



MITIGATED NEGATIVE DECLARATION FOR THE 529 CUTTER WAY SELF STORAGE PROJECT

Lead Agency:

City of Covina
Community Development Department
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Covina, CA 91723

Project Applicant:

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August 2024

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1 INTRODUCTION

1.1 PURPOSE AND SCOPE

This document is an Initial Study and Mitigated Negative Declaration (IS/MND) prepared pursuant to the California Environmental Quality Act (CEQA) for the proposed 529 Cutter Way Self Storage Project, which involves Conditional Use Permit (CUP-23-08) and Site Plan Review (SPR 23-268) to allow for the demolition of the existing 2,647 square foot (SF) building to construct a 4-story 183,584 SF public self-storage facility, and associated site improvements, within the Light Manufacturing (M-1) zone, located at 529 Cutter Way ("proposed Project", "Project"). This IS/MND has been prepared in accordance with CEQA, Public Resources Code Sections 21000 et seq., and the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines).

An initial study is conducted by a lead agency to determine if a project may have a significant effect on the environment. In accordance with CEQA Guidelines Section 15064, an environmental impact report (EIR) must be prepared if the initial study indicates that the proposed project under review may have a potentially significant impact on the environment. A negative declaration may be prepared instead, if the lead agency prepares a written statement describing the reasons why a proposed project would not have a significant effect on the environment, and, therefore, why it does not require the preparation of an EIR (State CEQA Guidelines Section 15371). According to State CEQA Guidelines Section 15070, a negative declaration shall be prepared for a project subject to CEQA when either:

- (a) The initial study shows there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- (b) The initial study identified potentially significant effects, but:
 - (1) Revisions in the project plans or proposals made by or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 - (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

If revisions are adopted into the proposed project in accordance with the State CEQA Guidelines Section 15070(b), a mitigated negative declaration is prepared. This document includes such revisions in the form of mitigation measures. Therefore, this document is a Mitigated Negative Declaration and incorporates all of the elements of an initial study. Hereafter this document is referred to as an IS/MND.

This IS/MND incorporates by reference the City of Covina General Plan EIR and the technical documents that relate to the proposed Project or provide additional information concerning the environmental setting of the proposed Project. The information within in this IS/MND is based on the following technical studies and/or planning documents:

- City of Covina General Plan
<https://covinaca.gov/city-departments/community-development/planning/resources/>
- City of Covina Municipal Code
[https://www.codepublishing.com/CA/Covina/ City of Covina Development Code](https://www.codepublishing.com/CA/Covina/City%20of%20Covina%20Development%20Code)
- Technical studies, personal communications, and web sites listed in Section 6, *References*

In addition to the websites listed above, all documents are available for review at the City of Covina Community Development Department, located at 125 E. College Street, Covina, CA 91723. The proposed Project evaluated herein involves a Conditional Use Permit and Site Plan Review for construction of an approximately 183,584 SF self-storage facility on an approximately 2.25 net-acre site located on the

northwest corner of the Cutter Way and West San Bernardino Road. The Project site has a General Plan Land Use designation of General Industrial (GI) and a zoning designation of Light Manufacturing (M-1). The proposed Project self-storage uses are consistent with the intended uses provided and analyzed by the General Plan for the site, and as such, is consistent with the General Plan EIR.

This IS/MND serves as the environmental review for the proposed 529 Cutter Way Self Storage Project. The Project proposes development of a site within the boundaries of the City of Covina, which would fulfill the purpose of the City's General Plan land use designation for the site.

2 ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION

The Project site is within the eastern portion of the County of Los Angeles, within the City of Covina. The site is located at 529 Cutter Way, which is on the northwest corner of West San Bernardino Road and Cutter Way. Regional access to the Project site is provided by the Interstate 10 (I-10) to the south. Local access to the site is via W San Bernardino Road. The Project site and surrounding area is shown in Figure 2-1, *Regional Location*, and Figure 2-2, *Local Vicinity*.

2.2 EXISTING PROJECT SITE

The Project site comprises two parcels encompassing approximately 2.55 gross (2.25 net) acres. The parcel is identified as Assessor's Parcel Number (APN) 8434-013-010 and 8434-012-091 and consists of undeveloped land, an existing church building totaling approximately 2,647 SF in the central portion of the site, and associated parking. The site is relatively flat with minimal surface gradients. The Project site contains vegetation consisting of grasses, weeds, and ornamental trees. Existing access to the Project site is via two paved driveways off Cutter Way. The Project site's existing conditions are shown in Figure 2-3, *Aerial*, and Figure 2-4, *Site Photos*.

2.3 EXISTING LAND USES AND ZONING DESIGNATION OF THE PROJECT SITE

The Project site has a General Plan Land Use designation of General Industrial (GI) and a zoning designation of Light Manufacturing Zone (M-1) within a Mixed-Use Overlay District. The City of Covina General Plan states that the General Industrial developments will contain manufacturing, processing, assembly, warehousing, and related activities plus ancillary administrative offices. The M-1 zone allows a maximum FAR of 2.0 and is intended to provide for the development of industrial uses which include fabrication, manufacturing, assembly or processing of materials that are already in processed form. Self-Storage facilities are allowed in the Light Manufacturing Zone with approval of a Conditional Use Permit (CUP).

2.4 SURROUNDING GENERAL PLAN AND ZONING DESIGNATIONS

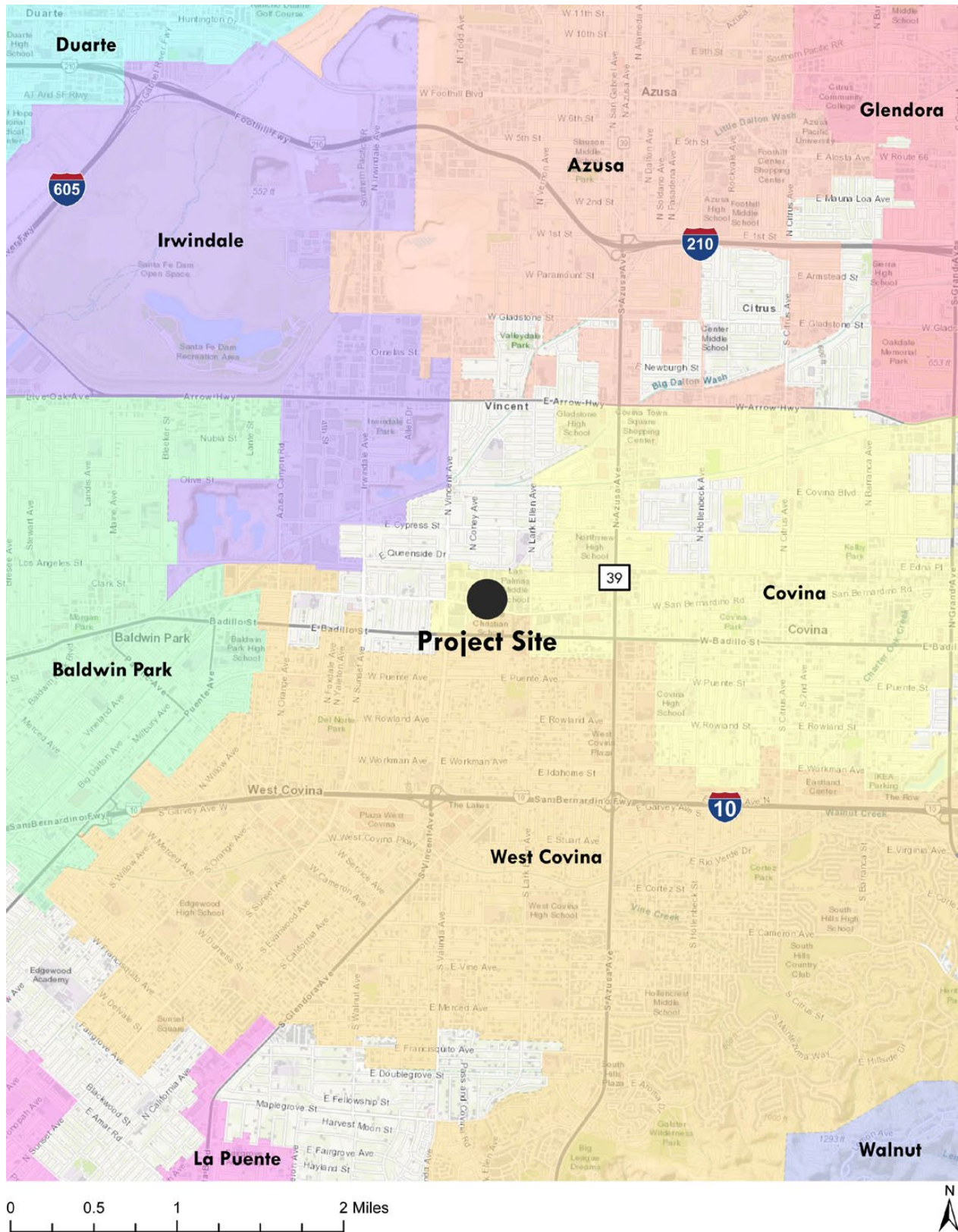
The Project site is located within a predominately industrialized area. The surrounding land uses are described in Table 1.

Table 1: Surrounding Existing Land Use, Zoning, and Specific Plan Designations

	Existing Land Use	General Plan Designation	Zoning Designation
North	Industrial buildings	General Industrial (GI)	Light Manufacturing (M-1)
West	An office building	General Industrial (GI)	Light Manufacturing (M-1)
South	West San Bernardino Road followed by Jubilee Christian School to the east and an industrial park to the west	West-General Industrial (GI) East- (West Covina) Industrial (I)	West-Light Manufacturing (M-1) East- (West Covina) Manufacturing (M-1)
East	Cutter Way followed by apartment buildings	High Density Residential (HDR)	Residential (Multi-Family) (RD)

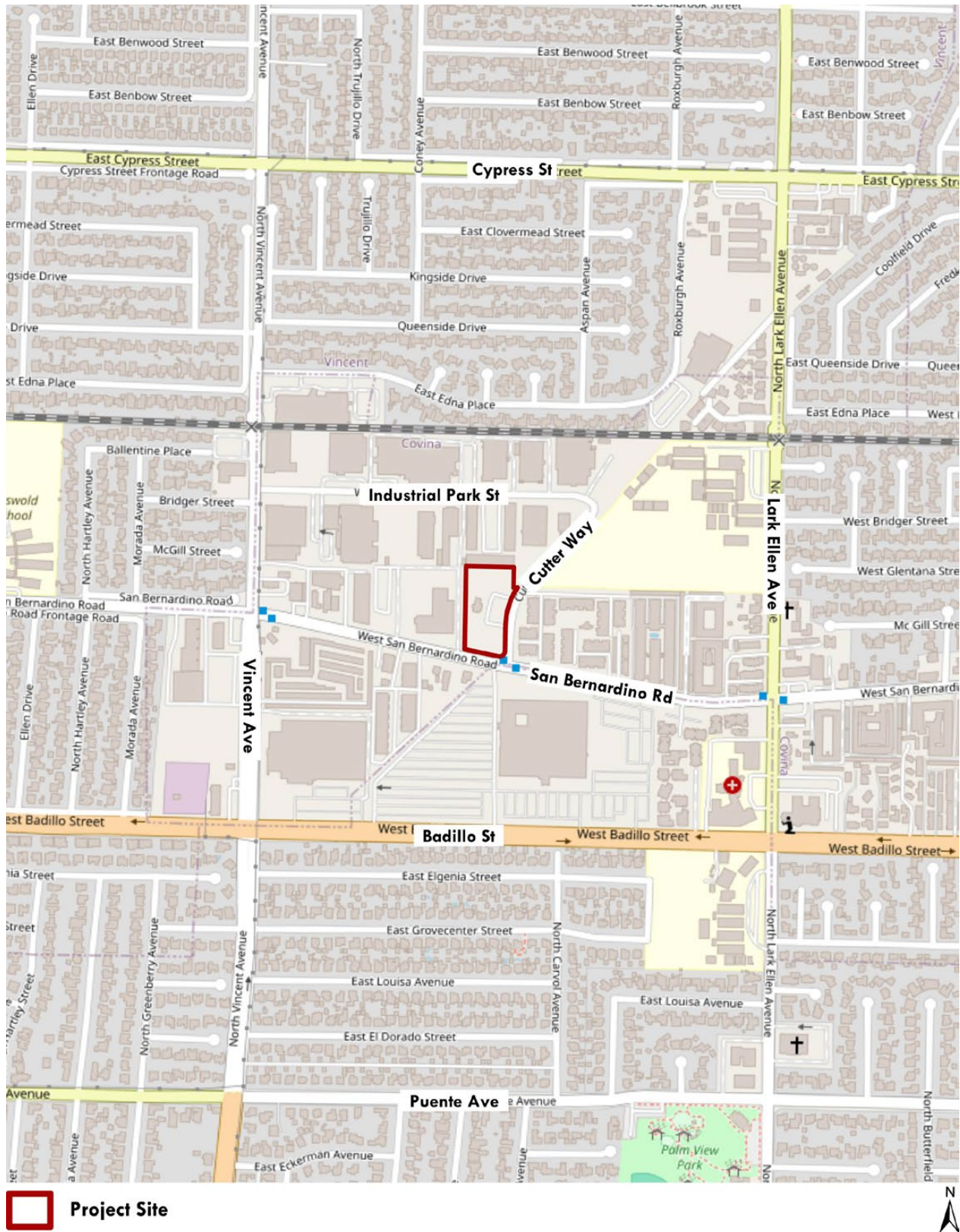
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Regional Location



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Project Vicinity



Cutter Way Self Storage
City of Covina

Figure 2-2

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Aerial View



Cutter Way Self Storage
City of Covina

Figure 2-3

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Existing Site Photos



View from the south of project site from San Bernardino Rd.



Existing parking lot and structure on Cutter Way.

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3 PROJECT DESCRIPTION

3.1 Project Overview

Westport Properties, Inc. (Applicant) is requesting approval from the City of Covina for a Conditional Use Permit and Site Plan Review in order to construct and operate a self-storage facility on APNs: 8434-013-010 and 8434-012-091. The Project would demolish the existing 2,647 SF building onsite and redevelop the Project site with a 183,584 SF self-storage facility that would be four stories. The proposed building would result in a FAR of 1.87. Additional site improvements would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and driveways. Figure 3-1, *Conceptual Site Plan*, illustrates the proposed site plan.

3.2 Project Features

Building Summary and Architecture

The proposed self-storage building would be four stories and approximately 46-feet 8-inches in height, and include an office, landscaping and associated vehicle parking spaces. The self-storage building would have a building footprint of approximately 45,896 SF and include 847 SF of office space with 45,049 SF of storage space on the ground floor, and 45,896 SF of storage space on each of the second, third, and fourth floors. The proposed building would include 1,370 storage units that would range in size from 5-foot by 5-foot units (25 SF) up to 12-foot by 17-foot units (204 SF).

As shown in Figure 3-2, *Elevations*, the proposed Project would provide various building finish materials that include stucco, split face block, concrete panels, brick, natural stones, aluminum storefront windows; and a consistent color scheme of off-whites, greys, and blues. The building would be set back by over 85 feet from Cutter Way, 38-feet 8-inches from West San Bernardino Road, 5 feet from both the northern and western property line.

Parking and Loading Dock Summary

The Project would provide 22 passenger vehicle parking stalls, inclusive of accessible spaces and electric vehicle/clean air/carpool spaces in a surface lot on the east side of the building.

Landscaping and Fencing

A 6-foot-tall wrought iron security sliding gate is proposed just north of the southern driveway and at the northern exit-only driveway. A 6-foot-tall wrought iron fence is proposed around the northeast border of the Project site and between the two sliding gates on the eastern border of the Project site. The proposed Project includes approximately 17,152 SF of ornamental landscaping that would cover approximately 17 percent of the site, as shown in Figure 3-3, *Landscape Plan*. Proposed landscaping would include 36 and 24-inch box trees, 5-gallon trees, various shrubs, and succulents to screen the proposed building and parking from off-site viewpoints.

Access and Circulation

Access to the proposed Project would be provided via two driveways from Cutter Way. The southern driveway would be 29-feet, 1-inch wide and would provide ingress and egress for automobiles. The northern driveway would be 37-feet, 1-inch wide and would be exit-only. Internal circulation would be via a 28-foot drive aisle. Fire department access would be via a 28-foot-wide fire lane. Knox padlocks would be provided for all gates.

Infrastructure Improvements

Water and Sewer Improvements

The Project would install new onsite connections to the existing 8-inch water line in Cutter Way. The Project would also install new onsite connections to the existing 8-inch diameter sewer line in West San Bernardino Road.

Drainage Improvements

The Project would install an underground stormwater infiltration system to collect stormwater. Runoff would be collected via three vegetated swales and then piped into the underground infiltration system with a

retention volume of 7,038 cubic yards (CY) located in the southern portion of the parking lot. Overflow from the underground storm chambers would be discharged out onto West San Bernardino Road.

Sidewalk Improvements

The proposed Project would maintain the existing 6-foot-wide sidewalk along the Project's frontage on West San Bernardino Road and Cutter Way.

3.3 Construction and Phasing

Construction activities would occur over one phase and include demolition, site preparation, grading, building construction, paving, and architectural coatings. Grading work of soils is expected to result in approximately 907 CY of cut and 2,023 CY of fill soils for a net import of 1,116 CY of soil. Construction is expected to occur over 12 months and would occur within the hours allowable by the City of Covina Municipal Code Section 9.40.110, which states that construction shall occur only between the hours of 7:00 AM and 8:00 PM, except that no construction shall occur on Sundays. Table 2 illustrates the anticipated construction schedule.

Table 2: Construction Schedule

Construction Activity	Number of Days
Demolition	20
Site Preparation	3
Grading	6
Building Construction	220
Paving	10
Architectural Coating	25

3.4 Operational Characteristics

The Project is analyzed as a self-storage facility. No cold storage is proposed. Typical operational characteristics include employees and customers traveling to and from the site. Operation is assumed to be 24 hours a day, 7 days a week. There would be two to three employees onsite during operation for security. As discussed above, a 6-foot-tall wrought iron security sliding gate is proposed just north of the southern driveway and at the northern exit-only driveway.

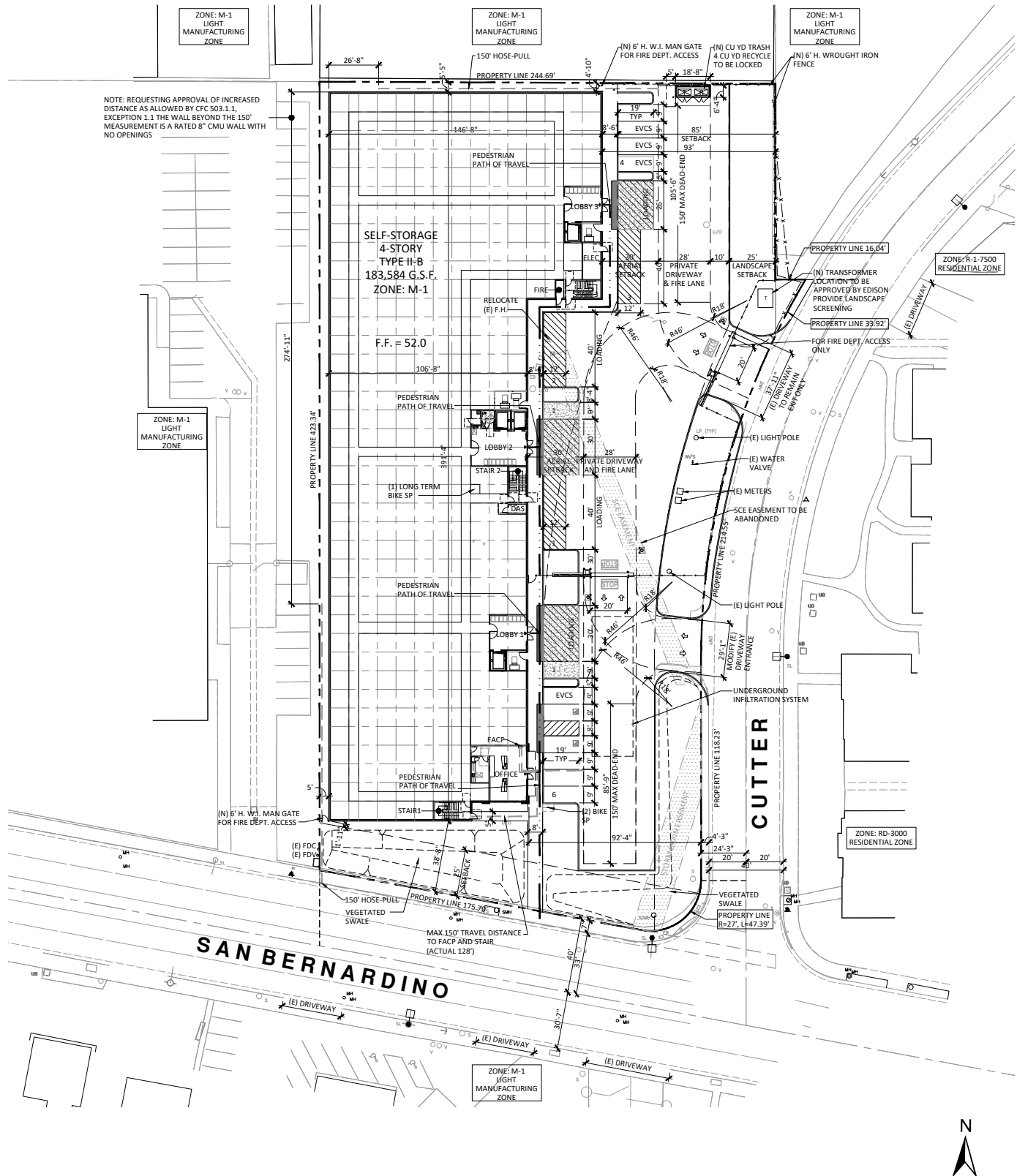
3.5 Discretionary Approvals, Permits, and Studies

The following discretionary approval, permits, and studies are anticipated to be necessary for implementation of the proposed Project:

City of Covina

- Site Plan Review
- Conditional Use Permit
- Adoption of this Mitigated Negative Declaration
- Ministerial approvals and permits necessary to execute the proposed Project, including but not limited to, grading permit, building permit, etc.

Conceptual Site Plan



Cutter Way Self Storage
City of Covina

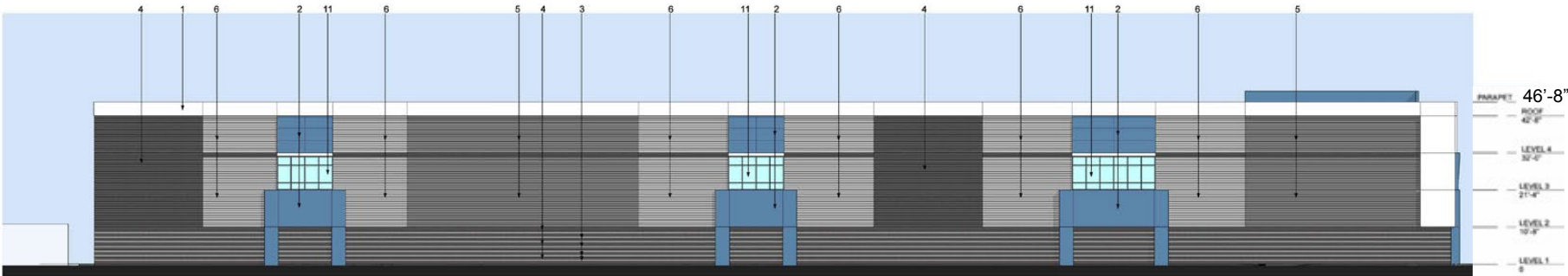
Figure 3-1

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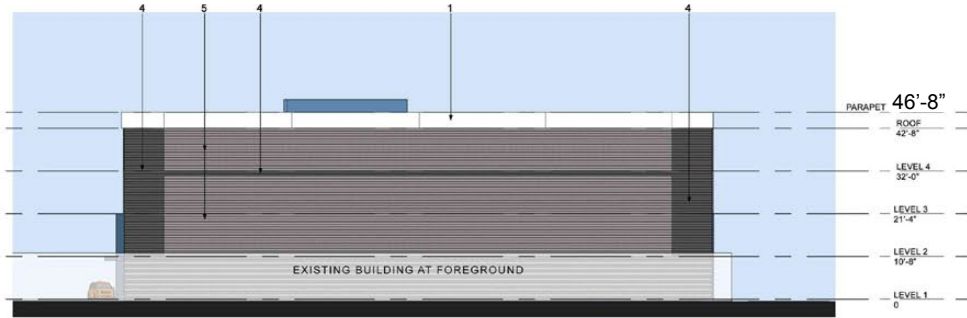
Elevations



1. WEST ELEVATION - CUTTER WAY



2. EAST ELEVATION



3. NORTH ELEVATION



4. SOUTH ELEVATION - SAN BERNARDINO RD

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Conceptual Landscape Plan



Cutter Way Self Storage
City of Covina

Figure 3-3

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4 ENVIRONMENTAL CHECKLIST

4.1 BACKGROUND

Date: April 2024
Project Title: 529 Cutter Way Self Storage Project
Lead Agency: City of Covina, 125 E. college Street. Covina, CA 91723
Lead Agency Contact: Mercenia Lugo City of Covina, Planning Division Manager mlugo@covinaca.gov (626) 384-5473
Project Location: 2.55-acre site comprised of two parcels located within the City of Covina on the northwest corner of West San Bernardino Road and Cutter Way.
Project Sponsor's Name and Address: Westport Properties, Inc. 660 Newport Center Dr, Suite 1450 Newport Beach, CA 92660
General Plan and Zoning Designation: The Project site has a General Plan Land Use designation of General Industrial (GI) and a zoning designation of Light Manufacturing (M-1).
Project Description: Westport Properties, Inc. (Applicant) is requesting approval from the City of Covina for a Conditional Use Permit and Site Plan Review in order to demolish the existing onsite building and construct and operate a self-storage facility on APNs: 8434-013-010 and 8434-012-091. The Project would redevelop the Project site with a 183,584 SF self-storage facility that would be four stories. The proposed building would result in a FAR of 1.87. Additional improvements would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and driveways. Figure 3-1, <i>Conceptual Site Plan</i> , illustrates the proposed site plan.
Other Public Agencies Whose Approval is Required: Not Applicable

4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (☒) would be potentially affected by this Project, involving at least one impact that is a “Potentially Significant Impact” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forest Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☐	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards and Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☒	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	☒	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	☒	Mandatory Findings of Significance

4.3 DETERMINATION:

(To be completed by the Lead Agency) on the basis of this initial evaluation

☐	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☒	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed Name

For

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is

- substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross-referenced).
 - 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(d). In this case, a brief discussion should identify the following:
 - (a) Earlier Analysis Used. Identify and state where they are available for review.
 - (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - (c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
 - 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 - 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 - 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
 - 9) The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

5 ENVIRONMENTAL ANALYSIS

This section provides evidence to substantiate the conclusions in the environmental checklist.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5.1 AESTHETICS. Except as provided in Public Resources Code Section 21099 would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) 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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Have a substantial adverse effect on a scenic vista?

Less than Significant Impact. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or "vista" of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

The City's General Plan Natural Resources and Open Space Element does not designate any scenic vistas within the City (Covina, 2000). However, the City is located near the foot of the San Gabriel Mountains, which are considered a prominent visual resource. The Project site is located within a highly urbanized area of the City predominately developed with industrial, commercial, and residential uses. The Project site is currently developed with a 2,647 SF church building in the central portion of the site with an associated parking lot. The remainder of the site consists of vacant land with vegetation consisting of grasses, weeds, and ornamental trees. Intermittent long-range views of the San Gabriel Mountains can be seen from the Project site and along adjacent streets, but the majority of these views are obstructed due to the existing structures, trees and relatively flat topography of the Project area.

The Project would include the demolition of the existing 2,647 SF building and the development of a 183,584 SF, four story self-storage facility that would be up to 46-feet 8-inches in height within a net 2.25-acre site. The ridgeline of the San Gabriel Mountains is partially visible when looking north along Cutter Way and San Bernardino Road across the project site but largely obstructed by existing trees and structures. These limited views are not considered to be of scenic value. The Project site is located on the west side of Cutter Way and the Project would not interrupt existing views as the structures would be offset approximately 85 feet from Cutter Way and 38-feet 8-inches from West San Bernardino Road. As previously stated, views of the ridgeline from West San Bernardino Road are obstructed by existing offsite trees and structures. Upon development of the four-story self-storage building on the Project site, which would be built in accordance with the City of Covina Municipal Code, the partial views of the San Gabriel Mountains would not be affected, as views are already limited in this segment of the city.

As such, the Project would not result in a substantial adverse effect on a scenic vista, and impacts would be less than significant. No mitigation is required.

b) Substantially damage scenic resources, including, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project proposes to develop the 2.25 net-acre site with a new four-story, 46-foot, 8-inch tall self-storage building. The Project site is not near to, nor visible from, any state scenic highways. The closest Officially Designated State Scenic Highway is State Route 2, approximately 18 miles from the Project site. The closest Eligible State Scenic Highway is State Route 39, located approximately 2.35 miles from the Project site. The closest County designated scenic highway is also Route 18, at the same point as the State designation. The Project site is not visible from State Routes 18 or 39. Therefore, due to the distance of the Project site from either a designated or eligible State or County scenic highway, the proposed Project would not have a substantial effect upon a scenic highway corridor within which it is located and there would be no impacts.

c) 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?

Less than Significant Impact. The Project site is located in an urbanized area. The following regulatory standards are applicable to development of the Project site and would ensure the preservation of visual character and quality through architecture, landscaping, and site planning.

City of Covina Municipal Code

The following provisions from the Municipal Code are intended to minimize adverse aesthetic impacts associated with new development projects and are relevant to the proposed Project, as demonstrated below in Table AES-1.

Table AES-1: Project Consistency with Light Manufacturing Development Standards

Light Manufacturing (M-1) Development Standards		Project Consistency
Minimum Net Lot Area	-	98,133 SF
Maximum Structure Size/Floor Area Ratio (FAR)	2.0 FAR	1.87 FAR
Maximum Structure Height	50 feet	46-feet 8-inches
Minimum Front Yard(Cutter Way) Setback	85 feet	85 feet
Minimum Rear Yard Setback	-	5 feet
Minimum Side Yard (W San Bernardino) Setback	25 feet	38-feet 8-inches
Minimum Interior Side Yard Setback	-	5 feet
Parking	6 spaces	22 spaces

Source: Chapter 17.54 of the City of Covina Municipal Code

As shown above in Table AES-1, the proposed Project would be consistent with the regulations regarding aesthetics and scenic quality. As discussed previously, the proposed Project is consistent with the existing land use and zoning on the Project site. The proposed Project would develop a 46-foot, 8-inch tall, four-story self-storage facility, which would be within the height maximum for the M-1 zone.

In addition, landscaping would be planted in the landscape setback space between the adjacent roads and the proposed parking areas (as shown in Figure 3-3, *Landscape Plan*), which would minimize the visual scale of the structure. The layering of landscaping consisting of 24-inch box trees, 36-inch box trees, layer shrubs, and accent succulents would provide visual depth and distance between the roadways and proposed structure. As a result, the Project would not result in the creation of an aesthetically offensive site open to public view. Therefore, while the proposed Project would physically alter the visual character of the site, it would not substantially degrade the existing visual character or quality of its surroundings. As discussed above, the proposed Project is consistent with the existing visual character and quality of the site and its surroundings and is consistent with development standards for the designations. Therefore, the Project would result in less than significant impacts on visual character and quality.

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

Less than Significant Impact. The Project site is located in a highly urbanized area of the City, predominantly developed with residential, commercial, industrial, and school uses. The Project site is currently developed with a two-story church building with exterior lighting. The Project area exhibits considerable ambient nighttime illumination levels due to the densely developed nature of the Project area and adjacent properties. Artificial light sources from surrounding properties include interior and exterior lighting for security, parking lot lighting, security lighting, and incidental landscape lighting. Automobile headings, streetlights, and stoplights for visibility and safety purposes along adjacent roadways contribute to overall ambient lighting levels as well.

Construction of the Project would not occur during evening hours. Outdoor project construction activities would occur only during permitted daytime hours (from 7 a.m. to 8 p.m.), in accordance with the City's Municipal Code Chapter 9.40.110. As such, construction of the Project would not introduce any new sources of substantial nighttime lighting or glare, and potential impacts associated with construction would be minor and temporary.

Security lighting used during operation of the Project could introduce new sources of light to the Project site and the immediate vicinities. Lensed light-emitting diode (LED) linear lights would be integrated into the architectural canopies to provide appropriate light levels. Fixtures would be designed to prevent light trespass on adjacent properties. Surface mounted lights on the building and lot lights will project down and meet all codes related to light pollution. Compliance with these regulations would ensure that operational impacts regarding Project lighting would be less than significant.

Glare within the Project site and the surrounding areas occur from sunlight reflected from reflective materials utilized in existing buildings along adjacent roadways and from vehicle windows and surfaces. Glare-sensitive receptors include motorists on the roadways surrounding the Project site. The building would not be constructed of highly reflective materials, which would reduce the potential for glare impacts. As glare is a temporary phenomenon that changes with the movement of the sun, receptors other than motorists are generally less sensitive to glare impacts than to light impacts. The City's Municipal Code Section 9.42.020 (applicable to disturbances imposed on residential uses only) requires that "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." Compliance with City's Municipal Code Section 9.42.020, included as Plan, Program, or Policy (PPP) AES-1, would ensure that adverse nighttime lighting and glare effects do not occur at nearby residential uses as a result of the Project. As such, a less than significant impact would occur in this regard.

Plans, Programs, or Policies (PPPs)

PPP AES-1: Outdoor Lighting. 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 in compliance with Municipal Code Section 9.42.020.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5.2 AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique 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 non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) 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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The proposed Project would develop a new four-story, 46-foot 8-inch tall self-storage facility on the 2.25 net-acre site. There are currently no agricultural activities within or adjacent to the Project site. The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. The Project site is currently zoned as M-1 with a land use designation of GI. In addition, the Project site is identified as “Urban and Built-Up Land” by the California Department of Conservation’s California Important Farmland Finder (FMMP, 2022). There would be no impacts related to the conversion of Farmland from the proposed Project.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project site is currently zoned as M-1 with a land use designation of GI and proposed development would be consistent with the existing land use and zoning designation. The Project site is not designated or zoned for agricultural use, used for agriculture, or subject to a Williamson Act contract. In addition, the Project site is identified as “Urban and Built-Up Land” by the California Department of Conservation’s California Important Farmland Finder (FMMP, 2022). Therefore, development of the site for industrial uses would not have an impact on agricultural zoning or a Williamson Act contract, and no impact would occur.

c) 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))?

No Impact. The Project site is currently developed with a church building and associated parking lot and located in an urban, developed area of the city. There are no forest lands or resources on or in proximity to the Project site. Additionally, the Project site is not designated or zoned for forest or timber land or used for foresting. As such, development of the proposed Project would have no impact on forest land or resources.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project site is currently developed with a church building and located in an urban, developed area of the city. There are no forest lands or resources on or in proximity to the Project site. Therefore, development of the proposed Project would not cause loss of forest land or convert forest land to non-forest use. No impact would occur to forest land or timberlands.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The proposed Project includes the construction of a new self-storage facility consistent with the land use designation and zoning of the Project site.

As previously discussed within this section, the Project site does not contain existing farmland or forest land, and therefore, development of the Project would not convert farmland or forest land. In addition, the Project site and surrounding areas are identified as “Urban and Built-Up Land” by the California Department of Conservation’s California Important Farmland Finder. Based on the site location and its urban nature, the proposed Project would not cause conversion of farmland or forest land as the proposed Project would be developed consistent with the intended designated uses. Therefore, the Project would result in no impact.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5.3 AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
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) affecting a substantial number of people?	☐	☐	☒	☐

This section was prepared using the Air Quality, Energy, and Greenhouse Gas Analysis Impact Analysis prepared by EPD Solutions on April 10, 2024 (Appendix A).

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

Less than Significant Impact. The Project site is located in the South Coast Air Basin (SCAB) and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the SCAB. In preparation of the AQMP, SCAQMD and SCAG uses regional growth projections to forecast, inventory, and allocate regional emissions from land use and development-related sources. For purposes of analyzing consistency with the AQMP, if a proposed Project would result in growth that is substantially greater than what was anticipated, then the proposed Project would conflict with the AQMP. On the other hand, if a project's density is within the anticipated growth of a jurisdiction, its emissions would be consistent with the assumptions in the AQMP, and the Project would not conflict with SCAQMD's attainment plans (Consistency Criterion 1). In addition, the SCAQMD considers a project consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation (Consistency Criterion 2).

Furthermore, the SCAB is in a non-attainment status for federal ozone standards, and state and federal particulate matter standards. The SCAB has a maintenance status for federal PM₁₀ standards. Any development in the SCAB, including the proposed Project, could cumulatively contribute to these pollutant violations. Should construction or operation of the proposed Project exceed these thresholds, a significant impact could occur; however, if estimated emissions are less than the thresholds, impacts would be considered less than significant.

The proposed Project Applicant would develop the site with a self-storage building. The Project site has a General Plan Land Use designation of General Industrial (GI) and a zoning ordinance of Light Manufacturing (M-1) within a Mixed-Use Overlay District. The proposed Project would develop the 2.25 net-acre site with a 183,584 SF self-storage facility. The proposed building would result in a FAR of 1.87, which is within the maximum allowable FAR of 2.0 in the M-1 zone. Thus, implementation of the Project would not exceed the growth assumptions for the Project site. As a result, the proposed Project would be consistent with Consistency Criterion No. 1.

As discussed below, the emissions generated by the construction and operation of the proposed Project would not exceed applicable SCAQMD regional thresholds, and the Project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation. As such, the proposed Project would be consistent with Consistency Criterion No. 2. Therefore, impacts related to conflict with the AQMP from the proposed Project would be less than significant.

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)?

Less than Significant Impact. The SCAB is in non-attainment status for federal ozone standards, and state and federal particulate matter standards. The SCAB is designated as a maintenance area for federal PM₁₀ standards. Any development in the SCAB, including the proposed Project, could cumulatively contribute to these pollutant violations. Evaluation of the cumulative air quality impacts of the proposed Project has been completed pursuant to SCAQMD's cumulative air quality impact methodology. SCAQMD states that if an individual project results in air emissions of criteria pollutants (ROG, CO, NO_x, SO_x, PM₁₀, and PM_{2.5}) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of the criteria pollutant(s) for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard. SCAQMD has established daily mass thresholds for regional pollutant emissions, which are shown in Table AQ-1.

Table AQ-1: SCAQMD Regional Daily Emissions Thresholds

Air Pollutant	Maximum Daily Emissions (pounds/day)	
	Construction	Operation
ROGs	75	55
NO _x	100	55
CO	550	550
SO ₂	150	150
PM ₁₀	150	150
PM _{2.5}	55	55

Source: Air Quality, Energy, Greenhouse Gas Impact Analysis (Appendix A)

Construction

Construction activities associated with the proposed Project are expected to take place over 12 months and would generate pollutant emissions from the following: (1) demolition (2) site preparation, (3) grading, (4) building construction, (5) paving, and (6) architectural coating. The construction equipment that is assumed to be used during the construction process is shown on Table E-1 in Section 5.6, *Energy*, and include the use of rubber-tired dozers, graders, scrapers and crawler tractors. The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring.

It is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM₁₀, and PM_{2.5} emissions from construction activities. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a

wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12 inches, and maintaining effective cover over exposed areas.

Compliance with Rule 403, included as PPP AQ-2, was accounted for in the construction emissions modeling. In addition, implementation of SCAQMD Rule 1113, included as PPP AQ-3, which governs the VOC content in architectural coating, paint, thinners, and solvents was accounted for in construction emissions modeling. As shown in Table AQ-2, the California Emissions Estimator Model (CalEEMod) Version 2022.1 results indicate that construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds. Therefore, construction activities would result in a less than significant impact.

Table AQ-2: Regional Construction Emission Estimates

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2025						
Demolition	1.5	15.0	16.2	<0.1	1.9	0.8
Site Prep	1.4	12.5	12.2	<0.1	1.3	0.7
Grading	2.0	19.4	17.5	<0.1	3.6	2.0
Building Construction	1.6	12.6	18.5	<0.1	1.7	0.7
Maximum Daily Emissions	2.0	19.4	18.5	<0.1	3.6	2.0
2026						
Building Construction	1.5	12.0	17.3	<0.1	1.7	0.7
Paving	1.0	5.9	9.0	<0.1	0.4	0.3
Architectural Coating	68.9	1.2	2.4	<0.1	0.2	0.1
Maximum Daily Emissions	68.9	12.0	17.3	<0.1	1.7	0.7
Maximum Daily Emission 2025-2026	68.9	19.4	18.5	<0.1	3.6	2.0
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: Air Quality, Energy, Greenhouse Gas Impact Analysis (Appendix A)

Operation

Implementation of the proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products. Operation of the proposed Project would include emissions from vehicles traveling to the Project site and from vehicles in the parking lots and loading areas. The proposed Project would generate 266 daily trips including 17 trips during the AM peak hour and 28 trips during the PM peak hour according to the Level of Service (LOS) and Vehicle Miles Traveled (VMT) Screening Analysis (EPD Solutions, Inc., 2024). Area source emissions would occur from operation of the self-storage building.

Operational emissions associated with the proposed Project were modeled using CalEEMod Version 2022.1 land use emission model and compared to the SCAQMD operational emissions thresholds. Emissions associated with operation of the proposed Project are presented in Table AQ-3. As shown, the proposed Project would result in long-term regional emissions below the SCAQMD's applicable thresholds. Therefore, the Project's operational emissions would not exceed the National Ambient Air Quality Standard (NAAQS)

and the California Ambient Air Quality Standards (CAAQS), would not result in a cumulatively considerable net increase of any criteria pollutant, and impacts would be less than significant.

Table AQ-3: Regional Operational Emission Estimates

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	0.8	0.2	2.2	<0.01	<0.01	<0.01
Area	5.7	0.1	8.0	<0.01	<0.01	<0.01
Energy	0.1	1.0	0.8	<0.01	0.1	0.1
Stationary	0.4	1.1	1.0	<0.01	0.1	0.1
Total Project Operational Emissions	7.0	2.4	12.0	<0.01	0.2	0.1
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: Air Quality, Energy, Greenhouse Gas Impact Analysis (Appendix A)

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant with Mitigation Incorporated. The SCAQMD's *Final Localized Significance Threshold Methodology* (SCAQMD 2008) recommends the evaluation of localized NO_x, CO, PM₁₀, and PM_{2.5} construction-related impacts to sensitive receptors in the immediate vicinity of the Project site. Such an evaluation is referred to as a localized significance threshold (LST) analysis. According to the SCAQMD's *Final Localized Significance Threshold Methodology*, "off-site mobile emissions from the Project should not be included in the emissions compared to the LSTs" (SCAQMD, 2008). SCAQMD has developed LSTs that 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 standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of NO_x, CO, PM₁₀, and PM_{2.5} pollutants for each of the 38 source receptor areas (SRAs) in the Basin. The City of Covina is located within SRA 9 (East San Gabriel Valley).

Sensitive receptors can include residences, schools, playgrounds, childcare centers, athletic facilities. The nearest sensitive receptors are the residences to the east of the site, approximately 70 feet from the Project boundary across Cutter Way. As the existing residences are located approximately 22 meters from the Project site, the most stringent 25-meter receptor distance is used for evaluation of localized impacts.

Construction

Construction of the proposed Project may expose nearby sensitive receptors to airborne particulates as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, construction contractors would be required to implement measures to reduce or eliminate emissions by following SCAQMD's standard construction practices. Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. As shown in Table AQ-4, Project construction-source emissions would not exceed SCAQMD LSTs and impacts would be less than significant.

Table AQ-4: Localized Construction Emission Estimates

Construction Activity	Maximum Daily Regional Emissions (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
2025				
Demolition	13.9	15.1	1.5	0.7
Site Prep	12.5	11.8	1.2	0.6
Grading	17.3	16.1	3.1	1.8
Building Construction	11.1	12.6	0.4	0.4
Maximum Daily Emissions	17.3	16.1	3.1	1.8
2026				
Building Construction	10.5	12.5	0.4	0.3
Paving	5.9	8.2	0.2	0.2
Architectural Coating	1.1	1.5	<0.1	<0.1
Maximum Daily Emissions	10.5	12.5	0.4	0.3
Maximum Daily Emission 2025-2026	17.3	16.1	3.1	1.8
SCAQMD Significance Thresholds	128	953	7	2
Threshold Exceeded?	No	No	No	No

Source: Air Quality, Energy, Greenhouse Gas Impact Analysis (Appendix A)

Construction Diesel Health Risk Assessment

A Construction Health Risk Assessment, included as Appendix B, was prepared to evaluate the health risk impacts as a result of exposure to diesel particulate matter (DPM) from the heavy-duty diesel vehicles and off-road construction equipment that would be utilized for the construction of the Project on a day-to-day basis. DPM has been identified by the California Air Resources Board (ARB) as a carcinogenic substance responsible for nearly 70 percent of the airborne cancer risk in California.¹ The estimated health risk impacts from the Project construction were compared to the health risk significance thresholds recommended by the South Coast Air Quality Management District (SCAQMD).

SCAQMD recommends using a risk level of 10 in one million as the cancer risk threshold. A risk level of 10 in one million implies a likelihood that up to 10 people, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. Non-cancer health risks are conveyed in terms of the Hazard Index (HI). A ratio of the predicted concentration of the facility's reported TAC emissions to a concentration is considered acceptable to public health professionals. A significant risk is defined as an HI of 1 or greater.

The SCAQMD defines a sensitive receptor as any residence, including private homes, condominiums, apartments, and living quarters, schools, preschools, daycare centers, and health facilities such as hospitals or retirement and nursing homes. For purposes of the HRA sensitive receptors were placed within the air dispersion model at the location of existing residences and locations along the offsite Project vehicle travel routes. In addition, a regular grid network of receptors was placed over the Project site to complete the receptor network. The nearest sensitive receptor was a residence located approximately 70 feet east of the Project boundary, while the nearest worker receptor was located at the light manufacturing office 17.7 meters (58 feet) to the west boundary of the Project.

Table AQ-5 presents a summary of the cancer risks and chronic non-cancer hazards resulting from the Project's construction DPM emissions along with the SCAQMD health risk significance thresholds. As noted from Table AQ-5, Summary of Proposed Project Health Risk Assessment, the estimated maximum cancer risk

¹ California Air Resources Board 2017. Study Links California Regulations, Dramatic Declines in Cancer Risk from Exposure to Air Toxics. Website: <https://ww2.arb.ca.gov/news/study-links-california-regulations-dramatic-declines-cancer-risk-exposure-air-toxics>

without mitigation is 18.14 in one million for sensitive/residential receptors, surpassing the 10 in one million significance threshold, while the estimated non-cancer hazard index of 0.04 is below the significance threshold of 1. Thus, the construction of the Project would have a less than significant result for chronic non-cancer impacts; however, there would be a potentially significant impact to cancer risk without mitigation measures.

Table AQ-5: Summary of Proposed Project Construction Health Risk Assessment without Mitigation

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	18.32	10	Yes
Maximum Impacted Sensitive Receptor – Child	18.41	10	Yes
Maximum Impacted Sensitive Receptor – Adult	0.58	10	No
Maximum Impacted Worker Receptor	0.40	10	No
Receptor	Chronic Non-Cancer Hazard Index		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	0.04	1.0	No
Maximum Impacted Sensitive Receptor – Child	0.04	1.0	No
Maximum Impacted Sensitive Receptor – Adult	0.04	1.0	No
Maximum Impacted Worker Receptor	0.03	1.0	No

Note: Cancer risk is calculated using 2015 OEHHA HRA guidelines. The modeling in the calculations of Table AQ-5 does not include mitigation measures.

However, as shown below in Table AQ-6, with implementation of Mitigation Measure AQ-1 which requires the use of Tier 4 off-road construction equipment for engines exceeding 50 horsepower (hp), the mitigated cancer risks would be below SCAQMD significance thresholds.

Table AQ-6: Summary of Proposed Project Construction Health Risk Assessment: Mitigated

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	7.06	10	No

Note: Modeling and calculations of Table AQ-6 utilizes mitigation measures, which requires and makes use of MM AQ-1 Tier 4 Final equipment for engines 50 horsepower and higher.

As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location. As such, construction of the Project would not cause a significant human health or cancer risk to nearby residences and impacts would be less than significant with mitigation incorporated.

Operation

According to the SCAQMD LST methodology, LSTs apply to Project onsite emissions of stationary and mobile sources. Projects that involve mobile sources that spend extended periods queuing and idling at a site, such as transfer facilities or warehousing and distribution buildings, have the potential to exceed the operational localized significance thresholds. The proposed Project would not involve vehicles idling or queueing for

extended periods. However, to provide a conservative analysis, an Operational LST analysis was conducted, and the results are shown in Table AQ-7 utilizing the 2-acre operational thresholds.

Table AQ-7. Localized Operational Emission Estimates

Operational Activity	Maximum Daily Regional Emissions (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Mobile	0.2	2.2	<0.1	<0.1
Area	0.1	8.0	<0.1	<0.1
Energy	1.0	0.8	0.1	0.1
Stationary	1.1	1.0	0.1	0.1
Total	2.4	12.0	0.2	0.1
SCAQMD Significance Thresholds	128	953	2	2
Threshold Exceeded?	No	No	No	No

Source: CalEEMod Sheets

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

Less than Significant Impact. The proposed Project would not generate any other emissions that were not described previously. The Project site does not contain land uses typically associated with emitting objectionable odors. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor issues include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations. The proposed Project would develop and operate a self-storage facility, which would not involve the types of uses that lead to odors.

Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's operational uses. The proposed Project would also be required to comply with SCAQMD Rule 402 (included as PPP AQ-1) to prevent occurrences of public nuisance odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction; thus, impacts would be less than significant.

Plans, Programs, or Policies (PPPs)

PPP AQ-1: Rule 402. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

PPP AQ-2: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less.

PPP AQ-3: Rule 1113. The Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only “Low-Volatile Organic Compounds” paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.

Mitigation Measures

MM AQ-1: Tier 4 Construction Equipment. The proposed Project is required to utilize Tier 4 Final or superior equipment for engines exceeding 50 horsepower (hp). If construction equipment cannot meet Tier 4 Final engine certification standards, the Project representative or contractor must provide a future study with written findings, backed by substantial evidence, for approval by SCAG before resorting to alternative technologies or strategies. Potential alternative strategies may encompass the use of Tier 4 Interim equipment, reducing the number and/or horsepower rating of construction equipment, or limiting simultaneous equipment operation. All equipment must undergo tuning and adhere to the manufacturer’s recommended maintenance schedule and specifications. Maintenance records for each piece of equipment, along with those of their contractors, must be available for inspection and kept on-site for a minimum of two years following construction completion. An exception to this requirement may be considered if a project can demonstrate that Tier 4 engines are unnecessary to reduce emissions below significance thresholds.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>5.4 BIOLOGICAL RESOURCES.</u>				
Would the project:				
a) 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?	☐	☒	☐	☐
b) 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?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒
d) 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?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

This section was prepared using the Habitat Assessment prepared by ELMT Consulting on February 13, 2024 (Appendix C).

- a) 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 Wildlife or U.S. Fish and Wildlife Service?**

Less than Significant with Mitigation Incorporated. A Habitat Assessment was prepared by ELMT Consulting for the proposed Project, which included a field survey conducted on January 23, 2024 (Appendix C). The Habitat Assessment describes that the site contains a church and undeveloped land with human disturbance associated with the historic uses and surrounding development, and no natural plant communities

are present onsite. The Project site supports two land cover types that would be classified as disturbed and developed. According to the California Natural Diversity Database (CNDDDB) Rarefind 5 and the California Native Plant Society (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California, a total of eight special-status plant species, 37 special-status wildlife species, and three special-status plant communities have the potential to occur on or within the vicinity of the Project site. These include those species listed or candidates for listing by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW) and California Native Plant Society (CNPS). All habitats with the potential to be used by sensitive species were evaluated during the field survey for their presence or potential presence.

Sensitive Plant Species

According to the CNDDDB and CNPS, a total of eight special-status plant species have been recorded within the vicinity of the Project site. No special-status plant species were observed onsite during the field investigation. Disturbed land supported by the project site is dominated by non-native weedy/early successional species and is subject to routine weed abatement activities. Due to decades of site disturbances from previous land uses and grading activities, and surrounding development, the suitability of the habitat to support special-status plant species known to occur in the general vicinity of the Project site has been greatly reduced. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, the Project site does not provide suitable habitat for any of the special-status plant species known to occur in the area. Therefore, the proposed Project would have no impact on special status plant species.

Sensitive Wildlife Species

According to the CNDDDB, a total of 37 special-status wildlife species have been recorded within the vicinity of the Project site. No special-status wildlife species were observed onsite during the field investigation conducted on January 23, 2024. It was determined that the Project site has moderate habitat for Cooper's hawk (*Accipiter cooperii*), sharp-shinned hawk (*Accipiter striatus*), and Costa's hummingbird (*Calypte costae*). Only Cooper's hawk and Costas hummingbird might be expected to nest onsite, sharp skinner hawk is not expected to nest onsite due to the Project site occurring outside of the geographic breeding range for the species. Therefore, the proposed Project has the potential to impact active bird nests if vegetation and trees are removed during the nesting season. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (United States Code Title 33, Section 703 et seq.; see also Code of Federal Regulations Title 50, Part 10) and Section 3503 of the California Fish and Game Code. Any activities that occur during the nesting/breeding season of birds protected by the MBTA could result in a potentially significant impact if requirements of the MBTA are not followed. However, implementation of Mitigation Measure BIO-1 would ensure MBTA compliance and would require a nesting bird survey to be conducted prior to the commencement of construction during nesting season. With implementation of Mitigation Measure BIO-1 impacts related to nesting avian species and native wildlife nursery sites would be reduced to a less than significant level.

Special Status Plant Communities

According to the CNDDDB, three special-status plant communities have been reported to occur within the Project vicinity: California Walnut Woodland, Riversidian Alluvial Fan Sage Scrub, and Walnut Forest. However, no special-status plant communities were observed onsite during the field investigation. Therefore, the proposed Project would not impact special status plant communities.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors.

As described in the Habitat Assessment (Appendix C), the Project site does not contain any drainage, riparian, or riverine features. In addition, there are no sensitive natural communities on site. The Project site

is not located within any designated critical habitat areas. The nearest Critical Habitat designation is located approximately 1.8 miles to the northwest of the site for the Southwestern Willow Flycatcher. Therefore, no impacts related to riparian habitat or other sensitive natural communities identified in local or regional plans would result from proposed Project implementation, and no mitigation is required.

c) 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?

No Impact. As discussed in the Habitat Assessment (Appendix C), the Project site does not include any wetlands or vernal pools. In addition, there are no CDFW, United States Army Corps of Engineers (USACE), or Regional Water Quality Control Board (RWQCB) jurisdictional waters within the Project site boundaries. Therefore, the Project would not impact any state or federally protected wetlands and no impacts would occur.

d) 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?

Less than Significant with Mitigation Incorporated. Wildlife corridors are linear features that connect areas of open space and provide avenues for the migration of animals and access to additional areas of foraging. The Project site does not contain, or is not adjacent to, any wildlife corridors. The Project site is relatively flat, and no hillsides or drainages exist on the site. The nearest wildlife corridor occurs within the Sante Fe Dam Recreational Area Significant Ecological Area, approximately 1.82-mile northwest of the site. However, the site is isolated from the wash by existing development. Thus, development of the site would not result in impacts related to established native resident or migratory wildlife corridor.

The Project site contains shrubs and trees that can be utilized by nesting birds and raptors during the nesting bird season of February 1 through September 15. Therefore, if vegetation is required to be removed during nesting bird season, Mitigation Measure BIO-1 has been included to require a nesting bird survey to be conducted prior to initiating vegetation clearing and to implement measures to protect active avian nests (e.g., monitoring, nest buffers) if detected. With the implementation of Mitigation Measure BIO-1, impacts related to nesting birds would be reduced to a less than significant level.

e) Conflict with any local policies or ordinances protecting biological resources?

Less than Significant Impact. The proposed Project would not conflict with any local policies or ordinances protecting biological resources. The City of Covina Municipal Code (CMC) Chapter 17.83, Tree Preservation, specifies heritage trees are protected that meet one or more of the following criteria:

1. Trees of the following species with a trunk diameter, as measured at standard height, of at least 10 inches for a single-trunk tree or with a combined diameter of at least 22 inches for multiple-trunk trees:
 - a. *Quercus*, all species (oaks).
2. Individual trees or groups of trees designated as heritage tree(s) by the city council pursuant to CMC 17.83.150.

The trees located within the Project site are ornamental and are not protected by the City's municipal code. The proposed Project would be required to comply with the Municipal Code requirements as part of the City permitting process, which would ensure that the Project does not conflict with local policies or ordinances protecting trees. As a result, impacts would be less than significant.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The proposed Project site is not located within a Habitat Conservation Plan or Natural Community Conservation Plan, and therefore, 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 (CDFW, 2022). As such, no impacts would occur.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

Mitigation Measure BIO-1: Nesting Bird Survey. Vegetation removal should occur outside of the nesting bird season (generally between February 1 and September 15). If vegetation removal is required during the nesting bird season, the Applicant shall retain a qualified biologist to conduct take avoidance surveys for nesting birds prior to initiating vegetation removal/clearing. Surveys will be conducted by a qualified biologist(s) within three days of vegetation removal. If active nests are observed, a qualified biologist will determine appropriate minimum disturbance buffers and other adaptive mitigation techniques (e.g., biological monitoring of active nests during construction-related activities, staggered schedules, etc.) to ensure that impacts to nesting birds are avoided until the nest is no longer active. A qualified biologist will identify the appropriate buffer which would depend on the species of bird and the individual birds' response to disturbance as well as the nest location relative to the construction activities. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist verify that the nests are no longer occupied, and the juvenile birds can survive independently from the nests. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, normal construction activities may occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5.5 CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

This section was prepared using the Cultural Resources Study prepared by Brian F. Smith and Associates, Inc. on February 15, 2024 (Appendix D).

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. According to the *State CEQA Guidelines*, a historical resource is defined as something that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by the project's Lead Agency. The California Register of Historical Resources defines a "historical resource" as a resource that meets one or more of the following criteria: (1) associated with events that have made a significant contribution to the broad patterns or local or regional history of the cultural heritage of California or the United States; (2) associated with the lives of persons important to local, California, or national history; (3) embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values; or (4) has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Implementation of the proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines, as there are no eligible historical resources on the Project site. A Cultural Resources Assessment was conducted for the proposed Project to locate and record any cultural resources that may be present within the Project site (Appendix D). Aerial photographs indicate that in the property was used as an orchard through the 1960s, and the San Dimas Wash ran through the southeastern corner of the property. In the early 1970s, the orchard was cleared, and the San Dimas Wash was rerouted. In 1990, the property was developed with a building and associated parking as the property exists today. Since the structure was built in the 1990s, it does not hold any historical significance as it is not historic age. Therefore, the Project would not result in an adverse change in the significance of a historical resource, no impacts would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less than Significant with Mitigation Incorporated. As part of the Cultural Resources Assessment, an archaeological records search was conducted through the South Central Coastal Information Center (SCCIC) at Cal State University, Fullerton (CSU Fullerton). The results of the records search did not identify any resources within the Project site; however, one previously recorded resource was identified within one-half mile of the Project boundaries. The resource identified is the Mojave Road, which originally served as a prehistoric trail used by Mojave Native Americans. Additionally, the records search indicated that four previous cultural resources studies have been conducted within a one-half mile of the Project site, none of which intersect the Project site. As such, they do not directly address the current Project.

In addition to the records search, a Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC) on November 20, 2023 (Appendix D). The NAHC responded on December 13, 2023, stating the SLF search was negative for previously known tribal cultural resources or sacred lands within one-half-mile of the Project site. Additional outreach has been conducted by the City of Covina under the official AB 52 Native American consultation process and is discussed in Section 5.18, *Tribal Cultural Resources*. Further, a field survey of the Project site was conducted on January 24, 2024, and did not identify the presence of any historic or prehistoric cultural resources as defined by CEQA. While the Project would not result in direct impacts to any of the previously known archeological resources within the Project vicinity, due the Project site's proximity to historic fresh water from the San Dimas Wash, Mitigation Measure CUL-1 is included to require archaeological evaluation in the event a resource is inadvertently discovered. With implementation of Mitigation Measure CUL-1, impacts related to archeological resources onsite would be less than significant.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. The Project site has not been previously used as a cemetery. Thus, human remains are not anticipated to be uncovered during Project construction. In addition, California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98, included as PPP CUL-1, mandate the process to be followed in the event of an accidental discovery of any human remains. Specifically, California Health and Safety Code Section 7050.5 requires that if human remains are discovered, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and made recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code (included as PPP CUL-1). If the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Compliance with existing law would ensure that impacts to human remains would be less than significant.

Plans, Programs, or Policies (PPPs)

PPP CUL-1: Human Remains. Should human remains or funerary objects be discovered during project construction, the project would be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body (within a 100-foot buffer of the find) until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of being granted access to the site.

Mitigation Measures

Mitigation Measure CUL-1: Inadvertent Discoveries. Prior to the issuance of any permits for ground-disturbing activities that cause excavation of soils (including as grading, excavation, and trenching), the City of Covina shall ensure that all Project grading and construction plans include specifications stating that in the

event that potential cultural or archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 60 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Work on the other portions of the Project outside of the buffered area may continue during this assessment period. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g).

Additionally, the Gabrieleño Band of Mission Indians – Kizh Nation shall be contacted, as detailed within Mitigation Measure TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

If significant pre-contact and/or historic-era cultural resources, as defined by CEQA, are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to Kizh Nation for review and comment, as detailed within Mitigation Measure TCR-1, below. The archaeologist shall monitor the remainder of the construction of the Project and implement the Plan accordingly.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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5.6 ENERGY. Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

This section was prepared using the Air Quality, Energy, and Greenhouse Gas Analysis Impact Analysis prepared by EPD Solutions on April 10, 2024 (Appendix A).

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact.

Construction

During construction of the proposed Project would consume energy in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, as well as delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and

Construction activities related to the proposed self-storage development and the associated infrastructure are not expected to result in demand for fuel greater on a per-development basis than other development projects in Southern California. Table E-1 details the construction fuel usage over the Project's construction period, as shown in Table E-1 below

Table E-1: Construction Equipment Fuel Usage

Activity	Equipment	Number	Hours per day	Horse-power	Load Factor	Days of Construction	Total Horsepower-hours	Fuel Rate (gal/hp-hr)	Fuel Use (gallons)
Demo	Rubber Tired Dozers	1	8	367	0.4	20	23,488	0.04745478	1,115
	Concrete/Industrial Saws	1	8	33	0.73	20	3,854	0.04200992	162
	Tractors/Loaders/Backhoes	3	8	84	0.37	20	14,918	0.05312078	792
Site Preparation	Crawler Tractors	1	8	87	0.43	3	898	0.05048826	45
	Graders	1	8	148	0.41	3	1,456	0.05153929	75
	Scrapers	1	8	423	0.48	3	4,873	0.04809065	234
Grading	Graders	1	8	148	0.41	6	2,913	0.05153929	150
	Rubber Tired Dozers	1	8	367	0.4	6	7,046	0.04745478	334
	Crawler Tractors	2	8	87	0.43	6	3,591	0.05048826	181
Building Construction	Cranes	1	8	367	0.29	220	187,317	0.05301236	9,930
	Forklifts	2	8	82	0.2	220	57,728	0.05325396	3,074
	Generator Sets	1	8	14	0.74	220	18,234	0.07797542	1,422
	Tractors/Loaders/Backhoes	1	8	84	0.37	220	54,701	0.05312078	2,906
	Welders	3	8	46	0.45	220	109,296	0.03171682	3,467
Paving	Pavers	1	8	89	0.36	10	2,563	0.05259167	140
	Paving Equipment	1	8	81	0.42	10	2,722	0.05151654	135
	Rollers	2	8	36	0.38	10	2,189	0.05259167	115
	Cement and Mortar Mixers	1	8	10	0.56	10	448	0.05116533	23
	Tractors/Loaders/Backhoes	1	8	84	0.37	10	2,486	0.05312078	132
Architectural Coating	Air Compressors	1	8	37	0.48	25	3,552	0.03000725	107
Total									24,539

Source: Air Quality, Energy, and Greenhouse Gas Impact Analysis (Appendix A)

Table E-2 shows that construction workers would use approximately 12,021 gallons of gasoline fuel to travel to and from the Project site. Haul trucks would use 418 gallons of diesel and vendor trucks would use 7,949 gallons of diesel fuel traveling to and from the Project site. This is in addition to the construction equipment fuel listed in Table E-1.

Table E-2: Estimated Construction Worker Fuel Consumption

Construction Source	Number of Vehicles	VMT	Fuel Rate	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Haul Trucks	35	2,560	6.12	418	0
Vendor Trucks	30	67,320	8.94	7,949	0
Worker Vehicles	138	325,304	27.06	0	12,021
Total				8,367	12,021

Source: Air Quality, Energy, and Greenhouse Gas Impact Analysis (Appendix A)

Table E-3 shows the overall fuel consumption for construction of the proposed Project. As shown, construction of the Project would consume approximately 12,021 gallons of gasoline fuel and 32,906 gallons of diesel fuel.

Table E-3: Total Construction Fuel Consumption

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Construction Vehicles	8,367	12,021
Off-road Construction Equipment	24,539	0
Total	32,906	12,021

Source: Air Quality, Energy, and Greenhouse Gas Impact Analysis (Appendix A)

Construction of the Project would result in fuel consumption from the use of construction tools and equipment, vendor and haul truck trips, and vehicle trips generated from construction workers traveling to and from the site. There are no unusual Project characteristics that would cause the use of construction equipment that would be less energy efficient compared with other similar construction sites in other parts of the state. Construction contractors are required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption. Overall, construction activities would require limited energy consumption as construction of the Project would only last 12 months, and would comply with all existing regulations, and would therefore not be expected to use large amounts of energy or fuel in a wasteful manner. Thus, impacts related to construction energy usage would be less than significant.

Operation

Once operational, the Project would generate demand for electricity, natural gas, as well as gasoline. No diesel vehicles were assumed for operations. Operational use of energy includes the heating, cooling, and lighting of the buildings, water heating, operation of electrical systems and plug-in appliances, parking lot and outdoor lighting, and the transport of electricity, and natural gas. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

The State of California provides a minimum standard for building design and construction standards through Title 24 of the California Code of Regulations (CCR). Compliance with Title 24 is mandatory at the time new building permits are issued by local governments. The City's administration of the Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation and air conditioning equipment (HVAC); energy-efficient indoor and

outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. Also, as Title 24 has become more progressive in realizing energy reductions and increasing efficiency, it now has requirements for solar installation for non-residential projects. With the new updates, Title 24 now mandates incorporation of solar photovoltaic systems and battery storage in many non-residential projects, or for non-qualifying projects installation of solar-ready roofs and systems. These requirements serve to offset electricity demand and the Project will be required to adhere to applicable Title 24 requirements. The project's compliance with Title 24 will be confirmed prior to issuance of building permits. In complying with the Title 24 standards, impacts to peak energy usage periods would be minimized, and impacts on statewide and regional energy needs would be reduced. Thus, operation of the Project would not use large amounts of energy or fuel in a wasteful manner, and no operational energy impacts would occur. As detailed in Table E-4, operation of the proposed Project is estimated to result in the annual use of approximately 12,021 gallons of gasoline fuel, approximately 3,536,363 British thermal units (BTU) of natural gas, and approximately 863,611 kilowatt-hours (kWh) of electricity.

Table E-4: Project Annual Operational Energy Demand Summary

Energy Usage	
863,611	
Natural Gas (Thousands British Thermal Units)	
3,536,363	
Fuel Consumption	
Annual VMT	Gallons of Gasoline Fuel
6,042	12,021

Source: Air Quality, Energy, and Greenhouse Gas Impact Analysis (Appendix A)

Therefore, construction and operations-related fuel consumption by the Project would not result in inefficient, wasteful, or unnecessary energy use compared with other similar uses in the region, and impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The California Title 24 Building Energy Efficiency Standards are designed to ensure new and existing buildings achieve energy efficiency and preserve outdoor and indoor environmental quality. These measures (Title 24, Part 6) are listed in the CCR. The California Energy Commission is responsible for adopting, implementing and updating building energy efficiency. Local city and county enforcement agencies have the authority to verify compliance with applicable building codes, including energy efficiency. As required by Municipal Code Chapter 14.02, Adoption of Codes by Reference, prior to issuance of a building permit, the Project Applicant shall submit plans showing that the Project would be in compliance with 2022 Title 24 requirements. For instance, the Project would result in a minimal water demand associated single occupancy restrooms, fire sprinklers, and drought tolerant landscaping, which would increase energy efficiency. Also, equipment and vehicles associated with construction and operation of the Project would also be subject to fuel standards at the state and federal level.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

The City's 2019 Energy Action Plan Update and 2012 Energy Action Plan were prepared by the San Gabriel Valley Council of Governments (SGVCOG) for the City. The plans' goals are to reduce energy consumption and decrease GHG emissions in accordance with AB 32 and Senate Bill (SB) 32 emission reduction targets. The City's strategy to achieve these goals is structured around four key strategy topics: electricity, natural gas, and water efficiency; municipal operations; employee & department engagement;

and partnership and regional engagement. These strategies will reduce energy usage at the City's municipal facilities (Covina, 2019). The Project would not obstruct implementation of the City's 2019 Energy Action Plan Update.

Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would not occur. As such, the Project would have less than significant impacts related to energy.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5.7 GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) 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? Refer to Division of Mines and Geology Special Publication 42?	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

This section was prepared using the Geotechnical Investigation prepared by Southern California Geotechnical (SCG) on December 8, 2023 (Appendix E) and the Paleontological Assessment prepared by Brian F. Smith and Associates on February 15, 2024 (Appendix F).

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. *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?***

Less than Significant Impact. A Geotechnical Investigation was conducted by Southern California Geotechnical for the Project site (see Appendix E). As described in the Geotechnical Investigation, the Project site is within a seismically active zone. Because the Project site is in a seismically active region of Southern California, occasional seismic ground shaking is likely to occur within the lifetime of the proposed Project. However, according to the California Department of Conservation, the California Geologic Survey, the Project site is not within an Alquist-Priolo Earthquake Fault Zone. The closest active faults are the Indian Hill Fault, which is located approximately 1.75 miles east of the site, and the Walnut Creek Fault, which is located approximately 2.50 miles southeast of the site. As the Project site does not contain an earthquake fault, it is not affected by a state-designated Alquist-Priolo Earthquake Fault Zone. Thus, impacts would be less than significant.

ii. *Strong seismic ground shaking?*

Less than Significant Impact. As mentioned previously, the Project site is located within a seismically active region of Southern California. The closest active faults are the Indian Hill Fault and the Walnut Creek Fault, located approximately 1.75 miles east and approximately 2.50 miles southeast of the site, respectively. Thus, strong seismic ground shaking has a high likelihood of occurring at the site. The amount of motion can vary depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located closer to an earthquake epicenter, which consist of poorly consolidated material such as alluvium, and in response to an earthquake of great magnitude.

Structures built in the city are required to be built in compliance with the California Building Code (CBC [California Code of Regulations, Title 24, Part 2]), included in the Municipal Code as Chapter 14.04.010. Compliance with the CBC would ensure earthquake safety based on factors including occupancy type, the types of soils onsite, and the probable strength of the ground motion. Compliance with the CBC would include the incorporation of 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. Also, consistent with the CBC and Municipal Code, construction of the project would implement the recommendations of the Geotechnical Investigation prepared for the project to ensure no geologic risks. Therefore, with CBC compliance, the proposed Project would not expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking more than other developments in Southern California. Impacts would be less than significant.

iii. *Seismic-related ground failure, including liquefaction?*

Less than Significant Impact. Liquefaction occurs when soils are transformed from a solid state into a liquefied state due to increased pressure. Liquefaction is most likely to occur with soils of higher porosity (i.e., clay) become saturated and subjected to seismic activity. Areas where the groundwater table is within approximately 50 feet below ground surface are also more susceptible to liquefaction. The Geotechnical Investigation (included as Appendix E) conducted for the Project site determined that groundwater below the site exists at a depth greater than 50 feet. Additionally, the Geotechnical Investigation determined due to the relatively dense nature of the site's underlying native earth materials, risks associated with liquefaction would be considered to be insignificant (SCG, 2023). Furthermore, according to the Seismic Hazards Map for the Baldwin Park, California 7.5 Minute Quadrangle, published by the California Geological Survey (CGS), the Project site is not located in an area mapped for high susceptibility to liquefaction (CGS, 2024). Thus, the soils underlying the Project site would not be considered at risk for liquefaction. Additionally, all structures built in the City are required to be developed in compliance with the CBC (California Code of

Regulations, Title 24, Part 2), which is adopted as Chapter 14.04.010 of the Municipal Code. Compliance with the CBC is included as a condition of approval and verified by the City's review process would ensure that impacts related to liquefaction are less than significant.

iv. Landslides?

No Impact. Landslides are the downhill movement of masses of earth and rock and are often associated with earthquakes; but other factors, such as the slope, moisture content of the soil, composition of the subsurface geology, heavy rains, and improper grading can influence the occurrence of landslides. The Project site is relatively level with minimal slope). The maximum elevation differential across the Project site is 5 feet (SCG, 2023). As the Project site and the adjacent parcels are flat and do not contain any hills or steep slopes, no landslides on or adjacent to the Project site would occur. Thus, there would be no impact.

b) Result in soil erosion or the loss of topsoil?

Less than Significant Impact. The proposed Project includes the construction of a new self-storage building consistent with the GI land use designation of the Project site. The Project would involve earthmoving activities that would disturb soil and leave exposed soil on the ground surface. As such, the proposed Project would be required to comply with the City's grading standards and erosion control measures, included in Municipal Code Section 8.50.100 (Construction sites requiring a building permit and/or grading plan). To comply, all graded areas must be protected from erosion through slope stabilization methods such as planting, walls, or netting. Interim erosion control plans shall be required, certified by the project engineer, and reviewed and approved by the Public Works Department.

The proposed Project would also be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including implementation of a Stormwater Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs). BMPs may include a combination of construction methods to reduce, prevent, or minimize soil erosion from project-related grading and construction activities. Additionally, the Construction General Permit (CGP; Order No. 2022-0057-DWQ) issued by the State Water Resources Control Board (SWRCB), regulates construction activities to minimize water pollution, including sediment. With compliance with City Municipal Code stormwater management requirements, Regional Water Quality Control Board (RWQCB) SWPPP requirements, and installation of BMPs, which would be ensured by the City's Project review by the Department of Building and Safety, construction impacts related to erosion and loss of topsoil would be less than significant.

The proposed Project includes installation of landscaping adjacent to the proposed self-storage facility and throughout the proposed parking areas. With this landscaping, areas of loose topsoil that could be eroded by wind or water would not exist upon operation of the proposed Project. In addition, as described in Section 5.10, *Hydrology and Water Quality*, the hydraulic features of the proposed Project have been designed to slow, filter, and retain stormwater within landscaping and the proposed infiltration basin, which would also reduce the potential for stormwater to erode topsoil. Furthermore, implementation of the Project requires City approval of a LID Plan, which would ensure that RWQCB requirements and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, with implementation of existing requirements, impacts related to substantial soil erosion or loss of topsoil would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Less than Significant Impact. As described above, the maximum elevation differential across the project site is 5 feet (SCG, 2023). The Project site is relatively flat and does not contain nor is adjacent to any significant slope or hillside area. The Project would not create slopes. Thus, on or off-site landslides would

not occur from implementation of the Project.

Lateral spreading is a type of liquefaction induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. As described previously, high groundwater does not exist in the Project vicinity and subsurface conditions are not considered to be conducive to liquefaction. Therefore, the Geotechnical Investigation determined that the Project site is not susceptible to liquefaction (SGC, 2023). Similarly, the site is not susceptible to lateral spreading. Impacts would be less than significant with compliance with the mandatory CBC requirements.

In addition, the Geotechnical Investigation identified that due to the presence of low strength alluvium and fill soils onsite, the soils are considered to have a moderate risk for settlement and over excavation is recommended. Differential settlement or subsidence could occur if buildings or other improvements are built on low-strength foundation materials (including imported fill) or if improvements straddle the boundary between different types of subsurface materials (e.g., a boundary between native material and fill). Although differential settlement generally occurs slowly enough that its effects are not dangerous to inhabitants, it can cause building damage over time. With implementation of the recommendations within the Geotechnical Investigation, impacts related to subsidence would be less than significant.

As described previously, compliance with the requirements of the CBC and related recommendations in the Geotechnical Investigation related to compaction of soils and development of foundations is required as part of the building plan check and development permitting process, and would reduce potential impacts related to liquefaction, settlement, and ground collapse to a less than significant level.

d) Be located on expansive soil, as defined in in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less than Significant Impact. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experiences, such as southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture.

The Geotechnical Investigation, included as Appendix E, performed an evaluation of the potential for expansive soils at the site and expansion index testing was performed on one bulk sample near surface soils which are anticipated to be within the zone of influence of the planned improvements. The results of expansion index testing indicated that near surface soils have a non-expansive potential (SGC, 2023). In addition, as described previously, compliance with the CBC would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand the effects of related to ground movement, including expansive soils. Therefore, impacts would be less than significant.

e) 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?

No Impact. The proposed Project would connect to existing sewer lines in West San Bernardino Road, and the Project would not use septic tanks or alternative wastewater disposal systems. As a result, no impacts related to septic tanks or alternative wastewater disposal systems would occur from implementation of the proposed Project.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant with Mitigation Incorporated. The proposed Project would develop the site with a self-storage facility. The Project would include earthmoving activities, such as grading, with the potential to disturb previously unknown paleontological resources. The Paleontological Resources Assessment (included as Appendix F) describes that the Project site is underlain by Holocene aged alluvial deposits, which have a low paleontological sensitivity. The Geotechnical Investigation (Appendix E) confirms this finding by showing a substantial consolidation of Holocene-aged alluvial deposits that reach at least 12 feet deep on the Project site. Earth moving activities are not expected to reach past the depth of 12 feet. According to the Paleontological Assessment, the nearest fossil localities are several miles away from the Project site, in Miocene and Pleistocene-aged rock units.

Based on the results of the Paleontological Resources Assessment and Geotechnical Investigation (Appendix E), the Project site is considered to have a low paleontological sensitivity and construction activities have a limited potential to impact paleontological resources. Additionally, due to the existence of Holocene alluvial at the Project site, and the lack of any known fossil specimens or fossil localities from within a several mile radius encompassing the Project site, paleontological monitoring is not recommended during earth disturbance activities. While there is a low potential for any paleontological resources to be discovered during grading activities, Mitigation Measure PAL-1 is included to require paleontological evaluation in the event a resource is inadvertently discovered. With implementation of Mitigation Measure PAL-1, impacts would be less than significant.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

Mitigation Measure PAL-1: Paleontological Resources. Construction plans and specifications shall state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist (who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified profession paleontologist) has evaluated the find. If a fossil is determined to be significant, the qualified paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

If any fossil remains are discovered, the qualified paleontologist shall make a recommendation whether monitoring shall be required for the continuance of earth moving activities. Prior to commencement of grading activities, the City of Covina Building and Safety Division shall verify that all project grading and construction plans specify the requirements herein related to the unanticipated discovery of paleontological resources.

After completion of the salvage and curation of any resources, the qualified paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the Director of the Covina Community Development Department, or designee, and the Natural History Museum of Los Angeles County.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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5.8 GREENHOUSE GAS EMISSIONS.

Would the project:

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?	☐	☐	☒	☐

This section was prepared using the Air Quality, Energy, and Greenhouse Gas Analysis Impact Analysis prepared by EPD Solutions on April 10, 2024 (Appendix A).

GHG Thresholds

SCAQMD: SCAQMD does not have approved thresholds; however, SCAQMD does have draft thresholds that provide a tiered approach to evaluate GHG impacts. The current interim SCAQMD thresholds consist of the following:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
 - Option 1: All land use types: 3,000 MTCO_{2e} per year
 - Option 2: Based on land use type: residential: 3,500 MTCO_{2e} per year; commercial: 1,400 MTCO_{2e} per year; or mixed use: 3,000 MTCO_{2e} per year
- Tier 4 has the following options:
 - Option 1: Reduce business as usual emissions by a certain percentage; this percentage is currently undefined.
 - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
 - Option 3, 2020 target for service populations (SP), which includes residents and employee: 4.8 MTCO_{2e}/SP/year for projects and 6.6 MTCO_{2e}/SP/year for plans;
 - Option 3, 2035 target: 3.0 MTCO_{2e}/SP/year for projects and 4.1 MTCO_{2e}/SP/year
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The assessment of the proposed Project applies the Tier 3: Numerical Screening Thresholds approach. In addition, SCAQMD methodology for a project's construction emissions are to average them over 30-years and then add them to the project's operational emissions to determine if the project would exceed the screening values listed above (Appendix A).

Executive Order S-3-05's year 2050 goal is the basis of SCAQMD's draft Tier 3 screening level thresholds. The objective of the Executive Order is to contribute to capping worldwide CO₂ concentrations at 450 ppm, stabilizing global climate change. The City of Covina has utilized Option 1 for other projects within the city, thus, Option 1 was utilized for this analysis and the GHG threshold used is 3,000 MTCO_{2e} per year.

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

Less than Significant Impact. Construction activities produce combustion emissions from various sources, such as site excavation, grading, utility engines, heavy-duty construction vehicles onsite, equipment hauling materials to and from the site, asphalt paving, and motor vehicles transporting the construction crew. Exhaust emissions from onsite construction activities would vary daily as construction activity levels change.

In addition, operation of the proposed self-storage facility would result in area and indirect sources of operational GHG emissions that would primarily result from vehicle trips, electricity and natural gas consumption, and solid waste generation. GHG emissions from electricity consumed by the building would be generated off-site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source.

The estimated operational GHG emissions that would be generated from implementation of the proposed Project are shown in Table GHG-2. Additionally, in accordance with SCAQMD recommendation, the Project's amortized construction related GHG emissions (shown in Table GHG-1) are added to the operational emissions estimate in order to determine the Project's total annual GHG emissions. As shown, GHG emissions would be less than SCAQMD threshold of 3,000 MTCO_{2e} per year. Therefore, based upon SCAQMD's screening threshold, impacts related to GHG emissions would be less than significant.

Table GHG-1: Project Construction GHG Emissions

Activity	Annual GHG Emissions (MTCO _{2e})
2025	456
2026	39
Total Construction Emissions	495
Total Emissions Amortized Over 30 Years	17

Source: Air Quality, Energy, Greenhouse Gas Impact Analysis (Appendix A)

Table GHG-2: Greenhouse Gas Emissions

Activity	Annual GHG Emissions (MTCO _{2e})
Project Operational Emissions	
Mobile	11
Area	4
Energy	325
Water	104
Waste	54
Refrigeration	5
Total Project Operation Emissions	502
Amortized Project Construction Emissions	17
Total Emissions	519
Tier 3: Significance Threshold	3,000
Threshold Exceeded?	No

Source: Air Quality, Energy, Greenhouse Gas Impact Analysis (Appendix A)

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

Less than Significant Impact. The Project involves the construction of a 183,584 SF self-storage facility at the Project site. In 2006, the California State Legislature adopted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires CARB to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable statewide emission cap, which was phased in starting in 2012. In 2022, CARB updated their Scoping Plan to reflect a reduction target for 2045 at 85 percent below 1990 levels. Therefore, as the proposed Project meets the current interim emissions targets/thresholds established by SCAQMD, it would also be on track to meet the reduction target of 85 percent below 1990 levels by 2045, as mandated by the State. Furthermore, all of the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level, and the proposed Project would be required to comply with these regulations as they come into effect. Therefore, implementation of the proposed Project would not conflict with existing plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gas. Table GHG-3 below shows the Project's consistency with the 2022 Scoping Plan.

Table GHG-3: Project Consistency with 2022 Scoping Plan

Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40% Below 1990 levels by 2030.	Consistent. The Project would comply with the 2022 Title 24, Part 6 building energy requirements along with other local and state initiatives such as CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and aim to achieve the 40% below 1990 levels by 2030 goal.
Smart Growth/Vehicle Miles Traveled VMT	
VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	Consistent. The Project is consistent with the existing General Plan land use of General Industrial, so the Project would not interfere with the analysis completed for the

	Connect SoCal (SCAG, 2024) report outlining VMT reduction targets and measures. In addition, VMT impacts associated with the Project would be less than significant.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100% of LDV sales are ZEV by 2035.	Consistent. The proposed Project would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which includes ZEV designated parking spaces and charging stations.
Truck ZEVs	
100% of medium-duty (MDV)/HDC sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	Not Applicable. The proposed Project would not utilize trucks for operations.
Aviation	
20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	Not Applicable. The proposed Project would not utilize aviation fuel.
Ocean-going Vessels (OGV)	
2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	Not Applicable. The proposed Project would not utilize any OGVs.
Port Operations	
100% of cargo handling equipment is zero-emission by 2037.	Not Applicable. The proposed Project would not impact any operations at any ports.
100% of drayage trucks are zero emission by 2035.	
Freight and Passenger Rail	
100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	Not Applicable. The proposed Project would not involve any freight or passenger rail operations.
Oil and Gas Extraction	
Reduce oil and gas extraction operations in line with petroleum demand by 2045.	Not Applicable. The proposed Project would not involve any oil or gas extraction.
Petroleum Refining	
CCS on majority of operations by 2030, beginning in 2028. Production reduced in line with petroleum demand.	Not Applicable. The proposed Project would not involve any petroleum refining.
Electricity Generation	
Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMTCO2e) in 2030 and 30 MMTCO2e in 2035. Retail sales load coverage. 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	Consistent. The Project would comply with the 2022 Title 24, Part 6 building energy requirements, including improved insulation reducing energy consumption and the use of energy efficient appliances. The proposed Project would also comply with the requirements of Title 24 regarding installation of solar or other renewable energy generation.
New Residential and Commercial Buildings	

All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	Consistent. The Project would comply with the 2022 Title 24, Part 6 building energy requirements, including installing electrical wiring for all built in appliances.
Existing Residential Buildings	
80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	Not Applicable. The proposed Project would not involve any existing residential buildings.
Existing Commercial Buildings	
80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	Not Applicable. The proposed Project would not involve any existing commercial buildings.
Food Products	
7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045.	Not Applicable. The proposed Project would not include refrigeration; therefore, no perishable food products would be associated with the operation of the proposed self-storage facility.
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	Consistent. The proposed Project would be required to use construction equipment that is registered by CARB and meets CARB's standards. CARB set's its standards to be in line with the goal of reducing energy demand by 25% in 2030 and 75% in 2045.
Chemicals and Allied Products; Pulp and Paper	
Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045. Electrify 100% of other energy demand by 2045.	Not Applicable. The Project does not involve the production of any chemical or allied products.
Stone, Clay, Glass, and Cement	
CCS on 40% of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	Not Applicable. The proposed Project would not be utilized for stone, clay, glass, and/or cement storage.
Other Industrial Manufacturing	
0% energy demand electrified by 2030 and 50% by 2045.	Not Applicable. The Project site does not involve manufacturing operations.
Combined Heat and Power	
Facilities retire by 2040.	Not Applicable. The proposed Project would not involve any existing combined heat and power facilities.
Agriculture Energy Use	
25% energy demand electrified by 2030 and 75% by 2045.	Not Applicable. The proposed Project would not involve any agricultural uses.
Low Carbon Fuels for Transportation	
Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	Not Applicable. The proposed Project would not involve any production of biofuels.
Low Carbon Fuels for Buildings and Industry	

In 2030s, biomethane 135 blended in pipeline. Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	Not Applicable. The proposed Project would not involve any production of fuels for buildings and industry.
Non-combustion Methane Emissions	
Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies. Moderate adoption of enteric strategies by 2030. Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand	Not Applicable. The proposed Project would not involve any landfill and/or dairy uses.
High GWP Potential Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions.	Not Applicable. The proposed Project does not include refrigeration uses nor would the Project include any manufacturing operations.

Source: CARB 2022 Scoping Plan

In addition to the 2022 Scoping Plan, the City of Covina General Plan also includes goals and policies aimed at reducing greenhouse gas emissions. Table GHG-4 below shows the proposed Project's consistency with the City's General Plan.

Table GHG-4: Project Consistency with City of Covina General Plan

General Plan Policy	Consistency
Policy 1.1.14 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.	Consistent. The proposed Project is consistent with GHG emission requirements of both the City of Covina and the 2022 Scoping Plan. The proposed Projects GHG emissions would be 824 MTCO_{2e} per year which is below the 3,000 MTCO_{2e} SCAQMD threshold which means there would not be significant adverse impacts. As discussed in Section 5.3, <i>Air Quality</i>, the proposed Project would not exceed the applicable SCAQMD regional threshold. Additionally, the proposed Project would be required to adhere to all applicable regulations regarding hazardous materials as discussed in Section 5.9, <i>Hazards and Hazardous Materials</i>. With implementation of the operational source and treatment control BMPs that are outlined in the preliminary LID (Appendix H) that would be reviewed and approved by the City during the permitting and approval process, potential pollutants would be reduced to the maximum extent feasible, and implementation of the proposed Project would not substantially degrade water quality. The proposed Project would also result in a less than significant Vehicle Miles Traveled (VMT) impact as discussed in Section 5.17, <i>Transportation</i>. Finally, as shown in Section 5.19, <i>Utilities and Service Systems</i>, the proposed Project would comply with Section 5.408.1 of the 2022 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste.
Policy 2.3.7 Protect residents and the local environment from potentially adverse impacts associated with industrial operations.	Consistent. The proposed Projects GHG emissions would be 824 MTCO_{2e} per year which is below the 3,000 MTCO_{2e} SCAQMD threshold. In addition, as shown on Table AQ-6, cancer risks associated with the construction of the proposed Project would be mitigated to a less than significant level with the implementation of MM AQ-1 requiring the use of Tier 4 construction equipment.
Policy 1o 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.	Consistent. The proposed Project is consistent with GHG emission requirements of both the City of Covina and the 2022 Scoping Plan. The proposed Projects GHG emissions would be 824 MTCO_{2e} per year which is below the 3,000 MTCO_{2e} SCAQMD threshold, which means there would not be significant adverse impacts. As discussed in Section 5.3, <i>Air Quality</i>, the proposed Project would not exceed the applicable SCAQMD regional threshold. The proposed Project would also result in a less than significant VMT impact as discussed in Section 5.17, <i>Transportation</i>. Finally, as shown on Table LU-1, the proposed Project would be consistent with the applicable goals and policies of the General Plan. The proposed Project would also comply with the National Pollution Discharge
Policy 1u Encourage and, where necessary, require the incorporation of energy conservation features in the design of all new and significantly expanded/remodeled private and public developments and encourage the installation of conservation devices in existing developments to	Not Applicable. The Project's total GHG emissions would be 824 MTCO_{2e} per year which is below the SCAQMD threshold of 3,000 MTCO_{2e} per year. The Project would also comply with Title 24 requirements which includes review of design components and energy conservation

increase energy efficiency and decrease pollution emissions from off-site electrical power plants and on-site natural gas use.	measures that occurs during the permitting process, which ensures that all requirements are met.
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Source: The City of Covina General Plan

As shown in Tables GHG-3 and GHG-4, the proposed Project is consistent with the actions and measures of the 2022 Scoping Plan and City of Covina General Plan, respectively, and would not interfere with the policies and goals set within those plans. In addition, the proposed Project's GHG emissions of 824 MTCO_{2e} per year are below the SCAQMD significance threshold of 3,000 MTCO_{2e} per year. Therefore, the proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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5.9 HAZARDS AND HAZARDOUS MATERIALS. Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact. Development and long-term operation of the Project would require standard transport, use, and disposal of hazardous materials and waste. If the use of these materials does not adhere to established federal, state, and local laws and regulations, workers, building occupants and residents, the public, and/or the environment could be exposed to hazardous materials.

Construction

Heavy construction equipment (e.g., dozers, excavators, tractors) would be operated for development of the Project. The equipment would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored, handled, or transported. Other materials used—such as paints, adhesives, and solvents—could also result in accidental releases or spills that could pose risks to people and the environment. These risks are standard; however, on all construction sites, and the Project would not cause greater risks than would occur on other similar construction sites.

Construction contractors would be required to comply with federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous materials. Applicable laws and regulations include CCR, Title 8 Section 1529 (pertaining to ACM) and Section 1532.1 (pertaining to LBP); CFR, Title 40, Part 61, Subpart M (pertaining to ACM); CCR, Title 23, Chapter 16 (pertaining to UST); CFR, Title 29 - Hazardous Waste Control Act; CFR, Title 49, Chapter I; and Hazardous Materials Transportation Act requirements as imposed by the U.S. Department of Transportation (USDOT), California Division of Occupational Safety and Health (CalOSHA), California Environmental Protection Agency (CalEPA) and Department of Toxic Substances Control (DTSC). Additionally, construction activities would require a SWPPP, which is mandated by the NPDES General Construction Permit (included as PPP WQ-1 herein) and enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB). The SWPPP will include strict onsite handling rules and BMPs to minimize potential adverse effects to workers, the public, and the environment during construction, including, but not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Mandatory compliance with applicable laws and regulations related to the routine transport, use, and disposal of hazardous materials during construction activities at the Project site would limit potentially significant hazards to construction workers, the public, and the environment. Impacts would be less than significant.

Operation

The Project site would be developed with a self-storage facility. Lessees of the storage units enter into an agreement with Public Storage that specifies hazardous materials are not permitted to be stored on the premises and that the premises shall not be used in any manner that will constitute a hazard, waste, nuisance or unreasonable annoyance to others. The types and amounts of hazardous materials that would be used in connection with operation of the Project would include typical housekeeping and janitorial products, including lubricants, solvents, cleaning agents, wastes, paints and related wastes, petroleum, and wastewater. The routine use and disposal of normal household products is not considered to create a significant hazard to the public or the environment. These substances are not stored or utilized in high concentrations and would be handled in accordance with their proper use and all applicable federal, State, and local regulations. Compliance with the numerous laws and regulations discussed above that govern the transportation, use, handling, and disposal of hazardous materials would limit the potential for impacts due to the transportation, use, handling, disposal, or accidental release of hazardous materials.

Under California Health and Safety Code Section 25531 et seq., CalEPA requires businesses operating with a regulated substance that exceeds a specified threshold quantity to register with a managing local agency, known as the Certified Unified Program Agency (CUPA). Additionally, businesses are required to provide workers with training on the safe use, handling, and storage of hazardous materials. Businesses are also

required to maintain equipment and supplies for containing and cleaning up spills of hazardous materials that can be safely contained and cleaned by onsite workers and to immediately notify emergency response agencies in the event of a hazardous materials release that cannot be safely contained and cleaned up by onsite personnel. Compliance with existing laws and regulations governing hazard and hazardous materials results in less than significant impacts related to the routine transport, use, and disposal of the hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact.

In July 2023, Partner completed a Phase I Environmental Assessment (Phase I ESA) of the Project site (Appendix G). The 2022 Phase I ESA did not identify any Recognized Environmental Conditions (RECs) related to the Project site.

Construction

Accidental Releases. While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during construction activities would not pose health risks or result in significant impacts; improper use, storage, transportation and disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. The project site does not have any Recognized Environmental Conditions and was previously used for agricultural uses, as vacant land, and with the current church structure and associated open space maintenance. To avoid an impact related to an accidental release, the use of BMPs during construction are implemented as part of a SWPPP as required by the NPDES General Construction Permit (PPP WQ-1). Implementation of an SWPPP would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict on-site handling rules and BMPs that include, but are not limited to:

- Establishing a dedicated area for fuel storage and refueling and construction dewatering activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Therefore, Project construction would result in less than significant impacts related to hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Operation

Operation of the proposed self-storage and associated areas could involve use and storage of common hazardous materials such as paints, solvents, cleaning products, fuels, lubricants, adhesives, sealers, and pesticides/herbicides. Normal routine use of these typical commercially used products pursuant to existing regulations would not result in a significant hazard to the environment or workers in the vicinity of the Project. Should future uses of the self-storage building utilize or store substantial amounts or acute types of hazardous materials, both federal and state governments require all businesses that handle more than specified amounts of hazardous materials to submit a business plan to regulating agencies. With adherence to existing regulations, impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. There are two schools within .25 mile of the Project site; Las Palmas Middle School (located at 641 N Lark Ellen Avenue), is approximately 0.16 miles from the Project site, across Cutter Way to the northeast. Grovecenter Elementary School (located at 775 N Lark Ellen Avenue) is approximately .25 miles southeast of the Project site. Construction activities associated with the Project would include the handling of hazardous materials, as discussed above. The truck route to the construction site would pass by Las Palmas Middle School. The accidental release or spill of hazardous materials transported near the Las Palmas Middle School could expose school children, school staff, and workers to hazardous materials. Further, the prolonged use of construction equipment could produce hazardous emissions as the construction site is near the Las Palmas Middle School. However, as discussed in Section 5.3, health risk impacts during construction would be less than significant with use of Tier 4 equipment. Although the Project site is within .25 mile of the school, as discussed above, there are numerous regulations covering the transportation, use, storage, and disposal of hazardous materials during construction activities. The required compliance with these regulations would ensure that nearby schools would not be exposed to hazardous materials, and the impacts would be less than significant. No mitigation is required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Government Code Section 65962.5 specifies lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. As described in the Phase I ESA, the proposed Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and therefore there would be no impact.

e) For a project within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. There are no airports within two miles of the Project site. The nearest airport is the San Gabriel Airport, approximately 6.35 miles west of the Project site. As such, the Project site is not within any delineated safety or noise hazard zones. The Project would not result in a safety hazard or excessive noise. No impact would occur in this regard.

f) Impair implementation of an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan.

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The installation of new driveways and connections to existing infrastructure systems that would be implemented during construction of the proposed Project would not require closure of Cutter Way or West San Bernardino Road. Any temporary lane closures needed for utility connections or driveway construction would be required to implement appropriate measures to facilitate vehicle circulation, as included within construction permits. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and potential construction-related emergency access or evacuation impacts would be less than significant.

Operation

Direct access to the Project site would be provided from Cutter Way by one ingress and one egress driveway. The Project driveways and internal access would be required through the City's permitting procedures to meet the City's design standards to ensure adequate emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers). The Fire Department and/or Public Works Department would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), included as Municipal Code Chapter 14.12.010. As such, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less than Significant Impact. The Project site is within an urbanized industrial area of the City of Covina. The Project site is bounded by West San Bernardino Road to the south, Cutter Way to the east, industrial buildings to the north, and commercial buildings to the west. According to the CAL FIRE Fire Hazard Severity Zone map, the Project site is not within an area identified as a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE, 2022). Thus, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires and impacts would be less than significant.

Plans, Programs, or Policies (PPPs)

PPP WQ-1: SWPPP. As discussed below in Section 5.10.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5.10 HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) 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:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) 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; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

This section was prepared using the Preliminary Low Impact Development (LID) Plan and Drainage Study prepared by SDH & Associates on February 12, 2024, and included as Appendix H and Appendix I, respectively.

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than Significant Impact.**Construction**

Construction of the Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Pollutants of concern during Project construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and transport of sediment downstream compared to existing conditions. During a storm event, soil erosion could occur at an accelerated rate. In addition, construction-related pollutants, such as chemicals, liquid and petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste, could be spilled, leaked, or transported via stormwater runoff into adjacent drainages and into downstream receiving waters.

These types of water quality impacts during construction of the Project would be prevented through implementation of a SWPPP that is required to identify all potential sources of pollution that are reasonably expected to affect the quality of storm water discharges from the construction site (PPP WQ-1). The SWPPP would include construction BMPs such as:

- Prompt revegetation of proposed landscaped/grassed swale areas;
- Perimeter gravel bags or silt fences to prevent off-site transport of sediment;
- Storm drain inlet protection (filter fabric gravel bags and straw wattles), with gravel bag check dams within paved roadways;
- Regular sprinkling of exposed soils to control dust during construction and soil binders for forecasted wind storms;
- Specifications for construction waste handling and disposal;
- Contained equipment wash-out and vehicle maintenance areas;
- Erosion control measures including soil binders, hydro mulch, geotextiles, and hydro seeding of disturbed areas ahead of forecasted storms;
- Construction of stabilized construction entry/exits to prevent trucks from tracking sediment on City roadways;
- Construction timing to minimize soil exposure to storm events; and
- Training of subcontractors on general site housekeeping.

Adherence to the existing requirements and implementation of the appropriate BMPs as ensured through the City's construction permitting process, which would ensure that the Project would not violate any water quality standards or waste discharge requirements, potential water quality degradation associated with construction activities would be minimized, and impacts would be less than significant.

Operation

The proposed Project would operate a self-storage facility, which would introduce the potential for pollutants such as chemicals from cleaners, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles. These pollutants could potentially discharge into surface waters and result in degradation of water quality. However, the proposed Project would be required to incorporate a Low Impact Development (LID) Plan, source control, and treatment control BMPs (PPP WQ-2). The LID site design would minimize impervious surfaces and provide infiltration of runoff into landscaped areas.

The source control BMPs would minimize the introduction of pollutants that may result in water quality impacts; and treatment control BMPs that would treat stormwater runoff. For the purposes of stormwater quality, an underground infiltration system is proposed. All runoff would be collected in a series of inlets and piped to a clarifier for pre-treatment and then into the underground system. Once the system fills up, flows would build up and be discharged onto West San Bernardino Road via a parkway drain proposed at the southern end of the site. Proposed stormwater facilities would mitigate the 85th percentile, 24-hour rain storm event

to pre-Project conditions by providing 7,039 cubic feet of underground retention. Runoff would not exceed the existing condition. This system would remove coarse sediment, trash, and pollutants (i.e., sediments, nutrients, heavy metals, oxygen demanding substances, oil and grease, bacteria, and pesticides).

With implementation of the operational source and treatment control BMPs that are outlined in the preliminary LID (Appendix H) that would be reviewed and approved by the City during the permitting and approval process, potential pollutants would be reduced to the maximum extent feasible, and implementation of the proposed Project would not substantially degrade water quality. Therefore, impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. Azusa Light and Water (ALW) is the water provider for the Project site. ALW's water supply is obtained from local ground water pumped from wells out of the Basin and from the San Gabriel River. Development of the proposed Project would introduce approximately 55,846 SF of additional impervious surfaces to the site compared to existing conditions. However, the proposed Project would install an onsite storm drain system that would convey runoff to a pre-treatment unit then to an underground infiltration/detention system that would capture, filter, and infiltrate runoff. In addition, the Project includes 17,152 SF of landscaping that would infiltrate stormwater onsite. As a result, the proposed Project would not decrease groundwater supplies or interfere substantially with groundwater recharge; and the Project would not impede sustainable groundwater management of the basin. Thus, the proposed Project would have a less than significant impact.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would:
i. Result in substantial erosion or siltation on- or off-site?

Less than Significant Impact.

Construction

Construction of the Project would require grading and excavation of soils, which would loosen sediment and could result in erosion or siltation. Approximately 2.55 acres would be disturbed as part of Project construction. However, as described previously, construction of the proposed Project requires City approval of a SWPPP prepared by a Qualified SWPPP Developer, as included in PPP WQ-1. The SWPPP is required during the City's plan check and permitting process and would include construction BMPs to reduce erosion or siltation. Typical BMPs for erosion or siltation, include use of silt fencing, fiber rolls, gravel bags, stabilized construction driveway, and stockpile management (as described in the previous response above). Adherence to the existing requirements and implementation of the required BMPs per the plan check and permitting process would ensure that erosion and siltation associated with construction activities would be minimized, and impacts would be less than significant.

Operation

The Project site consists of an existing church building and associated parking lot, as well as undeveloped land. The proposed Project would introduce impervious surfaces to the majority of the site. The Project site does not contain any drainage, riparian, or riverine features. Development of the proposed Project would introduce approximately 55,846 SF of additional impervious surfaces to the site. The pervious surfaces remaining on the site would be landscaped. There would be no substantial areas of bare or disturbed soil onsite subject to erosion. In addition, the Project is required to implement a LID, as included in PPP WQ-2, which would provide operational BMPs to ensure that operation of the self-storage facility would not result in erosion or siltation. With implementation of these regulations, impacts related to erosion or siltation onsite or off-site would be less than significant.

ii. **Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?**

Less than Significant Impact. As discussed in Section 5.10(a) above, during construction, a SWPPP would be implemented to control drainage and maintain drainage patterns across the proposed Project. As discussed in the Drainage Report (Appendix I) existing drainage patterns would remain unchanged, which would result in a decrease in time of concentration due to the increase in imperviousness. To mitigate this increase, an infiltration system would collect runoff prior to discharge offsite. Proposed LID infiltration BMPs would provide 7,039 cubic feet of total underground retention volume, which would provide a similar peak flow rate compared to the existing condition.

Also, as discussed in the Drainage Report prepared for the proposed Project, drainage runoff from the Project site would be adequately handled by the proposed Project's drainage system. Onsite drainage would be conveyed via catch basins, and then via pipes to the infiltration system BMP, with overflows draining out onto West San Bernardino Road via the existing storm drain system. The proposed onsite storm drain system would convey runoff to a pre-treatment unit then to an underground infiltration/detention system that would capture, filter, and infiltrate runoff. Proposed storm drain facilities would be able to capture runoff and mitigate the 85th percentile, 24-hour rainstorm event to pre-project conditions. Therefore, the Project would not result in flooding on- or off-site, and impacts would be less than significant.

iii. **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?**

Less than Significant Impact. As described in the previous responses, the proposed Project would be required to implement a SWPPP (PPP WQ-1) during construction that would implement BMPs, such as the use of silt fencing, fiber rolls, and gravel bags, that would ensure that runoff would not substantially increase during construction, and that pollutants would not discharge from the Project site, which would reduce potential impacts to drainage systems and water quality to a less than significant level.

See response to Section 5.10 c)(iii), above. The proposed Project would introduce approximately 55,846 SF of impervious surfaces to the Project site proposed stormwater facilities would mitigate the 85th percentile, 24-hour storm event to pre-Project conditions by providing 7,039 cubic feet of underground retention. Runoff would not exceed the existing condition. This system would remove coarse sediment, trash, and pollutants (i.e., sediments, nutrients, heavy metals, oxygen demanding substances, oil and grease, bacteria, and pesticides). Development of the proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems and impacts would be less than significant.

iv. **Impede or redirect flood flows?**

Less than Significant Impact. According to the FEMA's FIRM Map # 06037C1700F, the Project site is zoned as Flood Zone X, outside the 0.2% annual chance floodplain. The City would review the Project permit applications to ensure the proposed development would not be subject to significant flood hazard and structures would be floodproofed. Thus, the proposed Project would not impede or redirect flood flows, and impacts would not occur.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less than Significant Impact. As discussed in Response 5.10 c)(iv), the Project site is classified as Flood Zone X, outside the 0.2% annual chance floodplain. Additionally, a SWPPP and LID Plan would be prepared and implemented as part of the Project to ensure pollutants are contained and would not be released from the Project site during construction and operation. Post construction stormwater infrastructure would ensure capture and treatment of storm flows up to the 85th percentile, 24-hour runoff event. Therefore,

implementation of the Project would not risk the release of pollutants due to Project inundation in a flood hazard zone.

Tsunamis are ocean wave trains generally caused by tectonic displacement of the sea floor associated with shallow earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The Project site is located approximately 32 miles east of the Pacific Ocean. Therefore, the Project is not located within a tsunami zone and no impacts would occur.

Similarly, a seiche is the sloshing of a closed body of water from earthquake shaking. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The nearest body of water is Sante Fe Reservoir, approximately 2.0 miles to the northwest. The Project site is not within vicinity of any impounded bodies of water; therefore, the Project is not at risk of a seiche. Therefore, impacts would be less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. As described previously, the Project would be required to have an approved SWPPP (PPP WQ-1), which would include construction BMPs to minimize the potential for construction related sources of pollution. For operations, the proposed Project would be required to implement source control BMPs to minimize the introduction of pollutants; and treatment control BMPs to treat runoff. With implementation of the operational source and treatment control BMPs that would be required by the City during the permitting and approval process, potential pollutants would be reduced to the maximum extent feasible, and implementation of the proposed Project would not obstruct implementation of a water quality control plan.

Also as described previously, the Project site is within the Main San Gabriel Groundwater Basin. Development of the proposed Project would introduce approximately 55,846 SF of impervious surfaces to the site compared to existing conditions. However, the proposed Project would install an onsite storm drain system that would convey runoff to a pre-treatment unit then to an underground infiltration/detention system that would capture, filter, and infiltrate runoff. In addition, the Project includes 17,152 SF of landscaping that would infiltrate stormwater onsite. As a result, the proposed Project would not decrease groundwater supplies or interfere substantially with groundwater recharge; and the Project would not impede implementation of a sustainable groundwater management plan or water quality control plan. Thus, the proposed Project would have a less than significant impact.

Plans, Programs, or Policies (PPPs)

PPP WQ-1: SWPPP. Prior to grading permit issuance, the project developer shall have a SWPPP prepared by a QSD (Qualified SWPPP Developer) pursuant to the Municipal Code Chapter 8.50.100. The SWPPP shall incorporate all necessary BMPs and other City requirements to comply with the NPDES requirements to limit the potential of polluted runoff during construction activities. Project contractors shall be required to ensure compliance with the SWPPP and permit periodic inspection of the construction site by City of Covina staff or its designee to confirm compliance.

PPP WQ-2: LID. Prior to grading permit issuance, the project developer shall have a LID Plan approved by the City for implementation. The project shall comply with the City's Municipal Code Section 8.50.120 and the Municipal Separate Storm Sewer System (MS4) permit requirements in effect for the Regional Water Quality Control Board (RWQCB) at the time of grading permit to control discharges of sediments and other pollutants during operations of the Project.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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5.11 LAND USE AND PLANNING. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☒ | ☐ |

a) Physically divide an established community?

No Impact. As described previously, the Project site is currently developed with a church building and associated parking. The Project is in an area dominated by urban development, and there are no residential uses within the Project site. The site is surrounded by existing roadways, and existing industrial and commercial uses. The Project is consistent with the GI designation for the site. In addition, the Project does not involve development of roadways or other infrastructure that could divide a community. Therefore, the proposed Project would not disrupt or divide the physical arrangement of an established community, and no impact would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. The documents regulating land use for the Project site and immediate vicinity are the City's General Plan, and the City's Municipal Code. The proposed Project's relationship to these planning documents is described below.

General Plan. The Project would be required to comply with the goals and policies of the City of Covina General Plan. As shown in Table LU-1, the proposed Project would be consistent with the goals and policies of the Covina General Plan. As such, no impact related to General Plan inconsistency would occur.

Table LU-1: City of Covina General Plan Consistency

General Plan Policy	Proposed Project Consistency with Policy
Land Use Element	
Objective 1.1 A climate where moderate residential, commercial, and industrial development and redevelopment are accommodated.	Consistent. As shown on Table AES-1, the proposed Project would be consistent with the development standards for the M-1 designation.
Policy 1.1.1 Ensure that the type, location, and intensity of all new and intensified developments adhere to the requirements and standards specified for their particular land use categories and the rest of the General Plan, Zoning, plus any other applicable plans or programs, except where community goals, objectives, and policies are best furthered.	
Policy 1.1.7 Require that new or expanded commercial, industrial, and medium- to high-density residential projects, when adjacent to single-family residences, hospitals, nursing homes, schools, day care	

centers, and other sensitive uses, incorporate sufficient physical and visual buffers to ensure compatibility. Such buffers shall include, but not be limited to, building setback and architecture, landscaping, walls, and other physical and aesthetic elements and shall adequately protect the single family residences or sensitive uses from noise, light, trash, vehicular traffic, and other visual and environmental disturbances.	
Policy 1.1.14 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.	Consistent. As shown on Table AES-1, the proposed Project would be consistent with the development standards for the M-1 designation. As discussed throughout this table and this entire IS/MND, the Project would not result in any conflict with regional planning and growth management matters. Impacts related to air quality, recycling, hazardous waste, trip reduction, stormwater, water quality, housing, transportation, and circulation would be less than significant.
Policy 1.3.3 Preserve the predominantly low-rise, low-to medium-intensity character of Covina's commercial and industrial districts and corridors.	Consistent. As shown on Table AES-1, the proposed Project would be consistent with the development standards for the M-1 designation. The self-storage facility would have a maximum height of 46-feet 8-inches, which is within the maximum allowed height of 50 feet. The structure would also have a FAR of 1.87 which is within the maximum allowed density of 2.0.
Policy 1.3.5 Maintain its variety and abundance of viable, small- to medium-size industrial/light manufacturing, processing, assembling, wholesaling, and related operations for reasons pertaining to employment, community image enhancement, and jobs-to-housing ratio maximization.	Consistent. As shown on Table AES-1, the proposed Project would be consistent with the development standards for the M-1 designation. The proposed Project would generate five jobs for the operation of the self-storage facility.
Policy 1.3.6 Prohibit "heavy" or industrial-intensive operations and protect residents and the local environment from potentially adverse impacts associated with industrial operations.	Consistent. As shown on Table AES-1, the proposed Project would be consistent with the development standards for the M-1 designation. The self-storage facility would have a maximum height of 46-feet 8-inches, which is within the maximum allowed height of 50 feet. The structure would also have an FAR of 1.87 which is within the maximum allowed density of 2.0.
Policy 1.3.15 Require that new and remodeled/expanded commercial and industrial structures comply with Zoning, Design Guidelines, and other standards and incorporate adequate amenities that contribute to a high quality of life for workers and patrons, except in appropriate cases, such as PCD (Planned Community Development) overlay district application, where community goals, objectives, and policies are best furthered.	Consistent. As shown on Table AES-1, the proposed Project would be consistent with the development standards for the M-1 designation. As discussed throughout this table, the proposed Project would be consistent with the goals and policies of the General Plan.
Policy 2.1.1 Ensure that all developments adhere to the requirements and standards specified for their particular land use categories and the rest of the General Plan plus any other applicable plans or programs, except where community goals, objectives, and policies are best furthered.	Consistent. As shown on Table AES-1, the proposed Project would be consistent with the development standards for the M-1 zoning designation and is consistent with the GI General Plan designation. As discussed throughout this table, the proposed Project would be consistent with the goals and policies of the General Plan.
Policy 2.3.1 Encourage the physical, functional, and aesthetic maintenance and, where necessary, rehabilitation of all commercial and industrial buildings, including possible application of City Neighborhood Preservation Program and/or Code Enforcement efforts, and, where needed, the revitalization of deteriorating commercial and	Consistent. The proposed Project would develop a self-storage facility on an underutilized lot that is mostly vacant land with a church building and associated parking lot. The Project would be developed according to the City's design guidelines for the M-1 zone, as shown in Table AES-1.

industrial properties through Redevelopment Agency, private, and/ or other efforts.	
Policy 2.3.7 Protect residents and the local environment from potentially adverse impacts associated with industrial operations.	Consistent. As discussed in Section 5.3, <i>Air Quality</i> , impacts related to criteria pollutants at both the regional and local level for nearby sensitive receptors would be less than significant.
Objective 3 A community that is attractive and maintains a good image and small-town atmosphere.	Consistent. As discussed in Section 5.1, <i>Aesthetics</i> , the proposed Project would be constructed according to the City's development guidelines. The Project's setbacks would be decorated with landscaping that would provide visual depth and distance between the roadways and proposed structure.
Policy 3.1.3 Ensure that the type, location, and intensity of new and redeveloped projects adhere to the requirements and standards for their particular land use categories and the rest of the General Plan plus any other applicable plans or programs, except where community goals, objectives, and policies are best furthered, thereby promoting individual safety and best serving existing and future residents, workers, shoppers, and others, except in appropriate cases, such as affordable housing construction.	Consistent. As shown on Table AES-1, the proposed Project would be consistent with the development standards for the M-1 zoning designation and is consistent with the GI General Plan designation. As discussed throughout this table, the proposed Project would be consistent with the goals and policies of the General Plan.
Policy 3.1.10 Through general code enforcement efforts, maintain and preserve the physical and aesthetic condition and integrity of all commercial and industrial buildings and complexes in all areas so that Covina evokes a positive perception by residents, workers, shoppers, passers-by, and others.	Consistent. As shown on Table AES-1, the proposed Project would be consistent with the development standards for the M-1 designation.
Policy 3.1.37 Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure changes or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential land use and related impacts.	Consistent. As shown on Table AES-1, the proposed Project would be consistent with the development standards for the M-1 designation. As discussed throughout this table and this entire IS/MND, any potentially significant impacts to regional planning and growth management matter would be less than significant.
Objective 4 Economic and social vitality in all areas of the community.	Consistent. The Project proposes to construct a new self-storage facility that would bring five new jobs to the community.
Circulation Element	
Objective 1 Maintenance and improvement of public rights-of-way and related infrastructure to accommodate future growth.	Consistent. As discussed in Section 5.15, <i>Transportation</i> , the Project would include the installation of new sidewalks and roadway improvements along Cutter Way and West San Bernardino Road as well as provide bike racks onsite. The Project would also be located in an area that contains several existing bus stops for transit services provided by Foothill Transit. There are no existing or planned bike lanes within the vicinity of the Project.
Policy 1.12 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 uses and that all on-site parking facilities adequately serve their accompanying uses and are designed to facilitate safe, functionable, and viable circulation and maneuverability.	Consistent. As discussed in Section 3.0, <i>Project Description</i> , the proposed Project would include 22 passenger vehicle parking stalls, compliant with Covina Municipal Code Section 17.72.10. In addition, the Project driveways and internal access would be required through the City's permitting procedures to meet the City's design standards to ensure adequate emergency access and evacuation.

Policy 5.1 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.	Consistent. As discussed in Section 5.17, <i>Transportation</i>, while no longer an impact under CEQA, the proposed Project would not result in adverse impacts on the City's level of service requirements and does not require any circulation improvements.
Policy 5.2 Follow, in a reasonable manner, through the Covina Site Plan Review and other processes, applicable portions of all Federal, State, regional, and County transportation plans/provisions, such as the Los Angeles County Congestion Management Program(CMP), that mandate traffic congestion mitigation and air pollution reduction Measures be imposed on major private developments by, among other strategies, minimizing single-occupant trips, advancing alternative modes of transportation, and/or alleviating traffic-related impacts by requiring the incorporation of appropriate facilities into site design and the performing of necessary traffic impact analyses.	
Policy 5.7 Continue to require adequate on-site parking and vehicular circulation in the plan approval process through standards and provisions in the Zoning Ordinance, Design Guidelines, and other documents.	Consistent. As discussed in Section 3.0, <i>Project Description</i>, the proposed Project would include 22 passenger vehicle parking stalls, compliant with Covina Municipal Code Section 17.72.10.
Policy 6.9 Continue requiring private developers and project proponents to perform to construct street improvements and/or other infrastructure, where required and necessary, to mitigate development impacts.	Consistent. As discussed in Section 5.17, <i>Transportation</i>, while no longer an impact under CEQA, the proposed Project would result in a less than significant impact on the City's level of service requirements and does not require any circulation improvements.
Policy 6.10 Continue requiring private developers and project proponents to perform traffic/circulation studies/ analyses in particular area or on certain streets or intersections thereof to mitigate development impacts.	Consistent. A Level of Service (LOS) Screening Memo has been prepared for the project and is included as Appendix K. The Project screens out of further LOS analysis and impacts are less than significant.
Natural Resources and Open Space	
Policy 1a Support the efforts at all levels of government to monitor and regulate water quality and conditions, ensuring that all applicable standards are met.	Consistent. As discussed in Section 5.10, <i>Hydrology and Water Quality</i>, the Project would comply with the City Municipal Code guidelines and would implement BMPs.
Policy 1m Follow the City's Water-Efficient Landscape Ordinance for the sites of new and significantly expanded/ remodeled developments as a viable conservation tool.	Consistent. As discussed in Section 3.0, <i>Project Description</i>, and illustrated in Figure 3-3, Conceptual Landscaping Plan, the proposed Project would utilize drought tolerant landscaping to reduce water use.
Policy 1n 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.	Consistent. As discussed in Section 5.10, <i>Hydrology and Water Quality</i>, the Project would comply with the City Municipal Code guidelines and would implement Best Management Practices (BMPs). The Project would implement 2022 CalGreen standards for efficient appliances and fixtures
Policy 1o 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	Consistent. As discussed in Section 5.3, <i>Air Quality</i>, the proposed Project would not result in any air quality pollutants over the SCAQMD thresholds.

measures, proposals, and policies outlined in the Land Use and Circulation Elements, to the greatest extent feasible and practical.	
Policy 1u Encourage and, where necessary, require the incorporation of energy conservation features in the design of all new and significantly expanded/remodeled private and public developments and encourage the installation of conservation devices in existing developments to increase energy efficiency and decrease pollution emissions from off-site electrical power plants and on-site natural gas use.	Consistent. As discussed in Section 5.6, <i>Energy</i> , the proposed Project would comply with all applicable CalGreen Building Code standards including the use of energy efficient appliances. The Project would also comply with Title 24 requirements for solar-generation at the time building permits are issued.
Policy 2f Follow appropriate measures to handle and/or protect any officially recognized sensitive plant, animal, or other species that may be identified in the City.	Consistent. As discussed in Section 5.4, <i>Biological Resources</i> , there are no sensitive plant or animal species that have potential to be present on the site. The Project would implement Mitigation Measure BIO-1 in order to mitigate impacts on nesting birds.
Policy 2g Require that new and significantly expanded/remodeled private, quasi-public, and public developments, including parking lots, incorporate adequate landscaping, in accordance with City Zoning, Design Guidelines, and general landscape installation provisions, for both aesthetic and ecological reasons.	Consistent. As discussed in Section 5.1, <i>Aesthetics</i> , the project would include 17,152 SF of landscaping consistent with the City of Covina's design standards.
Safety Element	
Policy 1a Require all new and expanded or improved buildings and structures to comply with current seismic-related codes, standards, and construction practices.	Consistent. As discussed in Section 5.10, <i>Hazards and Hazardous Materials</i> , construction of the proposed Project would be built compliant to CBC guidelines adopted by the City of Covina Municipal Code Chapter 14.04.010.
Policy 1b Require adequate soils, geologic, and/or structural studies/evaluations prior to any building construction, particularly in the Covina Hills area, to identify appropriate, development-accommodating engineering and development siting measures.	Consistent. A Geotechnical Investigation was done for the Project site and is included as Appendix E. Construction of the proposed Project would follow the recommendations of the Geotechnical investigation and CBC guidelines.
Policy 2b 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.	Consistent. As discussed in Section 5.5.10, <i>Hydrology and Water Quality</i> , Project site is zoned as Flood Zone X, outside the 0.2% annual chance floodplain. The proposed Project would also implement post-construction (or permanent) LID site design, source control, and treatment control BMPs. The LID site design would minimize impervious surfaces and provide infiltration of runoff into landscaped areas.
Policy 2j Require the use of the greatest amount of landscaping feasible in new and significantly expanded developments to maximize permeable surface area to reduce site runoff as well as for aesthetic purposes, particularly along or near the unimproved portion of Walnut Creek.	Consistent. As discussed in Section 5.1, <i>Aesthetics</i> , the project would include 17,152 SF of landscaping consistent with the City of Covina's design standards
Policy 3b Maintain all fire-inhibiting Building and Safety and Fire Department requirements and standards for new construction and for substantial additions to existing structures, including those for fire-resistant building materials; fire-resistant roofing components (untreated wood-shakes being prohibited); building construction; detector and alarm systems; fire service equipment; automatic fire sprinklers; one-hour fire walls; clearances around structures; accessibility to and into buildings; and the	Consistent. As discussed in Section 5.9, <i>Hazards and Hazardous Materials</i> , the Fire Department and/or Public Works Department would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), included as Municipal Code Chapter 14.12.010.

proper storage of flammable and combustible materials.	
Policy 4a Continue to cooperate with all applicable laws and agencies concerning the regulation of the use, storage, and disposal of hazardous materials by following this Safety Element and related documents, mandates, and matters.	Consistent. As discussed in Section 5.9, <i>Hazards and Hazardous Materials</i> , routine use and transport of hazardous materials would comply with applicable laws and regulations.
Policy 4i Continue to cooperate with all applicable laws, particularly the Clean Water Act, and agencies concerning the regulation of discharges or prohibition of all wastes and non-storm water materials disposed into the public storm drainage system by implementing the National Pollutant Discharge Elimination System (NPDES)- related storm water/urban runoff management program.	Consistent. As discussed in Section 5.10, <i>Hydrology and Water Quality</i> , the Project includes BMPs that would treat stormwater in accordance with the County MS4 permit and Clean Water Act requirements.
Policy 4l Maximize, to the greatest extent practicable, the percentage of permeable surfaces to allow more percolation of storm water runoff into the ground.	Consistent. The Project would include implementation of onsite storm drain facilities. As discussed in Section 5.10, <i>Hydrology and Water Quality</i> , an underground stormwater infiltration system is proposed to collect stormwater. Runoff would be collected via a series of inlets and piped to a clarifier for pre-treatment before being piped into the underground infiltration system. Overflow from the underground storm chambers would be discharged out onto West San Bernardino Road via a parkway drain proposed at the southern border of the site. Proposed storm drain facilities would be able to capture runoff and mitigate the 85 th percentile, 24-hour runoff event to pre- Project conditions. Runoff would not exceed existing conditions.
Policy 4m Minimize, to the greatest extent practicable, the amount of storm water directed to impermeable areas and to the storm drainage system.	
Policy 4q Require erosion and sediment controls for developments to minimize erosion-related damages and the spillover of sediments to adjacent sites.	Consistent. As discussed in Section 5.7, <i>Geology and Soils</i> , the Project site and the adjacent parcels are relatively flat and do not contain any hills or steep slopes.
Policy 4ll Require all new development in Covina to be connected to public sewers.	Consistent. As discussed in Section 3.0, <i>Project Description</i> , the proposed Project would connect to the existing sewer line in West San Bernardino Road.
Polic 5t Ensure continuing adequate fire and paramedical response times for all Covina properties.	Consistent. As discussed in Section 5.15, <i>Public Services</i> , the fire and paramedic services would be sufficiently staffed to serve the Project site.
Policy 5nn Maintain adequate site design standards for public and private driveways, parking aisles, vertical clearance, vehicular turn-around, driveway approaches, the number and locations of site access points, emergency parking and unloading, building setback, clearances around structures, and other elements, in accordance with the Zoning Ordinance, Uniform Building Code, and Uniform Fire Code, to ensure that hazardous incidents and emergencies can be quickly and safely accessed by emergency vehicles and personnel. The City will attempt to ensure that developments or uses of which the State has permitting authority over, including public schools, hospitals, and mobile home parks, meet these standards and provisions to the greatest extent possible.	Consistent. As discussed in Section 5.11, <i>Hazards and Hazardous Materials</i> , the Project driveways and internal access would be required through the City's permitting procedures to meet the City's design standards to ensure adequate emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers). The Fire Department and/or Public Works Department would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), included as Municipal Code Chapter 14.12.010.
Noise Element	
Policy 1.6 Require noise-reduction techniques and features in site planning, architectural design, project landscaping, building materials, and/or construction, where necessary or required by law.	Consistent. As discussed in Section 5.12, <i>Noise</i> , a Noise Impact analysis was prepared by LSA (Appendix J) and found that impacts related to construction and operational

Policy 2.5 Require that parking lots and structures and loading areas be designed to minimize on-site 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.	activities would be less than significant and would therefore not require the implementation of mitigation measures.
Policy 2.12 Ensure that commercial or industrial buildings are constructed soundly to prevent adverse noise transmission onto adjacent businesses.	
Policy 4.1 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.	Consistent. As discussed in Section 5.12, <i>Noise</i> , the proposed project would comply with City of Covina Municipal Code Section 9.40.110 which limits the allowable hours of construction activities within 500 feet of residential land uses to between 7:00 am and 8:00 pm.
Policy 4.3 Require that construction activities incorporate feasible and practical techniques, measures, and procedures that minimize the noise impacts on all adjacent uses.	Consistent. As discussed in Section 5.12, <i>Noise</i> , construction noise impacts would be less than significant as noise levels during construction activities would not exceed the 80 dBA, 85 dBA, and 90 dBA 1-hour construction noise level criteria as established by the Federal Transit Authority.

Regional Transportation Plan/Sustainable Communities Strategy

The Project would be required to comply with the goals and policies of SCAG's 2024 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). As shown in Table LU-2, the proposed Project would be consistent with the goals and policies of the plan. As such, no impact related to regional plan inconsistency would occur.

Table LU-2: RTP/SCS Consistency

RTP/SCS Policy	Proposed Project Consistency with Policy
Complete Streets	
Support implementation of Complete Streets demonstrations (including those addressing curb space management) to accommodate and optimize new technologies and micromobility devices, first/last mile connections to transit and last-mile deliveries	Consistent. The Project does not currently propose any roadway improvements. As discussed in Section 5.17, <i>Transportation</i> , the proposed Project would install a six-foot wide sidewalk along both Cutter Way and West San Bernardino Road which would connect pedestrian access to public transit stops located along West San Bernardino Road.
Support community-led Complete Streets plans and projects, including those that take into account how to mitigate or adapt to climate change impacts (e.g., extreme heat)	Consistent. The Project does not currently propose any roadway improvements. As discussed in Section 5.17, <i>Transportation</i> , the proposed Project would install a six-foot wide sidewalk along both Cutter Way and West San Bernardino Road which would connect pedestrian access to public transit stops located along West San Bernardino Road.
Transit and Multimodal Integration	
Increase multimodal connectivity (e.g., first/last mile transit and airport connections), which includes planning for and developing mobility hubs throughout the SCAG region	Consistent. As discussed in Section 5.17, <i>Transportation</i> , the proposed Project would install a six-foot wide sidewalk along both Cutter Way and West San Bernardino Road which would connect pedestrian access to public transit stops located along West San Bernardino Road.
Expand the region's networks of bicycle and pedestrian facilities. This includes creating more low stress facilities, such as separated bikeways and bike paths, slow streets, and open streets	Consistent. As discussed in Section 5.17, <i>Transportation</i> , the proposed Project would install a six-foot wide sidewalk along both Cutter Way and West San Bernardino Road which would connect pedestrian access

	to public transit stops located along West San Bernardino Road.
Safety	
Work with local, state and federal partners to advance safer roadways, including reduced speeds to achieve zero deaths and reduce GHGs	Consistent. As discussed in Section 5.17, <i>Transportation</i> , the proposed Project would include driveways, internal roadways, and sidewalk construction that would be built according to the California Building Code Guidelines would connect pedestrian access to nearby public transit stops in order to reduce single occupant vehicle use.
Sustainable Development	
Research the availability of resources that can support the development of water and energy-efficient building practices, including green infrastructure	Consistent. As discussed in Section 5.6, <i>Energy</i> , the proposed Project would comply with CALGreen/Title 24 requirements to implement energy conservation measures and water efficient plumbing.
Air Quality	
Coordinate with local, regional, state and federal partners to meet federal and state ambient air-quality standards and improve public health	Consistent. As described in Section 5.3, <i>Air Quality</i> , particulate emissions would be below significance thresholds. The proposed Project would produce minimal mobile source emissions and would also be required to comply with all relevant State, regional, and local regulations and policies for reducing particulate emissions.
Clean Transportation	
Support the deployment of clean transit and technologies to reduce greenhouse gas emissions as part of the CARB innovative clean technology (ICT) rule	Consistent. As discussed in Section 5.6, <i>Energy</i> , the proposed Project would comply with CALGreen/Title 24 requirements to implement energy conservation measures and water efficient plumbing.
Natural and Agricultural Lands Preservation	
Work with implementation agencies to support, establish or supplement voluntary regional advance mitigation programs (RAMP) for regionally significant transportation projects to mitigate environmental impacts, reduce per-capita VMT and provide mitigation opportunities through the Intergovernmental Review Process	Consistent. The proposed Project would develop a 183,584 SF self-storage facility that would also construct a six-foot wide sidewalk along both Cutter Way and West San Bernardino Road which would connect pedestrian access to public transit stops located along West San Bernardino Road. As discussed in Section 5.17, <i>Transportation</i> , the proposed self-storage facility would result in a less than significant VMT impact due to the low number of trips accessing the site.
Continue efforts to support partners in identifying priority conservation areas—including habitat, wildlife corridors, and natural and agricultural lands—for permanent protection	Consistent. As discussed in Section 5.4, <i>Biological Resources</i> , the Project site is currently developed with a church building and associated parking and is not suitable habitat for any sensitive species and does not serve as a wildlife corridor. MM BIO-1 would be implemented to minimize impacts to nesting birds onsite.
Support the integration of nature-based solutions into implementing agency plans to address urban heat, organic waste reduction, protection of wetlands, habitat and wildlife corridor restoration, greenway connectivity and similar efforts	Consistent. As discussed in Section 5.4, <i>Biological Resources</i> , the Project site is currently developed with a church building and associated parking and is not suitable habitat for any sensitive species and does not serve as a wildlife corridor.
Climate Resilience	
Develop partnerships and programs to support local and regional climate adaptation, mitigation and resilience initiatives	Consistent. As discussed in Section 5.19, <i>Utilities and Service Systems</i> , the proposed Project would be required to implement the CalGreen Plumbing Code for efficient use of water. Additionally, as discussed in Section 5.10, <i>Hydrology and Water Quality</i> , development and construction of the Project site would require preparation and adherence to SWPPP and WQMP. Therefore,

	development of the site would not deplete or pollute groundwater resources.
Collaborate with partners to foster adoption of systems and technologies that can reduce water demand and/or increase water supply, such as alternative groundwater recharge technologies, stormwater capture systems, urban cooling infrastructure and greywater usage systems	Consistent. As discussed in Section 5.19, <i>Utilities and Service Systems</i> , the proposed Project would be required to implement the CalGreen Plumbing Code for efficient use of water. Additionally, as discussed in Section 5.10, <i>Hydrology and Water Quality</i> , development and construction of the Project site would require preparation and adherence to SWPPP and WQMP. Therefore, development of the site would not deplete or pollute groundwater resources.
Workforce Development	
Provide technical assistance to help local jurisdictions realize their economic and workforce-development goals	Consistent. As described in Section 5.6, <i>Population and Housing</i> , development of the proposed 183,584 SF self-storage facility on a site zoned for General Industrial uses would result in the need for five full-time employees, with two to three employees onsite per day, each working an 8-hour shift.
Encourage the growth of, and equitable access to, living-wage jobs throughout the region	Consistent. As described in Section 5.6, <i>Population and Housing</i> , buildout of the 183,584 SF self-storage facility would result in the need for five full-time employees, with two to three employees onsite per day, each working an 8-hour shift.

Municipal Code. According to Title 17 of the Municipal Code, the Project site is zoned for M-1 use. As detailed previously in Table AES-1, the proposed Project would be consistent with the development standards for the M-1 zoning district. Thus, the proposed Project would not conflict with any applicable zoning regulations adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be less than significant.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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5.12 MINERAL RESOURCES. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) 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? | ☐ | ☐ | ☐ | ☒ |
| b) 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? | ☐ | ☐ | ☐ | ☒ |

a) 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?

No Impact. According to the City's General Plan Natural Resources and Open Space Element, there are currently no extractable mineral resources due to long-term urbanization (Covina, 2000). Further, the City's Zoning Code prohibits the extraction or production of aggregate mineral resources. Further, the Project site is located in a highly urbanized area of the City and is currently developed with a two-story building used for church activities, an asphalt-paved parking lot, and ornamental landscaped areas. Therefore, the potential for the loss of a known mineral or locally important mineral resource is low. As such, no impact would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on the general plan, specific plan or other land use plan?

No Impact. As discussed above, the City's General Plan states that there are no extractable mineral resources due to long term urbanization (Covina, 2000). Further, the City's Zoning Code prohibits the extraction or production of aggregate mineral resources. Further, the Project site is located in a highly urbanized area of the City and is currently developed with a two-story building used for church activities, an asphalt-paved parking lot, and ornamental landscaped areas. Therefore, the potential for the loss of a known mineral or locally important mineral resource is low. As such, no impact would occur.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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5.13 NOISE. Would the project result in:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Generation of 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) Generation of excessive ground-borne vibration or ground-borne noise levels? | ☐ | ☒ | ☐ | ☐ |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☒ | ☐ |

This section was prepared using the Noise and Vibration Impact Analysis prepared by LSA, in March 2024 (Appendix J).

Existing Ambient Noise Levels

As detailed in the Noise and Vibration Impact Analysis (Appendix J), to identify the existing ambient noise level environment, long term noise level measurements were taken at two locations in the Project study area (see Table N-1). The Noise Impact Analysis describes that the background ambient noise levels in the Project area are dominated by transportation related noise from West San Bernardino Road and Cutter Way adjacent to the Project site, in addition to existing industrial land use activities in the vicinity. The existing noise levels are provided in Table N-1.

Table N-1: Long Term 24-Hour Ambient Noise Monitoring Results

Site No.	Location	Daytime Noise Levels ¹ (dBA L _{eq})	Nighttime Noise Levels ² (dBA L _{eq})
LT-1	529 Cutter Way, Covina, CA. On a light pole at the south edge of the parking lot, approximately 140 feet north of San Bernardino Road.	59.3-63.5	51.7-59.7
LT-2	529 Cutter Way, Covina, CA. On a light pole at the north edge of the parking lot, approximately 330 feet north of San Bernardino Road.	52.1-57.5	42.9-53.8

Source: Noise and Vibration Impact Analysis (Appendix J).

¹ Daytime Noise Levels = noise levels during the hours from 7:00 a.m. to 10:00 p.m.

² Nighttime Noise Levels = noise levels during the hours from 10:00 p.m. to 7:00 a.m.

dBA = A-weighted decibels L = equivalent continuous sound level

Noise Monitoring Locations



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City of Covina General Plan

The Noise Element of the General Plan provides the City's goals and policies related to noise, including the land use compatibility guidelines for community exterior noise environments. As specified in the General Plan, the City of Covina uses the land use compatibility guidelines illustrated in the State General Plan.

City of Covina Municipal Code

The City of Covina Municipal Code Noise Chapter (Chapter 9.40) includes regulations to control the negative effects of nuisance noise and identifies exterior noise level limits. In addition, the City of Covina Municipal Code Chapter 9.40.040 contains exterior and interior noise level standards for industrial, residential, and commercial land uses as shown in Table N-2.

Table N-2: Exterior Noise Level Limits

Receiving Land Use Category	Time	Sound Level (A-weighted Decibels)
Residential Estate of Agricultural	7:00 a.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	40
Residential Low Density	7:00 a.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	45
Residential Medium and High Density	7:00 a.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	50
Commercial	7:00 a.m. to 10:00 p.m.	65
	10:00 p.m. to 7:00 a.m.	55
Industrial	7:00 a.m. to 10:00 p.m.	70
	10:00 p.m. to 7:00 a.m.	60

Source: Section 9.40.040 of the City of Covina's Municipal Code.

¹ Daytime means 7:00 a.m. to 10:00 p.m.

² Nighttime means 10:00 p.m. to 7:00 a.m. dBA = A-weighted decibels

Leq = equivalent continuous sound level

Operational Noise. Section 9.40.090, Controlled Hours of Operation, states that it is unlawful for any period to operate, permit, use, or cause to operate any of the following other than between the hours of 7 am and 8 pm of any one day:

- A. Powered model vehicles;
- B. Loading and unloading vehicles such as garbage trucks, forklifts, or cranes in a residential area or within 500 feet of a residence;
- C. Domestic power tools;
- D. Lawn equipment, including but not limited to: lawn mowers, edgers, cultivators, chainsaws, and leaf blowers in any residential area or within 500 feet of any residence.
- E. Equipment associated with the repair and maintenance of any real property.

Construction Noise Standards. The City has set restrictions to control noise impacts associated with the construction of projects within the city. Section 9.40.110, Construction, prohibits construction activities within 500 feet of residential land use to between the hours of 8:00 pm of any one day and 7:00 am of the next day, at any time on any Sunday or at any time on any public holiday.

Federal Transit Administration (FTA) Manual

Because the City does not have construction noise level limits for activities that occur within the specified hours in Section 9.40.110, construction noise for the Project was assessed using criteria from the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA, 2018). Table N-3 presents the FTA's general assessment daytime construction noise criteria.

Table N-3: Federal Transit Administration Daytime Construction Noise Criteria

Land Use	Daytime 1-hour L_{eq} (dBA)	Nighttime 1-hour L_{eq} (dBA)
Residential	80	70
Commercial	85	85
Industrial	90	90

Source: Transit Noise and Vibration Impact Assessment Manual (FTA 2018)

FTA Vibration Standards

Vibration standards included in the FTA Manual are used in this analysis for ground-borne vibration impacts on human annoyance. The criteria for environmental impact from ground-borne vibration and noise are based on the maximum levels for a single event. Table N-4 provides the criteria for assessing the potential for interference or annoyance from vibration levels in a building.

Table N-4: Vibration Annoyance Criteria

Land Use	Max L_v (VdB) ¹	Description of Use
Workshop	90	Vibration that is distinctly felt. Appropriate for workshops and similar areas not as sensitive to vibration.
Office	84	Vibration that can be felt. Appropriate for offices and similar areas not as sensitive to vibration
Residential Day	78	Vibration that is barely felt. Adequate for computer equipment and low-power optical microscopes (up to 20×).
Residential Night and Operating Rooms	72	Vibration is not felt, but ground-borne noise may be audible inside quiet rooms. Suitable for medium-power microscopes (100×) and other equipment of low sensitivity.

Source: Transit Noise and Vibration Impact Assessment Manual (FTA 2018)

Table N-5 lists the potential vibration building damage criteria associated with construction activities, as suggested in the FTA Manual. FTA guidelines show that a vibration level of up to 0.5 in/sec in peak particle velocity (PPV) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For non-engineered timber and masonry buildings, the construction building vibration damage criterion is 0.2 in/sec in PPV.

Table N-5: Vibration Damage Criteria

Building Category	PPV (in/sec)
Reinforced concrete, steel or timber (no plaster)	0.50
Engineered concrete and masonry (no plaster)	0.30
Non-engineered timber and masonry buildings	0.20
Buildings extremely susceptible to vibration damage	0.12

Source: Transit Noise and Vibration Impact Assessment Manual (FTA 2018)

- a) **Generation of 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?**

Less than Significant Impact.**Construction**

Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. Construction is expected to occur in the following stages: demolition, site preparation, grading, building construction, architectural coating, and paving. The Project would not include pile driving, which typically results in the highest construction noise volumes.

The Project construction noise would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. The typical operating cycle for a piece of construction equipment involves one or two minutes of full power operation followed by three or four minutes at lower power settings. During the building construction phase, approximately 335 trips would occur during an average day from worker and hauling activities. Because construction-related vehicle trips would not approach existing daily traffic volumes, traffic noise would not increase by 3 dBA CNEL. A noise level increase of 0.09 dBA, as compared to the existing volume of 15,160 (Urban, 2020), would not be perceptible to the human ear in an outdoor environment. Therefore, short-term construction-related impacts associated with worker commutes and equipment transport to the project site would be less than significant.

Table N-6 below lists typical construction equipment noise levels based on a distance of 50 feet between the equipment and a noise receptor. As shown, noise levels generated by heavy construction equipment can range from approximately 55 dBA to 90 dBA when measured at 50 feet.

Table N-6: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Use Factor¹ (percent)	Maximum Noise Level (L_{max}) at 50 feet²
Auger Drill Rig	20	84
Backhoes	40	80
Compactor (ground)	20	80
Compressor	40	80
Concrete Saw	20	90
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Jackhammers	20	85
Paver	50	77
Pickup Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84
Trencher	50	80
Welder	40	73

Source: Noise and Vibration Impact Analysis (Appendix J)

Note: Noise levels reported in this table are rounded to the nearest whole number

1 Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.

2 Maximum noise levels were developed based on Specification 721.560 from the Central Artery/Tunnel program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.

L_{max} = maximum instantaneous sound level

For the purposes of the Noise Impact Analysis, the closest off-site receiver to the Project site are the existing buildings to the west of the site, approximately 55 feet from the Project boundary. The nearest sensitive receiver to the proposed Project is the residences to the east of the site, approximately 70 feet from the Project boundary across Cutter Way. Table N-7 below shows the nearest uses to the Project site, their distance from the center of construction activities, as recommended by FTA guidance, and composite noise levels expected during construction. As shown, construction noise at the nearby receiver locations would range from 65 to 77 dBA Leq, which would not exceed the 80 dBA, 85dBA and 90 dBA 1-hour construction noise level criteria for daytime construction noise level criteria as established by the FTA for residential and industrial/commercial land uses, respectively.

Table N-7: Construction Noise Levels at Sensitive Receivers

Receptor (Location)	Composite Noise Level (dBA Leq) at 50 feet ¹	Distance (feet)	Composite Noise Levels (dBA Leq)	Construction Noise Threshold (dBA Leq)
Industrial Uses (West)	88	170	77	90
Residential Uses (East)		195	76	80
Industrial Uses (North)		205	65	90
Commercial Uses (South)		340	71	85

Source: Noise and Vibration Impact Analysis (Appendix J)

¹ The composite construction noise level represents the demolition phase which is expected to result in the greatest noise level as compared to other phases.

dBA Leq = average A-weighted hourly noise level

ft = foot/feet

Additionally, as described above, Municipal Code Section 9.40.110 exempts construction noise between the hours of 7:00 a.m. and 8:00 p.m. The Project would comply with the City's construction hours regulations. Therefore, Project construction would result in less than significant impacts on substantial temporary or permanent increase in ambient noise levels.

Operation

Stationary Noise Impacts. Off-site land uses within the Project vicinity are currently exposed to noise sources onsite and on surrounding roadways. During operation of the Project, adjacent off-site land uses would be potentially exposed to stationary-source noise impacts from the Project's on-site heating, ventilation, and air conditioning (HVAC) equipment, truck deliveries, trash bin emptying activities and loading and unloading activities.

Table N-8, Daytime Exterior Noise Level Impacts, and Table N-9, Nighttime Exterior Noise Level Impacts, below, show the combined hourly noise levels generated by HVAC equipment, trash bin emptying activities, and truck delivery activities at the closest off-site sensitive receptor.

Table N-8: Daytime Exterior Noise Level Impacts

Receptor	Direction	Existing Quietest Noise Level (dBA Leq)	Project Generated Noise Levels (dBA Leq)	Potential Operational Noise Impact? ¹
Residential (Cutter Way)	East	52.1	49.3	No

Source: Noise and Vibration Impact Analysis (Appendix J)

¹ A potential operational noise impact would occur if (1) the quietest daytime ambient hour is less than 60 dBA Leq and project noise impacts are greater than 60 dBA Leq, OR (2) the quietest daytime ambient hour is greater than 60 dBA Leq and project noise impacts are 3 dBA greater than the quietest daytime ambient hour.

dBA = A-weighted decibels

Leq = equivalent noise level

Table N-9: Nighttime Exterior Noise Level Impacts

Receptor	Direction	Existing Quietest Noise Level (dBA Leq)	Project Generated Noise Levels (dBA Leq)	Potential Operational Noise Impact? ¹
Residential (Cutter Way)	East	42.9	46.3	No

Source: Noise and Vibration Impact Analysis (Appendix J)

¹ A potential operational noise impact would occur if (1) the quietest nighttime ambient hour is less than 50 dBA Leq and project noise impacts are greater than 50 dBA Leq, OR (2) the quietest nighttime ambient hour is greater than 50 dBA Leq and project noise impacts are 3 dBA greater than the quietest nighttime ambient hour.

dBA = A-weighted decibels

Leq = equivalent noise level

As shown in Tables N-8 and N-9, Project related noise level impacts would range from 46.3 dBA Leq to 49.3 dBA Leq at the surrounding receptors. These levels would be below the daytime and nighttime hourly noise level standards of 60 dBA Leq and 50 dBA Leq, respectively. In addition, Project daytime noise levels would be below the existing quietest ambient noise levels and Project nighttime noise levels would be 3.4 dBA Leq above the existing quietest ambient noise levels. Because Project noise levels would not generate a noise level that exceeds existing ambient noise levels by 5 dBA or more or exceed the City's thresholds, impacts would be less than significant.

Off-Site Traffic Noise. The implementation of the Project has the potential to increase off-site traffic volumes on surrounding roadways. However, the off-site Project-related traffic represents an incremental increase to the existing roadway volumes, which is not expected to generate a noise level increase of 3 dBA CNEL at nearby sensitive land uses adjacent to study area roadways, since a doubling of the existing traffic volumes would be required to generate a 3 dBA CNEL increase. The proposed Project would generate 266 daily trips including 17 trips during the AM peak hour and 28 trips during the PM peak hour according to the Level of Service (LOS) and Vehicle Miles Traveled (VMT) Screening Analysis (EPD Solutions, Inc., 2024). Because vehicle trips generated by the Project would not approach existing daily traffic volumes on San Bernardino Road (15,160 trips), traffic noise would increase by 0.08 dBA (Urban, 2020). A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, the traffic noise increase resulting from the proposed Project would be less than significant.

b) Generation of excessive ground-borne vibration or ground-borne noise levels?

Less than Significant with Mitigation Incorporated.

Construction

Construction activity can cause varying degrees of ground vibration, depending on the equipment and methods used, the distance to receptors, and soil type. Construction vibrations are intermittent, localized intrusions. The use of heavy construction equipment, particularly large bulldozers, and large loaded trucks hauling materials to or from the site generate construction-period vibration impacts.

The Noise and Vibration Impact Analysis (Appendix J) uses vibration standards in the FTA Manual to analyze ground-borne vibration impacts on human annoyance. The analysis discusses the level of human annoyance using vibration levels in VdB and assesses the potential for building damages using vibration levels in PPV (in/sec). Vibration levels calculated in VdB are best for characterizing human response to building vibration, while vibration level in PPV is best for characterizing potential for damage. The FTA guidelines indicated that for a non-engineered timber and masonry building, the construction vibration damage criterion is 0.2 in/sec in PPV. The threshold at which vibration levels would result in annoyance would be 78 VdB for daytime residential uses and 90 VdB for workshop or industrial type uses. Table N-10 shows the PPV and VdB values at 25 feet from the construction vibration source.

Table N-10: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L _v at 25 ft	
	PPV (in/sec)	L _v (VdB) ¹
Hoe Ram	0.089	87
Large Bulldozer²	0.089	87
Caisson Drilling	0.089	87
Loading Trucks²	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: Noise and Vibration Impact Analysis (Appendix J)

¹ RMS vibration velocity in decibels (VdB) is 1 μ in/sec.² Equipment shown in **bold** is expected to be used on site. μ in/sec = microinches per second; ft = foot/feet; in/sec = inch/inches per second; L_v = velocity in decibels; PPV = peak particle velocity; VdB = vibration velocity decibels

Table N-11 shows the summary of vibration annoyance levels due to construction equipment at each of the closest receptors. Because vibration annoyance assesses an average condition, the distance from the center of construction activities to surrounding land uses was utilized. When assessing potential vibration damage, the appropriate distance to assess a peak or maximum vibration condition is perimeter of construction to surrounding buildings. As shown in Table N-11, vibration levels are expected to approach 62 VdB at the closest industrial use to the west and 60 VdB at the closest residential use to the east which is below the 90 VdB and 78 VdB annoyance threshold for workshop or industrial types uses and for daytime residential uses, respectively.

Table N-11: Potential Construction Vibration Annoyance Impacts at Nearest Receptor

Receptor (Location)	Reference Vibration Level (VdB) at 25 feet ¹	Distance (ft)	Vibration Level (VdB)
Industrial (West)	87	170	62
Residential Uses (East)		195	60
Industrial (North)		205	60
Commercial (South)		340	53

Source: Noise and Vibration Impact Analysis (Appendix J)

The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.

The assessment distance is associated with the average condition, identified by the distance from the center of construction activities to surrounding uses.

ft = foot/feet

VdB = vibration velocity decibels

Table N-12 shows the summary of potential construction damage due to construction equipment at each of the closest receptors.

Table N-12: Potential Construction Vibration Damage Impacts at Nearest Receptor

Receptor (Location)	Reference Vibration Level (PPV) at 25 feet ¹	Distance (ft)	Vibration Level (PPV)
Industrial (West)	0.089	55	0.027
Residential Uses (East)		70	0.019
Industrial (North)		10	0.352
Commercial (South)		115	0.009

Source: Noise and Vibration Impact Analysis (Appendix J)

¹ The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.² The assessment distance is associated with the peak condition, identified by the distance from the perimeter of construction activities to surrounding structures.

ft = foot/feet

PPV = peak particle velocity

The closest structure to the Project site is the industrial use immediately to the north of the site, approximately 10 feet from the limits of construction activity. As shown in Table N-12, it is expected that vibration levels

generated by dump trucks and other large equipment would generate ground-borne vibration levels of 0.352 PPV (in/sec) or higher at the closest structures to the Project site. This vibration level would exceed the 0.2 in/sec PPV threshold considered safe for non-engineered timber and masonry buildings, which would result in a potentially significant impact. The distance from large construction equipment with a reference vibration level of 0.089 in/sec PPV at 25 feet for which the 0.2 in/sec threshold would no longer be exceeded is 15 feet. Vibration levels at all other buildings would be lower. As such, Mitigation Measure NOI-1 requires vibration monitoring for structures within 15 feet of the Project site boundary to ensure that construction vibration would not result in building damage. Therefore, with implementation of Mitigation Measure NOI-1, vibration impacts during construction would be less than significant.

Additionally, as discussed above, construction activities are regulated by the City's Municipal Code, which states that temporary construction, maintenance, or demolition activities are not allowed between 8:00 p.m. and 7:00 a.m. With the implementation of the above measures, vibration impacts would be less than significant.

Operation

Once operational, the Project would not be a significant source of ground-borne vibration. Ground-borne vibration surrounding the Project currently results from traffic on San Bernardino Road and light traffic on Cutter Way. Operations of the Project would include passenger cars and trucks. However, the closest off-site uses are greater than 25 feet away and vibration levels generated from trucks would not be perceptible. In addition, vibration levels generated from project-related traffic on the adjacent roadways are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Based on a reference vibration level of 0.089 in/sec PPV, structures greater than 25 feet from the roadways that contain project trips would experience vibration levels below the most conservative standard of 0.12 in/sec PPV; therefore, vibration levels generated from Project-related traffic on the adjacent roadways would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less than Significant Impact. The nearest airport to the Project site is Ontario International Airport (ONT), located approximately 18.7 miles east of the Project site. According to the *Ontario International Airport 2024 Airport Land Use Compatibility Plan*, the Project site is located well outside of the 65 dBA CNEL noise contours of Ontario International Airport. Two additional, non-commercial airports, San Gabriel Valley Airport and the Brackett Field Airport are closer at distances of 6.2 miles to the west and 7.4 miles to the east, respectively. Similarly, the project is located well outside each of the 65 dBA CNEL noise contours for each airport (Los Angeles County Airport Land Use Commission 2024). Therefore, the proposed Project would not expose people residing or working in the Project area to excessive noise levels from airports. Impacts would be less than significant.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

Mitigation Measure NOI-1: Construction Vibration Damage. Due to the close proximity to surrounding structures, the City of Covina (City) Director of Community Development, or designee, shall verify prior to issuance of demolition or grading permits, that the approved plans require that the construction contractor shall implement the following reduction measures during Project construction activities to ensure that damage does not occur at surrounding structures:

- Identify structures that are located within 15 feet (ft) of heavy construction activities and that have the potential to be affected by ground-borne vibration. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee.

- Once the construction equipment list finalized, a comparison of the proposed equipment to be used and the assumed equipment vibration levels presented in Table 7-4 of the Federal Transit Administration Noise and Vibration Impact Assessment Manual – FTA Report No. .0123 shall be completed. If it is determined that the proposed equipment would generate lower vibration levels than assumed, further vibration reduction would not be necessary. However, if levels would potentially exceed the FTA Damage Criteria presented in Table 7-5 of the Federal Transit Administration Noise and Vibration Impact Assessment Manual – FTA Report No. .0123, the Applicant shall develop a vibration monitoring and construction contingency plan for approval by the City Director of Community Development, or designee, to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approached the limits.
- If a vibration monitoring and construction contingency plan is deemed necessary, monitoring of vibration during initial construction activities shall be required. Monitoring results may indicate the need for more or less intensive measurements.
- When vibration levels approach limits, construction shall be suspended and contingencies shall be implemented as identified in the approved vibration monitoring and construction contingency plan to either lower vibration levels or secure the affected structures.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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5.14 POPULATION AND HOUSING.

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Induce substantial unplanned population growth in an area, either directly or indirectly?

Less than Significant Impact. The proposed Project would construct a new self-storage facility. The Project site has a General Plan land use designation of GI. Development of the Project would be consistent with the General Plan land use designation and zoning for the site.

Operation of the proposed self-storage facility would require five full-time employees, with two to three employees onsite per day, each working an 8-hour shift. The employees that would fill these roles are anticipated to come from the region, as the unemployment rate of the City of Covina in January 2024 was 5.8 percent, the City of West Covina was 5.5 percent, and the City of Irwindale was at 5.3 percent (California Employment Development Department, 2024). Due to these levels of unemployment, it is anticipated that new employees at the Project site would already reside within commuting distance and would not generate needs for any housing.

In addition, should the Project require employees to relocate to the area for work, there is sufficient vacant housing available within the region. The City of Covina has a vacancy rate of 3.0 percent, with a total of 17,585 housing units, 536 of which are vacant (California Department of Finance, 2023). Therefore, impacts related to unplanned population growth from the Project would be less than significant.

b) Displace substantial numbers of existing people housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project site is currently developed with a church building and associated parking and does not contain any housing, nor has it historically been used for housing. The Project site has a General Plan designation of GI, which does not provide for residential development. Therefore, the Project would not displace any housing and would not necessitate the construction of replacement housing. As a result, no impact would occur.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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5.15 PUBLIC SERVICES.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

a) Fire Protection and Emergency Services

Less than Significant Impact. Fire protection and emergency medical services for the City, including the Project site, is provided by the Los Angeles County Fire Department (LACFD), who is contracted with the City. LACFD Station Number 152, located at 807 Cypress Street, Covina, CA 91722, is the closest fire station to the Project site at approximately 0.95 mile away from the Project site to the northeast. In addition, the LACFD has additional fire stations, 153 and 154, located approximately 3.6 and 1.80 miles from the proposed Project site, respectively.

Construction

Construction activities associated with the Project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Further, fire suppression equipment specific to construction would be maintained on the Project Site. As applicable, construction activities would be required to comply with the 2019 CBC and the California Fire Code (CFC), of which the City has adopted as the City's Fire Code.

Construction activities may involve temporary lane closures along Cutter Way and San Bernardino Road for curbside improvements (e.g., sidewalks, driveways, underground facilities and infrastructure). Construction-related traffic could result in increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction. As such, construction activities could increase response times for emergency vehicles to local business and/or residences within the Project vicinity, due to

travel time delays to through traffic. However, the impacts of such construction activity would be temporary and on an intermittent basis. Construction activities within the Project site that may temporarily restrict vehicular traffic would be required to implement adequate measures to facilitate the safe passage of persons and vehicles during required temporary road restrictions (Title 24, California Code of Regulations, Part 9). In accordance with Section 503 of the California Fire Code, prior to any activity that would encroach into a right-of-way, the area of encroachment must be safeguarded through the installation of safety devices to ensure that construction activities do not physically interfere with emergency access or evacuation. Compliance with Section 503 of the California Fire Code would be specified by the City's Building and Safety Division during the construction permitting process to ensure adequate emergency access to the Project area and vicinity. Techniques typically employed by emergency vehicles to clear or circumvent traffic (i.e., lights and sirens), are expected to limit the potential for significant delays in emergency response times during construction of the Project. Therefore, impacts regarding emergency response times and emergency access during construction would be less than significant.

Operation

The new self-storage facility and the five-employee increase that would occur from implementation of the proposed Project would result in an incremental increase in demand for fire protection and emergency medical services. However, there are two fire stations within two miles of the Project site that currently serve the Project vicinity. The Project would be subject to compliance with fire protection design standards, as necessary, per the 2019 CBC, 2019 CFC, and LACFD, to ensure adequate fire protection and emergency medical services. The LACFD's standard conditions of approval generally require that plans for building construction, fire flow requirements, fire protection devices (i.e., fire sprinklers and alarms), fire hydrants and spacing, fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the City and LACFD. Overall, with compliance to the applicable requirements of the 2019 CBC, 2019 CFC, and LACFD, and due to the temporary nature of the necessary construction activities, the limited intensity of the proposed development, and limited operational activities, the Project is not expected to be beyond the scope of available fire and protection services for the City. Therefore, impacts regarding emergency response times and emergency access during operation would be less than significant.

b) Police Protection

Less than Significant Impact. The City of Covina is served by the Covina Police Department (CPD). The station, which would serve the Project site, is located approximately 1.80 miles away from the Project site at 444 North Citrus Avenue, Covina, CA 91723. The Project would result in five additional onsite employees and goods that could create the need for police services. Crime and safety issues during Project construction may include theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism. Operation of the self-storage facility may generate a typical range of police service calls such as burglaries, thefts, and employee disturbances. The Project would include security lighting and security gates at both the entrance and exit and other security measures. While new development would increase incremental demand on police protection services, such demand would be offset with payment of Development Impact Fees and/or special Community Facilities District taxes. The additional need for law enforcement services from the Project would not result in the need for new or physically altered police facilities since existing police personnel would be adequate to maintain existing response times, as the City of Covina Police Department has a ratio of 1.3 officers per 1,000 residents as of 2023 (provided by Captain Dan Regan of the Covina Police Department). This exceeds the City's minimum requirement of 1.0 officer per 1,000 residents (Covina, 2000). In addition, the average response time for Priority 1 calls was 4 minutes and 32 seconds in 2023, with Priority 2 calls averaging 10 minutes and 37 seconds. These times are well within the target of 10 and 20 minutes for such calls put forward in the Los Angeles County General Plan Update (Los Angeles, 2014). Thus, impacts related to police services would be less than significant.

c) School Services

Less than Significant Impact. The Project consists of a self-storage facility that would not directly generate students. As described previously, the Project is not anticipated to generate a new population, as the employees needed to operate the Project are anticipated to come from within the Project region and substantial in-migration of employees that could generate new students is not anticipated to occur. Thus, the Project would not generate the need for new or physically altered school facilities and impacts would be less than significant.

Additionally, pursuant to Government Code Section 65995 et seq., the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. The Project would be required to contribute fees to the Covina Valley Unified School District in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50). Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation under CEQA for Project-related impacts to school services.

d) Parks

Less than Significant Impact. The Project would build a self-storage facility on a site that is currently developed with a church building and associated parking, and would not construct any residential facilities, nor create an additional need for housing. Additionally, the employees needed to operate the Project are anticipated to come from the unemployed labor force in the region. The proposed Project would not generate an increase in use of the existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The Project does not include or require the construction or expansion of recreational facilities which could negatively impact the environment. In addition, no offsite parks or recreational improvements are proposed or required as part of the Project. Thus, impacts would be less than significant.

e) Other Public Facilities

Less than Significant Impact. As previously discussed, development of the Project would not result in a direct increase in the population of the Project site and would not increase the demand for public services, including public health services and library services which would require the construction of new or expanded public facilities. As described previously, the employees needed to operate the proposed Project are anticipated to come from the Project region and commute Project site and substantial in-migration of employees that could generate substantial usage of other public facilities is not anticipated to occur. Therefore, impacts related to other public services would be less than significant.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measure

None

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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5.16 RECREATION.

a) Would the project 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?

☐☐☒☐

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

☐☐☐☒

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated?

Less than Significant Impact. The Project would build a self-storage facility on a site that is currently developed with a church building and associated parking. As previously discussed, the Project does not propose any residential facilities, and would not cause an increase in residential population. Additionally, the employees needed to operate the Project are anticipated to come from the unemployed labor force in the region. The closest park to the Project site is Covina Park, located approximately 1.48 miles east of the Project site. Project employees may use the park for breaks or recreation; however, the use of the park by Project employees would not lead to a physical deterioration of the park. Thus, there would be no increase in residents which would cause any increase in demand for existing parks or other recreational facilities, and the Project would not cause nor accelerate physical deterioration of these facilities. As such, impacts would be less than significant.

b) Require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project would build a self-storage facility on a site that is currently that is currently developed with a church building and associated parking, and would not construct any residential facilities, nor create an additional need for housing. The Project would not directly increase the residential population of the City or generate additional need for parkland. The Project does not include or require the construction or expansion of recreational facilities which could negatively impact the environment, and no offsite parks or recreational improvements are proposed or required as part of the Project. Thus, no impacts would occur.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5.17 TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project 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)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

This section was prepared using the Level of Service (LOS) Screening Memo and Vehicle Miles Traveled (VMT) Screening Analysis is prepared by EPD Solutions, Inc., on February 8, 2024 (Appendix K and L).

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

Less than Significant Impact.

Construction

Construction activities associated with the Project would generate vehicular trips from construction workers traveling to and from the Project site, delivery of construction supplies and import materials to, and export of debris from, the Project site. However, these construction activities would be temporary in nature and only occur during the anticipated 13-month construction period. The increase of trips during construction activities would be limited and is not anticipated to exceed the number of operational trips described below. The short-term vehicle trips from construction of the Project would generate less than significant traffic related impacts.

Operation

The proposed Project involves the construction of a 185,584 SF self-storage facility, associated parking, landscaping, and utility improvements to serve the site. Operation of the Project would introduce new vehicular traffic from workers and proposed operations. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project site.

The City of Covina's *Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled and Level of Service Assessment* October 2020 states that a TIA is not required for projects that generate less than 50 vehicle trips in either the AM or PM peak hour. Table T-1 shows that during operation, the proposed Project would generate a total of 266 daily trips, with 17 trips produced in the AM peak hour and 28 trips produced in the PM peak hour. The trip generation analysis for the Project was prepared using trip rates from the Institute of Transportation Engineers (ITE) Trip Generation, 11th Edition (2021) based on the "Mini-Warehouse" land use. Therefore, the proposed Project would not generate 50 or more vehicle trips during the peak hour and would not require a TIA (Appendix K).

Table T-1: Project Trip Generation

AM Peak Hour										PM Peak Hour		
Land Use	Units	Daily	In	Out	Total	In	Out	Total				
Trip Rates												
151 Mini-Warehouse ¹	HSU	17.96	0.62	0.59	1.21	0.84	0.84	1.68				
151 Mini-Warehouse ²	TSF	1.45	0.05	0.04	0.09	0.07	0.08	0.15				
Proposed Project Trip Generation												
151 Mini-Warehouse ¹												
	13.70	HSU	246	8	9	17	12	11	23			
	183.458	TSF	266	10	7	17	13	15	28			
Worst Case Scenario Trip Generation			266	10	9	17	13	15	28			

Source: Vehicle Miles Traveled Analysis (Appendix L).

TFS = Thousand Square Feet

PCE = Passenger Car Equivalent

HSU= Hundred Storage Units

¹ Trip rates from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 151 – Mini-Warehouse.² Trip rates from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 151 – Mini-Warehouse.

The Project has been designed to construct onsite roadway improvements consistent with the City guidelines. As described under Table LU-1, Land Use Consistency, the Project would be consistent with applicable goals and policies from the City's General Plan Circulation Element.

Alternative Transportation

The proposed Project would construct sidewalks along West San Bernardino Road and Cutter Way. The Project would be located approximately two miles from the Baldwin Park Metrolink station. Foothill Transit Line 190 runs adjacent to the Project site on West San Bernardino Road and has a stop located 0.25 mile west of the Project site at the intersection of West San Bernardino Road and Vincent Avenue. Foothill Transit Line 280 has a bus stop located approximately .75 mile east of the Project site. The Project would not disrupt service of the Metrolink and would provide additional pedestrian access to Line 190 and Line 280 along West San Bernardino Road. Therefore, the Project would not conflict with alternative transportation and Project impacts to transit, bicycle, and pedestrian facilities would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact. Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the State CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. SB743 specified that the new criteria should promote the reduction of GHGs, the development of multimodal transportation networks and a diversity of land uses. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020. State CEQA Guidelines Section 15064.3 - Determining the Significance of Transportation Impacts states that VMT is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT.

The City of Covina adopted VMT guidelines referenced in the *Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (VMT Guidelines October 2020). The VMT Guidelines identify screening thresholds to determine if projects would require a full VMT analysis. If a project meets one of the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

1. The Project is located within a Transit Priority Area (TPA).
2. The Project is located in a low VMT generating area.
3. The Project is locally serving or generates less than 110 daily vehicle trips.

The applicability of each criterion to the proposed Project is discussed below.

Screening Criteria 1 - Transit Priority Area Screening: The Project is not located in a TPA; therefore, the Project would not meet Screening Criteria 1.

Screening Criteria 2 - Low VMT Area Screening: According to the City's guidelines, projects that are consistent with the General Plan land use designation for the site within a low VMT Traffic Analysis Zone (TAZ) would be presumed to have a less than significant impact absent substantial evidence to the contrary. The SGVCOG (San Gabriel Valley Council of Governments) VMT Evaluation Tool was used to determine if the proposed Project lies in a low VMT area. Since the Project land use is consistent with the predominate land use in the TAZ the Project is located in (TAZ 22327200), the appropriate metric to analyze VMT for this analysis is VMT per Service Population. The VMT per Service Population for TAZ 22327200 is 32.8, 15% less than the City average of 39.28. Therefore, the Project would meet Screening Criteria 2. The SGVCOG screening output can be found in Appendix L.

Screening Criteria 3 – Local Serving Land Use or Trip Generation Screening: According to the City's guidelines, projects that serve the local community or generate less than 110 daily vehicle trips and have the potential to reduce VMT would not be required to complete a VMT assessment. These types of projects include K-12 schools, local serving retail, day care centers, student housing and other community institutions. The Project proposes a self-storage facility with 1,370 self-storage units, which is not considered a locally serving use, and is expected to generate over 110 daily trips. Therefore, the Project would not meet Screening Criteria 3.

As the proposed Project would meet Screening Criteria 2, impacts related to VMT are presumed to be less than significant.

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

Less than Significant Impact. Vehicular access to the Project site would be provided via one ingress only and one egress only driveway connecting to Cutter Way. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project site. The proposed Project would not introduce any new roadways or introduce a land use that would conflict with existing urban land uses in the surrounding area. The proposed Project includes internal driveways that would provide cars access to the building and parking. Design of the proposed Project, including the internal private roadway, ingress, egress, and other streetscape changes are subject to the City's development standards. For example, the design of Project streets would be reviewed to ensure fire engine accessibility and turnaround area is provided to the fire code standards. As a result, impacts related to vehicular circulation design features would be less than significant.

d) Result in inadequate emergency access?

Less than Significant Impact.

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The installation of driveways and connections to existing infrastructure systems that would be implemented during construction of the proposed Project could require the temporary closure of one side or portions of Cutter Way for a short period of time (i.e., hours or a few days). However, the construction activities would be required to ensure emergency access in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), which would be ensured through the City's permitting process. Thus,

implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and would reduce potential construction related emergency access impacts to a less than significant level.

Operation

As described previously, the proposed Project site would be accessed from one ingress only driveway on Cutter Way. The construction permitting process would provide adequate and safe circulation to, from, and through the Project site, and would provide routes for emergency responders to access different portions of the Project site. The Project would provide a 28-foot or wider fire access lane throughout the parking area. Because the Project is required to comply with all applicable City codes, as verified by the City potential impacts related to inadequate emergency access would be less than significant.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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5.18 TRIBAL CULTURAL RESOURCES.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, 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)?

☐☒☐☐

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?

☐☒☐☐

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, 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 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)?**

Less than Significant with Mitigation Incorporated. The Project is required to comply with AB 52 regarding tribal consultation. Chapter 532, Statutes of 2014 (i.e., AB 52), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources (PRC Section 21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside the definition stated above nonetheless qualifies as a "tribal cultural resource." Also, per AB 52 (specifically PRC 21080.3.1), Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects.

An archaeological records search was completed in order to identify any previously recorded archaeological sites within the Project boundary or in the immediate vicinity. According to the records search one resource was identified within a one-half mile radius, none are located on the Project site. The resource is the Mojave Road, which originally served as a prehistoric trail used by Mojave Native Americans. Additionally, on November 20, 2023, Brian F. Smith and Associates requested a Sacred Lands File (SLF)

search from the Native American Heritage Commission. On December 13, 2023, the NAHC responded that the SLF search yielded negative results for known tribal cultural resources or sacred lands within a one-mile radius of the Project site. Pursuant to the requirements of AB 52, the City sent informational letters about the proposed Project and requests for consultation on January 29, 2024.

- Gabrieleño Band of Mission Indians - Kizh Nation responded, requesting consultation. Consultation was scheduled for March 24, 2024, where Gabrieleño requested mitigation measures.

The Gabrieleño Band of Mission Indians noted that the Project site has potential to contain buried Tribal Cultural Resources from their tribe. Thus, Mitigation Measure TCR-1 has been included to require the Project Applicant to retain a Native American Monitor from or approved by Kizh Nation prior to any ground disturbing activity. Mitigation Measures TCR-2 and TCR-3 include measures for the inadvertent discovery of tribal cultural resources. Coordination with Kizh Nation on potential cultural resource discoveries and archaeological/cultural documents would ensure proper precaution and handling of such resources, and further, minimize potential impacts to resources. Therefore, with implementation of Mitigation Measures TCR-1 through TCR-3, impacts to tribal cultural resources would be less than significant.

- b) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, 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 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Less than Significant with Mitigation Incorporated. As discussed above, to avoid potential adverse effects to tribal cultural resources, Mitigation Measures TCR-1 through TCR-3 have been included to require coordination with Kizh Nation to avoid potential impacts to tribal cultural resources that may be unearthed by Project construction activities. No information has been provided to the Lead Agency indicating any likelihood of uncovering tribal cultural resources on the Project site, there are no known tribal cultural resources on or adjacent to the Project site, and no potentially significant impacts are anticipated.

Additionally, as described previously, California Health and Safety Code, Section 7050.5, included as Mitigation Measure TCR-3, requires that if human remains are discovered in the Project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation. If the coroner determines that the remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Therefore, with implementation of Mitigation Measures TCR-1 through impacts to tribal cultural resources would be less than significant.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

- A. The Project Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement

- removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
 - C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project Applicant/lead agency upon written request to the Tribe.
 - D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the Project Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the Project are complete; or (2) a determination and written notification by the Kizh to the Project Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

Mitigation Measure TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial).

- A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

- A. 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 Public Resources Code Section 5097.98, are also to be treated according to this statute.
- B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
- C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
- E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5.19 UTILITIES AND SERVICE SYSTEMS.				
Would the project:				
a) Require or result in the relocation or construction of new or expanded water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐
a) Require or result in the construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				

Less than Significant Impact.**Water Infrastructure**

The Project Applicant would redevelop the Project site, which is currently served by ALW's water infrastructure and would install new water infrastructure at the Project site that would connect to existing water infrastructure within Cutter Way. The new onsite water system would convey water supplies to the proposed self-storage building and landscaping through plumbing/landscaping fixtures that are compliant with the CalGreen Plumbing Code for efficient use of water.

The proposed Project would continue to receive water supplies through the existing water lines located within the Cutter Way right-of-way that have the capacity to provide the increased water supplies needed to serve the proposed Project, and no expansions of the water pipelines that convey water to the Project site would be required. Installation of the new onsite water distribution lines would only serve the proposed Project and would not provide new water supplies to any off-site areas.

The construction activities related to the onsite water infrastructure that would be needed to serve the proposed Project is included as part of the Project and would not result in any physical environmental effects beyond those identified throughout this IS/MND. For example, analysis of construction emissions from excavation and installation of the water infrastructure is included in Sections 5.3, *Air Quality* and 5.8, *Greenhouse Gas Emissions*. Therefore, the proposed Project would not result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.

Wastewater

The Project site is currently served by the existing sewer lines within West San Bernardino Road. The Project includes installation of new onsite sewer lines that would connect to the existing sewer lines West San Bernardino Road. The existing sewer lines would accommodate development of the Project site and would not require expansion to serve the proposed Project. The Project would deliver sewage into the City's sewer collection system, which is operated and maintained by the City's Public Works Department and treated by the Los Angeles County Sanitation District (LACSD). The San Jose Creek Water Reclamation Plant (SJCWRP) is the water reclamation site that serves the City of Covina. The SJCWRP has the capacity to provide tertiary treatment for approximately 100 million gallons per day (MGD) and serves an estimated population of one million persons (LACSD, 2024). The necessary onsite installation of wastewater infrastructure is included as part of the proposed Project and would not result in any physical environmental effects beyond those identified in other sections of this IS/MND.

Storm Drainage

As discussed previously, the Project site is relatively flat, and runoff onsite would be conveyed into a clarifier for pre-treatment before being piped into the underground infiltration system. Due to the appropriate sizing of the onsite drainage features, as ensured through the Project permitting process, operation of the proposed Project would not substantially increase stormwater runoff, and the Project would not require or result in the construction of new offsite storm water drainage facilities or expansion of existing offsite facilities, the construction of which could cause significant environmental effects. The required installation of the proposed drainage features is included as part of the proposed Project and would not result in any physical environmental effects beyond those identified in other sections of this IS/MND. Overall, impacts related to stormwater drainage facilities would be less than significant.

Electric Power

The Project would connect to the existing Southern California Edison electrical distribution facilities that are adjacent to the Project site and would not require the construction of new electrical facilities.

Natural Gas

The Project would connect to the existing Southern California Gas natural gas distribution facilities that are adjacent to the Project site.

The installation of the utilities at the locations as described above are evaluated throughout this IS/MND and found to be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less than Significant Impact. Water service would be provided to the Project site by ALW. The 2020 ALW Urban Water Management Plan (UWMP), adopted in June 2021, was prepared for the ALW using existing General Plan designations for assumed future uses/demand and therefore accounts for the water usage that would be attributed to development of the Project site, consistent with its existing GI land use designation. According to the UWMP, the ALW currently uses two sources of water to provide to its service area: local ground water pumped from wells out of the Basin, and the San Gabriel River (UWMP, 2021).

The Water Supply Reliability Assessment within the UWMP concludes that the district has adequate supplies to meet projected demands under multiple dry year scenarios, taking into account the recent prolonged drought (UWMP, 2021). The 2021 UWMP detailed a 2020 water demand of 147 gallons per capita per day. However, in order to conservatively estimate water used for irrigation and domestic uses for the proposed Project a water demand rate of 2,000 gallons per day per acre was used. As described previously, the Project includes development of a 2.25 net-acre site. Thus, the Project would generate an increased water demand of 5,100 gallons per day or 5.71 acre-feet (AF) per year, which is within the anticipated increased demand and supply for water, as shown on Table UT-1.

Table UT-1: ALW Projected Water Demand and Supply Comparison (AF)

	2025	2030	2035	2040	2045
Supply Totals	38,450	38,450	38,450	38,450	38,450
Demand Totals	18,552	18,853	19,160	19,472	19,788
Difference	19,898	19,597	19,290	18,978	18,662

Source: UWMP 2021

Therefore, water demand from the proposed Project would be within the ALW's current and projected water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Thus, impacts related to water supplies would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. The Project would deliver sewage into the City's sewer collection system, which is operated and maintained by the City's Public Works Department and treated by LACSD. The SJCWRP has the capacity to provide tertiary treatment for approximately 100 MGD (LACSD, 2024). The CalEEMod results indicate that the Project is estimated to generate approximately 42,424,200 gallons per year (or 116,230 gallons per day) of wastewater. As such, based on the capacity of the SJCWRP, wastewater generated by the Project would be minimal and would not exceed current capacities of these wastewater plants. As such, impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impact. In 2019, 52 percent of the solid waste from the City, which was disposed of in landfills, went to the Mid Valley Sanitary Landfill. The Mid Valley Landfill is permitted to accept 7,500 tons per day of solid waste and is permitted to operate through 2045. The Mid Valley Sanitary Landfill has a remaining capacity of 54,219,377 tons. As of December 2022, the average daily tonnage received was 3,442 tons. Thus, on average, the facility had an additional capacity of 4,058 tons per day (CalRecycle, 2022).

Construction

Demolition of the Project site would include disposal of demolition materials. However, Section 5.408.1 of the 2022 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, the construction solid waste that would be disposed of at the landfill would be approximately 35 percent of the waste generated. Therefore, demolition activities, which would generate the most solid waste would generate approximately 324.8 tons of solid waste. As described in the Air Quality Analysis, included in Appendix A to this IS/MND, demolition is expected to take 20 days. As such this would equate to approximately 16.24 tons of solid waste per day.

As described above, the Mid Valley Sanitary has additional capacity of approximately 4,058 tons per day. Therefore, the facility would be able to accommodate the addition of 16.24 tons of waste per day during the 20 days of demolition of the proposed Project. Therefore, the Mid Valley Sanitary Landfill would be able to accommodate solid waste from construction of the proposed Project.

Operation

The CalEEMod solid waste generation assumes that the proposed Project would generate approximately 172 tons of solid waste per year. However, at least 75 percent of the solid waste is required by AB 341 to be recycled, which would reduce the volume of landfilled solid waste to approximately 43 tons per year or 0.82 ton per week.

As the Mid Valley Sanitary Landfill has additional capacity of approximately 4,058 tons per day, the facility would be able to accommodate the addition of 43 tons of waste per year and approximately 0.82 tons per week from the Project. Therefore, the Mid Valley Sanitary Landfill would be able to accommodate solid waste from operation of the proposed Project, and impacts related to landfill capacity would be less than significant.

e) Comply with federal, state, and local statutes and regulations related to solid waste?

Less than Significant Impact. The proposed Project would result in a new development that would generate an increased amount of solid waste. All solid waste-generating activities within the City are subject to the requirements set forth in Section 5.408.1 of the 2022 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste.

The proposed Project would be required to comply with the City's Municipal Code Section 8.09, Diversion Requirements for Construction and Demolition Projects, which requires that developments must meet the minimum diversion requirement. In addition, the proposed Project would be required to comply with all federal, State, and local regulations related to solid waste. Furthermore, the proposed Project would comply with all standards related to solid waste diversion, reduction, and recycling during Project construction and operation. Therefore, the proposed Project is anticipated to result in less than significant impacts related to potential conflicts with federal, State, and local management and reduction statutes and regulations pertaining to solid waste.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5.20 WILDFIRES. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒
d) 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?	☐	☐	☒	☐

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. According to the CAL FIRE Hazard Severity Zone map, the Project site is not within an area identified as a Fire Hazard Severity Zone (FHSZ) or a State Responsibility Area (SRA) (CALFIRE, 2022). The nearest Very High FHSZ is located approximately 4.0 miles southeast of the Project site. The proposed Project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would substantially impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Further, the proposed Project would not obstruct or alter any transportation routes that could be used as evacuation routes during emergency events.

The proposed Project would provide adequate emergency access to the site via driveways from Cutter Way and would connect to an internal access way that would ensure access for emergency vehicles within the interior of the site and would provide a knox box for fire department access at both gates. Additionally, access to and from the Project site for emergency vehicles would be reviewed and approved by the Los Angeles County Fire Department and the City as part of the Project approval process to ensure the proposed Project is compliant with all applicable codes and ordinances for emergency vehicle access. Since the Project is required to comply with all applicable City codes, as verified by the City, any potential impacts related to an emergency response or evacuation (if any) would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollution concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As stated previously, the Project site is not located within a VHFHSZ. Additionally, the Project site and surrounding area are currently developed or are being developed, and therefore, lack extensive combustible materials and vegetation necessary for the uncontrolled spread of a wildfire.

The Project site is relatively flat and there are limited elevation changes in the Project vicinity. The Project proposes industrial development in an area characterized by existing industrial, commercial, and residential uses. As such, the Project itself would not exacerbate wildfire risks as compared to existing conditions because it is representative of existing development in the area. Thus, impacts related to other factors that would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be less than significant.

c) 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?

No Impact. The Project does not require the installation or maintenance of associated infrastructure (including roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or that would result in impacts to the environment. Although the Project includes new driveways within the Project site, the Project does not include any changes to public or private roadways that would exacerbate fire risk or that would result in impacts to the environment. Although utility improvements, including domestic water, sanitary sewer, and storm drain lines proposed as part of the Project would be extended throughout the Project site, these utility improvements would be underground and would not exacerbate fire risk. Project design and implementation of utility improvements would be reviewed and approved by the City as part of the Project approval process to ensure the proposed Project is compliant with all applicable design standards and regulations. Therefore, the proposed Project would not include infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities), that would exacerbate fire risk or that would result in impacts to the environment and no impacts would occur.

d) 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?

Less than Significant Impact. According to the FEMA's FIRM Map # 06037C1700F, the Project site is zoned as Flood Zone X, outside the 0.2% annual chance floodplain.

As established in Section 5.10 of this IS/MND, during Project construction soil would be compacted and drainage patterns would be temporarily altered due to grading, and there would be an increased potential for flooding compared to existing conditions. However, construction BMPs would be identified and implemented as part of the proposed Project. Implementation of construction BMPs would control and direct surface runoff to prevent flooding, and as such, Project construction would not expose people or structures to significant risks related to downslope and downstream flooding. Therefore, impacts would be less than significant.

During operation, the proposed Project would not substantially alter the existing onsite drainage patterns. Compliance with the proposed operational BMPs would ensure onsite storm drain facilities would be sized to accommodate stormwater runoff from the Project site so that onsite flooding would not occur. Therefore, impacts would be less than significant.

As established in Section 5.7 of this IS/MND, there are no landslide zones close to or within the boundaries of the Project site. The Project site is relatively flat; therefore, the risk of slope failure represents a limited level of concern on the Project site. Further, projects in the City of Covina are required to comply with the CBC, which would include the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. These features would reduce potential impacts related to landslides to a less than significant level. Therefore, with

implementation of the CBC, the Project would not expose people or structures to significant risks, including downslope or downstream landslides, and impacts (if any) would be less than significant.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

- a) **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Less than Significant Impact with Mitigation Incorporated. Based on the discussion in Section 5.4, *Biological Resources*, the Project site does not provide suitable habitat for any special status plant species or special status plant communities due to the disturbed nature of the site. However, the existing ornamental landscaping trees on the site have the potential to provide habitat for nesting migratory birds. Therefore, Mitigation Measure BIO-1 has been incorporated to ensure MBTA compliance and would require a nesting bird survey to be conducted prior to the commencement of construction during nesting season, which would reduce potential impacts related to nesting avian species and native wildlife nursery sites to a less than significant level.

As described in Section 5.5, *Cultural Resources*, the Project site does not contain any buildings or structures that meet any of the California Register of Historical Resources (California Register) criteria or qualify as "historical resources" as defined by CEQA. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a historical resource. As described previously, the Project site has been previously disturbed and is currently developed with a church building and associated parking and landscaping. The records search conducted as part of the Cultural Resources Assessment did not identify any historic, archaeological, or cultural resources on the Project site. However, it did reveal a previously identified resource within one-half mile of the Project site. Based on the Cultural Resources Assessment, the site has a low archaeological sensitivity. However, Mitigation Measure CUL-1 has been included to require archaeological evaluation in the event a resource is inadvertently discovered. Additionally, Mitigation Measure TCR-1 has been included to require a qualified archaeologist to coordinate with the Kizh nation in

the event of a pre-contact and/or historic-era cultural resource discovery. Mitigation Measure TCR-2 has been included to require a pause in ground disturbing activity near any accidentally discovered tribal cultural resources. Implementation of Mitigation Measure CUL-1 and Mitigation Measures TCR-1 through TCR-2 would reduce potential impacts to important examples of California prehistory to a less than significant level.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than Significant with Mitigation Incorporated. As presented in this document, potential Project-related impacts are either less than significant or would be less than significant with mitigation incorporated. Based on the analysis contained in this document, Project-related impacts would be reduced to less than significant levels with the incorporation of mitigation measures.

The cumulative effect of the proposed Project taken into consideration with other development projects in the area would be limited, because the Project would develop the site in consistency with the General Plan land use designation, zoning designation, and City code, and would not result in substantial effects to any environmental resource topic, as described though out this document.

Given that the potential Project-related impacts would all be mitigated to a less than significant level, implementation of the proposed Project would not result in impacts that are cumulatively considerable when evaluated with the impacts of other current projects, or the effects of probable future projects. Therefore, the proposed Project's contribution to any significant cumulative impacts would be less than cumulatively considerable. As discussed in Sections 5.1 through 5.20 of this document, mitigation would be required and incorporated as necessary. Therefore, impacts would be less than significant with mitigation incorporated.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant with Mitigation Incorporated. Based on the Project Description and the preceding responses in Sections 5.1 through 5.20 of this document, implementation of the proposed Project would not cause substantial adverse effects to human beings because all potentially significant impacts of the proposed Project would be mitigated to a less than significant level. Therefore, since all potentially significant impacts of the proposed Project are expected to be mitigated to a less than significant level, implementation of the proposed Project would not cause substantial adverse effects on human beings.

Plans, Programs, or Policies (PPPs)

PPP AES-1, as listed in Section 5.1.

PPP AQ-1, as listed in Section 5.3.

PPP AQ-2, as listed in Section 5.3.

PPP AQ-3, as listed in Section 5.3.

PPP CUL-1, as listed in Section 5.5.

PPP WQ-1, as listed in Section 5.10.

PPP WQ-2, as listed in Section 5.10.

Mitigation Measures (MM)

MM AQ-1, as listed in Section 5.3

MM BIO-1, as listed in Section 5.4

MM CUL-1, as listed in Section 5.5

MM PAL-1, as listed in Section 5.7

MM NOI-1, as listed in Section 5.13

MM TCR-1, as listed in Section 5.18

MM TCR-2, as listed in Section 5.18

MM TCR-3, as listed in Section 5.18

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