONMENTAL ACCIDENTS

The project site is not known to be contaminated by hazardous materials and substances that would warrant special control measures during construction to prevent accidental releases of hazardous substances to the environment. The construction methods to be used are typical and would not require use of dangerous materials or processes that could result in an accident that could threaten the environment. Neither the proposed commercial or residential land uses would require regular use, transport, storage or disposal of large quantities of hazardous materials. Only minor quantities of typical substances applied in property maintenance are likely to occur. Based on these considerations, there is limited potential for serious environmental accidents as a result of project construction or long-term operational activities.

6.2.4 JUSTIFICATION FOR IRRETRIEVABLE COMMITMENT OF RESOURCES

As noted in Sections 6.2.1 and 6.2.2, implementation of the proposed project would require a significant investment of both renewable and non-renewable resources that would be irretrievable. The level of natural and manufactured resources that would be committed to the proposed project would be typical of similar developments of this size and scale. As discussed in the Initial Study, found in Appendix A of this Draft EIR, the project would not involve wasteful or inefficient methods of consuming energy during construction or over the long-term operating life. None of the building materials anticipated for this project would be unique, rare, in short supply, or require creation of new resource extraction sites or new manufacturing and delivery channels.

However, the project site is currently zoned by the City of Covina as C-4, Highway Commercial and designated in the City General Plan as General Commercial. Developing the project, as proposed, would require changes to both the current zoning and the general plan land use element policies to allow for the proposed residential development on the eastern part of the site. Because the proposed residential use is inconsistent with the City's land use policies and zoning standards, it is an unplanned commitment of resources. Therefore, the residential portion of this project is considered to be an unjustified irretrievable commitment of resources.

6.3 EFFECTS FOUND NOT TO BE SIGNIFICANT

Pursuant to Section 15128 of the CEQA Guidelines, this section identifies the range of environmental topics and issues that were determined in the initial scoping process to have no effects or effects that would be less than significant. As such, they are not further examined within this EIR. Please refer to Appendix A of this Draft EIR, where the explanations for these findings are provided in the Initial Study, and further confirmed through the public scoping process.

Effects found not to be significant, organized by topic and CEQA significance threshold, include:

Aesthetics

Aes(b) The project would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

Agriculture and Forestry Resources

Ag(a) The project would not convert Prime Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.

Ag(b) The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

Ag(c) The project would not conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

Ag(d) The project would not result in the loss of forestland or conversion of forestland to non-forest use.

Ag(e) The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forestland to non-forest use.

Biological Resources

BR(a) The project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

BR(b) The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.

BR(c) The project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

BR(d) The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

BR(e) The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

BR(f) The project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

Cultural Resources

CR(a) The project would not cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.

CR(b) The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.

CR(c) The project would not disturb any human remains, including those interred outside of dedicated cemeteries.

Energy

En(a) The project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

En(b) The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Geology and Soils

GS(a)(i) The project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.

GS(a)(ii) The project would not cause potential substantial adverse effects related to strong seismic ground shaking.

GS(a)(iii) The project would not cause potential substantial adverse effects related to seismic-related ground failure, including liquefaction.

GS(a)(iv) The project would not cause potential substantial adverse effects related to landslides.

GS(b) The project would not result in substantial soil erosion or the loss of topsoil.

GS(c) The project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and it could not potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

GS(d) The project would not be located on expansive soil that would create substantial direct or indirect risks to life or property.

GS(e) The project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

GS(f) The project would not result directly or indirectly in the destruction of a unique paleontological resource or site or unique geologic feature.

Hazards and Hazardous Materials

HM(a) The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

HM(b) The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

HM(c) The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

HM(d) The project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

HM(e) The project would not be located within an airport land use plan or within two miles of a public or public use airport and so would not result in a safety hazard or excessive noise for people residing or working in the project area.

HM(f) The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

HM(g) The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fire.

Hydrology and Water Quality

WQ(a) The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

WQ(b) The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin.

WQ(c)(i) The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site.

WQ(c)(ii) The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

WQ(c)(iii) The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

WQ(c)(iv) The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.

WQ(d) The project would not be in a flood hazard, tsunami, or seiche zone and would not risk release of pollutants due to project inundation.

WQ(e) The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Land Use and Planning

LU(a) The project would not disrupt or physically divide an established community (including a low-income or minority community).

LU(b) The project would not cause a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mineral and Energy Resources

MR(a) The project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

MR(b) The project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Noise

N(c) The project would not be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, therefore the project would not expose people residing or working in the project area to excessive noise levels.

Population and Housing

PH(b) The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Public Services

PS(a) The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities that support miscellaneous public services such as libraries, general government centers, courts, senior centers, etc.

Recreation

R(a) The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

R(b) The project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Transportation

Tr(d) The project would not result in inadequate emergency access.

Wildfire

Wf(a) The project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

Wf(b) The project would not exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.

Wf(c) The project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

Wf(d) The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

7. REFERENCES

7. REFERENCES

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8. ORGANIZATIONS AND PERSONS CONSULTED

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9. EIR PREPARATION TEAM

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