



1501 Del Norte Street Residential Project

Initial Study – Mitigated Negative Declaration

prepared by

City of West Covina

Planning Division, Department of Community Development

1444 West Garvey Avenue

West Covina, California 91790

Contact: Jeff Anderson, Project Planner

prepared with the assistance of

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October 2025

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Initial Study

1. Project Title

1501 Del Norte Street Residential Project

2. Lead Agency Name and Address

City of West Covina
1444 West Garvey Avenue
West Covina, California 91790

3. Contact Person and Phone Number

Jeff Anderson, Project Planner
(626) 939-8422

4. Project Sponsor's Name and Address

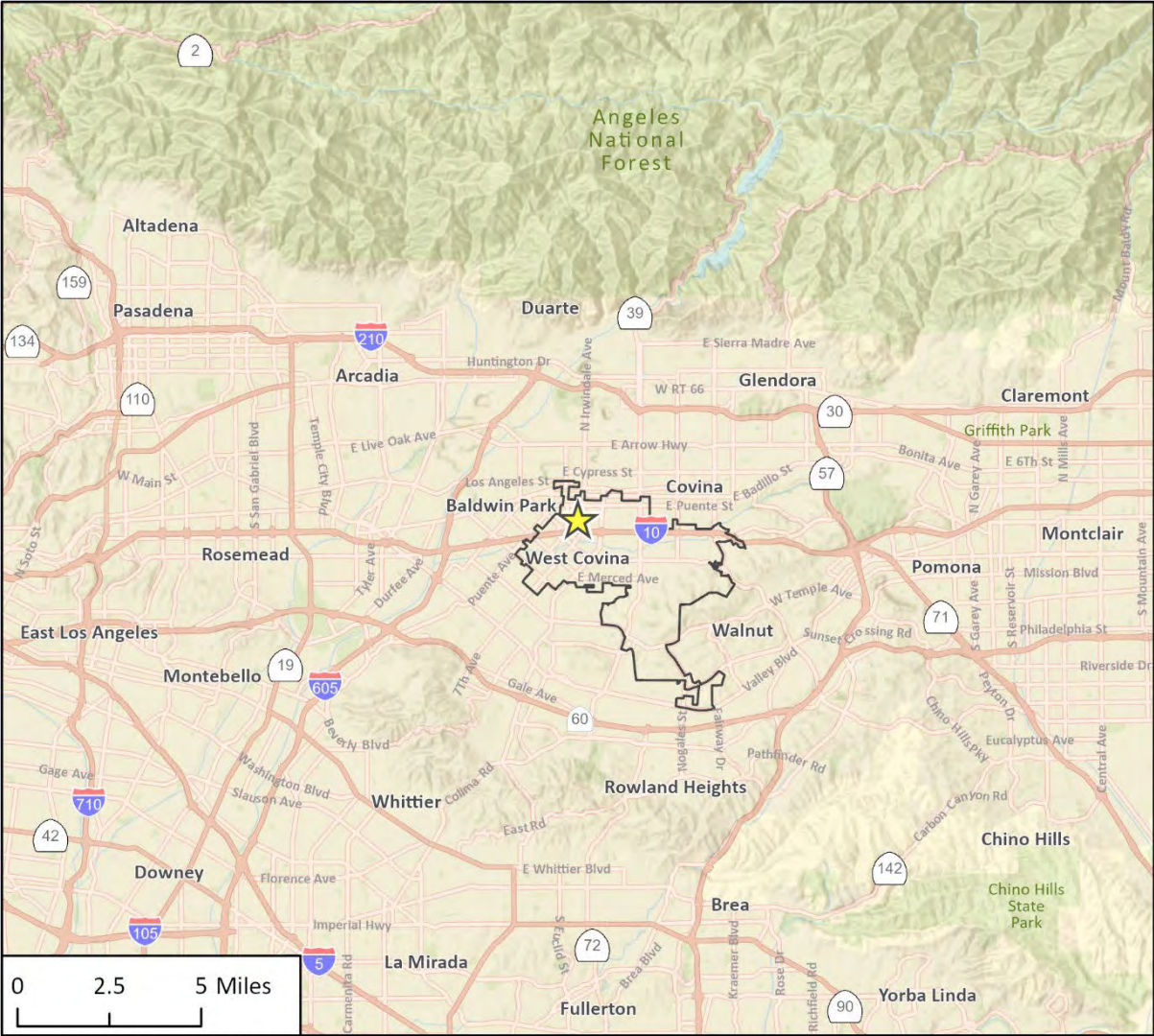
MLC Holdings, Inc.
Contact: Louisa Feletto, Forward Planning Manager
5 Peters Canyon Road
Irvine, California 92606

5. Project Location

The project site is located at 1501 Del Norte Street in the City of West Covina, California. Figure 1 shows the regional location of the project site and Figure 2 shows the location of the site in its neighborhood context. The project site encompasses approximately 13.56 acres and has an Assessor Parcel Number (APN) of 8458-020-901. The project site is bordered by Del Norte Park to the north and northeast; North Sunset Avenue, one residential building, and one commercial building to the east; West Del Norte Street and residential properties to the south; and North Nora Avenue to the west. The areas beyond these immediately bordering uses can be generally characterized as consisting of residential neighborhoods of mostly one-story single family homes.

Regional vehicular access to the project site is provided by the San Bernardino Freeway/Interstate 10 (I-10), with a westbound off-ramp available at Sunset Avenue and on- and off-ramps available both westbound and eastbound at Pacific Avenue/West Covina Parkway. In addition, the project site is locally accessible from West Del Norte Street and North Nora Avenue. There is a surface parking lot in the southeast corner of the project site that was accessible from North Sunset Avenue when the project site was being used as a school, but this access point is now gated off and there is currently no direct vehicular connection between North Sunset Avenue and West Del Norte Street. Regional mass transit service is provided by Foothill Transit, with the closest bus stops located at the intersection of North Sunset Avenue and West Rowland Avenue and the intersection of North Sunset Avenue and West Workman Avenue, both of which are within a few hundred feet of the project site.

Figure 1 Regional Location



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- ★ Project Location
- West Covina City Limits

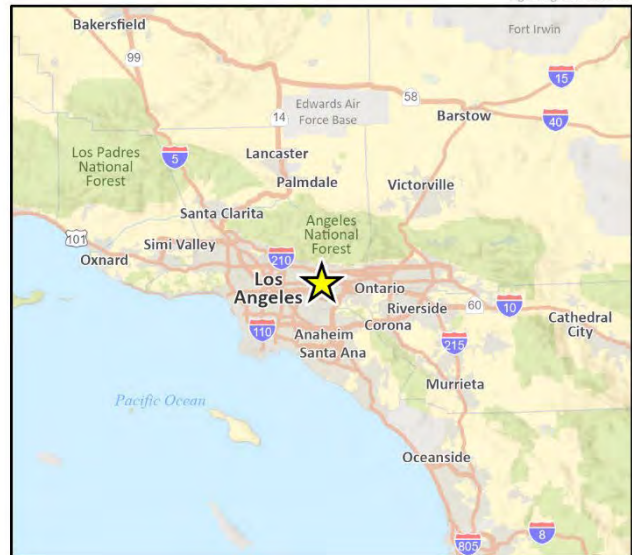


Figure 2 Project Site Location



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24-17187 EPS
Fig 2 Project Site Location

6. Existing Setting

The project site is in a developed urban area surrounded by roads and urban structures (i.e., residential, office, and commercial buildings). The project site was previously developed and used as Del Norte Intermediate School, which closed in 1989; after which the project site was used for the East San Gabriel Valley Regional Occupational Program (ROP) Technical Center, which has since been relocated, leaving the existing structures on the site vacant. The project site contains school buildings, a surface parking lot, and sports fields. Vegetation on the project site is limited to grass lawns, trees, hedges, ruderal vegetation, and ornamental landscaping.

7. Existing General Plan Designation

The project site has a General Plan land use designation of Civic: Schools, which accommodates civic functions such as government offices, libraries, schools, community center, and places of religious worship (City of West Covina 2016a).

8. Existing Zoning

The project site is currently zoned Single Family Residential (R-1). According to the West Covina General Plan and Municipal Code (WCMC), areas zoned R-1 are intended for one single-family dwelling unit per lot, or urban dwelling unit.

9. Project Description

The 1501 Del Norte Street Residential Project (hereafter referred to as “proposed project” or “project”), includes a General Plan Amendment, a Specific Plan, a Zone Change, a Precise Plan, a Tentative Tract Map and a Tree Removal Permit. The proposed project would include the demolition of the existing buildings and structures on the project site (requiring a demolition permit); followed by construction of 34 single-family detached homes and 248 attached townhomes and stacked flats, for a total of 282 homes. The project site is 13.56-acres, of which 13.19 acres would be developed for residential uses and common space (?), and the additional 0.37 acres would be used as an extension and dedication of West Del Norte Street from its current terminus east to North Sunset Avenue.

The detached single-family homes would be two stories with a maximum height to peak of roof of 24 feet, 6 inches and include three- and four-bedroom homes. These two-story single-family homes would include a private yard, two-car, side-by-side garage and a driveway two cars in width, and would serve as a buffer between the proposed project and the existing single family homes along North Nora Avenue and West Del Norte Street. The attached townhomes would be three stories (maximum height to peak of roof of 37 feet 10 inches) and include a mix of two- to four-bedroom homes. The stacked flats would be four stories (maximum height to peak of roof of 46 feet 1 inch). Each three-story townhome unit and four-story stacked flats would contain private open space in the form of a porch or deck, totaling approximately 32,367 square feet (sf) of private open space. In addition, the four-story stacked flat buildings would provide the necessary setbacks for aerial fire access. Each of the residential units would include a two-car garage (for a total of 564 enclosed parking spaces) and there would also be 77 uncovered parking spaces provided for guest parking, resulting in 641 total parking spaces, which would be distributed throughout the community.

The proposed project would provide approximately 68,305 sf of common open space, including an 18,000 sf central community space which would provide amenities such as a pool and restroom buildings, shade structure with seating, BBQ counter with seating, and a turf area for passive lawn play. Landscaping, including a variety of trees, shrubs, and groundcover would be provided throughout the project site. Fencing and walls would be used throughout the project site and along the project site borders to define private and semi-private spaces and would serve as a unifying design element. Fencing and perimeter walls would range from three feet to six feet in height, with pilasters up to eight feet and portal elements up to twelve feet in height.

In addition, the project approvals include establishing a new Specific Plan for the site, which would provide land use and development standards for the proposed project and would allow the proposed net density of 21.4 dwelling units per net acre. The Specific Plan is included as Appendix A of this IS-MND. The proposed project also includes the following requests:

- General Plan Amendment (GPA) to change the land use designation from Civic: Schools to Neighborhood Medium Residential (up to 20 units per acre) and Neighborhood High Residential (up to 53 units per acre)
- A Zone Change (to Specific Plan) to allow the proposed net density of 21.4 dwelling units per acre (du/ac);
- A Specific Plan, which provides land use and development standards for the proposed project and would allow a net density of 21.4 dwelling units per acre; and
- A Precise Plan for site plan layout and design
- A Tentative Tract Map to subdivide the property into multiple parcels
- A Tree Removal Permit to remove one significant tree.

Vehicles would be able to access the proposed project via a primary entrance on West Del Norte Street, and a secondary entrance on North Nora Avenue. Both entries would be defined by pedestrian entry pilasters with project signage, accent trees, enhanced landscaping and paving, and parkways and sidewalks on both sides. In addition, a 26-foot private lanes would provide vehicular access to all homes, which would be connected by the primary entrance on West Del Norte Street, and the secondary entrance on North Nora Avenue. Pedestrians would be able to access the project site via the sidewalks along West Del Norte Street, and North Nora Avenue. Residents will also be able to access the project site via two access points from Del Norte Park.

Table 1 summarizes the characteristics of the proposed project. Table 2 summarizes the characteristics of the proposed residential unit types. Figure 3 shows the anticipated proposed conceptual site plan. Figure 4 through Figure 8 illustrate the proposed building elevations. Figure 9 shows the proposed conceptual landscape plan.

Construction Phasing

The construction process would include demolition of the existing buildings located on the project site and construction of up to 282 homes along with associated community amenities on the site. Construction phases would include demolition, site preparation, grading, building construction, paving, and architectural coating. Construction of the proposed project is anticipated to occur over an approximately two year period, beginning in January 2026 and ending in January 2028. Construction would occur Monday through Friday between the hours of 7:00 a.m. and 8:00 p.m. pursuant to WCMC construction standards. Construction staging would occur within the project site boundaries. Occupancy is expected to take place in 2028.

Table 1 Project Characteristics

Characteristics	Details
Address	1501 Del Norte Street
APN	8458-020-901
Gross Lot Area	13.56 acres
Net Lot Area	13.19 acres ¹
Residential	
Residential Lot Area	13.19 acres
Number of Residential Units	282 dwelling units
Residential Net Density	21.4 du/ac ²
Open Space	
Common Open Space	68,305 sf (242 sf/unit)
Private Open Space	47,187 sf (167 sf/unit; min. 60 sf/unit)
Total Open Space	115,492 sf (409 sf/unit)
Parking	
Garage	564 spaces (2 car garage per unit)
Uncovered Guest Parking	77 spaces
Total Parking	641 spaces

sf = square feet

¹ Upon completion of the proposed project, the residential portion of the site would be reduced to 13.19 acres due to the 0.37-acre extension and dedication of West Del Norte Street from its current terminus east to North Sunset Avenue.

² Residential net density is calculated by dividing the number of proposed units by the net lot size.

Table 2 Townhome Residential Unit Type Summary

Unit Type (Count)	Area (sf)	Bedroom/Bathroom Count	Maximum Height
Detached Single-Family Homes¹			
Plan 3222 (16)	1,678 sf	3 bedroom, 2.5 bathroom	24'3" (two-story) ¹
Plan 3522 (18)	1,957 sf	4 bedroom, 3 bathroom	24'-6" (two-story)
3-Story Attached Townhomes²			
Plan 5 (30)	1,226 sf	2 bedroom, 2.5 bathroom	37'-2" (three-story)
Plan 6 (54)	1,470 sf	3 bedroom, 3 bathroom	37'-2" (three-story)
Plan 7 (54)	1,755 sf	4 bedroom, 4 bathroom	37'-2" (three-story)
4-Story Stacked Flats³			
Plan 1 (33)	1,060 sf	2 bedroom, 2 bathroom	47'-9" (four-story)
Plan 2 (22)	1,336 sf	3 bedroom, 3 bathroom	47'-9" (four-story)
Plan 3 (33)	1,749 sf	3 bedroom, 2.5 bathroom	47'-9" (four-story)
Plan 4 (22)	2,071 sf	4 bedroom, 3 bedroom	47'-9" (four-story)
Total Housing Units: 282 Homes			

N/A = Not Applicable

¹ Plan 3222 and Plan 3522 include exterior elevations for Spanish and Seaside designs as shown in sheets A2.12 and A2.13 of the Entitlement Package.

² All plans for the 3-Story Attached Townhomes would vary among the Spanish and Seaside designs as shown in sheets A5.60 and A5.61 of the Entitlement Package.

³ All plans for the 4-Story Stacked Flats would vary among the Spanish and Seaside designs as shown in sheets A5.90 and A5.91 of the Entitlement Package.

Figure 3 Conceptual Site Plan



Figure 4 Conceptual Detached Single-Family Home Elevations ¹



¹ Refer to the Applicant Submittal Package attached as Appendix B for other schematic designs of the proposed project.

Figure 5 Conceptual Attached 3-Story Townhome Elevations, 1



1 - FRONT



2 - RIGHT



3 - REAR



4 - LEFT

Figure 6 Conceptual Attached 3-Story Townhome Elevations, 2



1 - FRONT



2 - LEFT



3 - REAR



4 - RIGHT

Figure 7 Conceptual Attached 3-Story Townhome Elevations, 3



1- FRONT



2- LEFT



3- REAR



4- RIGHT

Figure 8 4-Story Stacked Flats Elevations



1 - FRONT



2 - LEFT



3 - REAR



4 - RIGHT

Figure 9 Conceptual Landscape Plan



10. Surrounding Land Uses and Setting

The project site is located in an urban area surrounded by residential, recreational, and commercial uses. The project site is bordered by Del Norte Park to the north and northeast; North Sunset Avenue, one residential building, and one commercial building to the east; West Del Norte Street and residential properties to the south; and North Nora Avenue to the west. The areas beyond these immediately bordering uses can be generally characterized as consisting of residential neighborhoods of mostly one-story single family homes.

11. Other Public Agencies Whose Approval is Required

The City of West Covina is the lead agency for the proposed project and no approvals are required from any other agency.

12. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

Three tribes have requested notification of projects in West Covina: the Soboba Band of Luiseño Indians, Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation), and Gabrieleño/Tongva Nation. Per the requirements of Public Resources Code (PRC) Section 21080.3.1, the City mailed AB 52 and SB 18 consultation letters to these tribes on May 14, 2025. On May 27, 2025, the City received an email from the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) requesting government-to-government consultation regarding the proposed project. The City engaged consultation with the Kizh Nation in June 2025 that resulted in the City receiving a letter from the Kizh Nation that expressed their opinion that the project site has potential for intact, subsurface Tribal Cultural Resources, and requesting that specific mitigation measures included in their letter (including attachments) be implemented. The City of West Covina will continue to comply with all applicable tribal consultation requirements of Public Resources Code Section 21080.3.1 and all other applicable regulations as the proposed project progresses through the required review and approval process. For further discussion of tribal cultural resources in this IS-MND refer to Section 18, *Tribal Cultural Resources*.

13. Required Approvals

The proposed project would require the following entitlements from the City of West Covina:

- General Plan Amendment (GPA) to change the land use designation from Civic: Schools to Neighborhood Medium Residential (up to 20 units per acre) and Neighborhood High Residential (up to 53 units per acre)
- A Zone Change (to Specific Plan) to allow the proposed net density of 21.4 dwelling units per acre (du/ac)
- A Specific Plan, which provides land use and development standards for the proposed project and would allow a net density of 21.4 dwelling units per acre; and
- A Precise Plan for site design layout and design
- A Tentative Tract Map to subdivide the property into multiple parcels
- A Tree Removal Permit for the removal of one significant tree

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

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

Determination

Based on 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 to 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 “less than significant with mitigation incorporated” 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 potential 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.

<i>Jeff Anderson</i>	10/21/25
_____ Signature	_____ Date
Jeff Anderson	Contract Planner
_____ Printed Name	_____ Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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 a 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 that would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

For purposes of determining significance under CEQA, scenic resources are the visible natural and cultural features of the landscape that contribute to the public's enjoyment of the environment. A scenic vista is defined as a public viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Public views are those that are experienced from a publicly accessible vantage point, such as a roadway or public park. Scenic vistas can be officially designated by public agencies, or informally designated by tourist guides. The California Department of Transportation (Caltrans) manages the California State Scenic Highway Program, which designates state scenic highways. Scenic highways are highways located in areas of natural beauty. A scenic highway becomes officially designated when the local governing body applies to and is approved by Caltrans for scenic highway designation and adopts a Corridor Protection Program that preserves the scenic quality of the land that is visible from the highway right of way (Caltrans 2025a).

The City is located in the relatively flat San Gabriel Valley, framed by the San Gabriel Mountains on the north, the San Rafael Hills on the west, the Puente Hills on the south, and the Chino Hills and San Jose Hills on the east. Portions of the San Jose Hills are located in the eastern and southern area

of the City (West Covina 2016a). These mountains and hills provide background scenic views within West Covina, depending on the viewer's vantage point and orientation.

a. Would the project have a substantial adverse effect on a scenic vista?

According to the City's General Plan, the City of West Covina does not have officially designated scenic vistas (West Covina 2016a). However, the Angeles National Forest and San Gabriel Mountains are approximately seven miles north of the project site. From West Del Norte Street along the project site's southern border, existing buildings and mature trees on the project site limit views of scenic vistas of the San Gabriel Mountains to the north. Views of the San Gabriel Mountains from the eastern border of the project site near the tennis courts in Del Norte Park are mostly obstructed by trees on the west side of the tennis courts and by trees in the park near the northern border of the project site. Views of the San Gabriel Mountains from North Nora Avenue along the western side of the project site are mostly obstructed by trees along North Nora Avenue and trees in Del Norte Park. Views of the San Gabriel Mountains from the northern side of the project site would not be affected by the proposed project because from that vantage point the viewer would be looking away from, not through, the project site and any development on the project site resulting from the proposed project would not affect views in that direction.

As discussed above, views of other hills framing the San Gabriel Valley (including the San Rafael Hills on the west, the Puente Hills on the south, and the Chino Hills and San Jose Hills on the east) may also provide background scenic views within West Covina, depending on the viewer's vantage point and orientation. However, these hills are significantly lower than the San Gabriel Mountains and are either not visible or, at most, barely visible when looking through the project site in their direction due to intervening structures and vegetation. Development of the proposed would therefore not substantially impact views of these hills.

The proposed project would involve demolition of the existing one-story institutional buildings currently on the project site and the construction of 282 residential units. As can be seen by comparing the aerial imagery of the current project site shown in Figure 2 to the Conceptual Site Plan shown in Figure 3, the proposed project would increase the proportion of the site covered with buildings; however, there are no scenic public views across the site that would be substantially blocked by this proposed development and thus the proposed project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

West Covina does not contain any officially designated State Scenic Highways (West Covina 2016a). State Route (SR) 57 between SR 60 and SR 91 (8.9 miles southeast of the project site) and SR 39 between SR 2 and I-210 (3.5 miles northeast of the project site) are eligible for State Scenic Highway designation, but both are too distant from the project site to be affected by implementation of the proposed project (Caltrans 2025b).

The project site is in an urban area consisting of residential, recreational, and commercial uses. The project site does not contain any scenic resources such as natural habitats or rock outcroppings, nor is it in proximity to any such resources. Although the proposed project includes the removal of trees and potentially historic buildings (refer to Section 5, *Cultural Resources*) the Cultural Resources Technical Report prepared by Rincon Consultants determined that the proposed project would not

have a significant impact on historical resources. The project site is not located near a California designated scenic highway and is not highly visible from SR 57 or SR 39 because of its distance from these roadways and because of intervening structures, vegetation, and topography. Therefore, the project would not substantially degrade views of mature trees, rock outcroppings, historic buildings, or any other scenic resources along or visible from a scenic highway, and this impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- c. *Would the project, 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 a 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?*

The project site is in an urban area of West Covina, primarily developed with Del Norte Park to the north and northeast; North Sunset Avenue, a residential building, and a commercial building to the east; West Del Norte Street and residential properties to the south; and North Nora Avenue to the west. The areas beyond these immediately bordering uses can be generally characterized as consisting of residential neighborhoods of mostly one-story single family homes. The project site is currently developed with vacant school buildings and a surface parking lot. Vegetation on the project site is limited to grass lawns, trees, hedges, ruderal vegetation, and ornamental landscaping. The proposed project includes the construction of 282 residential units, access roadways, and installation of perimeter and on-site landscaping. The Arborist Report (Rincon 2025; Appendix C) found that there are 26 trees, including one significant tree, on or immediately bordering the project site, all of which would be removed as part of the development of the proposed project. However, as shown in Figure 3, the proposed project would provide new landscaping, including a variety of trees (295), shrubs, and groundcover, throughout the project site.

Implementation of the proposed project would add residential uses to the project site, which currently contains institutional (school) buildings. The project would increase the massing and height of buildings throughout the project site compared to existing conditions. In addition, the proposed project would be subject to City design review, including review of building elevations, colors and materials, and compliance with the Precise Plan standards per Article VI, Division 2 of the WCMC Chapter 26. The project design would be reviewed for approval by the Planning Commission as part of the Precise Plan application process. This regulatory process provides the City with an opportunity for aesthetic review, consistent with State Law requiring such review to be based on objective design standards. Thus, the project would not conflict with applicable zoning and other regulations governing scenic quality and would not substantially degrade the existing visual character of the site and its surroundings. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

The project site is in an urban area of West Covina, primarily developed with Del Norte Park to the north and northeast; North Sunset Avenue, a residential building, and a commercial building to the east; West Del Norte Street and residential properties to the south; and North Nora Avenue to the west. The areas beyond these immediately bordering uses can be generally characterized as consisting of residential neighborhoods of mostly one-story single family homes. Streetlights and

exterior lighting associated with these uses comprise the main sources of lighting of light and glare in the project area. The proposed project would introduce new sources of lighting associated with residential development, including exterior lighting for homes, internal roadways, pedestrian pathways, common open space areas, and parking areas. These lighting sources are expected to operate during evening and nighttime hours to ensure visibility and safety for residents and visitors. While the site is located in an urban area with existing ambient lighting, the project would increase overall lighting levels compared to existing conditions on the project site, which currently include vacant school structures with minimal lighting.

All proposed lighting would be equipped with appropriate shielding to minimize light spillage onto adjacent properties. Lighting for the proposed project would be regulated by the City of West Covina's Multi-Family and Mixed-Use Objective Design Standards described in Division 2 of the WCMC and regulations within the proposed Specific Plan. The proposed project would increase outdoor lighting on the project site due to the added development intensity on the site compared to the site's existing condition as an unoccupied former school site. However, light sources associated with the proposed project would not substantially increase the overall levels of nighttime lighting in the area because they would be comparable to existing light levels of the surrounding residential and commercial land uses and regulations prohibit light spilling off the site. Furthermore, roadways adjacent to the project site, including North Nora Avenue, West Del Norte Street, and North Sunset Avenue, are already illuminated by street lighting. For these reasons, the proposed project would not create a substantial new source of light such that day or nighttime views in the area would be adversely affected. Rather, the proposed exterior lighting and building materials would be consistent with those of surrounding uses and would be an important aid to public safety by providing adequate nighttime visibility of the project site and immediately surrounding streets.

As shown in Figure 4 through Figure 8, the project design does not include highly reflective materials that could cause significant glare during the day, such as stainless steel panels or expansive glass windows. The design of this project, including its finish, colors, and materials, would be reviewed for approval through the City's design review process to ensure final plans continue with this approach. Furthermore, the City's Objective Design Standards prohibit the incorporation of highly reflective materials. This regulatory procedure provides the City with an additional layer of review for aesthetics including light and glare.

In addition to new lighting associated with buildings and site amenities, the proposed project would increase vehicular activity in and around the site, which may generate additional sources of light and glare. Vehicle headlights from residents and visitors entering and exiting the site, as well as internal circulation, would introduce nighttime lighting that may be visible to adjacent properties, particularly along North Nora Avenue and West Del Norte Street. However, the site is in an urban area where street lighting and vehicle traffic already contribute to baseline nighttime lighting levels. During the daytime, glare from sunlight reflecting off vehicles may occur intermittently but would not represent a substantial or sustained source of glare. Given the urban context and presence of similar existing light sources, vehicle-related light and glare impacts would be less than significant.

For the reasons discussed above, the proposed project would not create new source of substantial light or glare that would have a substantial adverse effect on daytime or nighttime views in the area, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on 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. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

The project site is in an urban area and is currently occupied by vacant buildings. According to the City's Zoning and Land Use Maps, the project site is currently zoned Single-Family Residential (R-1) and has a land use designation of Civic: School (S). The California Department of Conservation (DOC) has not designated important farmland areas for the project site (California DOC 2025a). The project site is also not zoned for agricultural production, it has been previously developed, and it is not located in the vicinity of agricultural operations. Therefore, the proposed project would have no impact on designated Farmland.

NO IMPACT

- b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*

As discussed under impact discussion 2.a of this section, the project site is currently occupied by vacant buildings and is not zoned or designated for agricultural use. In addition, the project site is not under a Williamson Act contract (California DOC 2025b). The proposed project involves demolition of existing school buildings and construction of a new residential community in an urban area. The project site does not include conversion of farmland to non-agricultural uses; therefore, the proposed project would not conflict with agricultural zoning or a Williamson Act contract. No impact would occur.

NO IMPACT

- c. Would the project 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))?*

As discussed in Section 5, *Project Location*, the project site is surrounded by residential, recreational, and commercial uses, and neither it nor any nearby uses are zoned or designated for forest land or timberland (DOC 2019). Therefore, the proposed project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

NO IMPACT

- d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

The project site is in an urban area and is currently occupied by vacant buildings and landscaped areas and is zoned and designated for urban uses. Therefore, the proposed project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

NO IMPACT

- e. Would the project 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?*

The project site is in an urban area and is currently occupied by vacant buildings and landscaped areas and is zoned and designated for urban uses. Therefore, the proposed project would not result in the conversion of farmland to non-agricultural uses, forest land to non-forest uses, nor any other change in the existing environment that could result in impacts to farmland or forest land. No impact would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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) adversely affecting a substantial number of people?	☐	☐	☒	☐

The information and analysis in this section of the IS-MND is based on the Air Quality Analysis report by UXR, which is Appendix D of this IS-MND.

Overview of Air Pollution

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for “criteria pollutants” and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide, volatile organic compounds (VOC)/reactive organic gases (ROG), nitrogen oxides (NO_x), particulate matter with diameters of ten microns or less (PM₁₀) and 2.5 microns or less (PM_{2.5}), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NO_x. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog).

Air pollutant emissions are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories:

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat.
- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and can also be divided into two major subcategories:

- On-road sources that may be legally operated on roadways and highways.
- Off-road sources include aircraft, ships, trains, and self-propelled construction equipment.

Air Quality Standards and Attainment

The project site is located in the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, SCAQMD must monitor air pollutant levels to ensure that the NAAQS and CAAQS are met, and to develop strategies to meet the standards if they are not met.

Depending on whether the standards are met or exceeded, the SCAB is classified as being in “attainment” or “nonattainment.” In areas designated as nonattainment for one or more air pollutants, a cumulative air quality impact exists for those air pollutants. The human health associated with these criteria pollutants, presented in Table 3, is already occurring in those areas as part of the environmental baseline condition. Under State law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The SCAB is in nonattainment for ozone and PM_{2.5} federal standards. Also, the SCAB is in nonattainment for the State standard for PM₁₀ and designated unclassifiable or in attainment for all other federal and State standards (CARB 2024). The nonattainment statuses result from several factors. These factors include the combination of emissions from a large urban area, the regional meteorological conditions adverse to the dispersion of air pollution emissions, and the mountainous terrain surrounding the SCAB that traps pollutants (SCAQMD 2022).

Table 3 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Carbon monoxide (CO)	Reduces oxygen delivery leading to: (1) aggravation of chest pain (angina pectoris) and other aspects of coronary heart disease; (2) decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (3) impairment of central nervous system functions; and (4) possible increased risk to fetuses.
Nitrogen dioxide (NO ₂)	(1) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (2) risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and (3) contribution to atmospheric discoloration.
Sulfur dioxide (SO ₂)	(1) Bronchoconstriction accompanied by symptoms that may include wheezing, shortness of breath, and chest tightness during exercise or physical activity in persons with asthma.
Suspended PM ₁₀	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).
Suspended PM _{2.5}	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.
Lead	(1) Short-term overexposures and lead poisoning can cause (a) anemia, (b) weakness, (c) kidney damage, and (d) brain damage; (2) long-term exposure to lead increases risk for (a) high blood pressure, (b) heart disease, (c) kidney failure, and (d) reduced fertility.

Source: USEPA 2024

Air Quality Management

Since the SCAB currently exceeds ozone and PM_{2.5} NAAQS standard, the SCAQMD is required to implement strategies to reduce pollutant levels to achieve attainment of the NAAQS. The SCAQMD 2022 Air Quality Management Plan (2022 AQMP) is a regional blueprint designed to meet the NAAQS and demonstrate how attainment will be reached. The 2022 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The prior AQMP, published in 2016, determined that, with implementation of the proposed control strategy, the SCAB could expect to reach attainment of the 1997 8-hour ozone standard by July 15, 2024, and the 2012 annual PM_{2.5} by 2025. The 2006 24-hour PM_{2.5} did not meet the attainment date of December 31, 2019, which required SCAQMD to revise the plan to meet standard as early as possible. SCAQMD's 2022 AQMP, an update to the 2016 AQMP, was developed to identify and implement strategies and control measures to meet the 2015 8-hour ozone NAAQS as expeditiously as practicable, but no later than the statutory attainment deadline of August 3, 2038 for the SCAB (SCAQMD 2022).

Air Emission Thresholds

The SCAQMD approved the *CEQA Air Quality Handbook* in 1993. Since then, the SCAQMD has provided supplemental guidance on their website to address changes to the methodology and nature of CEQA since the publication of the Handbook. Some of these changes include recommended thresholds for emissions associated with both construction and operation of the project are used to evaluate a project’s potential regional and localized air quality impacts (SCAQMD 2023).

Regional Thresholds

Table 4 presents the significance thresholds for regional construction and operational-related criteria air pollutant and precursor emissions being used for the purposes of this analysis.

Table 4 Air Quality Thresholds of Significance

Pollutant	Construction (pounds per day)	Operation (pounds per day)
NO _x	100	55
VOC	75	55
PM ₁₀	150	150
PM _{2.5}	55	55
SO _x	150	150
CO	550	550

NO_x = Nitrogen Oxides; VOC = Volatile Organic Compounds; PM₁₀ = Particulate Matter with a diameter no more than 10 microns; PM_{2.5} = Particulate Matter with a diameter no more than 2.5 microns; SO_x = Sulfur Oxide; CO = Carbon Monoxide
Source: SCAQMD 2023

Localized Significance Thresholds

In addition to the above regional thresholds, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board’s Environmental Justice Enhancement Initiative (1-4). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and have been developed for NO₂, CO, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest sensitive receptor by taking into consideration ambient concentrations in each SRA, distance to the sensitive receptor, and project size. LSTs have been developed for emissions generated in construction areas up to five acres in size. However, LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2009).

The project site is located within SRA 9 (East San Gabriel Valley). The Construction LSTs are provided in Table 5.

Table 5 SCAQMD LSTs for Construction in SRA 9

	Emission (ppm)				
	CO		NO2	PM10	PM2.5
	Averaging Time				
Peak Construction	1-Hour	8-Hours	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	0.07	0.05	2.25E-02	2.97	1.17
Background Concentration ^A	1.5	1.4	0.088		
Total Concentration	1.57	1.45	0.11	2.97	1.17
SCAQMD Localized Significance Threshold	20	9	0.18	10.4	10.4
Threshold Exceeded?	NO	NO	NO	NO	NO

^A Highest concentration from the last three years of available data.

Notes:

PM10 and PM2.5 concentrations are expressed in µg/m³. All others are expressed in ppm.

Based on SCAQMD's LST Methodology, background concentrations are considered only for CO and NO₂. According to the SCAQMD Air Quality Significance Thresholds (March 2023), the SCAB is in attainment for NO₂ and CO. Therefore, a project would be considered significant if it causes or contributes to an exceedance of the applicable attainment standards. As such, the maximum background concentration values from the most recent three years of monitoring data for SRA 9 were added to the proposed project's emissions to assess total concentrations.

Toxic Air Contaminants

SCAQMD has developed significance thresholds for the emissions of toxic air contaminants (TACs) based on health risks associated with elevated exposure to such compounds. For carcinogenic compounds, cancer risk is assessed in terms of incremental excess cancer risk. A project would result in a potentially significant impact if it would generate an incremental excess cancer risk of 10 in 1 million (1×10^{-6}) or a cancer burden of 0.5 excess cancer cases in areas exceeding a one-in-one-million risk. In addition, non-carcinogenic health risks are assessed in terms of a hazard index. A project would result in a potentially significant impact if it would result in a chronic and acute hazard index greater than 1.0 (SCAQMD 2023).

Methodology

Criteria pollutant and greenhouse gas (GHG) emissions for proposed project construction and operation were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air districts. CalEEMod allows for the use of default data (e.g., emission factors, trip lengths, meteorology, source inventory) provided by the various California air districts to account for local requirements and conditions, and/or user-defined inputs. The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide (CAPCOA 2022). The input data and subsequent construction and operation emission estimates for the proposed project are discussed below. CalEEMod output files for the proposed project are included in Appendix D to this report.

Proposed project construction would primarily generate temporary criteria pollutant and GHG emissions from on-site construction equipment operation, construction worker vehicle trips to and from the site, and haul truck trips related to demolition debris and soil import activities.

Construction input data for CalEEMod include but are not limited to: (1) the anticipated start and end dates of January 2026 through January 2028; (2) construction phase durations ranging from 15 to 450 days; (3) equipment inventories provided by the applicant, including excavators, graders, scrapers, air compressors, pavers, forklifts, and others operating up to eight hours per day; and (4) site-specific cut and fill volumes totaling 1,871 cubic yards of cut and 6,172 cubic yards of fill, with a net import of 4,301 cubic yards of material. The analysis assessed maximum daily emissions from individual construction activities, including demolition, site preparation, grading, building construction, paving, and architectural coating. Demolition would remove approximately 45,244 square feet of existing structures and 176,000 square feet of asphalt or concrete, generating an estimated 2,300 tons of debris.

Construction emissions were modeled in CalEEMod to reflect the actual duration and intensity of construction activity and the expected construction fleet provided by the applicant. Construction emissions associated with development of the proposed project were quantified using the types and quantities of equipment for each construction phase as provided by the applicant. CalEEMod also estimated emissions from on-road construction-related trips, including worker trips (ranging from 3 to 198 per day), vendor trips (up to 27 per day), and hauling trips (up to 19 per day), adjusted for each phase of construction. The analysis assumes that off-site utility and roadway improvements would not exceed the emissions already accounted for, as those activities would be constrained by limited work areas and equipment usage.

Operational emissions modeled include mobile source emissions, energy emissions, and area source emissions. For mobile source emissions, trip-generation estimates were based on land use codes from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition (2021), for single-family detached housing (ITE Code 210), multifamily low-rise residential (ITE Code 220), and multifamily mid-rise residential (ITE Code 221). These trip rates were used to quantify vehicle emissions resulting from proposed project-related travel. Fugitive dust related to vehicular travel was also included and estimated in CalEEMod.

Area source emissions were modeled for architectural coatings, consumer products, and landscaping equipment using CalEEMod defaults. Although Assembly Bill (AB) 1346 bans the sale of new gasoline-powered landscaping equipment as of January 1, 2024, the analysis conservatively does not incorporate emissions reductions associated with this regulation.

Energy emissions were modeled based on electricity usage only, as no natural gas would be used according to the project applicant. Since electricity generation occurs offsite and may be offset through mechanisms like RECLAIM, emissions from offsite generation were excluded from the significance evaluation.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The proposed project is located within the South Coast Air Basin (SCAB), an area under the jurisdiction of the South Coast Air Quality Management District (SCAQMD), which regularly prepares Air Quality Management Plans (AQMPs) to meet federal and state air quality standards. The current applicable plan is the 2022 AQMP, which is based on regional growth projections in SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Consistency with the AQMP is determined using two CEQA Handbook criteria.

The criterion are as follows:

- Would the project result in increased frequency or severity of air quality violations?
- Would the project exceed the growth assumptions in the AQMP?

Regarding the first criterion, the analysis demonstrates that the proposed project’s construction and operational emissions (shown in Table 6 and Table 7 below) would not exceed applicable regional significance thresholds or localized significance thresholds listed in Table 4 and Table 5. Therefore, the proposed project would not interfere with timely attainment of ambient air quality standards and would result in a less than significant impact.

For the second criterion, the proposed project proposes residential development requiring a General Plan Amendment and zone change from “Civic: Schools” and “Single-Family Residential” to “Neighborhood Medium Residential” and “Neighborhood High Residential”, and “Specific Plan”, respectively. Although the proposed development differs from existing land use designations, the emissions would remain below applicable thresholds, and the overall development intensity aligns with regional growth forecasts considered in the 2022 AQMP. As such, the proposed project would not conflict with the AQMP’s goals.

Therefore, the proposed project would not conflict with or obstruct implementation of the 2022 AQMP. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

Table 6 Construction Emissions (pounds/day)

Year	VOC	Nox	CO	SO2	PM10	PM2.5
Summer						
2026	2.99	27.00	25.40	0.06	4.12	2.16
2027	33.20	7.32	23.10	0.02	3.52	0.95
Winter						
2026	33.20	27.10	25.30	0.06	4.12	2.16
2027	33.90	11.90	27.40	0.03	3.83	1.15
2028	33.80	11.50	26.60	0.03	3.79	1.11
Maximum Daily Emissions	33.90	27.10	27.40	0.06	4.12	2.16
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
See Appendix D for CalEEMod worksheets.						

Table 7 Operational Emissions (pounds/day)

Source	VOC	Nox	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer						
Mobile	4.37	3.08	36.70	0.09	8.71	2.25
Area	36.40	0.15	16.10	< 0.005	0.01	0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Maximum Daily Emissions	40.77	3.23	52.80	0.09	8.72	2.26
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Winter						
Mobile	4.32	3.36	33.80	0.09	8.71	2.25
Area	35.00	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Maximum Daily Emissions	39.32	3.36	33.80	0.09	8.71	2.25
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
See Appendix D for CalEEMod worksheets.						

- b. *Would the project 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?*

The SCAB is currently designated non-attainment for ozone (O₃), particulate matter less than 10 microns (PM₁₀), and particulate matter less than 2.5 microns (PM_{2.5}) under federal and/or state air quality standards. During construction, emissions would result from on-site equipment, soil disturbance, and vehicle travel associated with construction activities. As shown in Table 6, maximum daily unmitigated emissions for all criteria pollutants during construction would remain below the applicable South Coast Air Quality Management District (SCAQMD) regional thresholds. Therefore, the proposed project's construction emissions would not be cumulatively considerable.

During operation, emissions would originate primarily from mobile sources (i.e., vehicle trips), as well as area sources such as architectural coatings, consumer products, and landscape maintenance equipment. As shown in Table 7, operational emissions for all criteria pollutants, including VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5}, would also remain well below applicable SCAQMD thresholds. Energy source emissions are minimal and no natural gas use is proposed.

Given that both construction and operational emissions would be below SCAQMD significance thresholds, which are designed to account for cumulative regional air quality impacts, the proposed project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant. Therefore, because the proposed project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant, impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

As discussed above, the proposed project would not exceed the SCAQMD localized significance thresholds during construction. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during proposed project construction.

Additionally, the proposed project would not exceed the SCAQMD localized significance thresholds during operational activity. Furthermore, proposed project traffic would not create or result in a CO “hotspot.” Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of proposed project operations. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The potential for the proposed project to generate objectionable odors has also been considered. Land uses generally associated with odor complaints include:

- Agricultural uses (livestock and farming)
- Wastewater treatment plants
- Food processing plants
- Chemical plants
- Composting operations
- Refineries
- Landfills
- Dairies
- Fiberglass molding facilities

The proposed project does not contain land uses typically associated with emitting objectionable 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 long-term operational uses. 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 the respective phase of construction and is thus considered less than significant. It is expected that proposed project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors and other emissions (such as those leading to odors) associated with construction and operations activities of the proposed project would be less than significant

LESS-THAN-SIGNIFICANT IMPACT

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4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 Wildlife 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, or regulations, or by the California Department of Fish and Wildlife or U.S. 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?	☐	☐	☐	☒

The analysis presented in this section is predominantly based on a review of available technical information regarding biological resources in the project vicinity. In order to obtain comprehensive information regarding the presence or potential presence of sensitive biological resources (including special status species, sensitive communities, and jurisdictional waters and wetlands) in the vicinity of the project site, queries of the United States Fish and Wildlife Service (USFWS) Environmental Conservation Online System (ECOS): Information for Planning and Consultation System (IPaC) (USFWS 2025a), USFWS Critical Habitat Portal (USFWS 2025b), USFWS National Wetlands Inventory (NWI) (USFWS 2025c), California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) (CDFW 2025a), CDFW Biogeographic Information and Observation System (BIOS) (CDFW 2024b) and California Native Plant Society (CNPS) Online Inventory of Rare, Threatened and Endangered Plants of California (CNPS 2025) were conducted. Additionally, a site reconnaissance as well as an arborist assessment was performed in March 2025 to assess trees on and near the project site. An Arborist Report (Rincon 2025) was prepared to document results of the survey and is included as Appendix C.

- a. *Would the project 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?*

The project site encompasses 13.56 acres of land developed with buildings, asphalt surfaces, lawns, and recreational and baseball fields. The site is in a developed urban area approximately 3.8 miles southeast of Santa Fe Dam Recreation Area, which is the nearest open space covering approximately 1,200 acres in Irwindale. The literature review identified records or ranges of 35 special status plants and 47 special status wildlife species within the project site vicinity (within a 9-quadrangle search area). The nearest USFWS-designated Critical Habitats occur approximately three miles to the southeast for the coastal California gnatcatcher (*Poliioptila californica californica*; federally threatened) and three miles to the northwest for the southwestern willow flycatcher (*Empidonax traillii extimus*; federal and state endangered) (CDFW 2025c; USFWS 2025b).

Based on a desktop review of aerial imagery and results of the arborist assessment, the site contains paved and vegetated areas. Non-native/ornamental trees are predominant at the site and include Chinese banyan (*Ficus microcarpa*), Chinese elm (*Ulmus parvifolia*), holly oak (*Quercus ilex*), deodar cedar (*Cedrus deodara*), Shamel ash (*Fraxinus uhdei*), tuckeroo (*Cupaniopsis anacardioides*), common olive (*Olea europaea*), callery pear (*Pyrus calleryana*), and tulip tree (*Liriodendron tulipifera*). Additionally, a single native coast live oak (*Quercus agrifolia*) is present on site. Additionally, recreational fields and smaller lawn areas, both consisting of turf grasses, are present.

None of the special status plant and wildlife species identified in the literature review have potential to occur on the project site based on incompatible habitat conditions or limited habitat components meeting the species' requirements (e.g., vegetation assemblage, soils, topography, hydrology, and prior disturbances) and/or because the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. Specifically, the entire site has been developed, and the majority of vegetation types present on site are ornamental. While a few trees are present on site that could provide nesting habitat for birds (including one native oak) they are not expected to be suitable for other special status species. As a result, impacts to special status species would be less than significant without mitigation.

However, the site has the potential to provide minimal foraging and nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area that are adapted to disturbed areas and urban environments. Whether designated at the federal, state, or local level as special status or not, migratory or other common nesting birds are protected by the California Fish and Game Code (CFGF) and Migratory Bird Treaty Act (MBTA) and may nest in any of the 26 trees currently on and adjacent to the project site. Therefore, construction of the project has the potential to directly impact (by destroying a nest) or indirectly impact (by creating construction noise, dust, and other human disturbances that may cause a nest to fail) nesting birds protected under the CFGF and MBTA. Implementation of Mitigation Measure BIO-1 would ensure compliance with the CFGF Section 3503 and the MBTA with respect to nesting birds by reducing the impact through pre-construction nesting bird surveys and avoidance of active nests. As a result, impacts to protected nesting birds would be less than significant with mitigation incorporated.

Mitigation Measure

BIO-1 Nesting Bird Avoidance

Prior to issuance of grading permits, the following measures shall be implemented:

- To avoid disturbance of nesting birds, including raptorial species protected by the MBTA and CFGF, construction activities related to the project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 31). If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of construction activities. The nesting bird pre-construction survey shall be conducted on foot inside the project site, including a 100-foot buffer, and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California.
- If active nests (i.e., nests occupied by eggs or fledglings) are found, the 100-foot avoidance buffer shall be demarcated by a qualified biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No parking, storage of materials, or construction activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.
- A survey report by the qualified biologist documenting and verifying compliance with the mitigation and applicable State and federal regulations protecting nesting birds shall be submitted to the City. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

Implementation of Mitigation Measure BIO-1 would reduce potentially significant impacts to nesting birds to less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- b. *Would the project 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 cdfw 2025a and Wildlife or U.S. Fish and Wildlife Service?*

Natural vegetation communities are classified as sensitive biological resources if they have limited distributions, have high wildlife value, include special status species, or are particularly susceptible to disturbance. Vegetation alliances in the CNDDDB are ranked 1 through 5 based on NatureServe's methodology (2025), with those alliances ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Some alliances with the rank of 4 and 5 have also been included in the sensitive natural communities list under CDFW's revised ranking methodology (CDFW 2025).

The project is in a developed urban area and is not located within a naturally vegetated or open space area. On-site vegetation, including ornamental shrubs and trees, does not constitute a sensitive natural community. Additionally, there is no riparian habitat on the project site. The channelized Walnut Creek occurs approximately 0.6 mile south of the site, where it runs under South Sunset Avenue and is designated as riverine habitat (USFWS 2025c); review of aerial imagery indicates that it does not contain riparian vegetation. Construction and operation of the proposed project would not have a substantial adverse effect on riparian habitat or other sensitive natural communities as none exist on the site or in nearby areas. No impact would occur.

NO IMPACT

- c. *Would the project 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 riparian habitats, wetlands, or other water features have been identified on or directly adjacent to the project site (USFWS 2025c). Furthermore, the project site does not include any discernable drainage courses, inundated areas, wetland vegetation, or hydric soils (USDA 2025). No State or federally protected wetlands or other waters that may be considered jurisdictional by the CDFW, United State Army Corps of Engineers (USACE), or Regional Water Quality Control Board (RWQCB) occur on or adjacent to the project site. Therefore, the proposed project would not directly or indirectly have a substantial adverse effect on State or federally protected wetlands or other jurisdictional waters. No impact would occur.

NO IMPACT

- d. *Would the project 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?*

Wildlife corridors are generally defined as connections between habitat areas that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover.

As discussed above, the project site is developed and within an urbanized area. While the site overlaps areas mapped by the California Essential Habitat Connectivity (CEHC) as small natural areas, the site is isolated from the nearest open space area or regional wildlife corridors or linkages,

and there are no riparian corridors, creeks or useful patches of stepping-stone habitat (natural areas) on or connecting the project site. Thus, project implementation would not disrupt or have any adverse effects on migratory corridors or linkages in the area. In addition, the project site does not contain any natural communities or habitat that would be expected to support native wildlife nurseries or the movement of species. Therefore, the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. No impact would occur.

NO IMPACT

- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

In accordance with Article VI, Division 10 –Preservation, Protection and Removal of Trees of the City of West Covina Municipal Code (referred to as “Tree Ordinance”; Ordinance No. 2519; City of West Covina 2024), a tree permit is required to:

- Remove, relocate, or destroy any significant or heritage trees on private or public property.
- Prune or trim more than 20 percent of live foliage or limbs from any oak tree as defined in this article.

A heritage tree generally means any tree(s) identified as such by the City’s Planning Commission and/or any of the Southern California black walnut (*Juglans californica*) tree species located in the San Jose Hills, as found within the City's jurisdictional boundaries.

A significant tree is a tree located on private and/or public property that meets one or more of the following requirements:

- Is located in the front yard of a lot or parcel and has a caliper² of one foot or more, as measured four and one-half feet above mean natural grade;
- Is located in the street-side yard of a corner lot and has a caliper of one foot or more;
- Is located anywhere on a lot, has a caliper of six inches, or more, and is one of the following species: any oak tree native to California, including but not limited to California live, canyon, interior, mesa, scrub, or valley oak (*Quercus agrifolia*, *Q. chrysolepis*, *Q. wislezenii*, *Q. engelmannii*, *Q. dumoso*, or *Q. lobata*); California sycamore (*Platanus racemosa*); or American sycamore (*Platanus occidentalis*).

Tree removal is defined as the uprooting, cutting, or severing of the main trunk or any act which causes, or may be reasonably expected to cause a tree to die or to be seriously damaged. This includes damaging the root system by machinery, storage of materials within the dripline, soil compaction, or substantially changing the grade around the root system, excessive pruning, or paving with concrete, asphalt, or other inadequate irrigation.

² Caliper is defined by the Tree Ordinance as the maximum diameter of the trunk of a tree measured at 4.5 feet above the natural grade. In the case of multi-trunked trees, caliper shall mean the sum of the calipers of each individual trunk measured at 4.5 feet above grade.

A total of 26 trees were assessed in the Arborist Report (Rincon 2025; Appendix C), of which 1 is a significant tree and 25 are non-significant trees³. As shown in Figure 10, seven of the non-significant trees are street trees located along North Nora Avenue outside of the project boundary and 18 are located within the project boundary within landscaped areas and adjacent to buildings. One non-significant tree (#30) is located adjacent to a single-family residence. The proposed project would remove all 26 trees identified in the Arborist Report. While existing street trees would normally be preserved, if possible, the proposed project would install new parkway and sidewalk along North Nora Avenue and West Del Norte Street. The proposed project would plant 295 new trees for a 1:11 replacement ratio. There are no designated heritage trees within or adjacent to the project site. None of the trees are so diseased or damaged that they are no longer viable or are a threat to other protected plant species, per Tree Ordinance §26-260(c).

The WCMC Section 26-290 also specifies that removal of any City/public tree with a caliper of one foot or more requires a permit. In addition, no tree permit shall be issued for the removal of any heritage tree or significant tree on any lot associated with a development application, unless all discretionary approvals have been obtained from the City. The Planning Director may approve, conditionally approve, or deny a tree removal application, after a site investigation regarding specific trees, site conditions, and topographic considerations. The Planning Director may also place conditions on the tree removal permit, including replacement of removed trees with comparable size and species, or relocation of existing trees.

As described above and shown in Figure 9, the proposed project would incorporate landscaping which would include a greater number of new trees than the number of trees to be removed, resulting in greater tree coverage on the proposed project site than what currently exists.

Additionally, the proposed project would conform to the requirements of Division 10 of the West Covina Municipal Code, including the following:

- Obtaining permits for the removal of significant trees.
- Replacement of the removed trees with a tree of comparable species, size, and condition as determined by the Community Development Director.
- Payment of the proper restitution value of the trees or donation of boxed trees to the City or other public agency should a suitable replacement location not be possible on-site or off-site.

As a result, the proposed project would not conflict with any local policies or ordinance protecting biological resources, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- f. Would the project 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 adopted Habitat Conservation or Natural Community Conservation Plans or other approved local, regional, or State habitat conservation plans apply to City of West Covina (CDFW 2023). Therefore, no impact would occur.

NO IMPACT

³ Defined as any tree not meeting the requirement of "significant tree".

Legend:

- Project Boundary (Yellow outline)
- Dripline (Green outline)
- Significant Trees (Red square)
- Non-Significant Trees (Green circle)

Scale: 0, 50, 100 Feet

North Arrow: N

Map Labels: Del Norte St, N Foxdale Ave, N Alston Ave, N Willow Ave, N Sunset Ave

Tree Locations: 14 (Significant), 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38

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5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §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?	☐	☐	☒	☐

A Cultural Resources Technical Report was conducted by Rincon Consultants, Inc. in April 2025 for the proposed project. The report conducted background and archival research, California Historical Resources Information System (CHRIS) records search, sacred lands file search, and a pedestrian field survey. The report found that implementation of the proposed project would not result in significant impacts to cultural resources. The following analyses are based on the Cultural Resources Technical Report.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

The Cultural Resources Technical Report found, based on the field survey and background research done for the report, that there is one built environment historical resource on the project site, the Del Norte School. This resource was previously evaluated for listing in the National Register of Historic Places, California Register of Historical Resources, and local listing in 2019 by GPA Consulting. Rincon's Cultural Resources Technical Report concurs with the finding of the finding of GPA's 2019 analysis that the resource is ineligible for NRHP, CRHR, and local listing and therefore does not qualify as a historical resource as defined by CEQA. Consequently, the proposed project would not result in a substantial adverse change in the significance of a historical resource, and there would be no impact.

NO IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

No archaeological resources were identified within or adjacent to the project site by the Cultural Resources Technical Report, which included a records search, Sacred Lands File search, Native American consultation support, and a cultural resources survey. The lack of surface evidence of archaeological materials does not preclude their subsurface existence, but the absence of substantial prehistoric or historic-period archaeological remains within the immediate vicinity, along

with the existing level of disturbance in the project site, suggests there is a low potential for encountering intact subsurface archaeological deposits. Because the possibility of encountering subsurface archaeological materials during construction of the proposed project cannot be ruled out, Mitigation Measure CUL-1 is required.

Mitigation Measure

CUL-1 Unanticipated Discovery of Cultural Resources

In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Guidelines Section 15126.4(b)(3)(C).

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- c. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

The Cultural Resources Technical Report determined that no human remains are known to be present within the project site. However, the discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the NAHC, which will determine and notify a mostly likely descendant (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. With adherence to existing regulations, impacts to human remains would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Result in a 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?	☐	☐	☒	☐

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

The proposed project would use nonrenewable resources for construction and operation of the proposed project. Natural resources that would be utilized by the proposed project include petroleum-based fuels for vehicles and equipment. The anticipated use of these resources is detailed in the following subsections. As supported by the discussion below, the proposed project would not create energy demand that would result in a significant environmental impact.

Construction Energy Demand

During proposed project construction, energy would be consumed in the form of 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, and vehicles used to deliver materials to the site. The proposed project would require demolition, site preparation and grading, including hauling material off-site, installing pavement and asphalt, constructing buildings, applying architectural coating, and installing landscaping and hardscaping. Energy use during construction would be temporary, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of California Code of Regulations (CCR) Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes, minimizing unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, per applicable regulatory requirements such as California's Green Building Standards Code ([CALGreen] CCR, Title 24, Part 11), the proposed project would comply with construction waste management practices to divert a minimum of 75 percent of construction and demolition debris. These practices would result in efficient use of energy necessary to construct the proposed project. In the interest of cost-efficiency, construction contractors also would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, the proposed project

would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Operational Energy Demand

Operation of the proposed project would contribute to area energy demand by consuming electricity, , gasoline, and diesel fuel. Electricity would be used for heating and cooling systems, lighting, appliances, water use, and overall operation of the proposed project. However, as described in Section 5.6 of the proposed Specific Plan (Appendix A of this IS-MND) all homes would include roof top photovoltaic (PV) solar panels, energy efficient lighting and appliances, cool roofs, energy efficient windows, and other design features that significantly conserve energy. These features would help the proposed project achieve net zero electricity use to meet 2025 Title 24 requirements. Gasoline and diesel consumption would result from trips generated by future residents.

Table 8 summarizes estimated operational energy consumption for the proposed project. While the West Covina Unified School District (WCUSD) no longer operates a full-time school on the project site, it does occasionally rent out a multi-purpose room and sports fields on the project site. While these activities may generate some operational energy usage, they are irregular in nature and represent a fraction of the previous operational use of the project site when it functioned as a fully operational school. For these reasons, and to produce a conservative analysis, existing operational energy use is assumed to be zero and any estimated increase in future operational energy use under the proposed project is analyzed as increasing from a baseline of zero. Proposed project operation is estimated to require approximately 12,036 million metric British thermal units (MMBtu) per year.

The proposed project would be required to comply with all standards set in CBC Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California's Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2022 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the California Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every 3 years, and each iteration is more energy efficient than the previous standards. While the 2025 Building Energy Efficiency Standards are still in the rulemaking phase and are not scheduled to take effect until January 2026 (CEC 2025), it is expected that this trend towards energy efficiency in the standards will continue with the 2025 Standards. Furthermore, the proposed project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase to comply with State requirements through Senate Bill (SB) 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Table 8 Estimated Project Annual Operational Energy Consumption

Source	Energy Consumption ¹	
Electricity	1.4 GWh	4,773 MMBtu
Natural Gas Usage	72,629 U.S. therms	7,263 MMBtu
Total Energy Consumption	12,036 MMBtu	
MMBtu: million metric British thermal units; GWh: Gigawatt hours		
¹ Energy consumption is converted to MMBtu for each source		
See CalEEMod output results for electricity and natural gas usage.		

Overall, construction of the proposed project would be temporary and typical of similar projects, and would not result in the wasteful, inefficient, or unnecessary consumption of energy. Operation of the proposed project would consume fuel; however, the proposed project would conform to the latest version of California's Green Building Standards Code and Building Energy Efficiency Standards, and would therefore not lead to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The City adopted its Energy Action Plan (EAP) in 2011, which includes energy conservation goals and policies for municipal operations in West Covina, and outreach programs to encourage local businesses and residents to implement utility energy efficiency measures such as design features that achieve water and energy use reductions, including compliance with Title 24 (City of West Covina 2011). The goals and policies established by the EAP are geared towards municipal operations and the establishment of new local energy policies and, therefore, have limited applicability to residential projects in the City. However, the proposed project would be in accordance with the overall intent of the EAP. For example, the proposed project would be designed to comply with the performance levels of the latest version of CALGreen, through adoption of the State building code as amended by the West Coving Building and Building Regulations (Chapter 7 of the WCMC). This would reduce energy consumption compared to standard building practices. The proposed project would be required to comply with the residential mandatory measures in the 2025 CALGreen, Title 24, Part 11. The proposed project would also be required to comply with the energy standards in the California Energy Code, CALGreen Part 6. Compliance with these regulations would minimize potential conflicts with adopted energy conservation plans. There would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	☐	☐	☒	☐
2. Strong seismic ground shaking?	☐	☐	☒	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
4. 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 wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

A Geotechnical Due Diligence Study was prepared for the project site by SA Geotechnical, Inc. in June 2024 to analyze the geotechnical factors that may impact the redevelopment of the site. The report included a review of relevant United States Geological Survey (USGS) and California Geological Survey (CGS) maps for the site and surrounding area; geological field investigation to evaluate subsurface conditions; laboratory testing on selected soil samples to evaluate physical, engineering, and chemical properties of on-site soils, evaluation of geologic and seismic hazards (i.e., seismicity, surface fault rupture, ground shaking, liquefaction); and evaluation of design parameters in accordance with the California Building Code (CBC). The report concluded that the proposed project is feasible from a geotechnical engineering standpoint, provided that the recommendations presented in the report are adhered to during design, grading, and construction of the proposed project, to the satisfaction of the City's Building Division. The following analysis is based on the information contained in the project-specific Preliminary Geotechnical Due Diligence Study (SA Geotechnical Inc 2024; Appendix E).

- a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*
- a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

The project site is in a seismically active area of southern California, but according to the CGS, the project site is not in an Alquist-Priolo Fault Zone (CGS 2025). No faults are present on the project site. According to the Preliminary Geotechnical Due Diligence Study, the nearest active fault is the San Jose Fault, approximately 4.1 miles southeast of the project site, and the estimated maximum "moment magnitude" (Mw) at the project site is 7.4 Mw, which would be generated from the Puente Hills Fault (SA Geotechnical Inc 2024; Appendix E) approximately 13.2 miles southwest of the project site. Other nearby faults include the Sierra Madre Fault Zone approximately 4.6 miles north of the site and the Whittier section of the Elsinore fault zone approximately 9.1 miles south of the project site (CGS 2025). Implementation of the proposed project would not exacerbate any existing risk of fault rupture, as the proposed project would not include uses such as hydraulic fracturing or minerals extraction that can exacerbate earthquake risks. Though the project site is not on an Alquist-Priolo Fault Zone, strong ground shaking at the site may occur if a sufficiently large earthquake occurs on this or other nearby faults.

To reduce geologic and seismic impacts, the City regulates development based on CBC requirements. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare by ensuring structural strength, means of egress, and general stability through regulation and control of the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures under its jurisdiction. The CBC earthquake design requirements consider the occupancy category of the structure, site class, soil classifications, and various seismic coefficients. The CBC provides standards for various aspects of construction, including but not limited to excavation, grading, earthwork, construction, preparation of the site prior to fill placement, specification of fill materials, fill compaction and field testing, retaining wall design and construction, foundation design and construction, and seismic requirements. It includes provisions to address issues such as construction on expansive soils and soil strength loss, among other things.

In accordance with California law, proposed project design and construction would be required to comply with provisions of the CBC. Because the proposed project would comply with the CBC and recommendations of the Preliminary Geotechnical Due Diligence Study, and because the proposed project would not exacerbate existing ground shaking hazards, impacts related to seismically induced ground shaking would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Liquefaction is a process whereby soil is temporarily transformed to fluid form during intense and prolonged ground shaking or because of a sudden shock or strain. Typically, liquefaction occurs in areas where there are loose soils and the depth to groundwater is less than 50 feet from the surface. According to the Preliminary Geotechnical Due Diligence Study, the site is not located within an Earthquake Required Investigation Zone for liquefaction. Furthermore, groundwater was not encountered during the associated field investigation at the maximum drilled depth of 50.5 below ground surface (bgs) and the site's historical highest groundwater level is 100 feet deep (SA Geotechnical 2024). Therefore, the report concluded that site has low potential for liquefaction. Furthermore, design and construction of the proposed project would conform to the current seismic design provisions of the CBC, which incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program, to mitigate losses from an earthquake and provide for the latest in earthquake safety. While the proposed project would be susceptible to seismic activity given its location within a seismically active area, the project site is not susceptible to liquefaction and the proposed project would be required to minimize this risk, to the extent feasible, through the incorporation of applicable CBC standards. Therefore, the potential effects of differential settlement as a result of liquefaction would be less than significant.

In addition, the project site and surrounding areas are relatively flat and located centrally within an alluvial valley with a gentle slope to the southwest. There are no significant slopes that would present a landslide hazard at or near the site (SA Geotechnical 2024). The proposed project would not involve changes to the site grading or terrain that would destabilize soils prone to landslide. Therefore, the proposed project would not directly or indirectly cause potential adverse effects related to landslides. Potential impacts related to liquefaction and landslides would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

The proposed project involves demolition of existing school buildings and construction of new residential buildings in an urban area. Fugitive dust caused by strong wind and/or earth-moving operations during construction would be minimized through compliance with SCAQMD Rule 403, which prohibits visible particulate matter from crossing property lines. Standard practices to control fugitive dust emissions include watering of active grading sites, covering soil stockpiles with plastic sheeting, and covering soils in haul trucks with secured tarps.

The potential for proposed project construction activities involving soil disturbance, such as excavation, stockpiling, and grading to result in increased erosion and sediment transport by stormwater to surface waters would be minimized because the proposed project would be required to comply with a Construction General Permit, which is issued by the State Water Resources Control Board (SWRCB). The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP), which outlines best management practices (BMPs) to reduce erosion and topsoil loss from stormwater runoff (also refer to the discussion in Section 9, *Hydrology and Water Quality*). Compliance with the Construction General Permit would ensure that BMPs are implemented during construction and minimize substantial soil erosion or the loss of topsoil. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- c. *Would the project 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?*

Lateral spreading is the horizontal movement or spreading of soil toward an open face. Lateral spreading may occur when soils liquefy during an earthquake event, and the liquefied soils with overlying soils move laterally to unconfined spaces. Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is caused by a variety of activities that include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydrocompaction. Collapse potential refers to the potential settlement of a soil under existing stresses upon being wetted.

As discussed under impact discussions 7.a.1 through 7.a.4, although the proposed project is in a seismically active area, the project site is not located on unstable soils or a geologic unit at risk for liquefaction or landslides. The project site consists of compact, relatively flat land that is surrounded by developed land with no significant slopes that would present a landslide hazard. Furthermore, construction and operation of the proposed project would not involve activities known to cause or trigger subsidence and is not anticipated to adversely affect soil stability or increase the potential for local or regional landslides, subsidence, liquefaction, or collapse. The proposed project would comply with CBC requirements and recommendations of the Preliminary Geotechnical Due Diligence Study. Because the proposed project would not create or exacerbate conditions related to unstable soils, impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- d. *Would the project 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?*

Expansive soils are highly compressible, clay-based soils that tend to expand as they absorb water and shrink as water is drawn away. According to the Preliminary Geotechnical Due Diligence Study, alluvium (Qal) encountered in the borings done for the study generally consisted of dark brown, yellowish brown, yellowish gray and gray sandy silt and silty sand near-surface (uppermost 5 to 7 feet), below which the soils consisted of silty sand, clean sand, and sand with gravel. Furthermore, the depth to groundwater at the project site is reported to exceed 50.5 feet bgs, and the historic high ground water is approximately 100 feet bgs at the site. In addition, laboratory testing performed on representative samples of the near surface soils indicates that the on-site sandy soils are expected to have a very low expansion potential. Therefore, the proposed project would not

create a substantial direct or indirect risk to life or property due to expansive soils and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- e. *Would the project 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?*

The proposed project would be served by the City of West Covina's existing sewer system and no septic tanks are proposed for the project. Therefore, there is no potential for adverse effects due to soil incompatibility with septic tanks. No impact would occur.

NO IMPACT

- f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The project site is currently developed and in an urban region of the City. The Preliminary Geotechnical Due Diligence Study states the following:

Remedial grading at the site should consist of removal of undocumented fill, if any, and weathered/unsuitable alluvium in their entirety. In general, we recommend that remedial removals consist of removal and recompaction of soils in the upper 5 to 7 feet, below existing grades across the site. Where deeper unsuitable material or undocumented fill is encountered, the removals should be extended to the bottom of unsuitable materials and/or undocumented fill to competent native soils. Where not limited by adjacent properties, the removals should extend a minimum of 5 feet laterally beyond the building footprints.

Due to the site being previously graded and developed, and near-surface soils consisting of relatively young alluvium and potential previously placed artificial fill, it is unlikely that unique paleontological resources exist on the project site. Although proposed project implementation is not expected to uncover paleontological resources, a remote possibility for such resources to be uncovered during the over excavation and compaction process exists, and therefore the potential for impacts to previously undiscovered paleontological resources cannot be ruled out. Mitigation Measure GEO-1 is therefore required to avoid impacts to paleontological resources in the case of unanticipated fossil discoveries. This measure would apply to all phases of proposed project construction and would reduce the potential for impacts to fossils present on site by providing for the recovery, identification, and curation of paleontological resources.

Mitigation Measure

GEO-1 Unanticipated Discovery of Paleontological Resources

In the event an unanticipated fossil discovery is made during the course of project development, construction activity shall be halted in the immediate vicinity of the fossil, and a qualified professional paleontologist shall be notified and retained to evaluate the discovery, determine its significance, and determine if additional mitigation or treatment is warranted. Work in the area of the discovery shall resume once the find is properly documented and the qualified professional paleontologist authorizes resumption of construction work. Any significant paleontological resources found during construction monitoring shall be prepared, identified, analyzed, and

permanently curated in an approved regional museum repository under the oversight of the qualified paleontologist.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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?	☐	☐	☒	☐

The information and analysis in this section of the IS-MND is based on the *Greenhouse Gas Analysis* report by UXR, which is Appendix F of this IS-MND.

Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of GHGs. GHGs contribute to the "greenhouse effect," which is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the Sun hits the Earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth's temperature.

GHGs occur naturally and from human activities. Human activities that produce GHGs include the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock, deforestation activities; and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF₆). Emissions of GHGs affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way in which the Earth absorbs gases from the atmosphere. Potential impacts of climate change in California may include loss in snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (State of California 2018).

Regulatory Setting

State and Regional Regulations

CALIFORNIA GLOBAL WARMING SOLUTIONS ACT OF 2006 (ASSEMBLY BILL 32, SENATE BILL 32, AND ASSEMBLY BILL 1279)

The “California Global Warming Solutions Act of 2006,” (AB 32), outlines California’s major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO₂e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others.

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100 (discussed below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies (CARB 2017).

AB 1279, “The California Climate Crisis Act,” was passed on September 16, 2022, and declares the State would achieve net zero GHG emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. In addition, the bill states that the State would reduce GHG emissions by 85 percent below 1990 levels no later than 2045. In response, CARB published a 2022 update to the Scoping Plan. The 2022 Scoping Plan lays out a path to achieve AB 1279 targets (CARB 2022a). The actions and outcomes in the 2022 Scoping Plan would achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

SENATE BILL 100 (100 PERCENT CLEAN ENERGY ACT)

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State’s Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

SENATE BILL 375 (SUSTAINABLE COMMUNITIES AND CLIMATE PROTECTION ACT)

SB 375, signed in August 2008, enhances the State’s ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. In addition, SB 375 directs each of the State’s 18 major Metropolitan Planning

Organizations to prepare a “sustainable communities strategy” (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. SCAG was assigned targets of an 8 percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by 2035 (CARB 2022b). In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

CALIFORNIA CODE OF REGULATIONS TITLE 24 (CALIFORNIA BUILDING CODE)

Updated every three years through a rigorous stakeholder process, Title 24 of the California Code of Regulations requires California homes and businesses to meet strong energy efficiency and sustainability measures, thereby lowering their GHG emissions. Title 24 contains numerous subparts, including Part 1 (Administrative Code), Part 2 (Building Code), Part 3 (Electrical Code), Part 4 (Mechanical Code), Part 5 (Plumbing Code), Part 6 (Energy Code), Part 8 (Historical Building Code), Part 9 (Fire Code), Part 10 (Existing Building Code), Part 11 (Green Building Standards Code), Part 12 (Referenced Standards Code). The CBC is applicable to all development in California (Health and Safety Code Sections 17950 and 18938[b]). Part 6 and Part 11 set forth energy and other conservation standards which establish, among other requirements, rules for installation of solar photovoltaic and battery storage standards, solid waste diversion standards, water conservation requirements, and electric vehicle accommodation requirements. The most recent iteration of the CBC, the 2022 Title 24 standards, is applicable to all buildings for which an application for a building permit is submitted on or after January 1, 2023.

The regulations receive input from members of industry, as well as the public, with the goal of “[r]educing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy” (Public Resources Code Section 25402). These regulations are scrutinized and analyzed for technological and economic feasibility (Public Resources Code Section 25402[d]) and cost effectiveness (Public Resources Code Sections 25402[b][2] and [b][3]).

Regional and Local Regulations

SCAQMD

The project site is in the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, which could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. The SCAQMD Board

has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

- 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. The most commonly used SCAQMD threshold is 3,000 MTCO₂e/yr.
- Tier 4 has the following options:
 - Option 1: Reduce Business-as-Usual (BAU) 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 employees: 4.8 MTCO₂e per SP per year for projects and 6.6 MTCO₂e per SP per year for plans;
 - Option 3, 2035 target: 3.0 MTCO₂e per SP per year for projects and 4.1 MTCO₂e per SP per year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO₂ concentrations at 450 ppm, thus stabilizing global climate.

SCAQMD only has authority over GHG emissions from development projects that include air quality permits. At this time, it is unknown if the proposed project would include stationary sources of emissions subject to SCAQMD permits. Notwithstanding, if the proposed project requires a stationary permit, it would be subject to the applicable SCAQMD regulations.

SCAQMD Regulation XXVII, adopted in 2009 includes the following rules:

- Rule 2700 defines terms and post global warming potentials.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.
- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the SCAQMD. The SCAQMD would fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over

to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

CITY OF WEST COVINA ENERGY ACTION PLAN

The City of West Covina Energy Action Plan (EAP) outlines strategies to enhance energy efficiency, promote renewable energy, and reduce GHG emissions. By implementing energy efficiency programs in residential and commercial buildings, encouraging renewable energy sources like solar, and setting long-term sustainability goals, the EAP aims to mitigate climate change impacts. It also emphasizes community engagement and collaboration with local organizations to foster a culture of energy conservation. Ultimately, the EAP directly contributes to reducing GHG emissions, improving air quality, and promoting a healthier, more sustainable environment for its residents (City of West Covina 2011).

Significance Thresholds

Most individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to significant cumulative effects, even if individual changes resulting from a project are limited. As a result, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

The criteria used to determine the significance of potential Project-related GHG impacts are taken from the Initial Study Checklist in Appendix G of the State *CEQA Guidelines* (14 California Code of Regulations §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to GHG if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

The evaluation of an impact under CEQA requires measuring data from a project against both existing conditions and a "threshold of significance." For establishing significance thresholds, the Office of Planning and Research's amendments to the CEQA Guidelines Section 15064.7(c) state *"[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."*

CEQA Guidelines Section 15064.4(a) further states, ". . . A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use . . .; or (2) Rely on a qualitative analysis or performance-based standards."

CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- Consideration #1: The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.

- Consideration #2: Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- Consideration #3: The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

The City of West Covina has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 MTCO₂e/yr to determine if additional analysis is required is an acceptable approach for small projects such as the proposed Project. This approach is a widely accepted screening threshold used by the City of West Covina and numerous cities in the SCAB and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required. As noted by the SCAQMD:

"...the...screening level for stationary sources is based on an emission capture rate of 90% for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90% of all new or modified stationary source projects. A GHG significance threshold based on a 90% emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90% emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than 1% of future 2050 statewide GHG emissions target (85 [MMTCO₂e/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."

Thus, and based on guidance from the SCAQMD, if a non-industrial project would emit GHGs less than 3,000 MTCO₂e/yr, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation. On the other hand, if a non-industrial project would emit GHGs in excess of 3,000 MTCO₂e/yr, then the project could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation. As previously discussed, a screening threshold of 3,000 MTCO₂e/yr is an acceptable approach for small projects to determine if additional analysis is required and is therefore applied for this Project.

Methodology

The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity for the proposed project is provided in Appendix 3.1 of the *Greenhouse Gas Analysis* report by UXR, which is Appendix F of this IS-MND. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water, and refrigerants sources.

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time. Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the Project development, infrastructure, and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time, an LCA would be extremely speculative and thus has not been prepared.

Additionally, the SCAQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood, or documented, and would be challenging to mitigate. Additionally, the science to calculate life cycle emissions is not yet established or well defined; therefore, the SCAQMD has not recommended, and is not requiring, life-cycle emissions analysis.

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

Construction Emissions

Project construction activities would generate CO₂, CH₄, N₂O, and refrigerant (R) emissions. The *Air Quality Analysis* (AQA) report (Appendix D) contains detailed information regarding Project construction activities. As discussed in the AQA, construction-related emissions are expected from the following activities.

- Demolition
- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

For purposes of analysis, construction will begin January 2026 and would last through January 2028. The construction schedule utilized in the analysis represents a “conservative” analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment

represents a reasonable approximation of the expected construction fleet as required per the CEQA Guidelines.

Consistent with industry standards and typical construction practices, each piece of construction equipment listed in Table 3-2 of the AQA (Appendix D) is assumed to operate up to a total of eight hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the City of West Covina Municipal Code.

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. As shown in Table 9 below, the proposed project's estimated amortized construction emissions are 40 MT/yr CO₂e.

Table 9 Estimated Construction GHG Emissions

Year	Project Emissions (MT/yr CO ₂ e)
Total	1,206
Total Amortized over 30 Years	40

See Appendix D for CalEEMod worksheets.

Operational Emissions

Operational activities associated with the proposed project would result in emissions of CO₂, CH₄, N₂O, and Refrigerant emissions from the following primary sources:

- Mobile Sources
- Area Sources
- Energy Sources
- Water Supply, Treatment, and Distribution
- Solid Waste
- Refrigeration

Mobile Source Emissions

The operational air quality emissions associated with the Project are primarily attributable to vehicle trips generated by the proposed development. In order to develop the traffic characteristics of the proposed Project, trip-generation statistics published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021) for the following land use codes (51):

- Single-Family Detached Housing (ITE Land Use Code 210)
- Multifamily (Low-Rise) Residential (ITE Land Use Code 220)
- Multifamily (Mid-Rise) Residential (ITE Land Use Code 221)

Area Source Emissions

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers,

shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by January 1, 2024, which is now in effect. However, for purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod, and do not incorporate the emissions reductions that would be realized from implementation of AB 1346.

Energy Source Emissions

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting.⁴ GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Electricity usage associated with the Project was calculated by CalEEMod using default parameters. Based on information provided by the Project Applicant, no natural gas would be used as a result of the Project, and as such use of natural gas is not considered in the analysis.

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used.

The proposed land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters.

Air conditioning (A/C) and refrigeration equipment associated with the buildings are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the USEPA (2016b). CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per 17 CCR 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. Additionally, beginning January 1, 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater. GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters.

Estimated GHG emissions related to the proposed project are summarized in Table 10 below. Detailed operation model outputs for the proposed project are shown in Appendix 3.1 of UXR's *Greenhouse Gas Analysis* report (Appendix F). As shown in Table 10, construction and operation of the proposed project is estimated to generate approximately 1,889 MTCO₂e/yr.

⁴ The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would occur.

Table 10 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (CO ₂ e in metric tons)
Construction	40
Operational	
Mobile	1,479
Area	17
Energy	221
Water	34
Solid Waste	98
Total	1,889

MT CO₂e = metric tons of carbon dioxide equivalent
See Appendix D for CalEEMod worksheets.
Source: UXR. *Greenhouse Gas Analysis*. June 2025.

The City of West Covina has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 MTCO₂e/yr to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by the City of West Covina and numerous cities in the SCAB and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required.

As shown in Table 10, the proposed project would result in a net increase of approximately 1,889 MTCO₂e/yr. As such, the proposed project would not exceed the SCAQMD's recommended numeric threshold of 3,000 MTCO₂e/yr, and proposed project-related emissions would have a less than significant direct or indirect impact on GHG and climate change, and no mitigation measures are required.

LESS-THAN-SIGNIFICANT IMPACT

- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Pursuant to 15604.4 of the *CEQA Guidelines*, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the proposed project's consistency with the 2022 Scoping Plan is discussed below. It should be noted that the proposed project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32, since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary, since both of these plans have been superseded by the 2022 Scoping Plan. For reasons outlined below, the proposed project would result in a less than significant impact with respect to GHG emissions in this regard.

2022 Scoping Plan Consistency

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the

ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State’s Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects, in fact CARB states in Appendix D to the 2022 Scoping Plan (page 4): “...focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting.”

The 2022 Scoping Plan lays out a framework to determine project-level consistency when there is not a CEQA-qualified CAP available to tier off of. CARB recommends that the first approach for determining whether a proposed residential or mixed-use residential development would align with the State’s climate goals is to examine whether the project includes key project attributes that reduce operational GHG emissions while simultaneously advancing fair housing. The 2022 Scoping Plan goes on to note that projects that can demonstrate consistency with the priority areas identified in Table 3 *Key Residential and Mixed-Use Project Attributes that Reduce GHGs* of the 2022 Scoping Plan would be aligned with the State’s priority GHG reduction strategies and would be deemed consistent with the Scoping Plan. As such, these projects are considered to be consistent with the Scoping Plan or other plans, policies, or regulations adopted for the purposes of reducing GHGs; therefore, the GHG emissions associated with such projects would result in a less-than-significant GHG impact under CEQA.

The proposed project’s consistency with the *Key Residential and Mixed-Use Project Attributes that Reduce GHGs* is summarized in Table 11.

Table 11 Proposed Project’s Potential to Conflict with Key Attributes Identified in Table 3 of the 2022 CARB Scoping Plan’s Appendix D

Priority Areas	Key Project Attribute	Potential to Conflict
Transportation Electrification	Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval	No Conflict. The Project would meet the most ambitious voluntary EV charging infrastructure standards (Tier 2) required by the most recent CALGreen standards.
VMT Reduction	Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	No Conflict. The Project site is currently developed with an existing structure that housed the East San Gabriel Valley Regional Occupational Program And Technical Center. The site’s surrounding area is urbanized with a variety of residential densities and other uses consistent with these current designations. Specifically, the surrounding area is predominantly developed with residential uses, primarily single-family neighborhood developments. Among these residential neighborhoods lie the Del Norte Park. Existing infrastructure and utilities to serve the site are located within adjacent roadways. The Project would require internal construction of roads for local access, customary extension of water services and facilities, and construction of new sewer lines and stormwater and drainage infrastructure, consistent with existing sewer and stormwater/drainage infrastructure in the area.

City of West Covina
1501 Del Norte Street Residential Project

Priority Areas	Key Project Attribute	Potential to Conflict
	Does not result in the loss or conversion of natural and working lands	No Conflict. The Project would not result in the loss or conversion of natural and working lands, as none exist on the Project site. Therefore, the Project would be consistent with this attribute.
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or Is in proximity to existing transit stops (within a half mile), or Satisfies more detailed and stringent criteria specified in the region's SCS	No Conflict. The overall density for the Project would be 21.4 dwelling units per acre. Therefore, the Project is consistent with this attribute.
	Reduces parking requirements by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.	No Conflict. The Project is consistent with this attribute as the parking requirements identified within the Specific Plan are consistent with those outlined in the West Covina Municipal Code.
	At least 20 percent of units included are affordable to lower-income residents	No Conflict. Although the Project does not include 20 percent affordable or low-income units, the VMT analysis found the Project is located in a low VMT-generating area, with 25.5 VMT per service population, below the 15% below-baseline threshold of 27.1. Therefore, the Project is presumed to have a less than significant impact. As such, the Project would not conflict with VMT reductions consistent with the 2022 Scoping Plan.
	Results in no net loss of existing affordable units	No Conflict. The Project site does not contain any existing residences. Project implementation would not displace any existing affordable housing units or necessitate construction of any replacement affordable housing units elsewhere.
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking	No Conflict. The Project would not be served by natural gas. The single-family detached homes, townhomes, and flats proposed as part of the Project would use all-electric appliances without any natural gas connections and would not include the use of propane or other fossil fuels for space heating, water heating, or indoor cooking. Therefore, the Project would not conflict with the CARB 2022 scoping plan according to this attribute.

Source: UXR. *Greenhouse Gas Analysis*. June 2025

As shown in Table 11, the proposed project would not conflict with the priority areas identified in Table 3 *Key Residential and Mixed-Use Project Attributes that Reduce GHGs* of the 2022 Scoping Plan, and would therefore be aligned with the State's priority GHG reduction strategies and be consistent with the Scoping Plan.

Consistency with City of West Covina EAP

The City's EAP is not directly applicable to the proposed Project because the goals and policies in the plan are focused on energy efficiency and sustainability of City facilities. However, because the proposed project is required to comply CALGreen and Title 24 standards, the proposed project would not conflict with the community-wide energy use goals of the EAP.

For the reasons discussed above, implementation of the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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 0.25 miles of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site that is included on a list of hazardous material 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 in 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. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Proposed project construction would involve the use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur. However, standard construction BMPs for the use and handling of such materials would be implemented to avoid or reduce the potential for such conditions to occur. Any use of potentially hazardous materials during construction of the proposed project would be subject to all local, State, and federal regulations regarding the handling of potentially hazardous materials.

Operation of the proposed project would likely involve the use of common materials used in the regular maintenance of buildings and landscaping, such as cleaning and degreasing solvents, fertilizers, and pesticides. However, maintenance activities would only require minor quantities of these products and would not involve the use of extremely hazardous substances. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. The transport, use, and storage of hazardous materials during construction of the proposed project would be subject to all applicable State and federal laws, such as the Hazardous Materials Transportation Act (HMTA), Resource Conservation and Recovery Act (RCRA), the California Hazardous Material Management Act (CHMMA), and the CCR, Title 22.

The proposed project's residential uses would not emit or handle hazardous materials beyond typical household and landscaping maintenance waste and materials. Operation of the proposed project would not create a hazard to the public through transportation of hazardous materials upon completion and residential occupancy. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- b. *Would the project 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?*

Accidents during construction of the proposed project could occur as a result of any of the following actions: direct dermal contact with hazardous materials, incidental ingestion of hazardous materials, or inhalation of airborne dust released from dried hazardous materials. The transportation of hazardous materials could result in accidental spills, leaks, toxic releases, fire, or explosion.

Compliance with federal, State, and local laws, regulations, and California Division of Occupational Safety and Health training programs would minimize or avoid potential impacts associated with the routine transport, use, or disposal of hazardous materials during construction. Appropriate documentation for all hazardous waste that is transported, stored, or used in connection with specific project-site activities would be provided as required for compliance with existing hazardous materials regulations codified in the CCR.

The Certified Unified Program Agency is an agency certified by the Department of Toxic Substances Control (DTSC) to regulate hazardous waste generators and on-site treatment programs; aboveground and underground storage tank programs; Hazardous Materials Management, Business Plans, and Inventory Statements; and the Risk Management and Prevention Program. The Los Angeles County Fire Department (LACFD), Health and Hazardous Materials Division (HHMD) is the Certified Unified Program Agency responsible for administering hazardous materials programs in Los

Angeles County. LACFD and HHMD personnel respond to hazardous materials incidents in West Covina. (LACFD 2025).

Construction activities on the project site would be required to comply with federal and State laws to eliminate or reduce the consequences of hazardous materials accidents. For example, employees who would work around hazardous materials would be required to wear appropriate protective equipment, and safety equipment is routinely available in all areas where hazardous materials are used. Adherence to the federal, State, and local regulations governing the transportation, use, and disposal of hazardous waste would reduce impacts associated with reasonably foreseeable upset and accident conditions during construction to less than significant.

Buildings built before about 1970 may contain asbestos-containing materials (ACMs). According to the Cultural Resources Technical Report (Appendix G), the Del Norte School buildings on the project site date to 1953. ACMs may therefore be present in the existing buildings on the project site.

Demolition of structures potentially containing ACMs, lead, and PCBs could pose a risk to construction workers and the public if not conducted according to applicable federal, state, and local regulations. Therefore, Mitigation Measure HAZ-1 is required to reduce these potential impacts to a less than significant level.

The proposed single-family residential uses are not typically associated with upset and accident conditions involving the release of hazardous materials. Maintenance and upkeep of facilities on-site, including cleaning of individual residences, play areas, open space areas, parking areas, and shared community spaces, would occasionally require the use of various solvents, cleaners, paints, oils/fuels, and pesticides/herbicides. However, maintenance activities would only require minor quantities of these products and would not involve the use of extremely hazardous substances. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. The transport, use, and storage of hazardous materials during construction of the proposed project would be subject to all applicable State and federal laws such as the HMTA, RCRA, the CHMMA, and the California Code of Regulations, Title 22. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

The proposed site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, due to the site's historical development and the potential presence of contaminants in soils, the potential presence of contaminated soils cannot be ruled out and further investigation is warranted. Therefore, Mitigation Measures HAZ-2 is required to ensure any residual hazardous materials in on-site soils are identified and properly managed prior to construction.

Mitigation Measures

HAZ-1 Testing and Disposal for Building Materials Containing ACMs, Lead-Based Paint, and PCBs

Prior to issuance of a demolition permit for any building on the project site, the applicant shall obtain and submit to the City for review and approval a letter from a qualified consultant verifying that no ACMs, lead-based paint, or PCB-containing materials are present in the on-site buildings. This requirement can also be satisfied by completion of the Phase I Environmental Assessment required by Mitigation Measure HAZ-2. If any of these materials are found to be present, they shall

be abated in compliance with SCAQMD Rule 1403, as well as other applicable State and federal rules and regulations. Only asbestos trained and certified abatement personnel shall be allowed to perform asbestos abatement activities on-site. All such materials removed from any on-site structure shall be hauled and disposed off-site by a transportation company certified to handle these materials. If these abatement measures are necessary, the applicant shall submit documentation to the City demonstrating that they have been properly carried out prior to issuance of building permits for the project.

HAZ-2 Phase I Environmental Site Assessment

Prior to the issuance of a demolition permit for any building on the project site, the applicant shall retain a qualified environmental professional to prepare a Phase I Environmental Site Assessment (ESA) for the project site in accordance with the current ASTM E1527-21 standard. The Phase I ESA shall evaluate the potential presence of hazardous substances, including but not limited to contaminated soils, asbestos-containing materials (ACMs), lead-based paint, and polychlorinated biphenyls (PCBs), based on the site's historical use and age of existing structures. If the Phase I ESA identifies Recognized Environmental Conditions (RECs), a Phase II ESA shall be conducted to further investigate the nature and extent of contamination. If contamination is confirmed, appropriate remediation measures shall be developed in consultation with the appropriate regulatory agencies. All required investigations and, if necessary, remediation activities shall be completed prior to issuance of grading permits. Documentation of the completed assessments and any required remediation shall be submitted to the City for review and approval.

With implementation of Mitigation Measure HAZ-1 and Mitigation Measure HAZ-2 the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school?*

There are no schools within 0.25 mile of the project site. The nearest schools are the following:

- Monte Vista Elementary School, approximately 0.35 mile northwest of the project site at 1615 West Elfred Avenue in West Covina
- Baldwin Park High School, approximately 0.61 mile northwest of the project site, at 3900 Puente Avenue in Baldwin Park
- Central Elementary School, approximately 0.91 mile west of the project site, at 14741 Central Avenue in Baldwin Park

During construction of the proposed project, hazardous and potentially hazardous materials would be utilized for the transport and operation of vehicles and machinery. As discussed above, the transport, use, and storage of hazardous materials during the construction of the proposed project would be conducted in accordance with all applicable State and federal laws, such as the HMTA, RCRA, the CHMMA, and the California Code of Regulations, Title 22. As discussed under impact discussion 9a, construction of the proposed project, and associated air pollutant emissions, would be temporary and less than significant. Furthermore, operation and maintenance of the proposed project would only involve the use of common cleaning and landscape maintenance materials comparable to those materials already in use in the project site vicinity. Because the nearest school

is located over 0.25 mile from the project site and operation of the proposed project would not include emissions or use of substantial quantities of hazardous materials, there would be no impact to nearby schools.

Potential uses of hazardous materials would be site-specific and limited to the physical boundaries of the project site, and therefore, the proposed project would not emit or handle hazardous materials within 0.25-mile of an existing or proposed school. There would be no impact.

NO IMPACT

- d. *Would the project be located on a site that is included on a list of hazardous material 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?*

The following databases and listings compiled pursuant to Government Code Section 65962.5 were checked for known hazardous materials contamination at the project site:

- USEPA – Superfund Enterprise Management System (SEMS) Search
- DTSC – EnviroStor database for hazardous waste facilities or known contamination sites; Cortese list of Hazardous Waste and Substances Sites
- SWRCB – GeoTracker search for leaking underground storage tanks (LUST) and other cleanup sites

The SEMS database search did not produce any results associated with the project site, indicating that the site is free of known hazards and contaminants (USEPA 2019). A search of the DTSC EnviroStor database did not identify any hazardous or known contamination sites within a 0.25 mile of the site (DTSC 2025a). Furthermore, according to the DTSC Cortese list, the only hazardous materials release site in West Covina is the BKK Sanitary Landfill located approximately 4.5 miles southeast of the project site (DTSC 2025b). According to GeoTracker, the project site does not contain any LUST or other cleanup sites. There are no LUST sites within 0.25 mile of the project site (SWRCB 2025).

Therefore, impacts related to hazardous material sites would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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?*

The project site is not located within two miles of a public airport or in an airport land use plan. The closest airport to project site is San Gabriel Valley Airport, approximately 5 miles west of the project site. Furthermore, no private airstrips are near the project site. Therefore, the proposed project would not result in safety hazards or excessive noise related to airports for people residing or working at the project site and its vicinity. No impact would occur.

NO IMPACT

- f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The proposed project would modify site access to include one driveway on North Nora Avenue and another on West Del Norte Street. In addition, the project will extend Del Norte Street from the existing terminus at Hollow Avenue easterly out towards Sunset Avenue, creating a new intersection. These improvements were analyzed in the *Del Norte Traffic Engineering and Construction Evaluation Technical Memorandum* prepared by Urban Crossroads, identify that there's adequate sight distance for the planned improvements (refer to Appendix K).

Additionally, the proposed residential development is consistent with adjacent land uses (refer to Section 11, *Land Use and Planning*) and would not introduce an incompatible use to local roadways. Internal roadways have been configured to allow for adequate turning radii throughout the site for passenger vehicle, garbage truck, and emergency vehicle access. Additionally, as part of building permit process, the West Covina Fire Department will review the project plans to confirm adequate emergency vehicle access is provided.

Furthermore, as discussed in Section 17, *Transportation* and in the *Del Norte Traffic Engineering and Construction Evaluation Technical Memorandum* included in Appendix K, development of the proposed project would not impair roadways or conflict with planned pedestrian, bicycle, and transit facilities in the vicinity. The proposed project would not have a significant impact on any area intersections that would be used for emergency access or evacuation. As such, operation of the proposed project would not interfere with existing emergency evacuation plans or emergency response plans in the area. Therefore, the proposed project would have a less than significant impact.

LESS-THAN-SIGNIFICANT IMPACT

- g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

The project site is in an urban area of West Covina. Undeveloped wildland areas are not close to the project site. As detailed in Section 20, *Wildfire*, the project site is not in any "Fire Hazard Severity Zone" (including the "Moderate," "High," or "Very High" zones) for wildland fires (CAL FIRE 2025). The nearest Very High Hazard Severity Zones are approximately 3.0 miles north of the project site on the northeastern edge of the Santa Fe Dam Open Space area; and 3.0 miles southeast of the project site in the San Jose Hills. Therefore, the proposed project would not directly expose people or structures to a significant risk of loss injury or death involving wildland fires. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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 off-site;	☐	☐	☒	☐
(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?	☐	☐	☒	☐

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The project site is almost entirely developed and is surrounded by residential and commercial uses in an urban area. The site is currently developed with buildings associated with its previous uses for the Del Norte Intermediate School and the East San Gabriel Valley Regional Occupational Program (ROP) Technical Center. Compared to existing conditions, and due to the density of proposed residential development, the proposed project would decrease pervious site surfaces and increase existing stormwater flows off the site. However, the proposed project would be required to comply with all established regulations under the National Pollution Discharge Elimination System (NPDES) permitting program to control both construction and operation stormwater discharges. Under the permit, the applicant would be required to eliminate or reduce non-stormwater discharges, develop and implement a SWPPP for proposed project construction activities, and perform inspections of the stormwater pollution prevention measures and control practices to ensure conformance with the SWPPP. Furthermore, the applicant would be required to implement all applicable source control BMPs to reduce water-quality impacts as listed under the NPDES permit. The proposed project would also be required to comply with WCMC water quality regulations. Chapter 9, Article III, Section 9-36, Control of pollutants from new developments/redevelopment projects, requires that a project implement a standard urban stormwater mitigation plan (SUSMP) that the City would review and approve prior to construction of the proposed project.

As required by the WCMC and NPDES permit, construction activities on the project site would use a series of BMPs to reduce erosion and sedimentation, and the construction contractor would be required to operate and maintain these controls throughout the duration of construction. According to proposed project plans, the grading plan is designed to drain all stormwater from within the project site into a private storm drain system. Catch basins and inlets would collect stormwater and convey water via 12-inch and 24-inch pipes to three infiltration galleries. Offsite drainage that currently flows towards the project site would be diverted via bio-swales along the north and east property lines that connect to the existing storm drain system in North Nora Avenue and West Del Norte Street. Because the proposed project includes infiltration basins that would improve infiltration and stormwater quality and would comply with all applicable local and federal stormwater drainage requirements, impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The project site receives its water service from Azusa Light and Water (ALW). ALW primarily sources its water supply from 11 groundwater wells that pump water from the Main San Gabriel Basin, which account for 65 percent of its water supply, and surface water from the San Gabriel River, which accounts for approximately a third of the water supply (ALW 2021). Imported water is sourced from Metropolitan Water District of Southern California and is only used on an emergency basis to supplement groundwater and surface water supplies (ALW 2021).

As discussed in Section 19, *Utilities and Service Systems*, the proposed project's water demand would not substantially affect the City's ability to meet water demands. According to its 2020 Urban Water Management Plan (UWMP), ALW would be able to provide reliable water supplies for an average year, single dry year, and multiple dry years for its existing and planned supplies through 2045 (ALW 2021). Though the proposed project would increase the amount of impervious surface

on the site compared to existing conditions, the incorporation of infiltration galleries would improve the infiltration mechanism and ensure stormwater is captured and treated on the project site prior to conveying to off-site storm drain systems or into groundwater. The proposed project would be served by available water supply and would not significantly deplete groundwater supplies or interfere with groundwater recharge. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?*

The project site is generally flat, with minimal elevation change across the site. The project site does not contain any streams, rivers, or other drainage features. According to proposed project plans, drainage for the project site is directed toward North Nora Avenue and West Del Norte Street. Though the proposed project would increase the amount of impervious surface on the site compared to existing conditions, the incorporation of infiltration galleries would improve the infiltration mechanism and ensure stormwater is captured and treated on the project site prior to conveying to the off-site storm drain systems or into groundwater. Therefore, polluted runoff leaving the project site would not be increased compared to existing conditions. Furthermore, as listed under impact discussion 10.a, the proposed project would comply with the provisions of the NPDES General Construction Permit and the City's urban runoff requirements as stated in the WCMC, which would reduce the quantity and level of pollutants in runoff leaving the project site. Therefore, impacts related to erosion and siltation would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?*

The project site is generally flat, with minimal elevation change across the site. The project site does not contain any streams, rivers, or other drainage features. Though the proposed project would increase the amount of impervious surface on the site compared to existing conditions, the incorporation of infiltration galleries would improve the infiltration mechanism and ensure stormwater is captured and treated on the project site prior to conveying to the off-site storm drain systems or into groundwater. Therefore, any runoff from the site would be conveyed into the existing drainage system and the proposed project would not substantially change the site's drainage patterns and would not alter a stream, river or other drainage course in a manner that would result in flooding or redirect flood flows. The proposed project would not increase runoff such that flooding would occur or flood flows would be impeded or redirected, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- c.(iii) Would the project 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 that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The project site is generally flat, with minimal elevation change across the site. The project site does not contain any streams, rivers, or other drainage features. Though the proposed project would increase the amount of impervious surface on the site, compared to existing conditions, the incorporation of infiltration galleries would improve the infiltration mechanism and ensure stormwater is captured and treated on the project site prior to conveying to the off-site storm drain systems or into groundwater. Furthermore, as discussed under impact discussion 10.a, the proposed project would comply with the City's urban runoff requirements as stated in the WCMC and with the requirements of NPDES, which would reduce the quantity and level of pollutants in runoff leaving the project site. Therefore, the proposed project would not create runoff that would exceed the capacity of the storm drain system and would not provide a substantial additional source of polluted runoff. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

The project site is not located near any major bodies of water that could produce seiche impacts at the project site. In addition, the project site is located approximately 35 miles from the Pacific Ocean and, according to the California DOC, is not inside the boundaries of any regional tsunami impact areas (California DOC 2025c). Furthermore, according to the Federal Emergency Management Agency (FEMA), the project site is located in Zone X and has a 0.2 percent Annual Chance Flood Hazard, indicating that the project site is in an area of minimal flood hazard (FEMA 2025). However, the City could be impacted by flooding in the event of dam failure at the Puddingstone Dam or San Dimas Dam, located 7.2 miles east and 9.5 miles northeast of the project site, respectively (West Covina 2020). The Puddingstone Dam failed once in 1926, when it overtopped due to construction on the dam, and there was no loss of life or significant damage. The San Dimas Dam has not experienced failure to date (West Covina 2020). Dam failure at either of these dams is unlikely, and each dam has an Emergency Action Plan in place to guide emergency response in case of dam failure. Furthermore, the proposed project would not involve the regular use or storage of large quantities of hazardous materials. Therefore, the proposed project would not pose a significant risk of release of pollutants due to inundation and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The proposed project would receive water service from ALW, which maintains a UWMP (ALW 2021). ALW primarily sources water from groundwater wells and purchases imported water from Metropolitan on an emergency basis (ALW 2021). The proposed residential uses on the project site would not be point source generators of water pollutants and would not interfere with the ability of the City to maintain water quality standards per the UWMP. Furthermore, as discussed under impact discussion 10.a, the proposed project would include infiltration galleries that would improve

infiltration and ensure stormwater is captured and treated on the project site prior to conveying to the off-site storm drain systems or into groundwater. Section 19, *Utilities and Service Systems* provides additional details about proposed project water demand. The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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. Would the project physically divide an established community?

The project site is located in an urban area surrounded by residential, recreational, and commercial uses. The project site is bordered by Del Norte Park to the north and northeast; North Sunset Avenue, one residential building, and one commercial building to the east; West Del Norte Street and residential properties to the south; and North Nora Avenue to the west. The areas beyond these immediately bordering uses can be generally characterized as consisting of residential neighborhoods of mostly one-story single family homes.

The proposed project involves demolition of the existing structures on the site and construction of a new residential community in a predominantly residential area. The proposed project would also include the addition of internal access drives throughout the project site, and walls and fencing to delineate the boundaries of the community and individual properties within the community.

As the project site is already fenced and previously was developed and operated, the proposed project would not substantially alter access in and around the project site or divide an established community. Therefore, impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. Would the project 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?

The proposed project involves the construction of a residential community in an area zoned Single Family Residential (R-1) and having a General Plan designation of Civic: Schools. According to the West Covina General Plan and Municipal Code, areas zoned R-1 are intended for one single-family dwelling per lot.

However, land use on the site would be regulated by the Del Norte Specific Plan (Appendix A), which would provide the development standards and regulations for development of the proposed project and supersede the existing zoning.

Additionally, while the proposed project requires an amendment to the General Plan (PlanWC), it is consistent and/or compatible with surrounding residential development in terms of aesthetics (as

1501 Del Norte Street Residential Project

described in Section 1, *Aesthetics*) and residential land use type; and supports the General Plan's goals to enhance neighborhood character and improve the pedestrian environment by providing improved landscaping, street edges, and sidewalks. Additionally, the proposed project is consistent with all applicable objective land use standards.

Therefore, the proposed project would not conflict with any applicable land use plans, policies, or regulations. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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. *Would the project 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. *Would the project 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?*

The California Surface Mining and Reclamation Act of 1975 was enacted to promote conservation and protection of significant mineral deposits. According to the California Department of Conservation Mineral Land Classification Maps, the project site is in an area with MRZ-2 designation, indicating that significant measured mineral resources may exist or the likely presence of mineral resources (DOC 2010). However, according to the EIR for the City's 2016 General Plan Update, the City does not contain mineral resources appropriate for extraction (City of West Covina 2016b). The proposed project involves demolition of school buildings and construction of a new residential community in a residential area of the City. The project site and its vicinity are, therefore, not used for or compatible with mineral deposit recovery. Given the existing developed condition of the site and its surroundings and the consistency of the proposed project with the land use designation, zoning, and actual use of the project site and its surroundings, the loss of availability of a known mineral resource would not occur, and there would be no impact.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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 groundborne vibration or groundborne 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?	☐	☐	☒	☐

Overview of Noise and Vibration

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Caltrans 2013).

Human Perception of Sound

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3 dB decrease (Caltrans 2013).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible

(8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5 times the sound energy) (Caltrans 2013).

Sound Propagation and Shielding

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in the noise level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line), the path the sound will travel, site conditions, and obstructions.

Sound levels are described as either a “sound power level” or a “sound pressure level,” which are two distinct characteristics of sound. Both share the same unit of measurement, dB. However, sound power (expressed as L_{pw}) is the energy converted into sound by the source. As sound energy travels through the air, it creates a sound wave that exerts pressure on receivers, such as an eardrum or microphone, which is the sound pressure level. Sound measurement instruments only measure sound pressure, and noise level limits are typically expressed as sound pressure levels.

Noise levels from a point source (e.g., construction, industrial machinery, air conditioning units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce exposure to noise as well. The FHWA’s guidance indicates that modern building construction generally provides an exterior-to-interior noise level reduction of 10 dBA with open windows and an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows (FHWA 2011).

Descriptors

The impact of noise is not a function of loudness alone. The time of day and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. The noise descriptors used for this study are the equivalent noise level (L_{eq}).

L_{eq} is one of the most frequently used noise metrics; it considers both duration and sound power level. The L_{eq} is defined as the single steady-state A-weighted sound level equal to the average sound energy over a time period. When no time period is specified, a one-hour period is assumed. The L_{max} is the highest noise level within the sampling period, and the L_{min} is the lowest noise level within the measuring period. Normal conversational levels are in the 60 to 65-dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise levels may also be reduced by intervening structures. The amount of reduction provided by the “shielding” of these features depends on the size of the structure/s, the location of the structure/s relative to the noise source and receivers, and the frequency content of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight

between a noise source and receiver will provide at least a 5-dBA reduction in source noise levels at the receiver (FHWA 2011).

Groundborne Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hz. The frequency of a vibrating object describes how rapidly it oscillates. Vibration levels are usually expressed as a single-number measure of vibration magnitude in terms of velocity or acceleration, which describes the severity of the vibration without the frequency variable. The peak particle velocity (PPV) is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in inches per second. Since it is related to the stresses experienced by buildings, PPV is often used in monitoring and controlling construction vibration to prevent damage to nearby structures.

Project Noise Setting

Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Sensitive land uses are generally defined as locations where people reside or where the presence of noise could adversely affect the use of the land. According to the City of West Covina General Plan, noise sensitive uses in the city includes residential uses, health care facilities, and schools (City of West Covina 2016b).

Vibration sensitive receptors, which are similar to noise sensitive receptors, include residences and institutional uses (e.g., schools, libraries, and religious facilities). However, vibration-sensitive receptors also include buildings where vibrations may interfere with vibration-sensitive equipment that is affected by vibration levels that may be well below those associated with human annoyance (e.g., recording studios or medical facilities with sensitive equipment).

The nearest sensitive receptors in the project area include the residential area adjacent to West Del Norte Street, North Nora Avenue, and North Sunset Avenue, all located less than 200 feet from the project boundary, which includes multi-family and single-family residences.

Noise Measurements

The most common source of noise in the project site vicinity is vehicular traffic from nearby roadways such as North Sunset Avenue, North Nora Avenue, and West Rowland Avenue; and from Del Norte Park. To characterize ambient sound levels at and near the project site, four sound level measurements were taken: two measurements on the south side of the project site primarily capturing traffic noise; and two measurements on the north side of the project site primarily capturing noise from activities at the park. The two measurements on the south side of the project site were taken at the corner of North Nora Avenue and West Del Norte Street, and the southeast corner of the project site on the west side of North Sunset Avenue, between 12:28 pm and 12:53 pm on Wednesday, May 29, 2024. The two measurements on the north side of the project site were taken in Del Norte Park approximately 50 feet south of the Little League Field, and in the small dog portion of the Central Bark Dog Park, between 1:04 pm and 1:23 pm on Saturday, November 16, 2024. Table 12 summarizes the results of the noise measurement, and Figure 11 shows the noise measurement locations.

Table 12 Project Site Vicinity Noise Measurement Results

Site Number	Description	Primary Noise Source	Start Time of Measurement	Measured Noise Level	
				dBA Leq	dBA Lmax
Noise Measurements taken on Wednesday, May 29, 2024					
1	Located near the southwest corner of the project site, approximately 25 feet north of West Del Norte Street centerline and 60 feet east of North Nora Avenue centerline	Vehicles on North Nora Avenue and West Del Norte Street	12:28 p.m.	55.0	70.1
2	Located near lower southeast corner of the project site, approximately 65 feet west of Sunset Avenue centerline	Vehicles on North Sunset Avenue	12:43 p.m.	60.3	68.3
Noise Measurements taken on Saturday, November 16, 2024					
3	Located on the north property line, approximately 50 feet south of the Little League Field	People in Stands and on Little League Field	1:04 p.m.	55.0	66.1
4	Located a couple feet north of the north property line in the small dog portion of the Central Bark Doig Park	Dogs in the Dog Park	1:23 p.m.	62.4	78.7
Noise measurements taken with a Larson-Davis Model 831 Type 1 precision sound level meter. dBA = A-weighted decibel; Leq = equivalent noise level; L _{min} = minimum noise level; L _{max} = maximum noise level					

Figure 11 Noise Measurement Locations



Source: Vista Environmental: Noise Impact Analysis, 1501 Del Norte Street Residential Project, June 2025 (Appendix H)

Regulatory Setting

City of West Covina 2016 General Plan Our Healthy and Safe Community

The City maintains the health and welfare of its residents with respect to noise through abatement ordinances and land use planning. The City's General Plan Our Healthy and Safe Community Section includes several policies and actions with the intent to reduce excessive noise impacts that are applicable to the proposed project:

- **Policy 6.23.** Ensure that new development is not exposed to excessive noise.
 - **Action 6.23a.** Require new developments to reduce exterior noise levels for any usable outdoor area to the "normally acceptable" range in the City's land use/noise compatibility matrix, shown in Table 6.4 of this Noise Element.
 - **Action 6.23c.** Require any residential component of all new buildings to comply with the requirements of the residential noise insulations standards of the most recent edition of California's building code.
- **Policy 6.24.** Ensure that new development does not expose surrounding land uses to excessive noise.
 - **Action 6.24.** Through the environmental review process, require applicants for new development to analyze potential noise impacts on nearby noise-sensitive receivers. If noise levels generated exceed the "normally acceptable" range shown in Table 6.4 of this Noise Element, require appropriate noise mitigation so that these levels would no longer be exceeded.
- **Policy 6.25.** Minimize noise conflicts between local noise generators and sensitive receivers.
 - **Action 6.25a.** Continue to enforce the City's existing Noise Ordinance.

City of West Covina Municipal Code

The City of West Covina Municipal Code establishes the following applicable standards related to noise.

SECTION 15-85 LOUD, UNNECESSARY NOISES PROHIBITED GENERALLY

Notwithstanding any other provision of this article, it shall be unlawful for any person within any residential zone of the city to willfully make or continue or cause to be made or continued, any loud, unnecessary or unusual noise which unreasonably disturbs the peace and quiet of any residential neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. If the noise which is being created is plainly audible at a distance of fifty (50) feet from the property line of any property (or if a condominium or apartment house, within any adjoining unit or apartment), building, structure or vehicle in which it is located, it shall be presumed that the noise being created is in violation of the provisions of this section.

SECTION 15-95 CONSTRUCTION AND BUILDING PROJECTS

- (a) *Regulation.* Between the hours of 8:00 p.m. of one day and 7:00 a.m. of the next day, it shall be unlawful for any person within a residential zone, or within a radius of five hundred (500) feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, steam shovel, pneumatic

hammer, derrick, steam or electric hoist, or other construction type device in such manner as to create any noise which causes the noise level at the property line to exceed the ambient noise level by more than five (5) decibels unless a permit therefor has been duly obtained in accordance with paragraph (b) of this section. No permit shall be required to perform emergency work as defined in section 15-83 of this article.

- (b) *Permit procedure.* A permit may be issued authorizing noises prohibited by this section whenever it is found that the public interest will be served thereby. Applications for permits shall be in writing, shall be accompanied by an application fee in the amount of five dollars (\$5.00), and shall set forth in detail facts showing that the public interest will be served by the issuance of such permit. Applications shall be made to the building director; provided, however, that, with respect to work upon or involving the use of a public street, alley, building, or other public place under the jurisdiction of the engineering department, applications shall be made to the city engineer. Anyone dissatisfied with the denial of a permit may appeal to the council.
- (c) *Unloading and Loading.* Between the hours of 8:00 p.m. of one day and 6:00 a.m. of the next day, it shall be unlawful for any person within the radius of five hundred (500) feet of generally occupied residences to unload, load or otherwise perform duties preparatory to the commencement of construction or repair work on buildings and structures. Generally occupied residences shall include, but not limited to, areas which there is a reasonable probability of occupancy in the area.
- a. *Would the project result in 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?*

The proposed project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, with the incorporation of mitigation. The following section calculates the potential noise emissions associated with the temporary construction activities and long-term operations of the proposed project and compares the noise levels to the City standards.

Construction-Related Noise

The construction activities for the proposed project are anticipated to include demolition of the existing school structures and parking areas, site preparation and grading of the 13.56-acre project site, building construction of a residential community with 282 homes, paving of the onsite roads and sidewalks, and application of architectural coatings. Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

The nearest sensitive receptors to the project site are the single-family homes located as near as eight (8) feet south of the southeastern portion of the project site and mixed-use office professional (zoned OPMU) structures as near as four (4) feet north of the southeastern portion of the project site. There are also single-family homes located on the west side of North Nora Avenue, which are as near as 90 feet west of the project site. In addition, Del Norte Park is adjacent to the north and east sides of the project site, where the nearest picnic table area (passive recreation area) is located as near as 150 feet north of the project site. In order to account for the acoustical center of the offroad equipment, it has been assumed that the average width of offroad equipment is 12 feet

wide, which would result in an additional 6 feet being added to the distances to the nearby sensitive receptors.

Section 15-95(a) of the City's Municipal Code restricts construction activities from occurring between the hours of 8:00 p.m. one day and 7:00 a.m. of the next day. The City construction noise standards do not provide any limits to the noise levels that may be created from construction activities that occur during the allowable hours of construction. As such, in order to determine if the proposed construction activities would create a significant substantial temporary noise increase, the FTA construction noise criteria thresholds detailed above have been utilized, which shows that a significant construction noise impact would occur if construction noise exceeds 80 dBA during the daytime at the nearby homes and park.

Construction noise impacts to the nearby sensitive receptors have been calculated through use of the RCNM and the parameters and assumptions that show the anticipated construction equipment that would be used in each phase of construction. The calculated construction-related noise impacts prior to mitigation are shown below in Table 13 and the RCNM printouts for the unmitigated conditions are provided in Appendix H.

Table 13 Construction Noise Levels at the Nearby Sensitive Receptors Prior to Mitigation

Construction Phase	Construction Noise Level (dBA Leq) at:			
	Homes to the East ¹	Homes to the South ²	Homes to the West ³	Park to the North ⁴
Demolition	97	94	78	74
Site Preparation	94	91	74	70
Grading	95	92	77	74
Building Construction	94	91	76	72
Paving	88	86	71	67
Painting	88	85	70	66
Maximum Construction Noise Level	97	94	78	74
FTA Construction Noise Threshold	80	80	80	80
Exceed Threshold? ⁴	Yes	Yes	No	No

¹ The nearest homes to the east are located as near as 4 feet from the project site.

² The nearest homes to the south are located as near as 8 feet from the project site.

³ The nearest homes to the west are located as near as 90 feet from the center of the project site

⁴ The distance to the park to the north is based on the location of the picnic table area in the park that is located as near as 150 feet from the project site.

Source: Vista Environmental: Noise Impact Analysis. 1501 Del Norte Street Residential Project. September 2025 (Appendix H); RCNM, Federal Highway Administration, 2006

Table 13 shows that the greatest noise impacts would occur during the demolition phase, with noise levels as high as 97 dBA Leq at the homes to the east, 94 dBA Leq at the homes to the south, 78 dBA Leq at the homes to the west, and 74 dBA Leq at the park to the north. Table 13 shows that the noise levels at the homes to the east and south would exceed the FTA construction noise standard of 80 dBA, while the noise levels at the homes to the west and park to the north would be below the FTA construction noise standard of 80 dBA. This would be considered a significant impact.

Mitigation Measure 1 has been provided that would require the installation of a temporary noise barrier on the portion of the east side that is adjacent to the homes and entire south side as well as

providing additional temporary noise barriers around all stationary equipment and concrete saws that are operated within 30 feet of the homes to the east and south and Mitigation Measure 2 has been provided that would restrict the largest equipment, which is typically the loudest from operating within 20 feet from any offsite structure.

According to the Housing and Urban Development's Barrier Performance Module, a ten-foot barrier would result in a noise reduction of approximately 10 dBA, which was entered into the RCNM model for the homes to the east and homes to the south in order to account for Mitigation Measure 1. In addition, the minimum distance was adjusted out to 20 feet for the homes to the east and homes to the south in order to account for Mitigation Measure 2. The RCNM model was re-run and the calculated mitigated construction-related noise levels are shown in Table 14 and the RCNM printouts for the mitigated conditions are provided in Appendix D. As shown in Table 14, with implementation of Mitigation Measures 1 and 2, construction-related noise impacts would be below the FTA construction noise standard of 80 dBA at all analyzed receptors. Therefore, with implementation of Mitigation Measures 1 and 2, construction noise impacts would be less than significant.

Table 14 Mitigated Construction Noise Levels at the Nearby Sensitive Receptors

Construction Phase	Construction Noise Level (dBA Leq) at:			
	Homes to the East ¹	Homes to the South ²	Homes to the West ³	Park to the North ⁴
Demolition	79	79	78	74
Site Preparation	76	76	74	70
Grading	77	77	77	74
Building Construction	76	76	76	72
Paving	71	71	71	67
Painting	71	71	71	67
Maximum Construction Noise Level	79	79	78	74
FTA Construction Noise Threshold⁵	80	80	80	80
Exceed Threshold? ⁴	No	No	No	No

¹ The nearest homes to the east are located as near as 4 feet from the project site.

² The nearest homes to the south are located as near as 8 feet from the project site.

³ The nearest homes to the west are located as near as 90 feet from the center of the project site

⁴ The park to the noise is based on the picnic table area that is located as near as 150 feet from the project site.

⁵ Obtained from Table B of the Vista Environmental: Noise Impact Analysis. 1501 Del Norte Street Residential Project. September 2025 (Appendix H)

Source: RCNM, Federal Highway Administration, 2006

Operational-Related Noise

Potential noise impacts associated with the operations of the proposed project would be from project-generated vehicular traffic on the nearby roadways and from onsite noise sources to the nearby sensitive receptors. The noise impacts created from project generated vehicular traffic on the nearby roadways and from onsite noise sources to the nearby homes have been analyzed separately below.

Roadway Vehicular Noise Impact to Nearby Sensitive Receptors

Vehicle noise is a combination of the noise produced by the engine, exhaust and tires. The level of traffic noise depends on three primary factors (1) the volume of traffic, (2) the speed of traffic, and (3) the number of trucks in the flow of traffic. The proposed project does not propose any uses that would require a substantial number of truck trips and the proposed project would not alter the speed limit on any existing roadway so the proposed project's potential offsite noise impacts have been focused on the noise impacts associated with the change of volume of traffic that would occur with development of the proposed project.

Neither the General Plan nor the Municipal Code defines what constitutes a "substantial permanent increase to ambient noise levels". As such, this impact analysis has utilized guidance from the Federal Transit Administration for a moderate impact.

The potential offsite traffic noise impacts created by the on-going operations of the proposed project have been analyzed through utilization of the FHWA model and parameters provided in Appendix H. The proposed project's potential offsite traffic noise impacts have been calculated through a comparison of the existing year scenario to the existing with project scenario. The results of this comparison are shown in Table 15.

Table 15 Project Related Roadway Noise Contributions

Roadway	Segment	dBA CNEL at Nearest Receptor ¹			Increase Threshold ²
		Existing	Existing Plus Project	Project Contribution	
North Nora Avenue	North of Driveway 1	48.2	50.0	+1.8	+7 dBA
North Nora Avenue	North of West Del Norte Street	48.2	49.0	+0.8	+7 dBA
North Nora Avenue	South of West Del Norte Street	47.5	48.5	+1.0	+7 dBA
North Yaleton Avenue	South of West Del Norte Street	40.5	44.6	+4.1	+7 dBA
North Sunset Avenue	North of West Workman Avenue	67.2	67.3	+0.1	+1 dBA
West Del Norte Street	West of North Yaleton Avenue	45.3	48.4	+3.1	+7 dBA
West Del Norte Street	East of North Yaleton Avenue	43.4	49.9	+6.5	+7 dBA

¹Distance to nearest sensitive receptors shown in Table 13 does not take into account existing noise barriers such as walls and structures.

²Increase Threshold obtained from the FTA's allowable noise impact exposures.

Source: Vista Environmental: Noise Impact Analysis. 1501 Del Norte Street Residential Project. June 2025 (Appendix H); FHWA Traffic Noise Prediction Model FHWA-RD-77-108.

Table 15 shows that the proposed project's permanent noise increases to the nearby homes from the generation of additional vehicular traffic would not exceed the roadway noise increase thresholds detailed above. It should be also noted that the noise levels shown in Table 15 do not account for non-road noise sources and the greatest project impacts that occur on West Del Norte Street are below the measured ambient noise level of 55.0 dBA Leq as shown above in Table 15. For these reasons, the proposed project would not result in a substantial permanent roadway noise increase above ambient noise levels. Roadway noise impacts would be less than significant.

Onsite Noise Impacts to Nearby Sensitive Receptors

Operation of the project may create onsite noise impacts to the nearby residential properties from the operation of air conditioning equipment. Section 15-85 of the Municipal Code restricts the making of noise in any residential neighborhood that is plainly audible at a distance of 50 feet from the property line of any property. In order to provide a quantitative threshold, "plainly audible" has been assumed in this analysis to be a noise level that exceeds ambient noise levels at a distance of 50 feet from the nearby homes and park property lines.

The project applicant has stated that the proposed townhomes will likely use a heat pump made by Carrier Series 38 MURA, which produces noise levels as high as 62 dBA at one meter. The noise level at 50 feet from the nearest residential property lines were calculated through use of standard geometric spreading of noise, which provides an attenuation rate of 6 dB per doubling the distance between source and receptor. Table 16 shows the calculated noise levels at the nearby sensitive receptors.

Table 16 Onsite Operational Noise Levels at the Nearby Sensitive Receptors

Noise Source	Calculated Noise Levels (dBA Leq) at ¹ :			
	Homes to the East ²	Homes to the South ³	Homes to the West ⁴	Park to the North ⁵
Air Conditioner Equipment	37	31	31	47
Existing Ambient Noise Levels	60.3	60.3	55.0	55.0
Exceed Ambient Noise Threshold?	No	No	No	No

¹ Noise levels calculated based on a reference noise level of 62 dB at one meter and a standard geometric spreading of noise, which results in a 6.0 dB drop in noise when distance is doubled.

² The distance from the nearest air conditioner equipment to the nearest property line for the Homes to the East is 10 feet. As such, noise was calculated at 60 feet.

³ The distance from the nearest air conditioner equipment to the nearest property line for the Homes to the South is 60 feet. As such, noise was calculated at 110 feet.

⁴ The distance from the nearest air conditioner equipment to the nearest property line for the Homes to the West is 60 feet. As such, noise was calculated at 110 feet.

⁵ The distance from the nearest air conditioner equipment to the property line for the Park to the North is 5 feet. As such, noise was calculated at 55 feet.

Table 16 shows that the proposed project's operational noise from air conditioner units on the project site would create a noise level as high as 47 dBA at the park to the north and as high as 37 dBA at the nearest homes to the east. The operational onsite noise levels would be below the existing ambient noise levels at 50 feet from the nearest property lines. Therefore, operation of the proposed project's onsite noise sources would not create a substantial increase in ambient noise levels that are in excess of applicable noise standards. Onsite noise impacts would be less than significant.

Generation of Noise Levels in Excess of Standards

The proposed project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, with the incorporation of mitigation for temporary construction noise (N-1 and N-2).

Mitigation Measure

N-1 Construction Temporary Noise Barriers

The project applicant shall require the installation of a minimum 12-foot high temporary noise barrier on the portion of the east side of the project site that is adjacent to the homes as well as the entire south side of the project site. The project applicant shall also require the installation of minimum 8-foot high temporary noise barriers around all stationary equipment and concrete saws that are operated within 30 feet of the homes located on the east and south sides of the project site. The temporary noise barriers shall be constructed with either minimum 5/8" thick plywood or oriented strand board (OSB) or sound blankets that have a minimum Sound transmission class (STC) rating of 15 STC.

N-2 Construction Equipment Use Restrictions

The project applicant shall require that all construction contractors restrict the operation of any large bulldozers that is powered by a greater than 150 horsepower engine from operating within 20 feet of any off-site structure. The grading contractor shall use a small bulldozer (i.e., D1, D2, or D3 dozers) or other type of equipment that is less than 150 horsepower to perform all demolition and grading activities that are located within 20 feet of any off-site structure.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

The proposed project would not expose persons to or generation of excessive groundborne vibration or groundborne noise levels. The following section analyzes the potential vibration impacts associated with the construction and operations of the proposed project.

Construction-Related Vibration Impacts

The construction activities for the proposed project are anticipated to include demolition of the existing school structures and parking areas, site preparation and grading of the 13.56-acre project site, building construction of a residential community with 282 homes, paving of the onsite roads and sidewalks, and application of architectural coatings. Vibration impacts from construction activities associated with the proposed project would typically be created from the operation of heavy off-road equipment.

The primary sources of vibration during construction would be from the operation of a bulldozer during demolition and grading activities and from a vibratory roller during paving activities. A large bulldozer would create a vibration level of 0.089 inch-per-second PPV or 87 VdB at 25 feet and a vibratory roller would create a vibration level of 0.21 inch-per-second PPV or 94 VdB at 25 feet. Vibration has the potential to create annoyance to the nearby residents as well as damage to the nearby structures, which have been analyzed separately below.

Human Annoyance Vibration Impacts

The FTA guidance that is detailed above in Section 4.1, defines the threshold for human annoyance in residential buildings where people normally sleep is 72 VdB. Since the human annoyance threshold is based on the daily average, the analyzed distance utilized is based on the nearest offsite home to the center of the project site, which are the homes to the east that are located as near as 485 feet from the center of the project.

As detailed above, a vibratory roller would create the highest level of vibration at 94 VdB at 25 feet. Based on typical vibration propagation rates, the average vibration level at the nearest homes to the east (485 feet from center of project site) would be 56 VdB, which is below the FTA's human annoyance threshold of 72 VdB. Therefore, construction-related human annoyance vibration impacts would be less than significant.

Building Damage Vibration Impacts

Caltrans guidance defines the threshold for building damage to older residential structures and other older buildings to 0.3 inch per second PPV, which is based on the peak vibration level. Since the building damage threshold is based on the peak vibration level, the analyzed distance is the shortest distance between where construction equipment would operate and the nearest offsite structure. The nearest offsite structures are the single-family homes located as near as eight (8) feet south of the southeastern portion of the project site and mixed-use office professional (zoned OPMU) structures as near as four (4) feet north of the southeastern portion of the project site.

For the vibratory roller, the laying of asphalt pavement would occur as near as 24 feet from the nearest home located south of the southeastern portion of the project site. Based on typical vibration propagation rates, the vibration level at the nearest offsite home (24 feet away) would be 0.22 inch per second PPV. The vibration level at the nearest offsite home would be below the building damage threshold of 0.3 inch per second PPV threshold that is detailed above. Therefore, the use of vibratory rollers during paving activities, would create a less than significant building damage vibration impact.

For the large bulldozer, based on typical vibration propagation rates, the vibration level at the nearest offsite mixed-use structure (4 feet away) would be 0.67 inch per second PPV. The vibration level at the nearest offsite mixed-use structure would exceed the building damage threshold of 0.3 inch per second PPV. This would be considered a significant impact.

Mitigation Measure N-2 is provided that would require that the applicant to restrict the use of a large dozer within 20 feet of any offsite structure. For all grading activities that occur within 20 feet of any offsite structure, the applicant shall require the use of a small dozer or other type of equipment that is less than 150 horsepower. A small bulldozer would create a vibration level of 0.003 inch-per-second PPV at 25 feet. Based on typical propagation rates, the vibration level at the nearest mixed-use structure (4 feet away) would be 0.023 inch per second PPV, which would be below the building damage threshold of 0.3 inch per second PPV. Therefore, with implementation of Mitigation Measure N-2, a less than significant building damage vibration impact is anticipated from construction of the proposed project.

Operations-Related Vibration Impacts

The proposed project would consist of the development of a residential community. The ongoing operation of the proposed project would not include the operation of any known vibration sources other than typical onsite vehicle operations for a residential development. Therefore, a less than significant vibration impact is anticipated from operation of the proposed project.

Mitigation Measure

N-2 *Construction Equipment Use Restrictions (see above)*

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- 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?*

The proposed project would not expose people residing or working in the project area to excessive noise levels from aircraft. The nearest airport is San Gabriel Valley Airport, located approximately 5.5 miles west of the project site. The project site is located outside of the Airport Land Use Plan, and the 60 dBA CNEL noise contours, of this airport. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

- a. *Would the project 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)?*

Existing development on the project site includes buildings and ancillary structures associated with the site’s previous use for Del Norte Intermediate School and the East San Gabriel Valley Regional Occupational Program (ROP) Technical Center. The proposed project involves the construction of a total of up to 282 residential units.

According to the California Department Of Finance, the City has an estimated current population of 109,428, with 35,864 households with an average of 3.14 persons per household (CDOF 2025). The State’s anticipated growth level for the City is reflected by the City of West Covina’s RHNA allocation is 5,346 additional housing units during the 2021-2029 planning period.

The 282 housing units generated by the proposed project would represent approximately 5.3 percent of the City’s RHNA allocation.⁵ If all of the proposed project’s housing units were filled by new residents of the City with an average household size of 3.14 persons, the proposed project would increase the City’s existing population by 885, or approximately 0.8 percent, to 110,313, which would be within SCAG’s 2045 population forecast of 118,900 residents (SCAG 2020).

Therefore, population and housing growth generated by the proposed project would be within SCAG forecasts for the City and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

⁵ Assuming one household per housing unit.

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- b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

There is currently no housing on the project site; therefore, the proposed project would not displace existing housing or people and would not necessitate the construction of replacement housing elsewhere. No impact would occur.

NO IMPACT

15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				
1 Fire protection?	☐	☐	☒	☐
2 Police protection?	☐	☐	☒	☐
3 Schools?	☐	☐	☒	☐
4 Parks?	☐	☐	☒	☐
5 Other public facilities?	☐	☐	☒	☐

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The West Covina Fire Department (WCFD) provides fire protection and paramedic emergency services to residents and businesses within the City. The project site is located in the district of Fire Station No. 3, which is located at 1433 West Puente Avenue approximately 0.25 mile north of the project site. According to the City, the WCFD responds to the average emergency medical service (EMS) call with one fire engine and paramedic ambulance with a total of five personnel, and for single alarm/initial fire calls, the response would consist of three engines, one ladder truck, one paramedic vehicle, and one command unit, for a total of 15 personnel. More equipment and additional personnel may be called to respond, based on a greater alarm fire or more significant event, at the discretion of the fire captain and/or the incident commander (City of West Covina 2025).

The proposed project is designed to accommodate emergency access to the site. As shown in Figure 3, fire access routes have been designed to meet the minimum width and turning dimensions required by WCFD. Furthermore, all buildings would be constructed to meet the current building code requirements for fire safety. The West Covina Fire Prevention Bureau of the WCFD provides

technical review of all building construction plans within the City to ensure proposed buildings meet the City's adopted 2025 California Fire Code, 2025 California Building Code (CBC), California Health and Safety Code, and WCMC standards prior to construction. As such, the WCFD would review the site and building plans for the proposed project as part of the City's review process. The proposed project would demolish the school facilities currently on the site and replace them with 34 single-family detached homes and 248 attached townhomes and stacked flats, for a total of 282 homes, which would incrementally increase demand for fire protection services. However, the project site is in an urbanized area already served by the WCFD and the proposed project would be required to adhere to all applicable Fire Code standards and requirements. Therefore, the proposed project would not have a significant impact on fire response times nor create a substantially greater need for additional fire protection services above current capacity.

General Plan Policy P6.13 aims to optimize firefighting and emergency response capabilities. Specifically, Action A6.13-a under Policy P3.11 states that an increase of public access to fire protection services would be enhanced by an increase in fire staffing and funding to coincide with increasing population, development, and calls for public services. Consistent with the City's General Plan policies and actions, developers in the City are required to pay development impact fees that go toward public facilities such as fire facilities, as per WCMC Section 17-204. Because it would not create a substantially greater need for additional fire protection services above current capacity, the proposed project would not require new or expanded facilities to support fire protection and emergency response providers. Therefore, the proposed project's potential impacts to fire services and facilities would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The West Covina Police Department (WCPD) provides police protection services to residents and businesses within the City. As of June 2025, the WCPD consists of a full-time workforce of 96 sworn Officers and 41 civilians, with approximately 52 percent of all sworn Officers pertaining to the Patrol Division. The Patrol Division focuses on patrolling City streets, answering calls for service, and identifying potential crime problems. In addition, there are approximately 7 part-time civilian positions in the force (WCPD 2025). With approximately 109,428 residents and 885 additional potential residents resulting from the proposed project in West Covina and 96 sworn officers, the WCPD currently operates with 0.87 officers per 1,000 residents, which is below the national average of 1.7 officers per 1,000 residents for police departments serving a population between 100,000 to 249,999. The WCPD would need an additional 92 officers to reach the 188 total officers that would allow it to meet the national average.

The project site is located in WCPD Service Area 1 (North), and the police station is located at 1444 West Garvey Avenue, approximately 0.5 mile south of the project site along public streets. The proposed project would incrementally increase demand for police protection services by adding up to approximately 885 residents to the City as described in Section 14, *Population and Housing*. However, the ratio of police officers to residents would remain at 0.87 officers per 1,000 residents even with the additional residents generated by the proposed project. Furthermore, the project site is in a highly urbanized area already served by the WCPD and the proposed project would not have a

significant impact on police response times nor create a substantially greater need for additional police services above current capacity.

West Covina General Plan Policy P6.11 aims to provide community safety through enhanced police services. Specifically, Action A6.11-a under Policy P6.11 states that an increase of public access to police services would be enhanced by an increase in police staffing and funding to coincide with increasing population, development, and calls for public services. Consistent with the City's General Plan policies and actions, developers in the City are required to pay development impact fees that go toward police facilities, as per Chapter 17, Article IV of the WCMC. Because it would not create a substantially greater need for additional police services above current capacity, the proposed project would not result in the need for new or physically altered police protection facilities that could have an environmental impact, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

West Covina is primarily served by the West Covina Unified School District (WCUSD), Covina-Valley Unified School District (CVUSD), and Rowland Unified School District (RUSD), as well as other districts at least partially within West Covina. The project site, specifically, is served by WCUSD. Based on available enrollment data, the estimated number of students enrolled is 14,750 at WCUSD (Ed-Data 2025). The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause new schools to be constructed. The proposed project involves construction of 34 single-family detached homes and 248 attached townhomes and stacked flats, for a total of 282 homes. As discussed in Section 14, *Population and Housing*, if all of the proposed project's housing units were filled by new residents of the City, the proposed project would increase the City's existing population by 885 residents. The Environmental Impact Report for the City's General Plan (City of West Covina 2016b) assumes a student generation rate of 0.5 students per single family detached dwelling unit and 0.36 students per multi-family dwelling unit. Using these rates, the proposed project would generate 106 students, which would increase the combined current enrollment of all schools in the WCUSD from 14,750 students to 14,856 students, an increase of approximately 0.7 percent.

The applicant would be required to pay state-mandated school impact fees that would contribute to the funds available for development of new school facilities. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization."

For the reasons discussed above, the proposed project would not increase student enrollment at serving school districts in a manner that would result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

According to the CDOF, the City has an existing population of 109,428 (CDOF 2025). West Covina has 501.5 acres of existing parks and open space, which results in an estimated ratio of 4.7 acres per 1,000 residents (West Covina 2016b). The City is urbanized and nearly built out, with limited open space available to meet recreational needs associated with anticipated population growth. However, public schools in West Covina have 287 acres of additional open space, which provide potential recreational access for residents through joint use agreements between the City and school districts (West Covina 2016b). The proposed project would reduce the amount of school open space that is currently potentially available for recreational use by approximately 7.7 acres⁶, from 287 to 279.3 acres, because it would replace the approximately 7.7 acres of open space currently on the project site with residential uses. Nonetheless, these 279.3 acres of school open space, added to the City's existing 501.5 acres of parks and open space, equals approximately 780.8 acres of parks and open space within the City, which results in a ratio of approximately 7.1 acres per 1,000 residents.

The nearest park to the project site is Del Norte Park, which is adjacent to the project site. Del Norte Park includes a baseball field, tennis courts, picnic tables, children's play areas, splash pads, and a dog park. Palmview Park, which includes walking paths, play structures, a baseball field, and a recreation center, is approximately 1.5 miles east (either driving or walking) of the project site. As discussed in Section 14, *Population and Housing*, if all the proposed project's housing units were filled by new residents of the City, the proposed project would increase the City's existing population by 885 residents, to a population of 110,313, resulting in a ratio of approximately 7.0 acres per 1,000 residents. This population increase would not substantially decrease the existing parkland-to-resident ratio, which would go from approximately 7.1 acres per 1,000 residents before implementation of the proposed project to approximately 7.0 acres per 1,000 residents after implementation of the proposed project, a 1.4 percent decrease. Furthermore, the proposed project would provide 68,305 sf (1.57 acres) of common open space (including a 18,000 sf central area with amenities such as a pool and restroom building, shade structure with seating, BBQ counter with seating, and a turf area for passive lawn play). Additionally, the proposed project would be required to pay land dedication fees, as stated in WCMC Section 26-308. The proposed project would therefore not create the need for new or expanded park facilities and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

⁶ The acreage of recreational open space currently on the project was calculated in Google Earth Pro.

- a.5. *Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

Development of the proposed project would result in incremental impacts to the City's public services and facilities such as storm drain usage, solid-waste disposal, water usage, and wastewater disposal. These impacts are analyzed in Section 10, *Hydrology and Water Quality*, and Section 19, *Utilities and Service Systems*.

The project site is in an urban area already served by other commonly used public facilities such as public libraries, including the West Covina Library, and medical facilities. As discussed in Section 14, *Population and Housing*, if all new residents of the proposed project were new to the City, the proposed project would increase the City's existing population of 109,428 by 885 residents to 110,313 residents, which would be an increase of approximately 0.8 percent. This would be within SCAG's 2045 population forecast of 118,900 residents. Therefore, the proposed project would not generate an unforeseen population increase that would substantially affect existing public facilities or necessitate the provision of new public facilities. In addition, the West Covina Library is part of the County of Los Angeles Public Library system, which is financed by property taxes from the service area, general county funds, parcel tax, grants, feeds, and funds raised by the Library Foundation. As a result, the proposed project would contribute to the financing of library services through property taxes, which would mitigate the need for new or physically altered government facilities that support library use. Therefore, the proposed project would not substantially affect existing governmental facilities or require the need for new or altered governmental facilities. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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. *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?*

According to the CDOF, the City has an existing population of 109,428 (CDOF 2025). West Covina has 501.5 acres of existing parks and open space, which results in an estimated ratio of 4.7 acres per 1,000 residents (West Covina 2016b). The City is urbanized and nearly built out, with limited open space available to meet anticipated population growth or to increase the current level of service. However, as discussed in Section 15, *Public Services*, public schools within the City have an additional 287 acres of open space which provide potential recreational access for residents through joint use agreements between the City and school districts (West Covina 2016b). The proposed project would reduce the amount of school open space that is currently potentially available for recreational use by approximately 7.7⁷ acres, from 287 to 279.3 acres, because it would replace approximately 7.7 acres of school open space currently on the project site with residential uses. Nonetheless, these 279.3 acres of school open space, added to the City's existing 501.5 acres of parks and open space, equals approximately 780.8 acres of parks and open space within the City, which results in a ratio of approximately 7.1 acres per 1,000 residents.

The nearest park to the project site is Del Norte Park located adjacent to the project site. Del Norte Park includes a baseball field, tennis courts, picnic tables, children's play areas, splash pads, and a dog park. Palmview Park, which includes walking paths, play structures, a baseball field, and a recreation center, is approximately 1.5 miles east (either driving or walking) of the project site. As discussed under impact discussion 15.a.4, the proposed project's influx of population would not substantially decrease the existing parkland-to-resident ratio because it would result in only a 1.4 percent decrease in this ratio; the proposed project would provide 68,305 sf of common open space (including a 18,000 sf central area with amenities such as a pool and restroom building, shade

⁷ The acreage of recreational open space currently on the project was calculated in Google Earth Pro.

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structure with seating, BBQ counter with seating, and a turf area for passive lawn play); and the proposed project would be required to pay land dedication fees, as stated in WCMC Section 26-308.

For reasons discussed above, the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and it does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Impacts would therefore be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	■	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	■	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	■	☐
d. Result in inadequate emergency access?	☐	☐	■	☐

The following analysis is based on the findings of the following transportation studies done for the proposed project:

- *1501 Del Norte Street Residential Vehicle Miles Traveled (VMT) Screening Evaluation*, April 2025 (Appendix I)
- *Del Norte (Tentative Tract No. 044618) Traffic Study Scoping Agreement*, June 2025 (Appendix J)
- *Del Norte Traffic Engineering and Construction Evaluation*, July 2025 (Appendix K)

In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines. The amended CEQA Guidelines, specifically Section 15064.3, generally require the use of VMT as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects. Therefore, the following trip generation and trip distribution information is provided for informational purposes rather than for purposes of impact analysis.

Trip Generation

Urban Crossroads estimated the proposed project's vehicle trip generation in their June 2025 Traffic Study Scoping Agreement. As explained in the Traffic Study Scoping Agreement, trip generation represents the amount of traffic that is attracted and produced by a development and is based upon the specific land uses planned for a given project. Urban Crossroads used trip-generation statistics published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021) to estimate the proposed project's vehicle trip generation. The following trip generation rates were utilized for calculating the proposed project's trip generation:

- Single Family Detached Housing (ITE Land Use Code 210) were used to derive site specific trip generation estimates for up to 34 dwelling units

- Single Family Attached Housing (ITE Land Use Code 215) were used to derive site specific trip generation estimates for up to 138 townhomes
- Multifamily Housing (Mid-Rise, 4-10 Floors) were used to derive site specific trip generation estimates for up to 110 4-story stacked flats

Using these rates, Urban Crossroads calculated the proposed project's estimated vehicle trip generation as shown in Table 17.

Table 17 Estimated Project Vehicle Trip Generation

ITE Land Use	Weekday Peak Hour AM	Weekday Peak Hour PM	Total Daily Trips
210: Single Family Detached	24	32	322
215: Single Family Attached: Townhomes	67	79	994
221: Multifamily (Mid-Rise): Stacked Flats	40	43	500
Total Trips	131	154	1,816

Source: Del Norte (Tentative Tract No. 044618) Traffic Study Scoping Agreement, June 2025 (Appendix J)

Trip Distribution

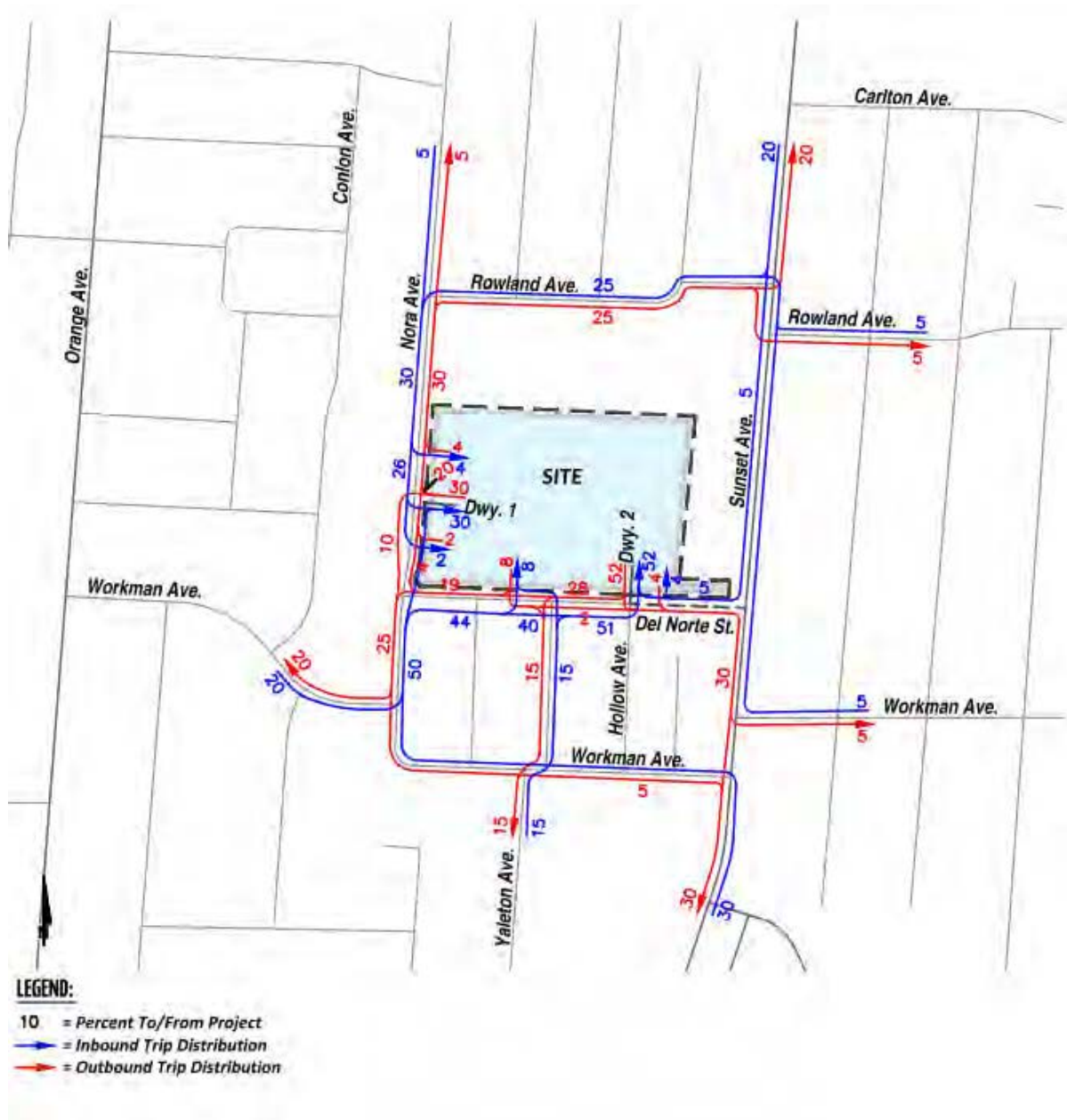
The proposed project's trip distribution represents the directional orientation of the trips generated by the proposed project to and from the project site. Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that will be utilized by project-generated traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered to identify the route where the proposed project's traffic would be distributed. The trip distribution patterns used by Urban Crossroads for their analysis of the proposed project are shown in Figure 12.

- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

The proposed project would be subject to various policies and regulations of the City of West Covina regarding the circulation system, including transit, roadway, bicycle and pedestrian facilities. The following discussion analyzes the proposed project's consistency with applicable policies and regulations, based on the Urban Crossroads traffic analyses listed above.

The proposed project would include an access point on Nora Avenue (secondary access) and another access point on Del Norte Street at the northerly extension of Hollow Avenue (primary access). In addition, the proposed project would include extending Del Norte Street from its existing terminus at Hollow Avenue easterly out towards Sunset Avenue, creating a new intersection. The new intersection of Sunset Avenue and Del Norte Street would be restricted to right-in/right-out access only, which would be physically controlled by the existing raised median on Sunset Avenue. The proposed project's entries are not proposed to be gated. The proposed project's anticipated Opening Year is 2029.

Figure 12 Project Trip Distribution



Pedestrian Connections

This section provides a review of existing pedestrian and transit facilities, and improvements to those site facilities that the proposed project would be responsible for. Per Chapter 7, Article 11 of the City of West Covina Municipal Code (WCMC), any person, owner, lessee or agent constructing commercial, residential, or industrial buildings shall also provide for the construction or installation to City Standards, of sidewalks, curbs, etc., unless such improvements already exist along all street frontages adjoining the lot on which the building is to be constructed.

Bicycle and Pedestrian Facilities

SIDEWALKS

In accordance with Chapter 19, Article II of the WCMC, the proposed project is responsible for the construction of sidewalks along the project site boundary in compliance with City Standards. For multiple-family residential projects, sidewalk widths must be a minimum of five feet. On full-width sidewalks, there should not be less than one tree well provided for each 40 linear feet. A greater distance between tree wells may be permitted if there are existing poles, signs, hydrants, etc., along the given area.

Concrete sidewalks will be provided along the residential units for internal circulation, and street sidewalks will be constructed along the project site's boundary on both Nora Avenue and Del Norte Street. The proposed project also includes a potential City park sidewalk that would connect the northeast region of the project site to the existing Del Norte Park located to the north. The proposed project will provide connections to the existing park via a connection with an overhead portal to the northwest end and northeast end of the project site. The proposed project will provide street trees along Nora Avenue and Del Norte Street, and accent trees along the project site's internal sidewalks.

CROSSWALKS

In accordance with Chapter 22, Article 6 of the WCMC, the traffic authority may establish, designate and maintain marked crosswalks at intersections and other places by appropriate devices, marks, or lines upon the surface of the roadway. The Project proposes two (2) driveway entrances, one along Nora Avenue, and another along Del Norte Street. The curb-to-curb length for both driveways is twenty-six (26) feet. The driveways are stop controlled for vehicles exiting the Project, giving pedestrians the right way when crossing. No formal crosswalk markings will be established at the Project driveways, but the corners will provide the required 2010 Americans with Disabilities Act (ADA) compliant ramps.

With the construction of the new right-in, right-out intersection of Sunset Avenue and Del Norte Street, the proposed project is responsible for constructing a north-south crosswalk connection along the project site's boundary. The proposed intersection of Sunset Avenue & Del Norte Street would be stop-controlled on the eastbound approach (vehicles exiting from Del Norte Street would make a right and head southbound on Sunset Avenue), allowing pedestrians that are accessing the existing Del Norte Park to safely use the proposed north-south crosswalk connection. Due to the existing median on Sunset Avenue, the proposed project does not include an east-west crosswalk connection from the project site across Sunset Avenue at Del Norte Street. There is also an existing marked mid-block pedestrian crosswalk to the north across Sunset Avenue at Rowland Avenue that provides direct access to Del Norte Park.

BIKE PATHS

The City of West Covina does not have an adopted bicycle plan. Chapter 22, Article III of the WCMC defines standards for Class I Bike Paths, Class II Bike Lanes, and Class III Shared Routes. A Class I Bike Path is an exclusive, off-road facility, and a Class III Shared Route is a street designated as a bicycle route (typically signed but not striped, shared space with vehicles). Class II Bike Lanes are divided into Class IIa (no parking) and Class IIb (parking permitted) categories and are striped, on-street facilities (typically curb-adjacent).

As stated in the City of West Covina General Plan, the City lacks any special facilities for cyclists outside of the Downtown area. No bicycle facilities have been identified surrounding the project site.

ADA RAMPS

Pursuant to Chapter 4, Section 406 Curb Ramps of the 2010 ADA Standards for Accessible Design, counter slopes adjoining road surfaces immediately adjacent to the curb ramp shall not be steeper than 1:20 (5%). Transitions between curb ramps, sidewalks, and streets must be flush and free of vertical changes in level. Curb landings shall be provided at the tops of curb ramps, and the landing clear length shall be thirty-six (36) inches minimum with the landing clear width being as wide as the curb ramp.

In addition to the 2010 ADA Standards, curb ramp construction in California must comply with the California Building Code (CBC), Chapter 11B. This includes stricter slope controls, clear landing dimensions, and detectable warning surface requirements. All curb ramps must have top landings of at least 36 inches in length (consistent with ADA), be aligned with the path of travel, and feature truncated dome detectable warnings in contrasting color and texture. Curb ramp design and construction must ensure flush transitions and no vertical level changes between the ramp and adjacent surfaces (also consistent with ADA). Compliance with these standards is required for all public and private projects and will be enforced during inspection and acceptance.

The proposed project is responsible for ensuring that the curb ramps at the project site driveways and at the proposed intersection of Sunset Avenue and Del Norte Street adhere to the ADA curb ramp design standards.

TRANSIT SERVICE

- The proposed project is currently served by Foothill Transit, a community-oriented public transit agency serving the San Gabriel Valley, Pomona Valley, and downtown Los Angeles. The transit line that runs along Sunset Avenue which could potentially serve the project site is Line 185: Azusa – West Covina – Puente Hills Mall via Irwindale. The following bus stops are in the project site vicinity: Sunset Avenue & Rowland Avenue (Northbound) – Stop 2524
- Sunset Avenue & Rowland Avenue (Southbound) – Stop 2525
- Sunset Avenue & Workman Avenue (Northbound) – Stop 2534
- Sunset Avenue & Workman Avenue (Southbound) – Stop 2535

Service times for the stops along Foothill Transit Route 185 are approximately every 30 minutes during the weekday peak hours. Transit service should be reviewed periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. As such, Urban

Crossroads recommends that the Project Applicant work in conjunction with the City to potentially provide bus service to the project site.

In January 2025, the City of West Covina phased out the Red and Blue shuttle services to shift towards the City's new Micro-Transit service, "Go West Covina." The new shuttle service started in November 2024 and aims to provide on-demand, app-based transit in vehicles. Go West Covina serves the City of West Covina free of charge Monday – Friday from 7AM to 7PM. Implementation of the City's new micro-transit service can serve the riders that once used the Red and Blue shuttle service stops along Sunset Avenue and Workman Avenue near the project site.

No transit improvements (bus stops, bus turnout, etc.) have been identified as part of the proposed project's construction along its frontages.

As described above, the proposed project would be responsible for complying with all applicable requirements of the WCMC (and other applicable regulations) related to the circulation system, including transit, roadway, bicycle and pedestrian facilities; the project site and its vicinity are already well-served by roadway, transit, and pedestrian facilities; and construction and operation of the proposed project would not hinder the continued operation of these facilities. For these reasons, the proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

LESS-THAN-SIGNIFICANT IMPACT

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

In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines. The amended CEQA Guidelines, specifically Section 15064.3, generally require the use of VMT as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region.

The updated CEQA Guidelines allow for the lead agency's discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the intended goals of the legislation. Where quantitative models or methods are unavailable, CEQA Guidelines Section 15064.3 allows agencies to assess VMT qualitatively using factors such as availability of transit and proximity to other destinations. The Office of Planning and Research (OPR's; now titled the Office of Land Use and Climate Innovation) *Technical Advisory on Evaluating Transportation Impacts in CEQA* provides considerations regarding methodologies and thresholds with a focus on office, residential, and retail developments as these projects tend to have the greatest influence on VMT.

This impact analysis is based on the *1501 Del Norte Street Residential Vehicle Miles Traveled (VMT) Screening Evaluation* completed by Urban Crossroads in April 2025 (Appendix I). The VMT screening evaluation presented in this report was developed based on the adopted City of West Covina City Resolution No. 2020-57.

VMT Screening

The City Guidelines recommends standardized VMT screening methods that can be used to identify when a proposed land use project is anticipated to result in a less than significant VMT impact thereby eliminating the need to conduct a full model-based analysis. The San Gabriel Valley Council

of Governments (SGVCOG) provides a VMT screening tool (Screening Tool) to assist with conducting VMT screening for individual land use projects. The Screening Tool is designed to assist in screening and estimating project-generated VMT for certain types of land use projects in the San Gabriel Valley and its member agencies. The City's screening methods are listed below, and a land use project need only meet one of the screening criteria to result in a less than significant impact:

- Transit Priority Area (TPA) Screening
- Low VMT Area Screening
- Project Type Screening
- Affordable Housing Screening

Transit Priority Area (TPA) Screening

Consistent with City Guidelines, projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing “major transit stop” or an existing stop along a “high-quality transit corridor”) may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project meets the following sub criteria:

- Has a Floor Area Ratio (FAR) of less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the City
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Southern California Association of Governments [SCAG]); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units

Based on the Screening Tool results included in Attachment B of the *(VMT) Screening Evaluation*, the project site is located within a TPA. As such, Urban Crossroads reviewed the applicable TPA sub-criteria to determine consistency with the City's VMT screening approach.

- The proposed project would develop a total of 461,687 square feet of inhabitable living space on 13.19 acres. This results in an estimated FAR of 0.8, which meets the City's minimum FAR requirement
- The proposed project includes a reduction in parking requirements below those outlined in the West Covina Municipal Code, as permitted under the proposed project's Specific Plan provisions
- The proposed project consists of residential uses located on parcels with a zoning designation that is also identified as residential and is consistent with the City's future development plans and the applicable Sustainable Communities Strategy
- The proposed project does not propose to replace any existing residential units

The project site is located within a TPA and meets all sub-criteria associated with the City's TPA screening requirements. The TPA screening criteria are therefore met.

Low VMT Area Screening

The City Guidelines state that projects that have a VMT per service population (population and employees) 15% below the baseline Citywide VMT per service population are presumed to have a less than significant impact. The parcels containing the project site were selected and the Screening Tool was run for VMT per service population (i.e., population and employment) measure of VMT.

The project site's transportation analysis zone (TAZ) 22306300 was found to generate 25.5 VMT per service population, whereas the Citywide baseline VMT per service population is 31.8 VMT per service population and a 15% below baseline threshold of 27.1 VMT per service population.

Based on the Screening Tool results presented in Attachment B of the *(VMT) Screening Evaluation*, the project site is located within a low VMT generating area and the Low VMT Area Screening criteria are therefore met.

Project Type Screening

As directed by the City Guidelines, local serving retail with buildings less than 50,000 square feet and other local serving essential services (e.g., day care centers, public schools, medical/dental office buildings, etc.) are presumed to have a less than significant VMT impact. In addition, City Guidelines recognize projects generating less than 110 daily trips, as having a less than significant impact on VMT.

The proposed project does not include any local serving retail, local essential services, nor is it expected to generate less than 110 daily trips. The Project Type Screening criteria is therefore not met.

Project Type Screening

The City Guidelines state residential or mixed-use development projects with units that are deed-restricted, income-qualified housing can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis.

The proposed project does not include any income-qualified units. The Affordable Housing Screening criteria is therefore not met.

Conclusion

Based on Urban Crossroad's review of applicable VMT screening thresholds as recommended by the SGVCOG, the proposed project would meet the TPA Screening and Low VMT Area screening criteria. The proposed project is therefore presumed to have a less than significant VMT impact; no further VMT analysis is required.

LESS-THAN-SIGNIFICANT IMPACT

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*

Geometric Design Features

The proposed project would allow direct vehicular access to the project site from two driveways: one on West Del Norte Street and another on North Nora Avenue. West Del Norte Street would be extended from its current terminus at Hollow Avenue out to North Sunset Avenue to the east, creating a new intersection at North Sunset Avenue and West Del Norte Street. This new intersection would be restricted to right-in/right-out access only.

As defined by the American Association of State Highway Transportation Officials (AASHTO) Green Book Guidelines (i.e. AASHTO Green Book), sight distance is the length of the roadway ahead that is visible to the driver. The available sight distance on a roadway should be sufficiently long to enable a vehicle traveling at or near the design speed to stop before reaching a stationary object in its path.

Urban Crossroad's July 2025 *Traffic Engineering and Construction Evaluation* (Appendix K) evaluated horizontal sight distance for Driveway 1 along Nora Avenue and Driveway 2 along Del Norte Street based on the AASHTO Green Book.

According to Urban Crossroad's July 2025 *Traffic Engineering and Construction Evaluation* (Appendix K), adequate visibility for vehicular and pedestrian traffic can be accommodated at the proposed project's driveways by limiting sight obstructions within the identified limited use area (shaded triangular area often referred to as "clear sight triangles"). Any landscaping/hardscape within the limited use area should not exceed 30 inches in height. The limited use area should be kept clear of any landscaping or any other obstructions that may impede the visibility of the driver, including on-street parking. As such, restrictions to on-street parking within the limited use areas are also necessary. Minimum horizontal sight distances for the proposed project's driveways are provided in Exhibit 6 of Urban Crossroad's July 2025 *Traffic Engineering and Construction Evaluation* (Appendix K); however, sight distance should be re-evaluated in the field once the driveways have been constructed. It is anticipated that the minimum 155-foot sight distance for both driveways can be accommodated. Driveway 1 should accommodate a 25-foot proposed red curb to the north of the driveway, and a 60-foot proposed red curb to the south of the driveway. Driveway 2 should accommodate an 80-foot proposed red curb to the east of the driveway, and a 25-foot proposed red curb to the west of the driveway. The sight distance lines, limited use area, and clear sight triangles per the AASHTO Green Book are illustrated in Exhibit 6 of Urban Crossroad's July 2025 *Traffic Engineering and Construction Evaluation* (Appendix K).

Construction Impacts

On-Site Construction Phasing

The proposed project is currently anticipated to be built in six construction phases with a duration of approximately 24 months. The construction phases include:

- Demolition
- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

The construction schedule utilized is presented in Table 18. Construction will begin January 2026 and would last through January 2028. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per the *CEQA Guidelines*.

Table 18 Construction Duration

Construction Activity	Start Date	End Date	Days
Demolition	01/01/2026	02/11/2026	30
Site Preparation	02/12/2026	03/04/2026	15
Grading	03/05/2026	05/06/2026	45
Building Construction	05/07/2026	01/26/2028	450
Paving	12/16/2027	01/26/2028	30
Architectural Coating	40	43	500

Source: Del Norte (Tentative Tract No. 044618) Traffic Study Scoping Agreement, June 2025 (Appendix J)

CONSTRUCTION VEHICLES

The construction vehicle list presented in Table 19 has been developed based on information provided by the project applicant. Consistent with industry standards and typical construction practices, each of the construction vehicles listed is assumed to operate up to a total of eight hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the City Code.

Table 19 Construction Vehicle Assumptions

Construction Activity	Equipment	Quantity	Hours
Demolition	Excavators	2	8
Rubber Tired Dozers	1	8	
Site Preparation	Crawler Tractors	1	8
Grading	Graders	1	8
Rubber Tired Dozers	1	8	
Scrapers	2	8	
Crawler Tractors	1	8	
Building Construction	Forklifts	1	8
Tractors/Loaders/Backhoes	2	8	
Paving	Pavers	1	8
Paving Equipment	1	8	
Rollers	2	8	

Source: Del Norte (Tentative Tract No. 044618) Traffic Study Scoping Agreement, June 2025 (Appendix J)

Traffic Control and Working Hours

Construction would occur Monday through Saturday between the hours of 7:00 AM and 8:00 PM pursuant to WCMC construction standards. The City may require the project applicant to prepare a construction management plan. The number of daily worker trips are based on the California Emissions Estimator Model (CalEEMod) defaults. It should be noted that for daily vendor trips, specifically, CalEEMod only assigns daily vendor trips to the Building Construction phase. Daily vendor trips would likely occur during all phases of construction. As such, the CalEEMod defaults for daily vendor trips were adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. Table 20 presents the construction trip assumptions based on the CalEEMod defaults.

Table 20 Construction Trip Assumptions

Construction Activity	Worker	Construction Activity	Worker
Demolition	10	2	19
Site Preparation	3	2	0
Grading	13	3	12
Building Construction	198	27	0
Paving	10	0	0
Architectural Coating	40	0	0

Source: Del Norte (Tentative Tract No. 044618) Traffic Study Scoping Agreement, June 2025 (Appendix J)

Conclusion

As discussed above, during construction and then operation of the proposed project the project site would continue to be served by and would not interfere with existing and planned roadway, pedestrian, and public transit facilities; and would be built according to all applicable standards regulating safety design features such as sight lines and turning radii. Furthermore, due to its nature as residential infill development in a residential area, the proposed project would not result in uses that would be incompatible with the existing land uses surrounding the project site. Therefore, implementation of the proposed project would not result in substantial hazards due to geometric design features or incompatible uses. No significant adverse impacts would occur, and this impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

d. Would the project result in inadequate emergency access?

As discussed in impact 17c above, during construction and then operation of the proposed project the project site would continue to be served by and would not interfere with existing and planned roadway, pedestrian, and public transit facilities. During proposed project operation, emergency response vehicles would be able to access the project site via the two proposed driveways on West Del Norte Street and North Nora Avenue, which would be built according to all applicable standards regulating safety design features such as sight lines and turning radii, which help ensure adequate access for emergency vehicles. The proposed project would not modify existing roadways in the vicinity in a way that would negatively affect emergency vehicle use of area roadways. In fact, extending West Del Norte Street to North Sunset Avenue would improve emergency vehicle access to the project site. Furthermore, site circulation plans would be reviewed by the City of West Covina Police Department and the West Covina Fire Department prior to occupancy to ensure that required fire protection safety features, including building sprinklers and emergency access, are implemented. Therefore, the project would result in less than significant impacts to emergency access.

LESS-THAN-SIGNIFICANT IMPACT

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18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Assembly Bill 52 of 2014

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources" (TCRs). AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). AB 52 further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
2. 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 PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Senate Bill 18 of 2004

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government’s jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research’s Tribal Consultation Guidelines (2005), “The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places.”

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 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)?*
- b. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 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?*

Three tribes have requested notification of projects in West Covina: the Soboba Band of Luiseño Indians, Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation), and Gabrieleño/Tongva Nation. Per Public Resources Code (PRC) Section 21080.3.1, the City mailed AB 52 and SB 18 consultation letters to these tribes on May 14, 2025. On May 27, 2025, the City received an email from the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) requesting government-to-government consultation regarding the proposed project. The City engaged consultation with the Kizh Nation in June 2025 that resulted in the City receiving a letter from the Kizh Nation that expressed their opinion that the project site has potential for intact, subsurface Tribal Cultural Resources, and requesting that specific mitigation measures included in their letter (including attachments) be implemented. The City of West Covina will continue to comply with all applicable tribal consultation requirements of Public Resources Code Section 21080.3.1 and all other applicable regulations as the proposed project progresses through the required review and approval process.

As described in Section 5, *Cultural Resources*, no archaeological resources were identified within or adjacent to the project site by the Cultural Resources Technical Report, which included a records search, Sacred Lands File search, Native American consultation support, and a cultural resources survey. The lack of surface evidence of archaeological materials does not preclude their subsurface existence, but the absence of substantial prehistoric or historic-period archaeological remains within the immediate vicinity, along with the existing level of disturbance in the project site, suggests there is a low potential for encountering intact subsurface archaeological deposits.

The possibility of encountering subsurface archaeological materials during construction of the proposed project cannot be ruled out. Additionally, the Kizh Nation, during the tribal consultation process expressed their opinion that the project site has potential for intact, subsurface Tribal Cultural Resources, and requested that specific mitigation measures be implemented.

Implementation of Mitigation Measure CUL-1, which includes provisions for including a Native American representative in evaluation of subsurface archaeological finds if the find is determined to be prehistoric, would reduce this potential impact, but not to a less than significant level without incorporation of the measures requested by the Kizh Nation. Therefore, mitigation measures TCR-1 through TCR-3 are also required.

Mitigation Measures

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.

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.

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.

Implementation of mitigation measures TCR-1 through TCR-3 would reduce potentially significant impacts to tribal cultural resources to a level of less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or 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?	☐	☐	☒	☐
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. *Would the project require or result in the relocation or 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?*
- c. *Would the project 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?*

Based on the applicant submittal package and the Preliminary Sewer Study for the proposed project by Moran Consulting Corporation, dated November 22, 2024 (Appendix L), all existing utility infrastructure on the project site would be demolished and removed and new on-site infrastructure

for water, wastewater transport, storm water drainage, electric power, and telecommunications facilities would be constructed as part of proposed project implementation. Existing easements will accommodate connections for electricity lines. New easements are proposed for water and sewer.

The proposed project would include installation of new water lines in West Del Norte Street that would create a looped system connecting to water lines in North Nora Avenue and North Sunset Avenue. Each residential unit in the proposed project would have its own water meter and the proposed project would include installation of backflow devices, low-flow fixtures, and water efficient irrigation systems, and all existing services and laterals would be connected to the new water main. These upgrades would ensure that the proposed project would have no impacts to potable water service in the area.

The City's Public Works Department provides local wastewater service, and the proposed project would connect to the public conveyance system. Wastewater from the City's system is treated at and disposed of by the San Jose Creek Water Reclamation Plant (SJCWRP) or the Whittier Narrows Reclamation Plant (WNRP), operated by the Sanitation Districts of Los Angeles County (LACSD). The two have a combined design capacity of 165.7 million gallons per day (mgd). The average daily flow into the two plants is approximately 73 mgd, leaving 42 mgd in available capacity to accommodate new development. The project site is in the SJCWRP tributary area (City of West Covina 2016b). The average daily flow to the SJCWRP is approximately 66 mgd, leaving approximately 34 mgd in available capacity (City of West Covina 2016b). Given the site is currently unoccupied and used minimally⁸include), existing flows from the site are negligible. The proposed project includes 34 single-family homes and 248 attached townhomes and stacked flat units. According to LACSD wastewater generation rates (LACSD, 2025), the expected increase in estimated average wastewater flow from the proposed project after its development is 57,200 gallons per day (gpd). Although the site is currently developed with former school buildings, these buildings are now vacant and used and do not contribute to existing wastewater flows. The net increase in wastewater generation compared to existing generation would therefore be 57,200 gpd. The proposed project's estimated average daily flow of 57,200 gpd would be well within the SJCWRP's available capacity of 34 mgd.

The City's existing sewer system consists of interceptors and lift stations for conveyance of wastewater within the city, including over 227 miles of gravity sewer and three pump stations, and implementation actions in the City's General Plan (PlanWC) require the City to pursue enlargement or extension of sewage collection systems where necessary to serve new development, with development fees supporting this expansion (City of West Covina 2016a). The proposed sewer line that will collect the townhomes and stacked flats will be an 8" Sewer with a 35-foot lateral connecting to North Nora Avenue 8" existing Sewer line and a 713-foot lateral on West Del Norte Street connecting to an existing line along North Sunset Avenue. All single-family homes on the property's perimeter will have an individual lateral connection to the adjacent public sewer. The Preliminary Sewer Study found that, based on the criteria developed by the City of West Covina, the sewer system serving the proposed project site is adequate to serve the proposed project.

According to LACSD wastewater generation rates (LACSD, 2025), the proposed project's estimated average wastewater flow after its development is 57,200 gallons per day (gpd), which would equal 20,878,000 gallons of wastewater per year. By comparison, the project site, as discussed above, currently generates a negligible amount of wastewater. Therefore, the proposed project's estimated

⁸ Current potential water-consuming activities on the project site include landscape irrigation, which consumes water but does not generate wastewater; and occasional use of a multi-purpose room and sports fields, which may include restroom use that would include both water consumption and wastewater generation.

net increase in wastewater generation compared to existing conditions is 57,200 gallons of wastewater per day, which would account for approximately 0.17 percent of the remaining available daily capacity of the SJCWRP of approximately 34 mgd. Therefore, the SJCWRP would have sufficient capacity to accommodate additional wastewater flows generated by the proposed project. The proposed project would not require the construction of new or expanded treatment facilities.

The proposed project's on-site drainage system would be maintained by the proposed project's homeowner's association. According to the site plans, proposed project implementation would result in 10 percent impervious surface to allow rainwater to percolate back into the groundwater table. According to proposed project plans, the grading plan is designed to drain all stormwater from within the project site into a private storm drain system. Catch basins and inlets would collect stormwater and convey water via 12-inch and 24-inch pipes to three infiltration galleries. Offsite drainage that currently flows towards the project site would be diverted via bio-swales along the north and east property lines that connect to the existing storm drain system in North Nora Avenue and West Del Norte Street. Drainage regulations require that stormwater be retained on site such that off-site flows are equal to or less than existing conditions. The project includes on-site catch basins to capture and manage these flows. The proposed project would not necessitate the construction of new stormwater drainage facilities or expansion of existing facilities.

As discussed in Section 6, *Energy*, the proposed project would not result in the wasteful, inefficient or unnecessary consumption of energy. The proposed project would conform to the latest version of California's Green Building Standards Code and Building Energy Efficiency Standards. The proposed project would not require the construction of new electric power or natural gas facilities. Likewise, the project site is an infill site served by existing telecommunications facilities and would not require the expansion or construction of new telecommunications infrastructure.

The proposed project would not result in significant environmental impacts due to the construction of new utility facilities, and the proposed project would be served by a wastewater treatment plant with adequate capacity. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

The project site is in an urbanized area served by existing utilities infrastructure. City of Azusa Light and Water (ALW) services the site with potable water (ALW 2021). On average, 65 percent of ALW's source water is local ground water pumped from wells out of the Basin, in which ALW holds adjudicated water rights to this groundwater. The remaining 35 percent of ALW's source water is surface water supplied from the San Gabriel River, from which ALW holds adjudicated diversion rights, and such water is treated at the Hsu Filtration Plant prior to being distributed to customers (ALW 2021).

As discussed in Section 10, *Hydrology and Water Quality*, the project site receives its water service from ALW. ALW's service area encompasses 8,900 acres in the San Gabriel Valley, servicing the cities of Azusa, Glendora, Covina, West Covina, Irwindale, and unincorporated Los Angeles County (ALW 2021). ALW relies upon three water supply sources: (1) groundwater from the Main San Gabriel Basin; (2) surface water from the San Gabriel River; and (3) water from the State Water Project. ALW does not use supplier-produced surface water, stormwater, recycled water, or desalinated water.

According to its 2020 Urban Water Management Plan (UWMP), ALW would have an adequate supply of water, with normal conservation efforts, to meet projected demand through 2045 in average year, single-dry year, and multiple-dry year scenarios (ALW 2021). Table 21 shows projected water supply and demand under normal year, single-dry year, and multiple-dry year conditions. These numbers reflect demand and supply for Suburban’s entire service area.

Table 21 Normal Year and Multiple Dry Year Water Supply and Demand Comparison

	2025	2030	2035	2040	2045
Water Demand Normal Year ¹	18,552	18,853	19,160	19,472	19,788
Water Supply Normal Year ¹	38,450	38,450	38,450	38,450	38,450
Water Demand Single-Dry Year ¹	19,715	20,036	20,362	20,693	21,029
Water Supply Single-Dry Year ¹	25,677	25,677	25,677	25,677	25,677
Water Demand Multiple-Dry Year ¹	17,559	17,845	18,135	18,430	18,729
Water Supply Multiple-Dry Year ¹	23,447	23,447	23,447	23,447	23,447

¹ Water supply and demand totals are reported in acre-feet per year (AFY) and are for ALW’s entire service area.

Source: ALW 2021

The proposed project would be constructed to all applicable CBC standards, including those that mandate water-efficient fixtures and features, and would be required to adhere to applicable water conservation measures for landscaping, specified in the City’s Municipal Code Section 26-750.1300. According to CalEEMod results (see Appendix D), the proposed project would generate a net demand of 31,714 gallons of water per day for indoor use and 18,702 gallons of water per day for outdoor use. This equates to approximately 56.51 acre-feet per year of water, which would fit within the projected usage and supply shown in Table 21, and the existing water supply under all scenarios would be sufficient to accommodate increased use from proposed project operation. Therefore, existing water supply, as projected, would be adequate to serve the anticipated residents and other users of the proposed project. The proposed project’s impact on water supply would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project 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. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The City contracts with Athens Services to provide trash, recycling, and special pickup services for residents. After collection, waste is conveyed to the Athens Services Materials Recovery Facility in the City of Industry, which can process 5,000 tons of mixed material each day (City of West Covina 2016b). Diversion of solid waste from the project site into the recycling stream would substantially reduce the proposed project’s impact on landfill capacity. Solid waste materials are transported to the Athens Services Materials Recovery Facility where recyclable materials are separated from disposable materials. This process and other waste reduction programs have increased the City’s diversion rate to 58 percent, higher than the State-mandated 50 percent. After waste is sorted, materials that cannot be recycled are sent to the Victorville Sanitary Landfill, which has a permitted

maximum capacity of 3,000 tons per day and a current estimated remaining daily capacity of 79,400,000 tons (CalRecycle 2019). The estimated cease operation year would be 2047.

The proposed project plans indicate two 96-gallon trash carts could be available for each unit, where one cart is for combined recycling and trash that would be sorted as indicated above, and one would be for green waste if needed. The current diversion rate (58 percent) combined with West Covina's incentives to reuse and recycle would continue to exceed the State-mandated 50 percent diversion rate. According to the CalEEMod results operation of the proposed project would generate approximately 312 tons of solid waste per year. The project site is currently vacant and does not produce solid waste. Therefore, the proposed project would generate a net increase of six tons of solid waste per year, or 0.85 tons per day. Conservatively assuming none of this waste could be diverted for recycling, the estimated 0.85 tons per day equals 310.25 tons per year, well within the current estimated remaining capacity of 79,400,000 tons at the Victorville Sanitary Landfill. Therefore, the proposed project's impacts on solid waste would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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 downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?				
b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?				

1501 Del Norte Street Residential Project

- d. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The project site is in an urban area of West Covina. Undeveloped wildland areas are not close to the project site. The project site is not in any “Fire Hazard Severity Zone” (including the “Moderate,” “High,” or “Very High” zones) for wildland fires (CAL FIRE 2025). The nearest Very High Hazard Severity Zones are approximately 3.0 miles north of the project site on the northeastern edge of the Santa Fe Dam Open Space area; and 3.0 miles southeast of the project site in the San Jose Hills. The proposed project would construct residences on a lot currently occupied by vacant school buildings and surrounded by residential and commercial development. The proposed project would be served by existing water utilities, including fire hydrants along West Del Norte Street, as well as three new fire hydrants within the project site.

LESS-THAN-SIGNIFICANT IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Does the project:				
a. 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. 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. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

- 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?*

As discussed in Section 4, *Biological Resources*, there are no mapped essential habitat connectivity areas in the immediate vicinity of the project site. In addition, regional wildlife movement is restricted given the built-out nature of the project area, and no native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or native wildlife nursery sites exist on or immediately around the project site. However, the site currently contains mature trees which may provide nesting habitat for birds. Therefore, Mitigation Measure BIO-1 requires a pre-construction nesting bird survey and other measures should construction occur during the breeding season to avoid potential impacts to on-site nesting birds.

Of the 26 trees affected by implementation of the proposed project, 1 is significant and 25 are non-significant per the City's Tree Ordinance. No heritage trees were identified. As shown in Figure 10, seven of the non-significant trees are street trees located along North Nora Avenue outside of the project boundary and 18 are located within the project boundary within landscaped areas and adjacent to buildings. One non-significant tree (#30) is located adjacent to a single-family residence. The proposed project would remove all 26 trees identified in the Arborist Report. As shown in Figure 9, the proposed project would incorporate landscaping which would include a greater number of new trees than the number of trees to be removed, resulting in greater tree coverage on the proposed project site than what currently exists. Thus, this impact would be less than significant.

As discussed in Section 5, *Cultural Resources*, Section 7, *Geology and Soils*, Section 9, *Hazards and Hazardous Materials*, and Section 18, *Tribal Cultural Resources*, the proposed project would have a less than significant impact on or from unanticipated archaeological resources, paleontological resources, human remains, and tribal cultural resources with implementation of Mitigation Measures CUL-1 and GEO-1. Implementation of these mitigation measures, as well as adherence to existing local, State, and federal regulations and specific monitoring procedures related to the discovery of any unanticipated cultural resources, paleontological resources, tribal cultural resources, and human remains during construction activity, would reduce these potential impacts to a less than significant level.

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- 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)?*

As concluded in Sections 1 through 20, the proposed project would have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated, with respect to all environmental issues considered in this document. Cumulative impacts related to several other resource areas have been addressed in the individual resource sections of this IS-MND, including air quality, GHG emissions, noise, transportation, and utilities (see CEQA Guidelines Section 15064(h)(3)). As discussed in Section 3, *Air Quality*, and Section 8, *Greenhouse Gas Emissions*, the proposed project would result in less than significant impacts associated with air quality and GHG emissions during both project construction and operation. The impact analyses in these sections use thresholds that already account for cumulative (regional) impacts. Therefore, air quality and GHG emissions associated with operation and construction would be less than significant and not be cumulatively considerable.

As discussed in Section 13, *Noise*, the proposed project would not generate significant construction noise impacts because construction would occur during hours between 7:00 a.m. and 8:00 p.m., consistent with WCMC Section 15-95. Furthermore, implementation of Mitigation Measure N-1 and N-2, and compliance with the construction hours requirements of the WCMC, would reduce construction noise impacts to a less than significant level. The noise and traffic analyses in this IS-MND both considered increases in traffic and traffic noise under Existing plus Project conditions and contribution to VMT and concluded that impacts would be less than significant.

As discussed in Section 19, *Utilities and Service Systems*, potential impacts to the City's sewer system related to the proposed project's contribution to sewer flows would be less than significant.

This IS-MND determined that, for some of the other resource areas (e.g., agricultural and mineral), the proposed project would have no impact in comparison to existing conditions. Therefore, the proposed project would not contribute to cumulative impacts related to these issues. Other issues (e.g., biological resources, cultural resources, geology, hazards, hazardous materials, and tribal cultural resources) are by their nature project-specific and impacts at one location do not add to impacts at other locations or create additive impacts.

Based on the analysis above, the proposed project's contribution to cumulative impacts would be less than significant with mitigation incorporated (not cumulatively considerable).

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed in analyses for air quality, hazards and hazardous materials, and noise, the proposed project would not result, either directly or indirectly, in adverse hazards related to air quality, hazardous materials or noise. Compliance with applicable rules, regulations, and mitigation measures included in this IS-MND (including Mitigation Measure HAZ-1, which would reduce potential impacts related to ACMs, lead-based paint, and PCBs during proposed project construction; Mitigation Measure HAZ-2, which requires near-surface soil testing and a soil management plan to avoid significant impacts from potentially contaminated soils; Mitigation Measure N-1 and N-2, which requires various construction noise reduction measures; Mitigation Measure N-2, which requires construction equipment measures for construction activity near noise-sensitive receptors near the project site; Mitigation Measure TCR-1, which requires a Native American monitor to observe grading activities; Mitigation Measure TCR-2, which includes direction if tribal cultural resources are uncovered during grading; and TCR-3, which includes direction if human remains or ceremonial objects are discovered during grading would reduce potential impacts on human beings to a less than significant level.

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References

Bibliography

- California Air Pollution Control Officers Association (CAPCOA). 2023. California Emissions Estimator Model User's Guide Version 2022.1. April. https://caleemod.com/documents/user-guide/01_User%20Guide.pdf. Accessed June 2025.
- California Air Resources Board (CARB). 2017. California's 2017 Climate Change Scoping Plan. December 14, 2017. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed June 2025. _____. 2022a. 2022 Scoping Plan for Achieving Carbon Neutrality. November 16. Available at: <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp.pdf>. Accessed June 2025.
- _____. 2022b. "Regional Plan Targets." <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets>. Accessed December 2024.
- California Department of Conservation (DOC). 2010. Mineral Land Classification. https://maps.conservation.ca.gov/cgs/minerals/?page=Mineral-Land-Classification#data_s=id%3AdataSource_335-18a47b5b8e5-layer-10-192c08351d6-layer-28%3A35 (accessed May 2025).
- _____. 2019. Los Angeles County Important Farmland Maps. <https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx> (accessed May 2025).
- _____. 2025a. California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/> (accessed May 2025).
- _____. 2025b. Williamson Act Enrollment Finder. <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/> (accessed June 2025).
- _____. 2025c. Tsunami Hazard Area Map. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/ (accessed June 2025).
- California Department of Finance (CDOF). 2025. E-5 Population and Housing Estimates for Cities, Counties, and the State: 2020-2025. <https://dof.ca.gov/Forecasting/Demographics/Estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/> (accessed May 2025).
- California Department of Fish and Wildlife. 2023. California Natural Community Conservation Plans. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline> (accessed March 2025).
- _____. 2025a. California Natural Diversity Database, Rarefind V5. Accessed March 2025.
- _____. 2025b. Biogeographic Information and Observation System. Accessed March 2025.
- _____. 2025c. Special Animals List. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406>. Accessed March 2025.
- _____. 2025d. California Natural Community List. February 27, 2025. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153398&inline>. Accessed April 2025).

- California Department of Forestry and Fire Protection (CAL FIRE). 2025. Fire Hazard Severity Zones in State Responsibility Area. <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008> (accessed May 2025).
- California Department of Resources Recycling and Recovery (CalRecycle). 2019. SWIS Facility/Site Activity Details Victorville Sanitary Landfill. <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652> (accessed April 2025).
- California Department of Toxic Substances and Control (DTSC). 2025a. EnviroStor. <https://www.envirostor.dtsc.ca.gov/public/> (accessed April 2025).
- _____. 2025b. Cortese List Data Resources. <https://calepa.ca.gov/sitecleanup/corteselist/> (accessed April 2025).
- California Department of Transportation (CalTrans). 2025a. California State Scenic Highways. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> (accessed May 2025).
- _____. 2025b. California State Scenic Highway System Map. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca> (accessed May 2025).
- California Energy Commission (CEC). 2025. 2025 Building Energy Efficiency Standards. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-building-energy-efficiency> (accessed June 2025).
- California Geological Survey. 2025. Earthquake Zones of Required Investigation. <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/> (accessed May 2025).
- California Native Plant Society. 2025. Inventory of Rare and Endangered Plants. v9-01 1.5. www.rareplants.cnps.org. Accessed March 2025.
- California State Water Resources Control Board (SWRCB). Geotracker. <https://geotracker.waterboards.ca.gov/map/?myaddress=California&from=header&cqid=5108716666#> (accessed April 2025).
- City of West Covina, Community Development, Planning Division. 2024. City Ordinance No. 2519 – Development Code Ordinance Update. <https://www.westcovina.org/home/showpublisheddocument/23694/6386>. Accessed March 2025.
- City of Azusa Light and Water. 2021. Azusa Light and Water 2020 Urban Water Management Plan. <https://www.azusaca.gov/DocumentCenter/View/43689/ALW-2020-Urban-Water-Management-Plan> (accessed April 2025).
- Education Data Partnership (Ed-Data). 2025. West Covina Unified. <https://www.ed-data.org/district/Los-Angeles/West-Covina-Unified> (accessed May 2025).
- Federal Emergency Management Agency (FEMA). 2025. FEMA’s National Flood Hazard Layer (NFHL) Viewer. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd> (accessed May 2025).

- Los Angeles County Fire Department (LACFD). 2025. Health Hazardous Materials Division. [https://fire.lacounty.gov/health-hazardous-materials-division/#:~:text=Health%20Hazardous%20Materials%20is%20a%20Certified%20Unified%20Program%20Agency%20that,Cal%20DARP\)%2C%20the%20Aboveground](https://fire.lacounty.gov/health-hazardous-materials-division/#:~:text=Health%20Hazardous%20Materials%20is%20a%20Certified%20Unified%20Program%20Agency%20that,Cal%20DARP)%2C%20the%20Aboveground) (accessed April 2025).
- Los Angeles County Sanitation District (LACSD). 2025. Consolidated Agenda for March 11, 2025 Board of Directors Meeting. <https://file.lacounty.gov/SDSInter/bos/supdocs/200669.pdf> (accessed June 2025).
- NatureServe. 2025. Definitions of NatureServe Conservation Status Ranks. https://help.natureserve.org/biotics/content/record_management/Element_Files/Element_Tracking/ETRACK_Definitions_of_Heritage_Conservation_Status_Ranks.htm (accessed April 2025).
- Rincon Consultants, Inc (Rincon). 2025. Arborist Report for the 1501 Del Norte Street Residential Project. Los Angeles, California. April 2025.
- SA Geotechnical, Inc. 2024. Geotechnical Due Diligence Study. June 2024.
- South Coast Air Quality Management District (SCAQMD). 2008. Final Localized Significance Threshold Methodology. July 2008. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>. Accessed June 2025.
- _____. 2010. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. September 2010. [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf). Accessed June 2025. Southern California Association of Governments (SCAG). 2020. Connect SoCal 2020. https://scag.ca.gov/sites/default/files/2024-05/0903fconnectsocal-plan_0.pdf (accessed May 2025).
- _____. 2024. 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy, Connect SoCal 2024. SCAG Connect SoCal 2024 - A Plan for Navigating to a Brighter Future, Adopted, April 4, 2024 - COMPLETE BOOK. Accessed June 2025.
- State of California. 2018. California's Fourth Climate Change Assessment Statewide Summary Report. August 27, 2018. https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf. Accessed June 2025.
- State Water Resources Board (SWRCB). 2025. Geotracker. <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Search+GeoTracker#> (accessed May 2025).
- United States Department of Agriculture (USDA). 2025. Natural Resources Conservation Service (NRCS) Web Soil Survey. <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>. Accessed March 2025.

United States Environmental Protection Agency (USEPA). 2019. SEMS Search.

<https://enviro.epa.gov/envirofacts/sems/search/results?q=N4lg7glgJg5gpgFwMIEMA2aQC4Bm6DOcANCFBPgA5ooCeSATHAnlytsAL4I4DGAynDRweCCAHSAduxBiKoyQJT0eACwAqNCnGwgARnBgQJAdSYqQXEPDEx6KCipqLI5rKBRQo9OPnzSAXhAUSGJQ2lggICQeXj74ADJG4SAAjACsAAwpAARhaNkSYvTM2fgl3ohRIDxMNDpgPgjZPGIAbkZsJC0ArhIIdRFoYvjZKBLwQn4kZSjM0i1hOkAgIVh%2BDyMcuJSEahoEDhFEhBsljH0zqoaWjr6hiZmFiQSVDp1ZIIKAC2HX3vDhAA>
(accessed April 2025).

United States Fish and Wildlife Service (USFWS). 2025a. Information for Planning and Consultation. Available at: <http://ecos.fws.gov/ipac/>. Accessed March 2025.

_____. 2025b. Critical Habitat for Threatened and Endangered Species.

<https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77>. Accessed March 2025.

_____. 2025c. National Wetlands Inventory. <https://www.fws.gov/wetlands/data/mapper.html>
Accessed March 2025.

West Covina, City of. 2011. City of West Covina Energy Action Plan. https://www.ca-ilg.org/sites/main/files/file-attachments/cwc_energy_action_plan.pdf (accessed April 2025).

_____. 2016a. West Covina General Plan (PlanWC).

<https://www.westcovina.org/home/showdocument?id=18138> (accessed November 2020).

_____. 2016b. General Plan Update and Downtown Plan and Code Final Environmental Impact Report. <https://www.westcovina.org/home/showdocument?id=18142> (accessed November 2020).

_____. 2020. West Covina Manor Ridge Crest Senior Living Initial Study/Mitigated Negative Declaration. March 2020. <https://www.westcovina.org/home/showdocument?id=18089>
(accessed May 2025).

West Covina Police Department (WCPD). 2025. Phone Call with Catherine Bayutas, Senior Administrative Assistant on June 3rd 2025.

City of West Covina Municipal Code (WCMC). 2022. Code of Ordinances, Chapter 26, Article VI, Division 9. Available at:
https://file.lacounty.gov/SDSInter/acwm/216029_WestCovinaMC.pdf. Accessed April 2025.

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