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BIG LEAGUE DREAMS CITY PARK, SPORTS COMPLEX AND COMMERCIAL RETAIL CENTER

Draft Supplemental Environmental Impact Report

May 2003

Prepared for
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202434

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EXECUTIVE SUMMARY

INTRODUCTION

This Supplemental Environmental Impact Report (SEIR) evaluates the potential environmental effects that might result from the proposed West Covina Sportsplex and Associated Developments (Sportsplex) project at the BKK Landfill site in the City of West Covina. The Sportsplex and other proposed uses described herein differ from the postclosure development assessed in the previously certified EIR.

This SEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) statutes and guidelines. The lead agency for this SEIR is the City of West Covina Planning Department.

In accordance with CEQA guidelines, this SEIR is an informational document intended to inform public-decision-makers, responsible or interested agencies and the general public of the potential environmental effects of the proposed project. The environmental review process has been established to enable interested parties to evaluate a project in terms of its environmental consequences, to examine and implement methods to eliminate or reduce potential adverse impacts and to consider a reasonable range of alternatives to the project. While CEQA requires that major consideration be given to avoiding adverse environmental effects, the lead agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including the economic and social benefits of a project, in determining whether a project should be approved.

This SEIR evaluates the impact of changes to the project evaluated in the previously certified EIR. Since the Final Closure Plan (FCP) and Final Post Closure Maintenance Plan (FPCMP) have not changed, they are not evaluated in the document. A minor change in the golf course design is evaluated herein. Note the impacts of past landfill operations (Class I or Class III) are also ***not*** evaluated in this SEIR.

PROJECT DESCRIPTION

The BKK property in West Covina encompasses approximately 656 acres. The landfill consists of approximately 583 acres which includes a closed Class I Landfill (195 acres), a closed Class III landfill (175 acres), ancillary buildings, and vacant land areas disturbed by landfill operations and natural hillsides (213 acres). The remaining property, approximately 73 acres, is a natural

hillside parcel northeast of the closed landfills. In addition to this acreage, an approximate 13-acre area is being added at the north edge of the site in conjunction with this project. This area is designated for use as part of the planned golf course.

This Supplemental EIR is being prepared to evaluate aspects of the project that have changed since the EIR for the FCP, FPCMP, and post closure development was certified in October, 2000. The following aspects of the project have **not** changed and are therefore not evaluated in the Supplemental EIR:

- Implementation of the Final Closure Plan and Post Closure Maintenance Plan
- Development of a public golf course (except impacts related to increasing the golf course area to incorporate the 13-acre area north of the current property boundary).

The changes being evaluated in the Supplemental EIR involve changing land uses on the 100-acre parcel (Parcel 1) that fronts Azusa Avenue. These changes consist of the following sets of actions:

- Development of approximately 35 acres into the Big League Dreams Sports Park on the northern portion of Parcel 1 consisting of the following facilities:
  - Six baseball/softball fields (6 replica ball fields)
  - A nine-station batting cage
  - One covered multi-sport pavilion designed to accommodate indoor inline hockey, basketball, indoor soccer, volleyball, and corporate or special events
  - Four sand/beach volleyball courts
  - Two playgrounds and picnic areas
  - Two "Stadium Club" family-style restaurants
  - Lighting for all sports fields
  - Related parking and landscaping areas
- Development of 35 to 45 acres on the southern portion of Parcel 1 into a 450,000 square foot commercial retail center consisting of one to three major anchors with ancillary retail tenants. If 450,000 square feet of commercial retail space is approved, the BLD Sports Park will be the only recreational use on the project site.

- Development of a 15,000 square foot restaurant on Pad B.

SUMMARY OF IMPACTS

A summary of the impacts and mitigation measures for this project is provided in Table S-1. Note that the impact statements and mitigation measures in this table are summarized from the detailed discussion of impacts and mitigation measures in Section 3. The determination of whether or not an impact is considered significant is based on the use of significance criteria described in Section 3.

Implementation of the project would result in the following impacts that, even with mitigation, cannot be mitigated to a less-than-significant level:

- Estimated daily average emissions of criteria pollutants from the project and from cumulative projects that would exceed significance thresholds established by the SCAQMD.

- Project traffic impacts at the intersection of Azusa Avenue and Amar Road would be unavoidable unless funds are allocated to mitigate impacts.

- Cumulative traffic impacts would be significant and unavoidable at the Valley Boulevard/Lemon Avenue intersection and the intersection of the I-10 westbound ramp and Brand Avenue.

Because impacts cannot be mitigated to less-than-significant levels, Section 15093(c) of the CEQA Guidelines require the preparation of a Statement of Overriding Considerations in order for the EIR to be certified. This statement provides a means to describe the balance between economic, legal, social or other benefits of a project and its unavoidable environmental effects.

ANALYSIS OF ALTERNATIVES

CEQA requires the impacts of the project be compared to a series of alternatives. In preparing this analysis, alternatives are selected as a means to eliminate or reduce impacts of the project. A comparison of a proposed alternative, consistent with project objectives described in Section 2, is compared to the project in Section 5 of this document. The alternatives include the no-project alternative and an alternative that develops the entire project site for recreational use.

This analysis indicates that the no-project alternative, that does not mitigate or eliminate unavoidable impacts of the project, is not environmentally superior because it worsens air quality and traffic impacts at several intersections. The alternative of using the entire area adjacent to Azusa Avenue for recreational use is environmentally superior to the project. This alternative

results in more beneficial air quality and traffic impacts that the project evaluated in the SEIR. It is also consistent with project objectives of providing employment opportunities and regionally significant recreational opportunities.

REQUIRED PERMITS AND DISCRETIONARY APPROVALS

If this SEIR is certified, it is anticipated that this document will support the following permit decisions and discretionary approvals:

- Amendments to the City of West Covina General Plan as follows:
  - Change the land use designation of the sports complex portion from "Planned Development" to "Parks."
  - Change the land use designation of the commercial retail center portion and Pad B from "Planned Development" to "Regional Commercial."
  - Change the land use designation of a 4-acre parcel to be included as part of the commercial retail center from "Service and Neighborhood Commercial" to "Regional Commercial."
  - Change the land use designation or the coastal sage preservation area and Pad A from "Planned Development" to "Open Space."
  - Change the land use designation of the 13-acre area to be added to the golf course from "Very Low Density Residential to "Planned Development."
  - Amendment of the Circulation Element to delete the "A" Street, "B" Street, and "C" Street collector street alignments (proposed as part of the previously approved BKK Technology Center project) from the Circulation Plan.
- Amendment to the Woodside Village Master Plan to delete a 4-acre parcel to be included as part of the commercial retail center from the physical boundary of the Master Plan.
- Zone changes as follows:
  - Change the zoning of the sports complex portion, the coastal sage preservation area, and Pad A from "Specific Plan No. 15" to "Open Space."
  - Change the zoning of the commercial retail portion from "Specific Plan No. 15" to "Regional Commercial."

- Change the zoning of a 4-acre area to be included as part of the commercial retail center from "Planned Commercial Development" (PCD-1) to "Regional Commercial."

- Change the zoning of the 13-acre area to be added to the golf course from "Single-Family Residential" (R-1) to "Specific Plan No. 15."

- Rescind " Specific Plan No. 14" in its entirety and amend "Specific Plan No. 15" to reflect the deletion of a portion of Pad B and the addition of the 13-acre parcel to be added to the golf course.

- Adoption of a "Park Master Plan" to establish and approve the physical development of the sports complex portion.

- It may be necessary to revise the Conditional Use Permit (CUP) for the golf course to incorporate the revised boundary of this facility.

- Modification of the deed restrictions on the project site which currently prohibit the development of parks and playgrounds.

- A precise plan to approve the physical design of the commercial retail center.

- A tentative tract map to subdivide the business park site for the purpose of accommodating the Sports Complex and commercial retail center.

Other incidental discretionary and ministerial permits may be required to develop the site in accordance with the project description provided in this section of the SEIR.

PROJECT IMPACT	MITIGATION MEASURE	LEVEL OF SIGNIFICANCE AFTER MITIGATION
Land Use		
Impact 3.1-1: The proposed commercial retail center and BLD Sports Park could potentially be incompatible with adjacent existing residential uses west of Azusa Avenue.	No mitigation is required.	Less than significant
Impact 3.1-2: The project is not consistent with the existing General Plan designation for the project site, however the project is consistent with the overriding land use policy for the project site as stated in the existing General Plan.	No mitigation is required.	Less than significant
Impact 3.1-3: The project is not consistent with the existing zoning designation for the project site, however the project is consistent with the overriding land use policy for the project site.	No mitigation is required.	Less than significant
Impact 3.1-4: The proposed recreational land uses are inconsistent with the current restrictions on these uses which are a requirement of the USEPA's February 10, 2000 Remedy Decision for the BKK Landfill site. However, recreational uses are consistent with the proposed revision to the Remedy Decision dated January 17, 2002.	**M-3.1-1** Implementation of the Environmental Monitoring Protocol incorporated in USEPA's Proposal to Modify USEPA Remedy Decision for Contaminated Ground Water at the BKK Landfill (January 17, 2002) will reduce this impact to a less than significant level.	Less than significant with mitigation
Impact 3.1-5: The development proposal could impact existing gas monitoring wells/probes; future groundwater extraction wells/piping; and present and future groundwater monitoring wells. Further, it might adversely constrain regulatory options for the installation and operation of future extraction that might be required for the corrective action remedy.	**M-3.1-2** Any proposed new well placements or relocations shall be subject to review and approval by the Regional Water Quality Control Board.	Less than significant with mitigation
Air Quality		
Impact 3.2-1: The proposed project would be consistent with the Air Quality Management Plan (AQMP). It would not conflict with or obstruct implementation of the AQMP.	No mitigation is required.	Less than significant

PROJECT IMPACT	MITIGATION MEASURE		LEVEL OF SIGNIFICANCE AFTER MITIGATION
Impact 3.2-2: Operation of the proposed project would emit criteria pollutants. Estimated daily average emissions would exceed significance thresholds set by the SCAQMD.	M-3.2-1	The circulation plan for the project site shall be designed to reduce vehicle queuing when entering and exiting parking lots.	Significant and unavoidable
	M-3.2-2	Commuter transit incentives for employees shall be provided, such as reimbursement for public transit.	
	M-3.2-3	The project applicant shall provide transit shelters along Azusa Avenue to encourage the use of public transportation.	
	M-3.2-4	The project shall be designed to implement relevant provisions of the City's Transportation Demand Management Ordinance.	
Impact 3.2-3: Motor vehicle trips generated by the project would affect carbon monoxide concentrations at intersections in the project vicinity. This impact is less than significant.	No mitigation is required.		Less than significant
Traffic and Circulation			
Impact 3.3-1: The proposed alternative with 450,000 square feet of commercial retail space and the BLD project would generate approximately 20,592 daily trips, 576 trips during the AM peak hour and 1,425 trips during the PM peak hour. These trips would have a significant impact at the Azusa Avenue/Amar Road intersection during the PM peak period. This impact is potentially significant and unavoidable unless appropriate mitigation measures are implemented.	M-3.3-1	An exclusive southbound right-turn lane from southbound Azusa to westbound Amar including median modifications to extend turn-lane storage.	Significant and unavoidable unless funds are allocated to implement these mitigation measures.
	M-3.3-2	An exclusive, free-movement westbound right-turn lane from westbound Amar Road to northbound Azusa.	
	M-3.3-3	Roadway widening on the east side of Azusa Ave for a transition lane into the through lane on northbound Azusa Avenue.	
	M-3.3-4	Signal improvements including timing, phasing and pole relocation.	
	M-3.3-5	An additional westbound through lane on the east leg of Amar Road.	

PROJECT IMPACT	MITIGATION MEASURE	LEVEL OF SIGNIFICANCE AFTER MITIGATION
Vision and Glare		
Impact 3.5-1: BLD's proximity to nearby residential uses and Azusa Avenue creates the potential to create a major new source of light and glare.	It is recommended that the following mitigation measures be implemented to reduce this impact to a less-than-significant level: The City shall retain the services of a qualified lighting consultant to review the lighting plan to be submitted by BLD. **M-3.5-1** The City shall retain the services of a qualified lighting consultant to review the lighting plan to be submitted by BLD. **M-3.5-2** The lighting plan shall to be submitted by BLD shall include provisions which demonstrate how the plan has been formulated to minimize light and glare on nearby residents and Azusa Avenue motorists. To the extent feasible, lighting shall be directed away from Azusa Avenue and residential areas north of the site. **M-3.5-3** The lighting plan shall include provisions to limit glare from direct and indirect sources. To limit glare from indirect sources (e.g. reflective surfaces illuminated by direct sources) on Azusa Avenue, the plan shall evaluate the need for more dense vegetation along this arterial. **M-3.5-4** The plan shall also include procedures to respond to complaints by residents. These procedures shall involve City staff verification of complaints and fine tuning of the lighting system by BLD to respond to verified complaints.	Less than significant.
Impact 3.5-2: A line of sight analysis conducted for residential areas in proximity to the landfill shows that the extension of the golf course into City-dedicated open space north of the project site will not result in a significant impact.	No mitigation is required.	Less than significant

CHAPTER 1
INTRODUCTION

In October 2000, the City of West Covina certified the *BKK Class III Landfill Closure, Postclosure Development Environmental Impact Report (EIR).* That EIR assessed impacts related to implementation of the Final Closure Plan (FCP) and Final Postclosure Maintenance Plan (FPCMP) for the Class III (municipal solid waste) landfill and proposed postclosure development (public golf course and business/technology park) at the project site. This Supplemental Environmental Impact Report (SEIR) has been prepared to evaluate the potential environmental effects that may result from the proposed West Covina Sportsplex and Associated Developments (Sportsplex) project at the BKK Landfill site in the City of West Covina. The Sportsplex and other proposed uses described herein differ from the postclosure development assessed in the previously certified EIR. Because postclosure development at the site will require several revisions to the land use entitlements for the project site, the City of West Covina Planning Department, the Planning Department is acting in the capacity of "lead agency" pursuant to Section (§) 15163 of California Environmental Quality Act (CEQA).

1.1 PREVIOUSLY CERTIFIED EIR

The City of West Covina (City) certified an Environmental Impact Report (EIR) for the BKK Class III Landfill Closure and Postclosure Development Plan in October 2000. This EIR included a project-level assessment of the FCP and the FPCMP for the inactive Class III (Municipal Solid Waste) Landfill and a program-level assessment of Specific Plans for the development of the BKK Public Golf Course and the development of the BKK Technology Center. The project description in the previously certified EIR consisted of the following:

- Implementation of the FCP for the 175-acre Class III landfill. The FCP included the removal of various structures, a closure construction phasing schedule, the final cover design for the landfill, proposed final grades, drainage system improvements, slope protection and erosion control measures, a proposed irrigation system for the slopes and golf course, a dust control program, a leachate control program, a groundwater Gas control and monitoring system.

- Implementation of the FPCMP for the Class III landfill. The FPCMP describes on-going groundwater monitoring and landfill gas disposal/utilization programs to be implemented during the postclosure period. The FPCMP also describes programs for the inspection and maintenance of the landfill cover, final grading, the drainage system, vegetative cover, and irrigation system.

- Implementation of the Technology Center Specific Plan covering approximately 100 acres along the western edge of the BKK site fronting Azusa Avenue with up to approximately 1,049,144 square feet of permitted and conditionally permitted commercial and light industrial land uses. The Circulation component of the Technology Center Specific Plan includes the construction of A, B, C, D, and E Streets. The Plan also includes components for landscaping, general development standards, and building design and architectural treatment.

- Implementation of the BKK Public Golf Course and Landfill Site Specific Plan. The golf course would be situated on the northerly perimeter of the landfill property (not used for waste disposal), the northern-most portion of the Class III landfill, and the Lot 5 parcel. The course would be a daily fee, 18-hole, regulation length, par 72, "returning nine" (9th and 18th holes end at the clubhouse), public golf course open from dawn to dusk on a year-round basis. Seven holes and most of the driving range would be located on the top deck of the closed Class III landfill; the remaining eleven holes and clubhouse would be located on the non-landfill areas.

- Amendment of the Circulation Element of the General Plan to delete the Fairgrove Avenue/Nogales Street loop connector The City's General Plan, adopted in 1985, included the Fairgrove Avenue/Nogales Street loop connector to Amar Road. The connector would have been developed as a rural scenic highway limited to 40 feet wide from curb to curb, which would not provide alternative access to Azusa Avenue.

This EIR evaluated a broad range of impacts including: (1) land use and zoning, (2) population and housing, (3) geologic conditions, (4) groundwater quality, (5) surface water quality, (6) biological resources, (7) air quality, (8) traffic and circulation, (9) hazards (health risks), (10) noise, (11) public services, (12) public utilities and (13) visual/aesthetic resources.

Where impacts were judged to be potentially significant, the previously certified EIR included mitigation measures to reduce the significance of these impacts. Except as noted below, most impacts were reduced to less than significant levels.

Several unavoidable, significant, or potentially significant adverse impacts associated with the project were identified in the previously certified EIR:

- Visual and noise impacts of lowering the natural ridgeline on apartment residents west of Azusa Avenue.

- Nitrogen oxides (NO_x), carbon monoxide (CO), and reactive organic compounds (ROC) emissions resulting from traffic to and from the business park and golf course.

- NO_x and particulate (PM_{10}) emissions resulting from construction activities at the project site.
- Traffic impacts at several intersections near the project site.

These adverse impacts are unavoidable even after the identified mitigation measures are incorporated into the project. In conjunction with the certification of the EIR, the West Covina City Council approved Findings and a Statement of Overriding Considerations in accordance with § 15091 and § 15093 of the CEQA Guidelines respectively.

1.2 PURPOSE OF THE SEIR

This SEIR augments the analysis contained in the previously certified EIR for the BKK Class III Landfill Closure and Postclosure Development. Proposed development of the 100-acre western portion of the site that is covered by the BKK Technology Center Specific Plan has been modified since the certification of the previous EIR. This SEIR assesses the impacts of a land use configuration for this area which includes the Big League Dreams project and approximately 450,000 square feet of commercial retail development. This SEIR also evaluates the impacts of modifying the design of the previously approved golf course to include a small area not previously considered part of the project site. More detailed descriptions of both alternatives are found in Section 2 of this SEIR.

The EIR is limited to these changes. No changes are being made to the FCP and/or FPCMP. Similarly, there have been few substantive changes to the golf course whose impacts were assessed in the previously certified EIR. Proposed changes to the golf course are evaluated in the SEIR.

The changes to the project being evaluated in this SEIR will be implemented by the City who is the process of acquiring the 100-acre western portion of the site. With the project, the City will acquire land and obtain a license to operate the golf course. These changes in implementation responsibilities lead to changes in what party (e.g. BKK or the City) has the responsibility to implement some of the mitigation measures included in the previously certified EIR. Project changes have also led to changes in the need to implement some of the mitigation measures included in the previously certified EIR. For the potentially significant impacts assessed in this EIR, this document presents mitigation measures which will replace mitigation measures in the previously certified EIR. For example, the traffic section of this SEIR includes mitigation measures associated with the proposed circulation improvements for the project. These mitigation measures replace the mitigation measures in the previously certified EIR which assumed the need to construct "A" Street to serve project traffic. The Mitigation Monitoring

Program to be prepared in conjunction with this SEIR will be inclusive in listing all mitigation measures to be implemented in conjunction with the project, including the deletion of mitigation measures rendered unnecessary or inapplicable due to changes in the scope of the project.. This Program, to be prepared in conjunction with the Final SEIR, will list all measures to be implemented, the party responsible for implementation, the party responsible for monitoring the implementation, and the schedule or timing for implementation. This information will be presented for mitigation measures to be implemented in conjunction with this SEIR and the previously certified environmental document.

The SEIR has been prepared in accordance with the Guidelines for the implementation of the California Environmental Quality Act (CEQA) published by the Resources Agency of the State of California (California Administrative Code § 15000 et seq.). CEQA provides that a supplement to a previously certified EIR may be prepared if a discretionary action is required for a project for which new information has become available, but for which little revision to the initial EIR is foreseen as necessary.

Specifically, CEQA Guidelines Section 15163 (a-b) state the following:

a) The lead or responsible agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

   1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and

   2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

b) The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.

A SEIR is appropriate in this case for the following reasons:

- The previously certified EIR did not assess the Big League Dreams Sports Park and the new area added to the golf course. In addition, the previous EIR included the construction of A Street, which is no longer a part of the proposed project. Therefore, it was considered appropriate to provide interested parties information concerning the now-proposed project, associated impacts, and mitigation measures.
- Substantial information in the EIR continues to be relevant and only minor changes and/or additions are necessary to reflect the proposed project.

Pursuant to Section 15082 of the CEQA Guidelines, a Notice of Preparation (NOP) was prepared for the projects and circulated to the public on August 21, 2002. The NOP requested that interested parties respond within 30 days with comments and concerns related to the proposed projects. The NOP comment period ended on September 21, 2002. A total of 9 NOP comment letters were received. Copies of the NOP and comments received are included in Appendices A and B. This SEIR addresses each of the issues received in the comments.

The SEIR will be circulated for a period of 45 days in compliance with CEQA requirements. Following the comment period, the City of West Covina Planning Department will compile comments received and prepare a Response to Comments document that, along with the Draft SEIR, will constitute the Final SEIR. The Final SEIR will be presented to the City Council/Redevelopment Agency for certification prior to approval of the project.

This SEIR is an informational document for decision-makers and the public to use in the review of potential significant environmental impacts of the project, as well as in the evaluation of alternatives and mitigation measures, which may minimize, avoid, or eliminate those impacts. As such, this document includes a full discussion of the project description, the existing environmental setting, significant impacts, mitigation measures, and project alternatives. The SEIR has been prepared to be understandable to the general public. However, due to the comprehensive scope and subject matter of this document, various types of technical terms are used throughout this document.

1.3 STUDY ISSUES AND POTENTIAL AREAS OF CONTROVERSY

City staff circulated an NOP on August 21, 2002 for a period of 30 days. This SEIR analyzes the following potentially significant environmental impacts identified in the NOP and response to the NOP:

- Air Quality
- Land Use Planning
- Lighting / Glare
- Noise
- Transportation and Circulation

At the end of the NOP circulation period, West Covina received comments from several interested agencies including U.S.E.P.A., the California Department of Toxic Substance Control (DTSC), the California Regional Water Quality Control Board-Los Angeles Region, the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG). Several other agencies also submitted responses. Some comments from these agencies

recommended that additional impacts be evaluated in the SEIR. For example, comments from USFWS and CDFG requested full biological assessments but did not appear to be aware that an assessment of biological resources was conducted in the previously certified EIR. Comments from the DTSC addressed issues related to implementation of the FCP, the adequacy of the risk assessment methodology prepared for the previous EIR, and the accuracy of statements in a 1997 Initial Study prepared in advance of the previously certified EIR. Where the comments received from interested agencies have a direct relationship to the project being evaluated in the SEIR, this document responds to those comments.

1.4 CONTENTS OF THE SEIR

This SEIR is organized into the following chapters:

Chapter S, Summary: This chapter summarizes the project design features and regulatory requirements for the proposed project, the environmental impacts that would result from implementation of the project, the mitigation measures proposed to reduce, avoid or eliminate impacts and alternatives to the proposed project.

Chapter 1, Introduction: This chapter provides an introduction and overview that describes the intended use of the document and authority under CEQA.

Chapter 2, Project Description: This chapter contains an overview of the project applicant's and the City's objectives and a full description of all aspects and operating characteristics of the project.

Chapter 3, Environmental Setting, Impacts, and Mitigation Measures: This chapter contains the environmental analysis of the proposed project by issue area (i.e., land use, air quality, etc). The chapter is divided into sections, each of which begins with a description of the general regional setting and existing site conditions, followed by a discussion of environmental impacts and the level of significance prior to the implementation of mitigation measures. Mitigation measures for each impact are identified and the level of significance after mitigation is stated.

Chapter 4, Cumulative Impacts: This chapter assesses cumulative impacts related to the project including traffic, air quality and noise.

Chapter 5, Alternatives: This chapter presents alternatives to the proposed project, including the no-project alternative and provides a discussion of the environmental impacts associated with each alternative. As required by CEQA, the environmentally superior alternative is also identified in this chapter.

Chapter 6, Growth-Inducing Impact: This section discusses the potential for the project to induce new development.

Chapter 7, Other Topics Required by CEQA: This chapter presents the CEQA-required discussion of significant irreversible environmental changes including the use of non-renewable resources, potential environmental accidents related to the project and the irretrievable commitment of resources related to the project. This chapter also includes a discussion of why various impacts are considered less-than-significant.

Chapter 8, EIR Authors; Organization and Persons Consulted: This chapter recognizes persons and organizations involved in report preparation and those agencies contacted in obtaining information to prepare this document.

EIR Appendices: Appendices for this document include the NOP and Initial Study, the HRA, and other technical studies (traffic, biology, etc.) and major documents used to prepare this EIR.

CHAPTER 2
PROJECT DESCRIPTION

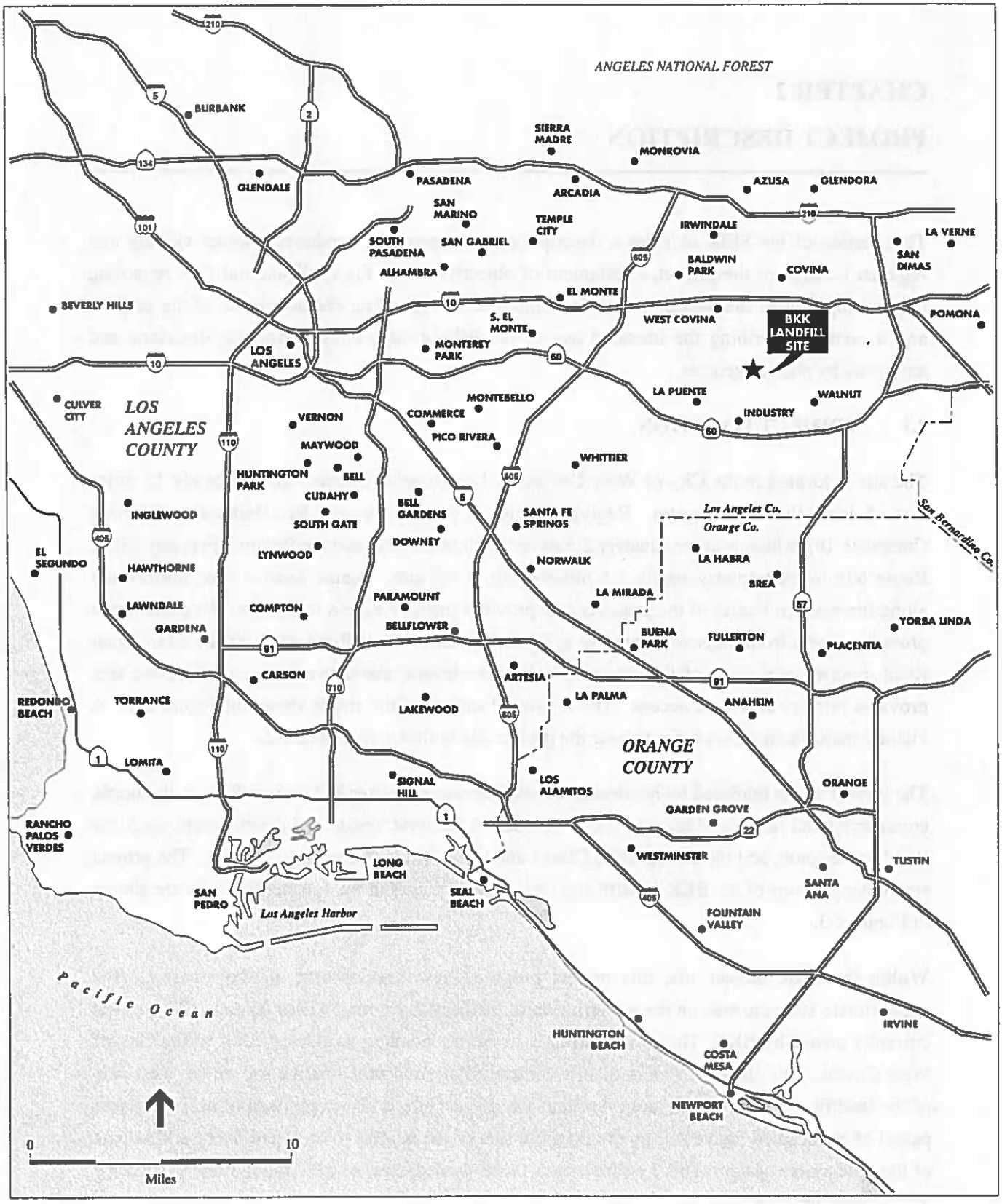
This section of the SEIR includes a description of the project boundaries, project vicinity and regional location of the project, a statement of objectives from the applicant and City regarding the development of the project, a full description of the operating characteristics of the project, and a section describing the intended use of the EIR in supporting permitting decisions and approvals by public agencies.

2.1 PROJECT LOCATION

The site is located in the City of West Covina, in Los Angeles County, approximately 15 miles east of downtown Los Angeles. Regional access is provided by the San Bernardino Freeway (Interstate 10), which is approximately 2.5 miles north of the site, and the Pomona Freeway (State Route 60), located approximately 2.5 miles south of the site. Azusa Avenue runs north-south along the western border of the property and provides primary access to the site. Nogales Street provides access from the south, forming a T-intersection at Amar Road south of the site. Amar Road, immediately south of the site, and Valley Boulevard, about two miles south of the site, provides primary east-west access. The regional location of the site is shown in Figure 2-1. A vicinity map which shows the area near the project site is shown in Figure 2-2.

The project site is bordered by residential development and Galster Wilderness Park to the north, commercial and residential uses on Azusa Avenue to the west, residential development on Amar Road to the south, and the closed BKK Class I and Class III landfill areas to the east. The project site, other portions of the BKK landfill site and other land uses in the surrounding area are shown in Figure 2-3.

Within the BKK project site, this project proposed new development in two areas: (1) the approximate 100-acre area on the western side of the landfill fronting Azusa Avenue. This site is currently owned by BKK. The site is currently in escrow pending its sale by BKK to the City of West Covina. This 100-acre area is wholly comprised of unoccupied native soil on the west side of the landfill site adjacent to Azusa Avenue. The project site is also comprised of a 13-acre area parcel of unoccupied native soil on the northern side of the landfill to be added to the site as part of the golf course design. This 13-acre area is currently dedicated to the City of West Covina for open space purposes.



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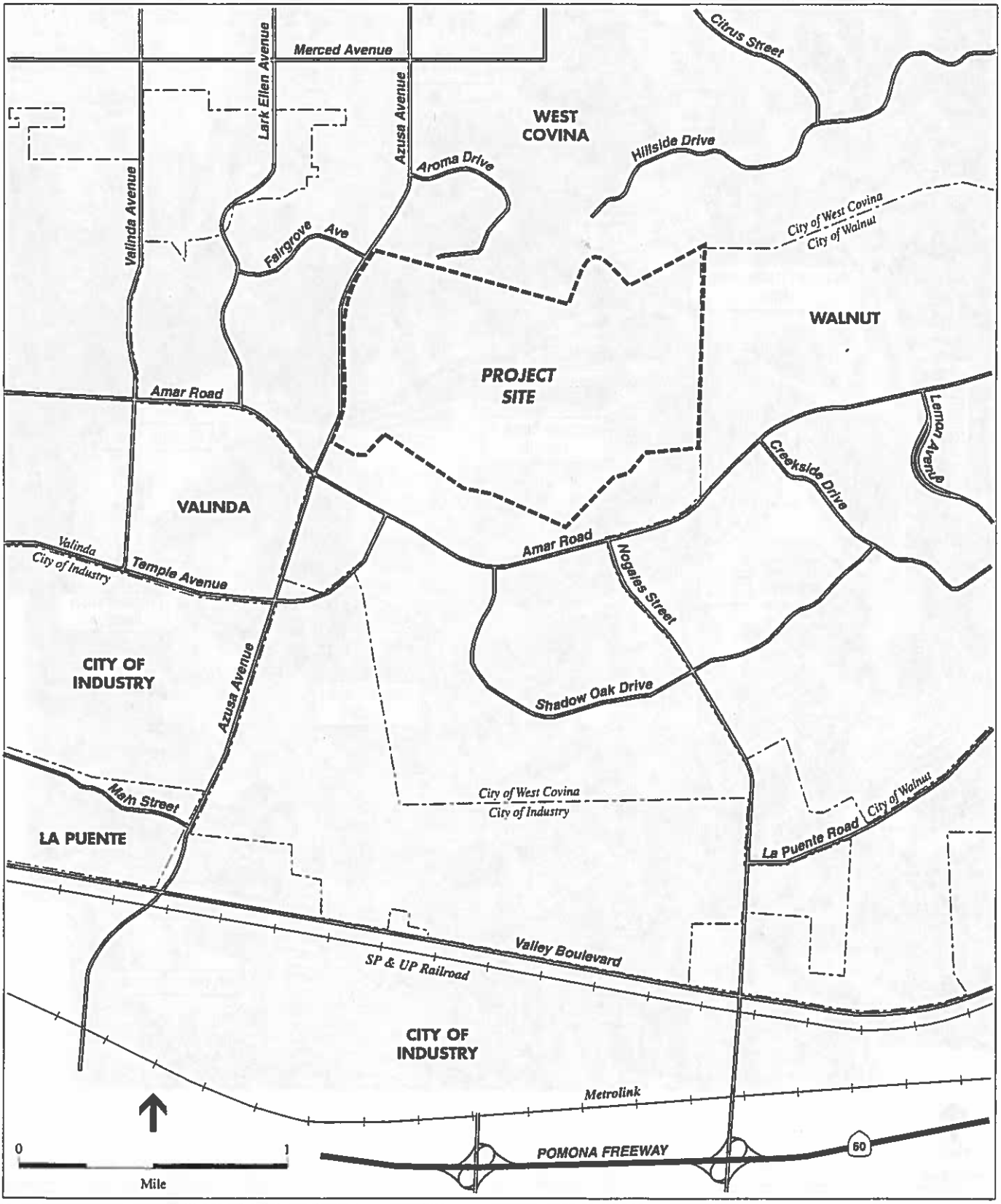
SOURCE: Environmental Science Associates 2002

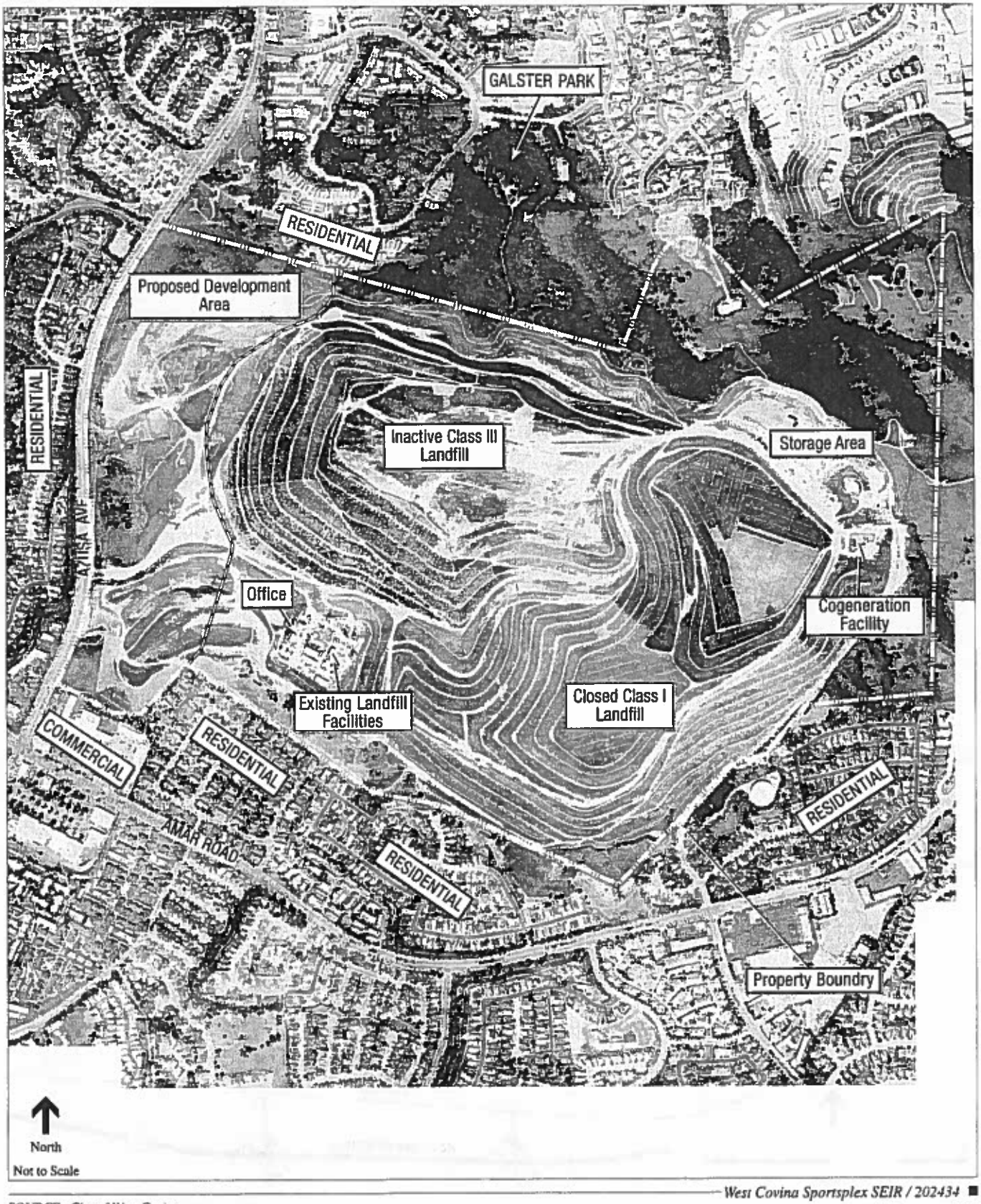
Figure 2-1
Regional Location Map



SOURCE: Environmental Science Associates 2002

West Covina Sportsplex SEIR / 202434 ■

Figure 2-2
Vicinity Map



SOURCE: City of West Covina

Figure 2-3
On and Off–Site Land Uses

2.2 PROJECT OBJECTIVES

The primary objectives of the project are as follows:

- Development of commercial recreational and commercial retail uses on Parcel 1 that will meet demand for these uses within the City and throughout the San Gabriel Valley.
- Employment opportunities by attracting new business and retaining existing businesses, and improving the environment.
- To minimize any potentially significant environmental effects of this project.
- To permit reasonable development on the site without impacting the Class I or Class III disposal areas.
- To implement with the City's General Plan, Zoning Ordinance, and other applicable land use and development regulations.
- To ensure that sufficient financial resources are available for BKK to meet their financial obligations with respect to closure and postclosure of the Class I and Class III disposal areas.

2.3 PROJECT CHARACTERISTICS

The BKK property in West Covina encompasses approximately 656 acres. The landfill consists of approximately 583 acres which includes a closed Class I Landfill (195 acres), a closed Class III landfill (175 acres), ancillary buildings, and vacant land areas disturbed by landfill operations and natural hillsides (213 acres). The remaining property, approximately 73 acres, is a natural hillside parcel northeast of the closed landfills. In addition to this acreage, an approximate 13-acre area is being added to this site in conjunction with this project. This area is designated for use as part of the planned golf course.

The closed Class I landfill, which accepted both non-hazardous and hazardous wastes, has been maintained since the March 1989 completion of closure construction under Title 22 postclosure regulations. This facility closed to the receipt of all wastes in 1984. As described below, this project does not involve changes or modifications to closure systems for the closed Class I landfill.

In September 1996, disposal activities ceased at the Class III (municipal solid waste) Landfill. In the year 2000, two Specific Plans, the BKK Public Golf Course Specific Plan and the BKK Technology Park Specific Plan, were adopted to allow for a broad range of permitted and

conditionally permitted land uses as part of the reuse and development of certain portions of the Class III (municipal solid waste) landfill, the 73-acre hillside parcel northeast of the closed landfills, and the 100-acre area fronting Azusa Avenue. The EIR for these projects was certified in October 2000.

This Supplemental EIR is being prepared to evaluate aspects of the project that have changed since the EIR for the FCP, FPCMP, and post closure development was certified in October 2000. The following aspects of the project have **not** changed and are therefore not evaluated in the Supplemental EIR:

- Implementation of the Final Closure Plan and Post Closure Maintenance Plan.
- Development of a public golf course (except impacts related to increasing the golf course area to incorporate the 13-acre area north of the current property boundary).

The changes being evaluated in the Supplemental EIR involve changing land uses on the 100-acre parcel (Parcel 1) that fronts Azusa Avenue. These changes consist of the following sets of actions:

- Development of approximately 25-30 acres into the Big League Dreams Sports Park on the northern portion of Parcel 1 consisting of the following facilities:
  - Six baseball/softball fields (6 replica ball fields)
  - A nine-station batting cage
  - One covered multi-sport pavilion designed to accommodate indoor inline hockey, basketball, indoor soccer, volleyball, and corporate or special events.
  - Four sand/beach volleyball courts
  - Two playgrounds and picnic areas
  - Two "Stadium Club" family-style restaurants
  - Lighting for all sports fields
  - Related parking and landscaping areas
- Development of 35 to 45 acres on the southern portion of Parcel 1 into a 450,000 square foot commercial retail center consisting of one to three major anchors with ancillary retail tenants.

- Development of 15,000 square foot restaurant at the northeastern corner of Parcel 1 (Pad B).

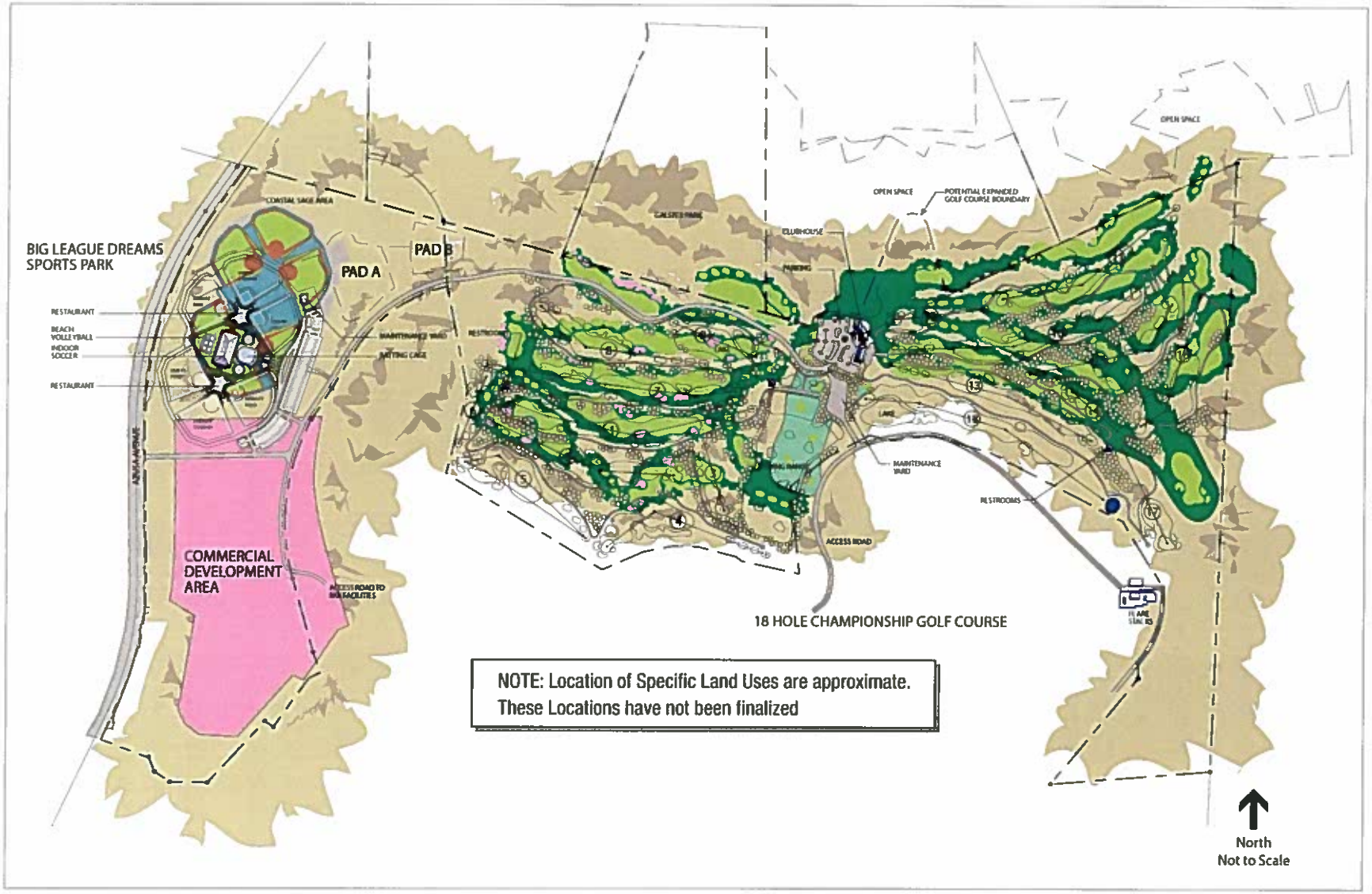
An illustrative site plan showing a concept plan for the project site is shown in Figure 2-4. While the site plan reflects the general planned location of land uses on the project site, it does not reflect the exact planned location of buildings and structures to be developed on the project site. Building footprints are not shown in the future commercial development area which is planned to support the 450,000 square foot commercial retail development. Two other areas on this figure are designated for "future development." The larger area closer to the BLD project (Pad A) is proposed to be zoned for open space but may be considered in the future to support the development of recreational, commercial, or restaurant uses. The second area (Pad B) is being planned to support a 15,000 square foot restaurant.

Please note that in the far northwest portion of the project site, Figure 2-4 shows a "coastal sage area." Another "coastal sage area" is a sliver of land located along Azusa Avenue just west of the BLD project. Together, these areas total to approximately 24 acres. The City and BKK are currently in negotiations with the U.S. Army Corps of Engineers and the U.S. Fish and Wildlife Service not to develop this area and to preserve the existing coastal sage scrub found in this area. These negotiations are being conducted to implement the mitigation measures to preserve coastal sage scrub in the previously certified EIR. Details regarding the status of these negotiations are provided in Section 7 of this document.

2.4 REQUIRED PERMITS AND DISCRETIONARY APPROVALS

If this SEIR is certified, it is anticipated that this document will support the following permit decisions and discretionary approvals:

- Amendments to the City of West Covina General Plan as follows:
  - Change the land use designation of the sports complex portion from "Planned Development" to "Parks."
  - Change the land use designation of the commercial retail center portion and Pad B from "Planned Development" to "Regional Commercial."
  - Change the land use designation of a 4-acre parcel to be included as part of the commercial retail center from "Service and Neighborhood Commercial" to "Regional Commercial."
  - Change the land use designation or the coastal sage preservation area and Pad A from "Planned Development" to "Open Space."



SOURCE. Rossetti Architects, January 2003

Figure 2-4
Illustrative Site Plan

- Change the land use designation of the 13-acre area to be added to the golf course from "Very Low Density Residential to "Planned Development."

- Amendment of the Circulation Element to delete the "A" Street, "B" Street, and "C" Street collector street alignments (proposed as part of the previously approved BKK Technology Center project) from the Circulation Plan.

- Amendment to the Woodside Village Master Plan to delete a 4-acre parcel to be included as part of the commercial retail center from the physical boundary of the Master Plan.

- Zone changes as follows:

  - Change the zoning of the sports complex portion, the coastal sage preservation area, and Pad A from "Specific Plan No. 15" to "Open Space."

  - Change the zoning of the commercial retail portion from "Specific Plan No. 15" to "Regional Commercial."

  - Change the zoning of a 4-acre area to be included as part of the commercial retail center from "Planned Commercial Development" (PCD-1) to "Regional Commercial."

  - Change the zoning of the 13-acre area to be added to the golf course from "Single-Family Residential" (R-1) to "Specific Plan No. 15."

  - Rescind " Specific Plan No. 14" in its entirety and amend "Specific Plan No. 15" to reflect the deletion of a portion of Pad B and the addition of the 13-acre parcel to be added to the golf course.

- Adoption of a "Park Master Plan" to establish and approve the physical development of the sports complex portion.

- It may be necessary to revise the Conditional Use Permit (CUP) for the golf course to incorporate the revised boundary of this facility.

- Modification of the deed restrictions on the project site which currently prohibit the development of parks and playgrounds.

- A precise plan to approve the physical design of the commercial retail center.

- A tentative tract map to subdivide the business park site for the purpose of accommodating the Sports Complex and commercial retail center.

Other incidental discretionary and ministerial permits may be required to develop the site in accordance with the project description provided in this section of the SEIR.

CHAPTER 3

IMPACTS AND MITIGATION MEASURES

3.1 LAND USE PLANNING AND ZONING

3.1.1 APPROACH TO ANALYSIS

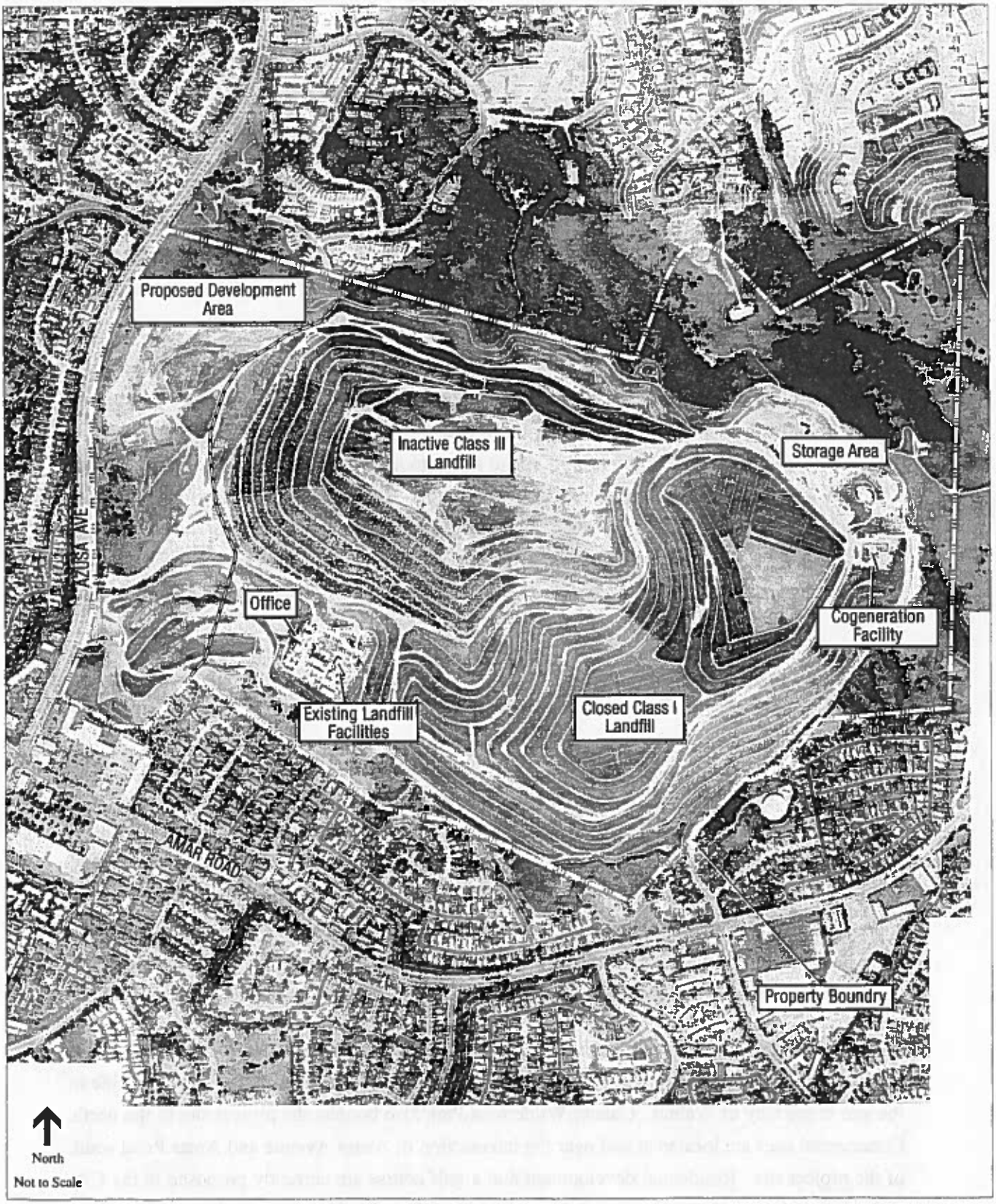
This SEIR assesses land use impacts related to the following changes from the project evaluated in the previously certified EIR: (1) changes to the proposed land use configurations for the 100-acre portion of the BKK site generally fronting Azusa Avenue and (2) modifications to project boundary on the north side of the project site to accommodate a revised design of the golf course (Section 2 for details). The land use analysis in this section addresses four issues: (1) the compatibility of the project with adjacent land uses, (2) the relationship of the project to the West Covina Zoning Code, (3) the relationship of the project to the West Covina General Plan and (4) the relationship of the project to current deed restrictions which prohibit parks and recreational uses.

3.1.2 SETTING

Existing Land Uses

The BKK project site evaluated in the previously certified EIR encompasses approximately 656 acres. This area includes the closed Class I (hazardous waste) landfill (approximately 195 acres), the inactive Class III (solid waste) landfill (approximately 175 acres), a 73-acre natural hillside parcel to the northeast of the landfills, and ancillary buildings and vacant land areas (approximately 213 acres). On the BKK project site, the area proposed for development in this SEIR is located immediately west of the inactive Class III (municipal solid waste landfill). The proposed development area and other land uses on the project site are shown in Figure 3.1-1

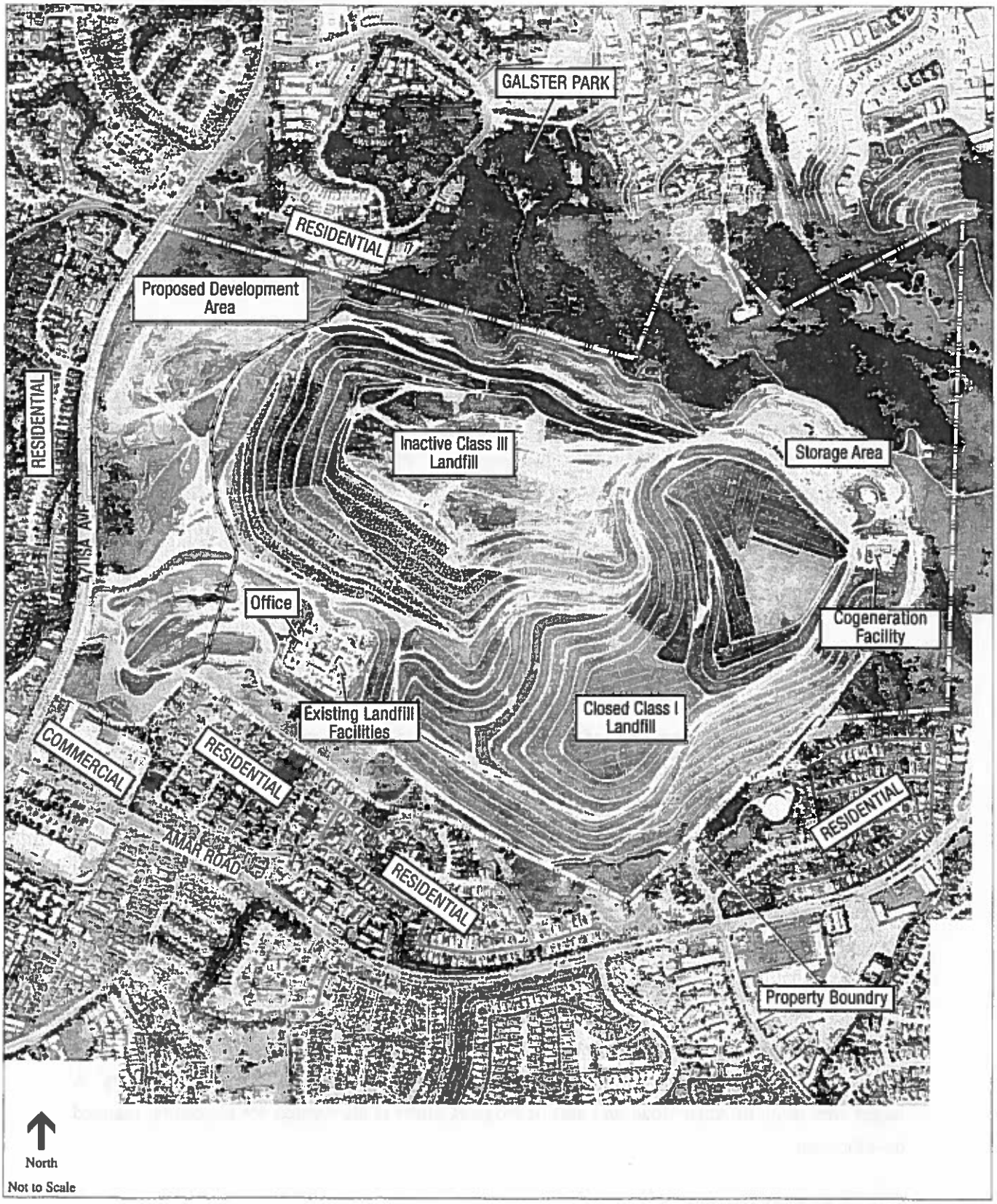
In general, the site is bordered by residential uses west of Azusa Avenue, to the south of the landfill near Amar Road, to the north and northeast in West Covina, and on the southeast side of the site in the City of Walnut. Galster Wilderness Park also borders the project site to the north. Commercial uses are located at and near the intersection of Azusa Avenue and Amar Road south of the project site. Residential development and a golf course are currently proposed in the City of Walnut east and northeast side of the project site. Existing land uses in the vicinity of the project site are shown in Figure 3.1-2.



West Covina Sportsplex SEIR / 202434 ■

SOURCE: City of West Covina

Figure 3.1-1
On–Site Land Uses



SOURCE: City of West Covina

Figure 3.1-2
On and Off–Site Land Uses

General Plan

Existing General Plan designations for the project site and the surrounding area are shown in Figure 3.1-3. The entire 656-acre BKK site evaluated in the previously certified EIR is designated "Planned Development" in the General Plan. The area to be added to the northern part of project site to accommodate the revised design of the golf course is currently designated "Very Low Density Residential" in the General Plan. The General Plan (page IV/3-7) supports the development of the project site as a commercial activity node.

With the exception of this new golf course area, most of the site has been designated "Planned Development" in General Plan for a considerable period of time. The exception is 73-acre hillside area on the northeast side of the site. The General Plan designation for the 73-acre parcel was amended from "Very Low Density Residential" to "Planned Development" in the year 2000 in conjunction with BKK's proposal for final closure of the Class III landfill and postclosure development on vacant portions of the project site. General Plan land use designations for the project site and land uses near the project site are shown in Figure 3.1-3.

Zoning

Existing zoning for the project site and the vicinity is shown in Figure 3.1-4. The approximate 100-acre area along Azusa Avenue is zoned for the BKK Technology Center Specific Plan (SP-14). The 556-acre remainder of the BKK property east of the project site, part of which is proposed for the golf course, is zoned for the BKK Public Golf Course and Landfill Site Specific Plan (SP-15). The area being added to the northern portion of the site for golf is currently zoned for single-family development (R-1). As shown in Figure 3.1-4, zoning near the site in West Covina and Walnut is predominately residential with commercial and mixed use zoning along Amar Road and at the intersection of Amar Road and Azusa Avenue.

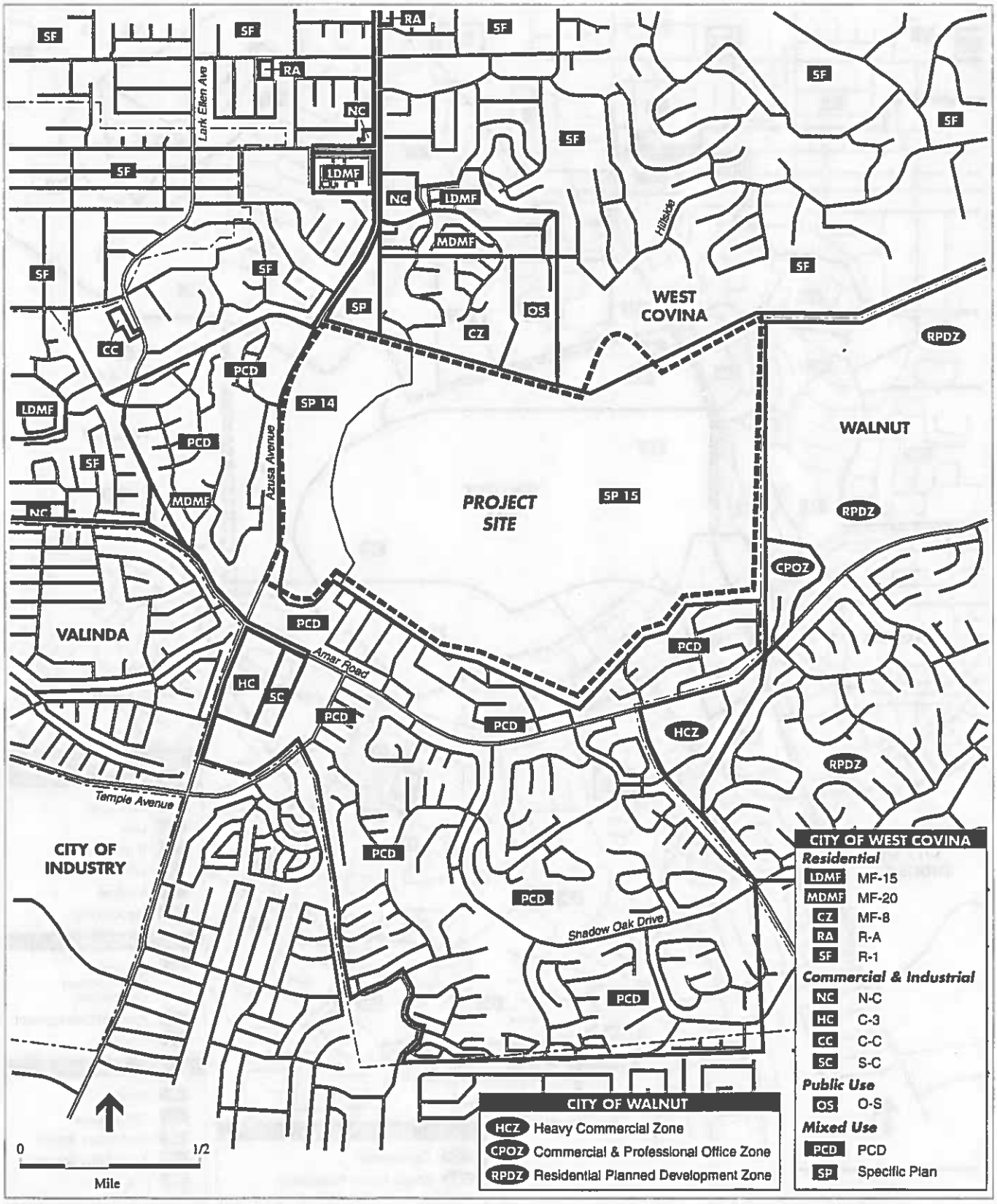
In Walnut (see Figure 3.1-4), most of the property immediately east of the landfill is in the residential planned development zone. An area immediately southeast of the landfill is in the commercial/professional office zone. An area on the southeast corner of the T-intersection of Nogales Street and Amar Road is in the heavy commercial zone. Approximately six acres along Francesca southeast of Nogales Street and Amar Road is zoned Walnut Grove Specific Plan. A larger area south of Amar Road and east of Nogales Street is also zoned for residential planned development.

USEPA Remedy Decision

February 2000, USEPA selected the ground water remedy for the BKK site in West Covina. The Remedy Decision requires BKK to operate and maintain a minimum of 61 new ground water and

SOURCE: City of West Covina / City of Walnut.

Figure 3.1-3
Existing General Plan Designations



West Covina Sportsplex SEIR / 202434 ■

SOURCE: City of West Covina / City of Walnut.

Figure 3.1-4
Existing Zoning Map

leachate extraction wells to remediate ground water and control further off-site movement of contaminated groundwater from the closed Class I disposal area. The Remedy Decision requires that institutional controls (e.g. land use restrictions) be implemented through restrictive covenants at the site. The Remedy Decision prohibits residences, hospitals, schools, day-care centers, parks and playgrounds, or any permanently occupied human habitation on the entire BKK Landfill site.

On January 17, 2002 USEPA issued a *Proposal to Modify USEPA Remedy Decision for Contaminated Groundwater at the BKK Landfill; West Covina, California.* This proposed modification would remove the land use prohibition on parks and playgrounds. It would retain the other prohibitions listed in the previous paragraph. The removal of this prohibition applies only to the northern 70 acres of Parcel 1 (along Azusa Avenue). Removal of this prohibition is based on USEPA's belief that outdoor recreational activities are appropriate for the north 70 acres of Parcel 1. The modified remedy decision to remove the land use prohibition on parks and recreational uses is conditional upon an enforceable agreement between USEPA and BKK whereby BKK agrees to implement an Environmental Monitoring Protocol consisting of pre-construction soil vapor sampling, post-construction sampling prior to public access, periodic monitoring during the operation of parks and/or playgrounds. The periodic monitoring during operations includes periodic monitoring of soil vapor and indoor air quality monitoring. A copy of the Proposal to Modify the Remedy Decision and the Environmental Monitoring Protocol is included Appendix C.

3.1.3 IMPACTS AND MITIGATION MEASURES

Significance Criteria

For the purpose of this SEIR, a project would result in a significant impact if it causes displacement of a large number of people, disrupts or divides the physical arrangement of an established community; or conflicts with established recreational, educational or other community facilities near the project site. A project may also have the potential to result in significant effects if it is incompatible with existing land uses in the vicinity of the project or if it conflicts with land use policies for the area.

Construction Impacts

The significance criteria above apply to the proposed use of the project site; not to the construction of the proposed uses. Other construction impacts (air, noise, and aesthetics) were assessed in the previously certified EIR. Since the amount and type of construction activity to occur in conjunction with this project is the same or less than evaluated in the previously certified EIR, construction related land use impacts are not considered significant.

Project Impacts and Mitigation Measures

This section discusses land use impacts related to operation of the West Covina Sportsplex project including the Big League Dreams Sports Park, commercial retail center, restaurant, and possible future development of recreation, commercial, or restaurant uses.

Impact 3.1-1: The proposed commercial retail center and BLD Sports Park could potentially be incompatible with adjacent existing residential uses west of Azusa Avenue.

In terms of land use compatibility, the proposed project presents less land use conflicts with surrounding uses than the project (Business Park) evaluated in the previously certified EIR. The introduction of recreational uses, just the BLD Sports Park or the BLD Sports Park with other recreational uses, is more compatible with nearby single-family uses north and west of the site than the Business Park evaluated in the previously certified environmental document.

As discussed in the previously certified EIR, the general vicinity of the project site is characterized by a mix of commercial and residential uses. The proposed commercial retail development which is part of the project is close to other nearby commercial uses on Azusa Avenue and near the Azusa Avenue/Amar Road intersection. The development of the commercial retail center and restaurant would be compatible with existing commercial uses near the project. It is also immediately across the street from single-family residential uses along Azusa Avenue. These uses face away from Azusa Avenue. The previously certified EIR indicated that the land use relationship between the Business Park and these residential uses does not constitute a significant impact because the City's General Plan encourages the development of the BKK site as an economic activity center (General Plan, Page IV/3-7). The previous environmental document also noted that this impact is less than significant because the proposed development is located in a mixed residential-commercial area and is not the first commercial development in a predominately residential area. The potential conflict between these uses is further reduced by the landscaping along Azusa Avenue that is required in conjunction with the Final Closure Plan for the Class III landfill. For these reasons, the proposed commercial retail uses will not have a significant land use impact on nearby residential uses.

Mitigation Measures: Since this impact is less than significant, mitigation measures are not required.

Residual Impact: Less than significant.

Impact 3.1-2: The project is not consistent with the existing General Plan designation for the project site, however the project is consistent with the overriding land use policy for the project site as stated in the existing General Plan.

The existing General Plan designation for the entire 100-acre area fronting Azusa Avenue is "Planned Development." This General Plan designation supports the implementation of the BKK Technology Center Specific Plan (SP-14) adopted in October 2000. Under the proposed project, the General Plan designation for the proposed commercial recreational uses and recreational uses would be changed to "Open Space." This General Plan designation is consistent with the proposed uses (BLD and other recreational uses) of the site. Since this General Plan designation would also allow for the implementation of the General Plan statements which call for development of the project site as an economic activity node, the "Open Space" designation is also considered consistent with the General Plan.

Another inconsistency with the General Plan pertains to the area north of the site which is designated as part of the golf course as part of this project. This area has a General Plan Designation of "Very Low Density Residential." Since this area is adjacent to other areas designated for recreational uses (Galster Park and other portions of the proposed golf course on the project site), changing the General Plan designation to "Open Space" is also considered consistent with the General Plan.

Mitigation Measures: Since this impact is less than significant, mitigation measures are not required.

Residual Impact: Less than significant.

Impact 3.1-3: The project is not consistent with the existing zoning designation for the project site, however the project is consistent with the overriding land use policy for the project site.

The existing zoning for the 100-acre parcel along Azusa Avenue is BKK Technology Center Specific Plan (SP-14). The Specific Plan includes a variety of permitted and conditionally permitted commercial and light industrial land uses, which may include professional offices, manufacturing, research assembly, light distribution, and storage. The current zoning, therefore allows, the development of commercial retail uses on the project site. It does not allow for either commercial recreational or other recreational uses. The inconsistency between the zoning for this portion of the site and the City's existing zoning necessitates a Zone Change. With the proposed project, the land use designation and zoning of the BLD Sports Park of the site would change from "Planned Development" and "Specific Plan" to "Parks" and "Open Space," respectively. The existing zoning of the new area to be incorporated into the site for golf is "Single-Family Residential." Its designation would change to "Open Space" as part of the proposed project.

Zoning is a land use tool to implement General Plan policy. From a land use policy perspective, the proposed General Plan designation (Planned Development), in conjunction with the proposed

zoning designation (Regional Commercial and Open Space), provides an appropriate land use policy basis to encourage the type of development of an economic activity center as indicated in the General Plan. Accordingly, the need to change the zoning for the project site to accommodate the proposed commercial retail, commercial recreational and other recreational uses is not considered a significant impact which would result if there were an inconsistency with the existing General Plan.

Mitigation Measures: Since this impact is less than significant, mitigation measures are not required.

Residual Impact: Less than significant.

Impact 3.1-4: The proposed recreational land uses are inconsistent with the current restrictions on these uses which are a requirement of the USEPA's February 10, 2000 Remedy Decision for the BKK Landfill site. However, recreational uses are consistent with the proposed revision to the Remedy Decision dated January 17, 2002.

This issue was identified in USEPA's response to the Notice of Preparation for this SEIR dated September 19, 2002. The approved Remedy Decision (February 2000) for the project site, approved by USEPA, requires that institutional controls (e.g. restrictions on land use) be implemented through restrictive land use covenants at the BKK site. Currently, the Remedy Decision states, "A prohibition that the 583-acre BKK facility shall not be used for residences, hospitals, schools, day-care centers, parks and playgrounds, or any permanently occupied human habitation." In response to the City's request to modify this restriction, the USEPA has recommended the following revised language:

> "A prohibition, pursuant to Article 11 of Chapter 6.5 of the California Health and Safety Code, that the southern thirty-one and 198/1000ths acres of Parcel 1 and all of Parcels 2 and 3, shall not be used for residences, hospitals, schools, day-care centers, parks and playgrounds, or any permanently occupied human habitation. For purposes of this prohibition, a golf course is neither a park or playground.
>
> A prohibition, pursuant to Article 11 of Chapter 6.5 of the California Health and Safety Code, that the northern seventy (70) acres of Parcel 1 shall not be used for residences, hospitals, schools, day-care centers, or any permanently human habitation."[1]

The second paragraph removes the prohibition on parks and playgrounds from the area proposed for commercial recreational and recreational land uses as part of the project. It should be noted that unlike the other prohibited uses in the Remedy Decision which are prohibited by statute, there is no legal prohibition for recreational uses.

[1] USEPA, Region IX, Proposal to Modify Remedy Decision for Contaminated Ground Water at the BKK Landfill, West Covina, California. January 17, 2002. Pages 1 and 4.

USEPA's basis for proposing to modify this restriction is two-fold:

(1) Projects involving parks and playgrounds are oriented to outdoor recreational activities and these types of projects are likely to minimize human exposure to gaseous/vapor contamination that could escape from the landfill either via landfill gas/oil vapor migration or volatilization from contaminated groundwater.

(2) The BKK Corporation has agreed to implement an Environmental Monitoring Protocol comprised of pre-construction sampling, post-construction sampling (prior to public access, and periodic monitoring. In general, the protocol requires that sampling of subsurface soil vapors, ambient air and indoor air be conducted in the development area. Indoor air monitoring is to be conducted inside all buildings to be used by the public, except for restaurants. The purpose of the protocol is to insure that there is a system in place over the long term to monitor for, and respond to any environmental releases that could possibly effect the 70 acres of Parcel 1.[2]

USEPA has requested that the mitigation measures for proposed Parcel 1 incorporate the monitoring protocol requirements. USEPA's proposal to modify the Remedy Decision which includes the monitoring protocol requirements is provided in Appendix C.

Mitigation Measures:

M-3.1-1 Implementation of the Environmental Monitoring Protocol incorporated in USEPA's Proposal to Modify USEPA Remedy Decision for Contaminated Ground Water at the BKK Landfill (January 17, 2002) will reduce this impact to a less than significant level.

Residual Impact: With the implementation of these mitigation measures, this impact will be reduced to a less than significant level.

Impact 3.1-5: The development proposal could impact existing gas monitoring wells/probes; future groundwater extraction wells/piping; and present and future groundwater monitoring wells. Further it might adversely constrain regulatory options for the installation and operation of future extraction that might be required for the corrective action remedy.

[2] September 19, 2002 letter from Carmen D. Santos, Project Manager, USEPA, Region IX to Doug McIsaac, Planning Director. Page 2.

This potential impact was raised in a comment on the NOP in a September 20, 2002 letter from the Department of Toxic Substances Control.[3] However, there are no existing landfill gas (LFG) extraction wells in the project area (Parcel 1). Further, BKK has already reached agreement on the movement of LFG monitoring probes with the appropriate regulatory agencies (CIWMB and SCAQMD).

There are no proposed ground water extraction wells in Parcel 1 included in USEPA's February 2000, Remedy Decision or the recent proposal to modify the Remedy Decision. BKK has previously submitted a proposal to relocate ground water monitoring wells outside of Parcel 1 for review by DTSC. Depending on the precise plan for development of this site, i.e. the location of buildings, streets, parking lots, utilities, etc, it may be necessary to relocate ground water monitoring wells for the Class III landfill. Any proposed well relocations would be subject to review and approval by the RWQCB.

Mitigation Measures:

M-3.1-2 Any proposed new well placements or relocations shall be subject to review and approval by the Regional Water Quality Control Board.

Residual Impact: With the implementation of the above mitigation measure, this impact is considered less than significant.

REFERENCES

West Covina General Plan (1995).

Zoning Ordinance Approval (November 14, 2000).

[3] September 20, 2002 letter from Phillip B. Chandler, C.E.G. Department of Toxic Substances Control to Doug McIsaac, Planning Director.

3.2 AIR QUALITY

3.2.1 APPROACH TO ANALYSIS

This air quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. This section analyzes the type and quantity of emissions that would be generated by the operation of the proposed project. Since the amount of grading due to occur during construction is not greater than the amount assessed in the previously certified EIR, construction emissions are not further analyzed in this document. The construction mitigation measures included in the previously certified EIR would apply to this project.

3.2.2 SETTING

Regional Climate

Air quality is affected by both the rate and location of pollutant emissions and by meteorological conditions that influence movement and dispersal of pollutants. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients, along with local topography, provide the link between air pollutant emissions and air quality.

The City of West Covina is located entirely within the South Coast Air Basin (SCAB). The SCAB incorporates approximately 6,745 square miles within four counties -- San Bernardino, Riverside, Los Angeles, and Orange -- including some portions of what was previously known as the Southeast Desert Air Basin. In May 1996, the boundaries of the South Coast Air Basin were changed by the California Air Resources Board (ARB) to include the Beaumont-Banning area. The distinctive climate of the SCAB is determined by its terrain and geographic location. The SCAB is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the southwest and high mountains around the rest of its perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds.[1]

The vertical dispersion of air pollutants in the SCAB is hampered by the presence of persistent temperature inversions. High-pressure systems, such as the semi-permanent high-pressure zone in which the SCAB is located, are characterized by an upper layer of dry air that warms as it

[1] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, April 1993, p. A8-1.

descends, restricting the mobility of cooler marine-influenced air near the ground surface, and resulting in the formation of subsidence inversions. Such inversions restrict the vertical dispersion of air pollutants released into the marine layer and, together with strong sunlight, can produce worst-case conditions for the formation of photochemical smog.

The atmospheric pollution potential of an area is largely dependent on winds, atmospheric stability, solar radiation, and terrain. The combination of low wind speeds and low inversions produces the greatest concentration of air pollutants. On days without inversions, or on days of winds averaging over 15 mph, smog potential is greatly reduced.[2]

Applicable Regulations

The Federal Clean Air Act (FCAA) was passed in 1963 by the U.S. Congress and has been amended several times. The 1970 Clean Air Act Amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including non-attainment requirements for areas not meeting National Ambient Air Quality Standards (NAAQS) and the Prevention of Significant Deterioration (PSD) program. The 1990 Amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the U.S.

In 1988, the State Legislature passed the California Clean Air Act, which established California's air quality goals, planning mechanisms, regulatory strategies, and standards of progress for the first time. The California Clean Air Act provides the State with a comprehensive framework for air quality planning regulation. The California Clean Air Act requires attainment of state ambient air quality standards by the earliest practicable date. Attainment Plans are required for air basins in violation of the state ozone, carbon monoxide, sulfur dioxide, or nitrogen dioxide standards. Preparation of, and adherence to, Attainment Plans are the responsibility of the local air pollution districts or air quality management districts.

State and federal agencies have set ambient air quality standards for certain air pollutants. NAAQS have been established for the following criteria pollutants: carbon monoxide (CO), ozone (O_3), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), inhalable particulate matter (PM_{10}) and $PM_{2.5}$), and lead (Pb). The state standards for these criteria pollutants are more stringent than the corresponding federal standards. Table 3.2-1 summarizes the state and federal standards.

Areas are classified under the Federal Clean Air Act as either "attainment" or "non-attainment" areas for each criteria pollutant based on whether the NAAQS have been achieved or not. The SCAB is designated as a non-attainment area for O_3, CO, and PM_{10}.

[2] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, April 1993, p. A8-1.

TABLE 3.2-1: AMBIENT AIR QUALITY STANDARDS FOR CRITERIA POLLUTANTS

Pollutant	Averaging Time	California Standard	Federal Primary Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone (O_3)	1 hour	0.09 ppm	0.12 ppm	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Motor vehicles.
	8 hours	---	0.08 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, CO interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9 ppm	9.0 ppm		
Nitrogen Dioxide (NO_2)	Annual Average	---	0.05 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.25 ppm	---		
	1 hour	0.25 ppm	---		
	24 hours	0.04 ppm	0.14 ppm		
Suspended Particulate Matter (PM_{10} $PM_{2.5}$)	Annual Geometric Mean	30 ug/m^3 (PM_{10})	65 ug/m^3 ($PM_{2.5}$)	May irritate eyes and respiratory tract, decreases in lung capacity, cancer and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g. wind-raised dust and ocean sprays).
	Annual Arithmetic Mean	---	50 ug/m^3 (PM_{10})		
	24 hours	50 ug/m^3 (PM_{10})	150 ug/m^3 (PM_{10}) 15 ug/m^3 ($PM_{2.5}$)		
LEAD	Monthly	1.5 ug/m^3	---	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurologic dysfunction (in severe cases).	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Quarterly	---	1.5 ug/m^3		

Source: California Air Resources Board, *Ambient Air Quality Standards*, January 25, 1999.

The SCAB is designated as an attainment area for SO_2 and lead, and a maintenance area for NO_2.

Existing Air Quality

The South Coast Air Quality Management District (SCAQMD) maintains an air quality monitoring station in the City of Azusa, near the intersection of North Loren Avenue and Foothill Boulevard. A five-year summary (1996-2000) of data collected at this station is shown in Table 3.2-2 and is compared with the corresponding state ambient air quality standards.

Ozone (O_3). The SCAB is in non-attainment for both the federal and state ozone standards. Ozone is a secondary pollutant produced through a series of photochemical reactions involving reactive organic compounds (ROC) and nitrogen oxides (NO_x). Ozone creation requires ROC and NO_x to be available for approximately three hours in a stable atmosphere with strong sunlight. Ozone is a regional air pollutant because it is not emitted directly by sources, but is formed downwind of sources generating ROC and NO_x emissions.

The federal and State Clean Air Acts require that management plans be developed for areas designated as non-attainment to establish strategies to achieve compliance. Because California's regulations are more stringent than the federal standard, two ozone plans apply to the project vicinity.

Ozone effects include eye and respiratory irritation, reduction of resistance to lung infection and possible aggravation of pulmonary conditions in persons with lung disease. Ozone is also damaging to vegetation and untreated rubber. The state one-hour ozone standard in the SCAQMD was exceeded 72 days in 1995 and at least once per year from 1996 through 2000 (see Table 3.2-2).

Carbon Monoxide (CO). The SCAB is in non-attainment for both federal and state carbon monoxide standards. Carbon monoxide is a non-reactive pollutant that is a product of incomplete combustion. Ambient carbon monoxide concentrations usually follow the spatial and temporal distributions of vehicular traffic and are also influenced by meteorological factors such as wind speed and atmospheric mixing. Under inversion conditions, carbon monoxide concentrations may be distributed more uniformly over an area out to some distance from vehicular sources. The one-hour and eight-hour average CO standards have not been exceeded at the Azusa monitoring station in the last five years.

Nitrogen Oxides (NO_x). The SCAB is a maintenance area for the federal and state NO_x standards, which means it had once been in non-attainment. There are two oxides of nitrogen which are important in air pollution: nitric oxide (NO) and nitrogen dioxide (NO_2). Nitric oxide and NO_2 are both emitted from motor vehicle engines, power plants, refineries, industrial boilers, aircraft and railroads. NO_2 is primarily formed when NO reacts with atmospheric oxygen. NO_2

TABLE 3.2-2: PROJECT AREA AIR POLLUTANT SUMMARY, 1996-2000[a]

Pollutant	Standard[b]	1996	1997	1998	1999	2000
Ozone (O_3)						
Highest 1-hr average, ppm[c]	0.09	0.20	0.16	0.20	0.13	0.17
Number of standard excesses[d]		74	42	43	3	32
Carbon Monoxide (CO)						
Highest 1-hr average, ppm[c]	20.0	6.0	8.0	8.0	5.0	5.0
Number of standard excesses[d]		0	0	0	0	0
Highest 8-hr average, ppm[c]	9.0	4.0	4.3	6.6	3.9	4.9
Number of standard excesses[d]		0	0	0	0	0
Nitrogen Dioxide (NO_2)						
Highest 1-hr average, ppm[c]	0.25	0.15	0.13	0.14	0.16	0.15
Number of standard excesses[d]		0	0	0	0	0
Particulate Matter-10 Micron (PM_{10})						
Highest 24-hr average, $\mu g/m^3$ [c]	50	100	116	87	103	94
Number of standard excesses[d,e]		24	24	16	35	24
Annual Geometric Mean, $\mu g/m^3$ [c]	30	39.3	40.8	35.7	51.5	42.5
Violation		Yes	Yes	Yes	Yes	Yes

NOTE: Underlined values indicate an excess of applicable standard.

a. Data are from the SCAQMD monitoring station located at the intersection of North Loren Avenue and Foothill Boulevard in the City of Azusa.
b. State standard, not to be exceeded.
c. ppm - parts per million; $\mu g/m^3$ - micrograms per cubic meter.
d. Refers to the number of days in a year during which at least one excess was recorded.
e. Measured every six days.

Source: South Coast Air Quality Management District, *Air Quality Data Summaries*, 1996-2000.

gives the air the "whiskey brown" color associated with smog. Since NO_x emissions contribute to ozone generation, NO_x emissions are regulated through the O_3 Attainment Plans.

Particulate Matter (PM_{10}). The SCAB is in non-attainment for the federal and state PM_{10} standard. PM_{10} is particulate matter that is smaller than 10 microns in diameter. Particulate matter less than 10 microns in diameter can be inhaled deep into the lungs and cause adverse health effects. PM_{10} in the atmosphere results from many kinds of dust and fume producing

industrial and agricultural operations, fuel combustion and atmospheric photochemical reactions. Some sources of particulate matter such as demolition and construction activities are more local in nature while others such as vehicular traffic have a more regional effect.

Particulate matter contributes to pollution in two ways, fugitive dust, and exhaust emissions. Fugitive dust is produced from activities that disturb soil such as grading, digging, or just driving on an unpaved road. Particulate matter from exhaust gasses is produced from incomplete combustion resulting in soot formation. Both forms of particulate matter are accounted for in calculations performed in this analysis.

Toxic Air Contaminants (TAC). Toxic air contaminants (TAC) are pollutants known or suspected to cause cancer or other serious health effects such as birth defects. TAC may also have significant adverse environmental and ecological effects. Examples of TAC include benzene, diesel particulate, hydrogen sulfide, methylchloride, 1,1,1-trichloroethane, toluene, and metals such as cadmium, mercury, chromium, and lead. Health effects from TAC vary depending on the specific toxic pollutant but may include cancer, immune system damage, as well as neurological, reproductive, developmental, and respiratory problems.

According to the Environmental Protection Agency (EPA), approximately 50% of the TAC we are exposed to comes from mobile source emissions. EPA and ARB are both concerned over diesel particulate matter emissions. The EPA has published its final rule to control emissions of hazardous air pollutants from mobile sources, in the March 29, 2001 Federal Register. The ARB approved a comprehensive diesel risk reduction plan in September 2000.

Existing Air Pollution Sources

Air quality in the vicinity of the project site is affected by emissions from motor vehicle traffic on adjacent roadways and air pollution transported from other areas. Generally wind blows polluted air east into the project area from the heavily industrialized City of Los Angeles.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely and chronically ill, and especially those with cardio-respiratory diseases.

Residential areas are considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on

respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, as the majority of the workers tend to stay indoors most of the time. In addition, the working population is generally the healthiest segment of the public.

Sensitive receptors in the immediate vicinity of the project site include Galster Wilderness Park, which borders the site on the north and single and multi-family dwellings located north, west, and south of the project site. In some instances, these residences are situated immediately adjacent of the landfill. In addition, light industry is located immediately south and west of the proposed project site along Azusa Avenue and Amar Road.

3.2.3 IMPACTS AND MITIGATION MEASURES

Methodology

Projected operational related air emissions are calculated using the methodologies set forth in the SCAQMD *CEQA Air Quality Handbook* with EMFAC7G, and California Air Resources Board (CARB) Emissions Inventory emissions factors. The calculated emissions of the project are compared to thresholds of significance for individual projects using the SCAQMD *CEQA Air Quality Handbook* (See Table 3.2-3). The SCAQMD *CEQA Air Quality Handbook* recommends assessing emissions of reactive organic compounds (ROC) as an indicator of O_3.[3]

Criteria for Determining Significance

CEQA allows for the significance criteria established by the applicable air quality management or air pollution control district to be used to assess impacts of a project on air quality. The SCAQMD has established the following thresholds of significance for air quality for construction activities and project operation:

The criteria used to determine the significance of an impact are based on the model initial study checklist contained in Appendix G of the State CEQA Guidelines. The proposed project may result in a significant impact if it would:

- conflict with or obstruct implementation of the applicable air quality attainment plan;
- violate any air quality standard or contribute substantially to an existing or projected air quality violation;

[3] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, April 1993.

TABLE 3.2-3: SCAQMD AIR POLLUTION SIGNIFICANCE CRITERIA

Air Pollutant	Project Operation
Carbon Monoxide (CO)	550 lbs. Per day
Reactive Organic Compounds (ROC)	55 lbs. Per day
Nitrogen Oxides (NO_x)	55 lbs. Per day
Particulates (PM_{10})	150 lbs. Per day

Source: SCAQMD CEQA Air Quality Handbook, 1993.

- 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- expose sensitive receptors to substantial pollutant concentrations; or,
- create objectionable odors affecting a substantial number of people.

Impacts are also considered significant if they exceed the significance criteria provided in Table 3.2-2.

Project Impacts

Impact 3.2-1: The proposed project would be consistent with the Air Quality Management Plan (AQMP). It would not conflict with or obstruct implementation of the AQMP.

Air emissions in the SCAB are regulated by the SCAQMD. Pursuant to the Clean Air Act, the SCAQMD is required to reduce emissions of criteria pollutants for which the SCAB is in non-attainment. Strategies to achieve these emissions reductions are developed in the AQMP prepared by SCAQMD for the region. Chapter 3 of the 1997 SCAQMD AQMP states, "future emissions forecasts are based on demographic and economic growth projections provided by the SCAG. Individual projects and long-term programs within the region are required to be consistent with population, employment, and housing projections."

As discusses in Section 4.2 of the EIR previously prepared for the project site, the proposed project would be consistent with the Southern California Association of Governments (SCAG) population, employment and housing projections. The increase in employment opportunities in the area as a result of the proposed project would be consistent with growth management policies and socioeconomic and travel characteristics included in the SCAG forecasts, which provided the basis for air pollutant projections in the AQMP. The proposed project is anticipated to be consistent with the AQMP.

Mitigation Measures: This impact is less than significant, therefore no mitigation is required.

Residual Impact: Less than significant.

Impact 3.2-2: Operation of the proposed project would emit criteria pollutants. Estimated daily average emissions would exceed significance thresholds set by the SCAQMD.

Operational emissions include stationary and mobile sources of emissions. Stationary sources of emissions include on-site emissions and off-site emissions resulting from increased electrical energy production. Stationary source emissions contribute an insignificant amount to local operational emissions when compared to mobile sources of emissions. Mobile source emissions are motor vehicle emissions and would be the largest source of pollutants resulting from project operation.

Project operational emissions were estimated using emissions estimation worksheets. The worksheets follow methodology outlined in the SCAQMD CEQA Air Quality Handbook and utilize emission factors found in the EMFAC-7G air emissions model, and SCAQMD CEQA Air Quality Handbook. Total operational emissions worksheets are presented in Appendix D.

Mobile Sources

Operational emissions are dominated by on-road mobile source emissions. Average Daily Trip Generation rates were found in the Traffic Study prepared by Kimley-Horn and Associates. The Traffic Study predicts that an additional 20,592 trips per day would occur over existing conditions. This analysis assumes that on average each trip would be 10 miles in length.

Operational on-road mobile sources of emissions were calculated for the year 2005. As shown in Table 3.2-4, Operational on-road mobile sources of emissions for the year 2005 would constitute a significant impact with regards to Carbon Monoxide, Reactive Organic Compounds, Nitrogen Oxides, and Particulate Matter.

TABLE 3.2-4: ALTERNATIVE 2 OPERATIONAL AIR EMISSIONS

Air Pollutant	Mobile Source Emissions	Stationary Source Emissions	Total Air Emissions	Significance Criteria	Significance Yes/No
Carbon Monoxide (CO)	2,198 lbs./day	5 lbs./day	2,203 lbs./day	550 lbs./day	Yes
Reactive Organic Compounds (ROC)	63 lbs./day	0.42 lbs./day	63 lbs./day	55 lbs./day	Yes
Nitrogen Oxides (NO_x)	258 lbs./day	27 lbs./day	285 lbs./day	55 lbs./day	Yes
Particulates (PM_{10})	383 lbs./day	0.76 lbs./day	384 lbs./day	150 lbs./day	Yes

Source: ESA Emissions Calculations Worksheets (See Appendix D).

Stationary Sources

Stationary sources of emissions are categorized as either on-site or off-site emissions sources. On-site emissions sources include emissions associated with natural gas usage, and emissions due to on site commercial activity. Off-site emissions are associated with energy power plant emissions due to the increase in energy demand. As shown in Table 3.2-4, off-site energy emissions, and on-site natural gas emissions would not constitute a significant impact to air quality.

Stationary-source emissions (on-site) would be generated as a result of the combustion of natural gas to meet the heating demand of the proposed project. In addition, stationary-source emissions resulting from electrical energy demand projected for the proposed project would occur off-site at electrical power generating plants assumed to be within the South Coast Air Basin. Power plant emission factors assume continued availability and use of natural gas in power plants.

Summary

As shown in Table 3.2-4, operational emissions associated with the project would exceed SCAQMD significance criteria and as such would be considered a significant unavoidable impact to air quality. The mitigation measures shown below would decrease emissions, but would not reduce emissions to a less than significant level.

Mitigation Measures

M-3.2-1 The circulation plan for the project site shall be designed to reduce vehicle queuing when entering and exiting parking lots.

M-3.2-2 Commuter transit incentives for employees shall be provided, such as reimbursement for public transit.

M-3.2-3 The project applicant shall provide transit shelters along Azusa Avenue to encourage the use of public transportation.

M-3.2-4 The project shall be designed to implement relevant provisions of the City's Transportation Demand Management Ordinance.

Residual Impacts: The project would result in significant unavoidable impacts.

Impact 3.2-3: Motor vehicle trips generated by the project would affect carbon monoxide concentrations at intersections in the project vicinity. This impact is less than significant.

To determine whether the project would create CO hotspots at local intersections, carbon monoxide concentrations under future project conditions were modeled using CALINE4.[4] The model results are compared to state 1-hour carbon monoxide standards of 20.0 parts per million (ppm).

The CALINE-4 dispersion model was developed by the California Department of Transportation (Caltrans). It utilizes peak-hour traffic volumes and worst-case meteorological assumptions to estimate localized worst-case CO concentrations. Worst case meteorological conditions include low wind speed and stable atmospheric conditions. The CALINE-4 model predicts an average concentration at specified receptor locations for this analysis 15 and 180 meters from the roadway on each side of the modeled intersections.

Background carbon monoxide concentrations in the project vicinity were based on data available from the SCAQMD air monitoring station, located in the City of Azusa. Based on data from the year 2005, existing worst-case background concentrations of 5.0 ppm, one-hour average, [6] was used, which is well below the California one hour standard of 20 ppm.

The intersection most affected by the project would be Azusa Avenue and Amar Road. Kimley-Horn and Associates estimated future traffic volumes for both project options. The CALINE-4 model was performed on the year 2005 traffic data. The CALINE-4 model is equipped with a

[4] California Line Dispersion Model, CALTRANS, 1998.

topographic feature that allows inputs to account for terrain features such as steep mountainsides or canyon walls. For each intersection modeled, the terrain was assumed to be flat. Modeling results for each option are presented in Table 3.2-5.

As indicated in Table 3.2-5, carbon monoxide concentrations would not be above state and national carbon monoxide standards at the intersection analyzed. This would be considered a less than significant impact. No mitigation measures would be required. Appendix D includes model result printouts.

Mitigation Measures: Since this impact is less than significant, mitigation measures are not required.

Residual Impact: Less than significant.

TABLE 3.2-5: PROJECTED MAXIMUM 1-HOUR CURBSIDE CARBON MONOXIDE CONCENTRATIONS

Intersection	State Standard (ppm)	Year 2020 (ppm)
450K Square Foot Retail, Azusa Avenue at Amar Road	20.00	6.2

Note: Local intersection increment based on CALINE4 and the results of the traffic analysis assuming worst-case meteorological conditions. Concentrations correspond to a distance of varying from approximately 15 to 180 meters from the center of the given intersection.

Note: All values are parts per million (ppm) of carbon monoxide.

Source: CALINE4 Emissions Model.

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3.3 TRAFFIC AND CIRCULATION

3.3.1 APPROACH TO ANALYSIS

This section of the EIR summarizes the traffic study prepared for this project entitled, *Traffic Impact Analysis: Big League Dreams,* prepared by Kimley-Horn Associates in October 2002. That report is included as Appendix E of this EIR. When this report was commissioned, the City's Redevelopment Agency wanted an analysis that compared two alternative development configurations for the 100-acre parcel adjacent to Azusa Avenue. The analysis of both alternatives is provided in Appendix E. One of those alternatives (the BLD project plus 450,000 square feet of commercial retail space) is the project evaluated in this SEIR.

The information in this section addresses current and future traffic operating conditions, project trip generation and distribution, project-related impacts on the surrounding street system, and a review of the site with respect to roadway access. The report also identifies measures required to mitigate any project traffic impacts. The analysis methodology follows the guidelines set forth in the documentation for the Congestion Management Program (CMP) for Los Angeles County and is based upon discussions with City of West Covina Planning and Traffic Engineering staff.

To be conservative in conducting this analysis, traffic from the golf course proposed on the project site and evaluated as part of the project in the previously certified EIR, is also considered "project" traffic for the purpose of this analysis. Golf course traffic is considered project traffic so that the need for mitigation can be determined based on all traffic generated on the project site.

3.3.2 SETTING

Study Intersections

Twenty-seven key intersections were analyzed as part of this traffic impact study. These intersections are listed below:

1. Amar Road - Valinda Avenue
2. Azusa Avenue - I-10 Westbound Ramp
3. Azusa Avenue - I-10 Eastbound Ramp
4. Azusa Avenue - Cameron Avenue
5. Azusa Avenue - Francisquito Avenue
6. Azusa Avenue - Fairgrove Avenue
7. Azusa Avenue - Amar Road
8. Azusa Avenue - Temple Avenue
9. Azusa Way - Valley Boulevard
10. Azusa Avenue - SR 60 Westbound Ramp
11. Azusa Avenue - SR 60 Eastbound Ramp
12. Azusa Avenue – Aroma Drive

13. Amar Road - Nogales Street
14. Amar Road - Temple Avenue
15. Azusa Avenue -"B" Street (proposed future intersection)
16. La Puente Road - Nogales Street
17. Nogales Street - Valley Boulevard
18. Nogales Street - SR 60 Westbound Ramp
19. Nogales Street - SR 60 Eastbound Ramp
20. Amar Road - Lemon Avenue
21. Lemon Road - Valley Boulevard
22. Grand Avenue - I-10 Westbound Ramp
23. Grand Avenue - I-10 Eastbound Ramp
24. Grand Avenue - Temple Avenue/Amar Road
25. Grand Avenue - Valley Boulevard
26. Azusa Avenue - "C" Street
27. Amar Road – Woodgate Drive

Figure 3.3-1 illustrates the intersection study locations.

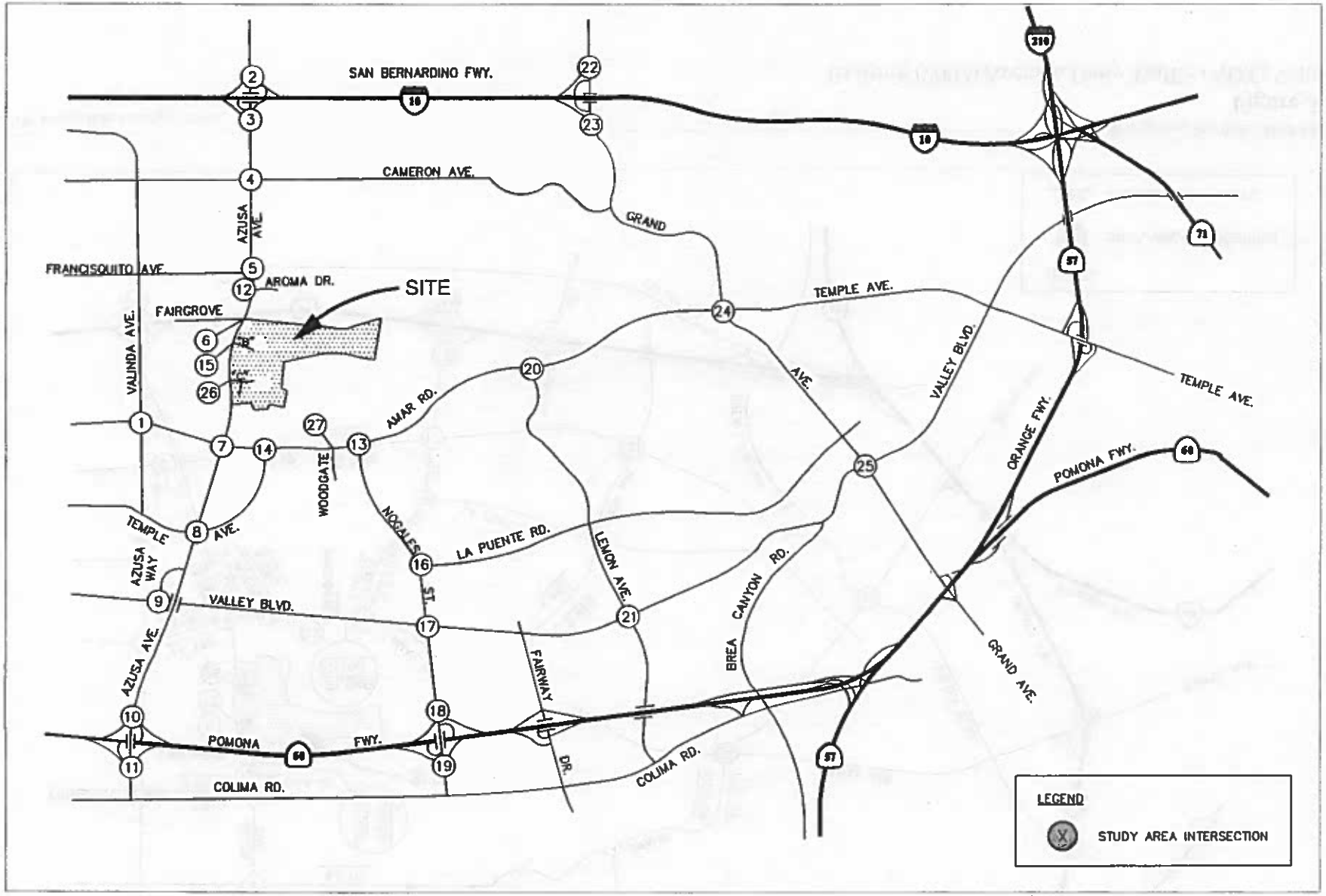
In addition, twelve roadway segments were analyzed for daily operations. These segments are listed below:

1. Amar Road west of Azusa Avenue
2. Grand Avenue north of Temple Avenue
3. Amar Road, east of Temple Avenue
4. Cameron Avenue east of Azusa Avenue
5. Nogales Street south of Amar Road
6. Lemon Avenue south of Amar Road
7. Azusa Avenue north of Temple Avenue
8. Temple Avenue south of Amar Road
9. Azusa Avenue north of Cameron Avenue
10. Azusa Avenue north of Fairgrove Street
11. Francisquito Avenue west of Azusa Avenue
12. Valley Boulevard west of Nogales Street

Daily traffic volumes for these segments are shown in Figure 3.3-2.

The intersection analysis locations were selected by City of West Covina staff consistent with Los Angeles County Congestion Management Program (CMP) guidelines. The CMP links land use transportation, and air quality decisions in manner which addresses concerns regarding congestion. The City uses CMP guidelines for traffic impact studies. These guidelines are especially appropriate to this project because several intersections near the project site are CMP monitored intersections.

The CMP guidelines state that all CMP monitored intersections where the project would add 50 or more trips during either the morning or evening weekday peak hours must be analyzed. The intersections of Azusa Avenue/Amar Road, Azusa Avenue/Cameron Avenue, and Azusa

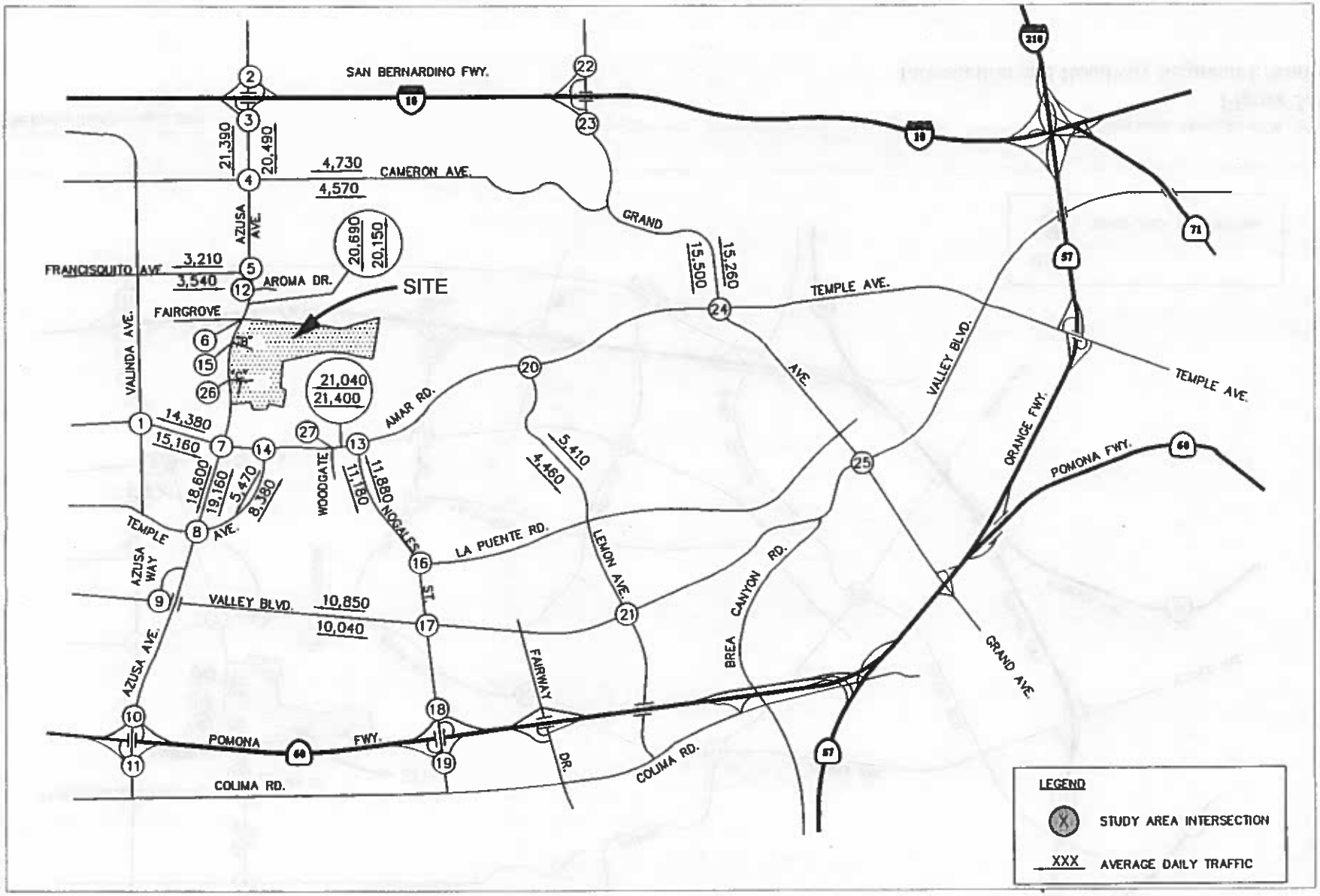


SOURCE: Kimley-Horn Associates, 2002

West Covina Sportsplex SEIR / 202434

Figure 3.3-1

Intersection and Roadway Segment Locations



SOURCE: Kimley-Horn Associates, 2002

Figure 3.3-2

Existing (2002) Average Daily Traffic (ADT) Volumes

Avenue/Workman Avenue are the only CMP monitored intersections in the study area. Based upon the trip distribution, the project will not add a significant number of trips during the peak hours to the intersection of Azusa Avenue/Workman Avenue. Azusa Avenue/Amar Road and Azusa Avenue/Cameron Avenue are the only CMP intersections analyzed as part of this study.

The existing roadway lane configurations at each of the twenty-seven intersections are illustrated on Figure 3.3-3. Existing AM and PM weekday peak hourly traffic volumes at each intersection are illustrated on Figure 3.3-4. Current peak hourly traffic volumes and daily traffic volumes used in the analysis were obtained from traffic counts conducted on February 2, 3, and 4, 1999 between the hours of 7:00 a.m.- 9:00 a.m. and 4:00 p.m.-6:00 p.m.

The existing intersections were analyzed using SYNCHRO software, version 5. The City of West Covina has traditionally used the Highway Capacity Manual (HCM) method of calculating intersection operations, including a level-of-service designation. The HCM method used volume to capacity (V/C) ratios to describe intersection operations until 1997, when V/C calculations were replaced with calculations describing the average number of seconds per delay a drivers would experience. This report uses the new delay methodology to determine project traffic impacts. Table 3.3-1 presents the average intersection delay (per vehicle) ratio and the corresponding LOS, under the 1997 HCM analysis used within the SYNCHRO program.

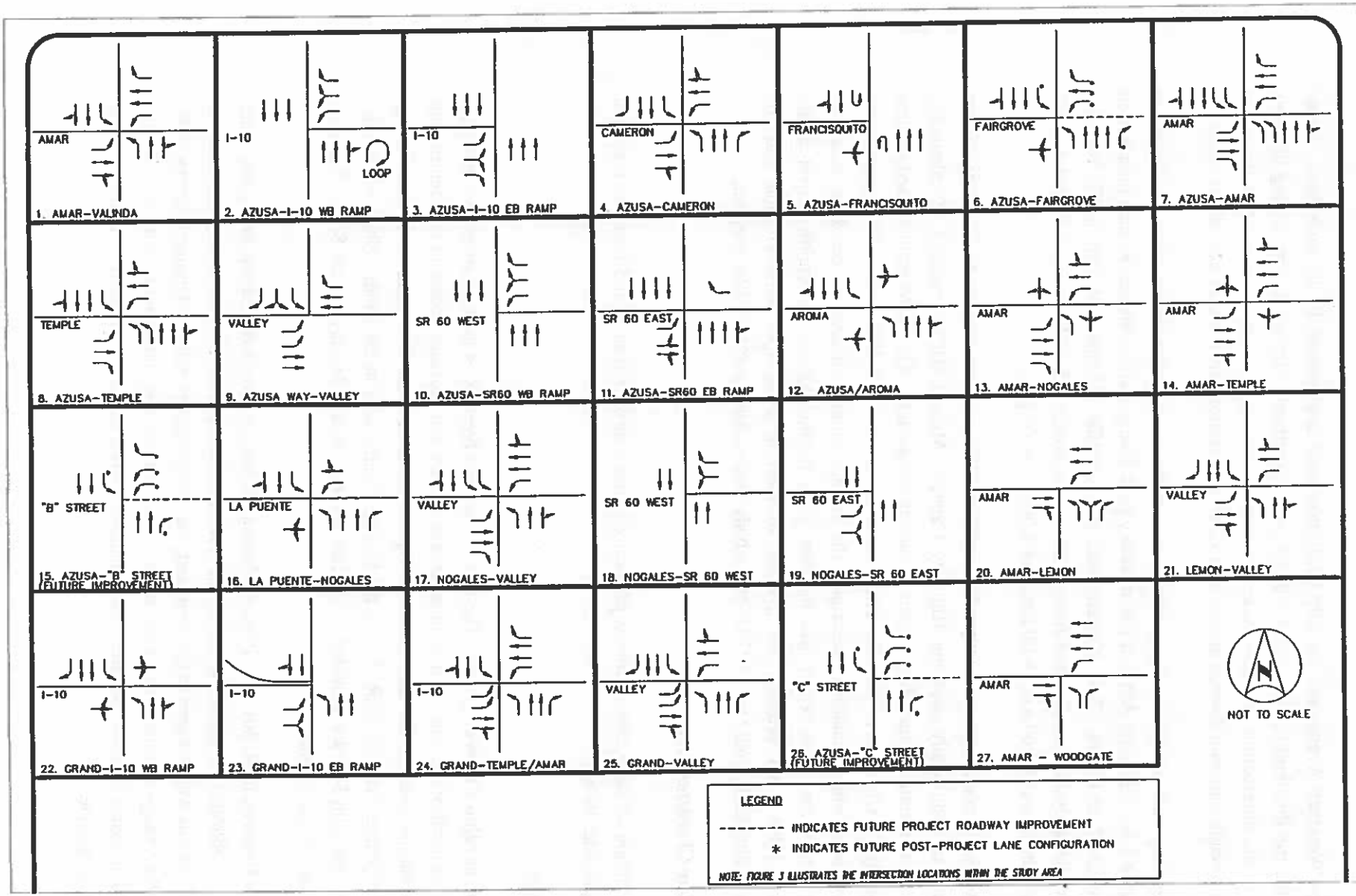
Roadway Characteristics

A description of study area roadways providing primary travel routes to and from the proposed site is provided below.

Freeways:

San Bernardino Freeway (I-10). The San Bernardino Freeway is located about two and one-half miles north of the site. I-10 is an eight-lane facility and provides access to the Ontario and San Bernardino areas to the east, and to the Los Angels area to the west; and, via its interchange with the Orange Freeway (S.R. 57), to the Orange County area to the south. North of the site, interchanges with I-10 are provided at Vincent Avenue, Azusa Avenue, Citrus Street, Barranca Street, and Grand Avenue.

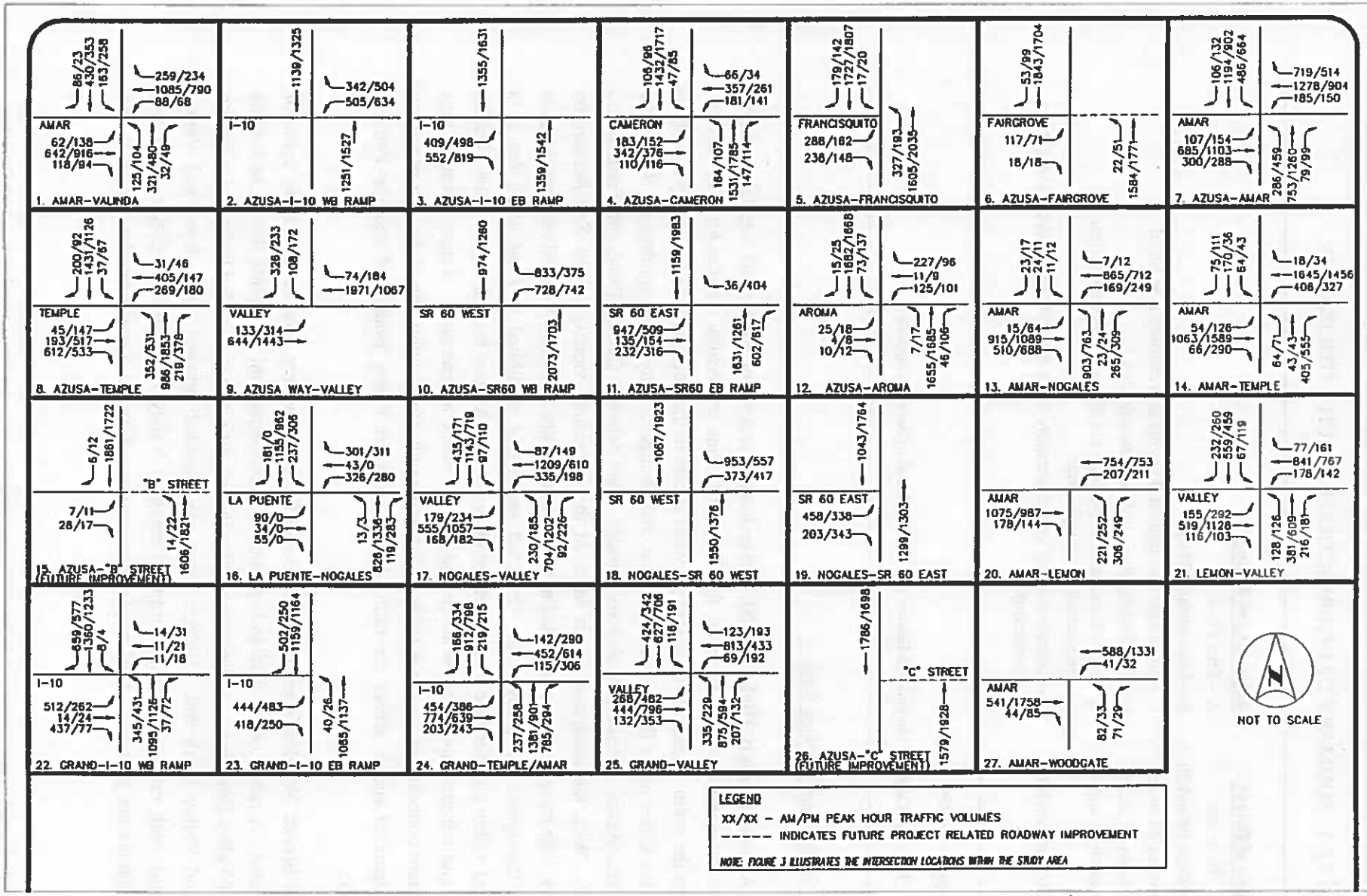
Pomona Freeway (S.R. 60). The Pomona Freeway is located about two and one-half miles south of the site. SR 60 is an eight-lane facility that provides access to the Chino and Riverside areas to the east; the Los Angeles area to the west; and, via its interchange with the Orange Freeway (S.R. 57), to the Orange County area to the south. South of the site, interchanges with S.R. 60 are provided at Azusa Avenue, Nogales Street, Fairway Drive, Lemon Avenue, Brea Canyon Road, and Grand Avenue.



SOURCE: Kimley-Horn Associates, 2002

Figure 3.3-3

Existing (2002) Intersection Lane Geometry



SOURCE: Kimley-Horn Associates, 2002

Figure 3.3-4

Existing (2002) Peak Hour Traffic Volumes

TABLE 3.3-1: SUMMARY OF INTERSECTION CAPACITY UTILIZATION

Seconds of Delay*	Related LOS Rating
10 or less	A – Free Flow
Between 10 and 20	B – Unconstrained Flow
Between 20 and 35	C – Somewhat constrained flow, maneuverability is reduced
Between 35 and 55	D – Constrained flow, little maneuverability
Between 55 and 80	E – Significant vehicle queuing; not all queued vehicles clear the intersection in a single cycle
Greater than 80	F – Excessive delay; vehicles require more than one signal cycle to clear the intersection

* Average per vehicle

Source: Highway Capacity Manual, 6th Edition and Volume/Level of Service Capacity.

Major North–South Surface Streets:

Azusa Avenue (County Highway N8). Azusa Avenue is a major north-south arterial providing access to the San Bernardino Freeway, the Cities of Covina and Azusa, and the Angeles National Forest to the north. Azusa Avenue also provides access to the Pomona Freeway and (via Colima Road), the Cities of La Habra and La Mirada, and Orange County to the southwest. Within the study area, Azusa Avenue provides six through lanes between Colima Road and Francisquito Avenue. With the exception of six lanes in the immediate vicinity of the San Bernardino Freeway, four travel lanes are provided north of Francisquito Avenue. A raised center median is present throughout the study area. On-street parking is prohibited in most areas, but it is permitted within the four-lane section between Francisquito Avenue and Garvey Avenue. Traffic signals and left-turn storage lanes are provided at all major intersections. Azusa Avenue forms the western boundary of the Project site, and it is the only street within the study area providing grade-separated access across the railroad lines between Valley Boulevard and the Pomona Freeway.

Nogales Street. Nogales Street is a north-south facility providing four through lanes south of Amar Road. A raised center median is present between Amar and La Puente Roads, as well as south of Valley Boulevard. A two-way continuous left-turn lane is provided between La Puente Road and Valley Boulevard. Bicycle lanes are provided between Amar Road and Valley Boulevard, with on-street parking permitted south of Valley Boulevard. Left-turn lanes and traffic signals are provided at all major intersections. Nogales Street provides access to the

Pomona Freeway, although the railroad crossings between Valley Boulevard and the freeway are at grade. North of Amar Road, Nogales Street is a two-lane, dead-end residential street.

Lemon Avenue. Lemon Avenue is a north-south facility providing four through lanes south of Amar Road. On the north side, Lemon Avenue dead-ends in Amar Road. To the south, it joins the Pomona Freeway (60) and dead-ends at Colima Road. No on-street parking is permitted. Traffic signals and left-turn storage lanes are provided at all major intersections, as well as right-turn lanes.

Grand Avenue. Grand Avenue is a major north-south arterial providing access to the San Bernardino Freeway, as well as to the Cities of Covina and Azusa, and the Angeles National Forest to the north. To the south it joins the (60) and the (57) freeways and continues beyond the two freeways providing access to Chino Hills, and San Bernardino County. No on-street parking is permitted. It provides four through lanes with traffic signals and left-turn storage lanes at all major intersections, as well as right-turn lanes.

Major East-West Surface Streets:

Cameron Avenue. West of Grand Avenue, Cameron Avenue is an east-west arterial that provides four through lanes and runs parallel to the San Bernardino Freeway. The posted speed limit is 45 miles per hour. Cameron Avenue provides access to residential neighborhoods and commercial developments. On-street parking is provided in front of single-family residential properties. There is a Foothill Transit bus stop for Line 488 at the northeast corner of the Cameron Avenue/Azusa Avenue intersection.

Francisquito Avenue. Francisquito Avenue is a minor east-west surface street which dead-ends at Azusa Avenue at an Edison side entrance traffic light. It is a two-lane roadway with one lane in each direction with both left and right turns permitted.

Fairgrove Street. Fairgrove Street is a minor east-west surface street and which dead-ends at Azusa Avenue at the study site. It provides two through lanes with both left and right turns permitted. A short segment of Fairgrove Avenue is located west of Azusa Avenue where it joins the project site.

Amar Road / Temple Avenue. Amar Road is a major east-west arterial with six through lanes throughout the study area. East of Grand Avenue, Amar Road continues as Temple Avenue to provide a connection with the Orange Freeway (57). It provides landscaped medians, and bicycle lanes are present along portions of the road. Traffic signals and double left-turn storage lanes at the major Azusa Avenue intersection are provided, as well as right-turn lanes. No on-street parking permitted. At the Temple Avenue and the Nogales Street intersections, six through lanes

are provided with a left turn storage lane. At the Lemon intersection, no left turn is provided as Lemon Avenue dead-ends at Amar Road. East of the Grand Avenue intersection, where Amar Road turns into Temple Avenue, four through lanes with two dedicated left turns are provided. West of the Grand Avenue intersection, one dedicated left turn is provided. Right-turn lanes are also provided. No on-street parking is permitted.

Valley Boulevard. Valley Boulevard is a major east-west arterial that provides access to Azusa Avenue to the west and to the Orange Freeway (57) and the Chino Valley Freeway (71) to the east, providing connections to the City of Pomona. Traffic signals and double left-turn storage lanes at the Azusa Avenue and Grand Avenue intersections are provided within a raised landscaped center median, as well as right-turn lanes. No on-street parking is permitted. At the Nogales Street and the Lemon Avenue intersections, four through lanes are provided with a left turn storage lane. At-grade rail crossings exist at the Grand Avenue and Temple Avenue intersections.

La Puente Road. La Puente Road is a minor arterial that connects Nogales Street to the west and Grand Avenue to the east. It provides two through lanes with one dedicated left turn going west at the major intersection; as it dead-ends at Nogales High School on Nogales Street. Right turns lanes are provided, as well as on street parking.

Colima Road. Colima Road is an east-west arterial that runs south of and parallel to the Pomona Freeway. This roadway provides a southern connection into the study area by connecting Azusa Avenue to the west, through the Orange Freeway (57) to the east, where it turns into Golden Springs Drive. At its eastern most connection it dead-ends at Temple Avenue, which in turn changes into Aveneda Rancheros.

Study Area Transit Service

The Los Angeles County Metropolitan Transportation Authority (MTA) provides local and freeway-oriented bus services in the general vicinity of the project site. However, only one bus route (Line 280) provides transit service within convenient walking distance of the site. Line 280 runs along Azusa Avenue throughout the study area, providing local service to the City of Industry and the Puente Hills Mall to the south, and to the Cities of Covina and Azusa to the north.

Two Foothill Transit routes (Lines 178 and 486) provide service along Amar Road in the vicinity of Azusa Avenue. Line 178 provides local service to the Cities of West Covina, El Monte, and the El Monte Bus Station to the west and to the City of Walnut and Cal-Poly Pomona to the east. Line 486 provides peak-hour express service from downtown Los Angeles (via the El Monte Busway to the east) to the City of Industry and Puente Hills Mall to the south. However, with the

exception of the extreme southwest corner of the Project site, these lines are more than one-quarter of a mile from the site. (Note: One-quarter mile is commonly considered to be the maximum walking distance to a transit stop.)

Two southern California Regional Rail commuter-train lines (Metrolink) run within the region in an east/west direction. The lines connect to/from Riverside County and San Bernardino County to downtown Los Angeles. These lines run generally parallel to I-10 and SR 60.

Intersection Analysis

The intersection analysis of existing conditions encompasses twenty-seven intersections. Table 3.3-2 summarizes the current intersection LOS during the morning and evening peak hours at the existing intersections in the vicinity of the proposed project. The morning and evening peak hours generally correspond to peak commuter traffic hours of 7:00 to 9:00 a.m. and 4:00 to 6:00 p.m. The analysis indicates that twenty-one of the existing intersections operate at LOS D or better in both peak hours. The remaining six intersections operate at LOS E or F in either the morning or evening peak hour. Results of existing 1999 Conditions are provided in Table 3.3-2. The following is a list of intersections and the time periods they would operate at unacceptable (LOS E or F) conditions:

- Amar Road/Azusa Avenue (PM Peak)
- Temple Avenue/Azusa Avenue (PM Peak)
- Amar Road/Temple Avenue (PM Peak)
- Valley Boulevard/Nogales Street (AM and PM Peak)
- I-10 WB Ramps/Grand Avenue (AM)
- Temple Avenue/Amar Road/Grand Avenue (AM and PM Peak)

3.3.3 IMPACTS AND MITIGATION MEASURES

Significance Criteria

The Los Angeles County Congestion Management Program (CMP) guidelines require that intersection analysis be calculated to determine if a project will create more than a 2% change in the volume-to-capacity (V/C) ratio of a CMP intersection. The 1997 Highway Capacity Manual (HCM) utilizes average vehicle delay for analysis of LOS, so the 2% threshold is applied to changes in intersection delay, for purposes of this TIA document.

The CMP sets the following standards for significant impacts due to project traffic:

- At LOS A, B, C, or D: A 2.0% increase in intersection delay or volume/capacity is significant if it results in LOS E or F.

TABLE 3.3-2: EXISTING LEVELS OF SERVICE (LOS)

Intersection	A.M. Peak Hour Average Delay (seconds)	A.M. Peak Hour LOS	P.M. Peak Hour Average Delay (seconds)	P.M. Peak Hour LOS
1 Amar Rd./Valinda Ave.	36.2	D	34.2	C
2 I-10 WB Ramp/Azusa Ave.	9.9	A	14.9	B
3 I-10 EB Ramp/Azusa Ave.	11.7	B	19.1	B
4 Cameron Ave./Azusa Ave.	38.2	D	42.5	D
5 Francisquito Ave./Azusa Ave.	46.9	D	18.7	B
6 Fairgrove Ave./Azusa Ave.	7.1	A	6.7	A
7 Amar Rd./Azusa Ave.	44.2	D	**62.2**	**E**
8 Temple Ave./Azusa Ave.	29.8	C	**62.5**	**E**
9 Valley Blvd./Azusa Way	7.0	A	5.1	A
10 SR60 WB Ramp/Azusa Ave.	13.7	B	14.2	B
11 SR60 EB Ramp/Azusa Ave.	24.6	C	19.9	B
12 Aroma Dr./Azusa Ave.	10.6	B	12.1	B
13 Amar Rd./Nogales St.	34.0	C	43.3	D
14 Amar Rd./Temple Ave.	32.7	C	**64.4**	**E**
15 Amar Rd./Project Roadway - B	*			
16 La Puente Rd./Nogales St.	24.7	C	25.8	C
17 Valley Blvd./Nogales St.	**97.0**	**F**	**64.6**	**E**
18 SR 60 WB Ramp/Nogales St.	43.6	D	33.2	C
19 SR 60 EB Ramp/Nogales St.	11.4	B	16.4	B
20 Amar Rd./Lemon Ave.	15.6	B	15.2	B
21 Valley Blvd./Lemon Ave.	30.9	C	44.2	D
22 I-10 WB Ramp/Grand Ave.	**101.6**	**F**	54.5	D
23 I-10 EB Ramp/Grand Ave.	9.3	A	11.6	B
24 Temple Ave./Amar Rd./Grand Ave.	**58.2**	**E**	**69.4**	**E**
25 Valley Blvd./Grand Ave.	40.3	D	46.9	D
26 Azusa Ave./Project Roadway - C	*			
27 Amar Rd./Woodgate	5.2	A	3.9	A

Notes:

Intersections with Level of Service 'E' or 'F' are indicated in bold.

** These intersections exist after project development, and therefore are not analyzed in the existing or future pre-project periods.*

Level of Service	Average Vehicle Delay
A - Free flow operations with high speeds	0 - 10 seconds
B - Free flow operations with slight restrictions	10 - 20 seconds
C - Stable but restricted flow	20 - 35 seconds
D - Unstable-congested flow	35 - 55 seconds
E - Extremely limited maneuverability with poor driver comfort	55 - 80 seconds
F - Breakdown in flow with delays	more than 80 seconds

Source: Volume/Level of Service Capacity Highway Capacity Manual, 1997.

- At LOS E or F: A 2.0% increase in intersection delay or volume/capacity is significant even if the LOS does not change.

Construction Impacts

Construction impacts were assessed in the previously certified EIR. Because the amount of grading and construction associated with this project is the same as that evaluated in the previously certified EIR, no further analysis is warranted in this SEIR.

Operations Impacts

Future Intersection Configurations

Project impacts were assessed using two sets of assumptions regarding future intersection conditions: (1) The future (2005) pre-project and post-project analysis assumes that the existing intersection deficiencies will improved so that the impacts from Big League Dreams project traffic can be identified. Some of the improvements are expected to be completed as part of the South Azusa Avenue Capacity Enhancement project. It should be noted that none of the assumed improvements are fully funded, and no specific construction schedules are known. Therefore, the future intersection improvements are included only to separate future pre-project deficiencies from future post-project impacts. (2) Intersection operations were assessed assuming no existing deficiencies will be improved. This assumptions provides more of a worst case situation, but one that is likely to occur given uncertainties regarding the availability of State and local funding sources. Tables and figures showing future pre-project and future with project conditions are based on the first assumption. The discussion of impacts at the end of this section describes impacts that would occur under both sets of assumptions.

Cumulative Project Traffic

Cumulative projects include approved and pending projects located within an approximate four-mile radius from the project site. The trip generation expected from these projects was calculated in order to determine the total daily and peak hour traffic volumes produced by these developments. Table 3.3-3 summarizes cumulative project trip generation. The total cumulative project traffic is assumed to increase existing traffic levels by 3% each year over the three-year period between 2002 (existing) and 2005 (future project year). Future pre-project peak traffic volumes at the study area intersections are provided in Figure 3.3-5. Future pre-project ADT volumes are shown in Figure 3.3-6.

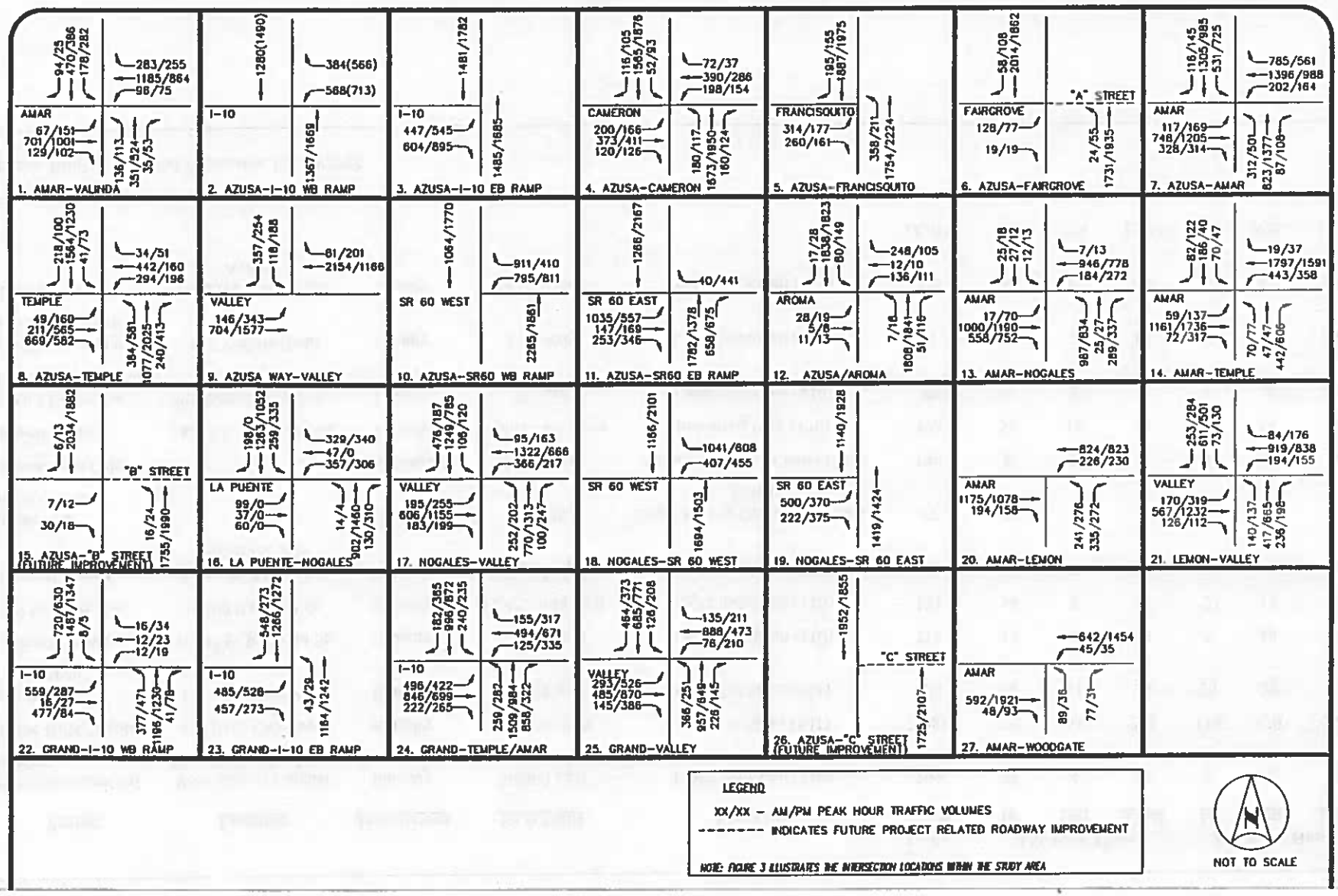
TABLE 3.3-3: SUMMARY OF TRAFFIC VOLUMES FOR APPROVED/PENDING PROJECTS WITHIN SAN JOSE HILLS BUSINESS PARK VICINITY

Project	Location	Jurisdiction	Sq ft/Units	Land Use	Daily Trips	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
Walnut Hills Development	NW corner of the City, N of Amar & E of the BKK	Walnut Hills	268 units (3,362,657 sq ft)	Residential Planned Development (270)	2,010	30	107	137	108	58	166
Walnut Hills Development	NW corner of the City, N of Amar & E of the BKK	Walnut Hills	18-hole	Golf Course (430)	643	32	8	40	22	28	50
Millie's @ Snow Creek Village	21627 Valley Blvd.	Snow Creek	5,090 sq ft	High Turnover (Sit-down) Rest (832)	663	24	23	47	33	22	55
Applebee's @ Snow Creek Village	21625 Valley Blvd.	Snow Creek	6,458 sq ft	High Turnover (Sit-down) Rest (832)	842	31	29	60	42	28	70
Extra Space Storage	20671 Valley Blvd.	Walnut	76,915 sq ft	Mini-Warehousing (151)	192	7	5	12	10	10	20
Walnut Grove	Francesca Avenue	Walnut Grove	108 units	Residential Condominiums (230)	633	8	40	48	39	19	58
Castlehill Plaza	20003 Valley Blvd.	Walnut	32,910 sq ft	General Office Bldg (710)	362	45	6	51	8	41	49
Carrara Marble Company of America	15000 Phoenix Drive	Industry	28,720 sq ft	Light Industrial (110)	200	23	3	26	3	25	28
Continental Marketing Services, Inc.	15375 E. Proctor	Industry	106,300 sq ft	Light Industrial (110)	741	86	12	98	12	92	104
Gyangyi Group (USA) Industrial Building	17665 E. Rowland St.	Industry	7,903 sq ft	Light Industrial (110)	55	6	1	7	1	7	8
Max Group	16605 Gale Avenue	Industry	14,620 Add sq ft	Light Industrial (110)	102	12	2	14	2	13	15
Morningstar Foods, Inc.	18275 E. Arenth Ave.	Industry	5,500 Add sq ft	Light Industrial (110)	38	4	1	5	1	5	6
MSC Investments, LLC	17009 Evergreen Pl.	Industry	42,080 sq ft	Light Industrial (110)	293	34	5	39	5	36	41

TABLE 3.3-3: SUMMARY OF TRAFFIC VOLUMES FOR APPROVED/PENDING PROJECTS WITHIN SAN JOSE HILLS BUSINESS PARK VICINITY (CONT.)

Project	Location	Jurisdiction	Sq ft/Units	Land Use	Daily Trips	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
O'Connell Industrial Building	West side of Hatcher Ave; s/o Rowland Ave.	Industry	30,000 sq ft	Light Industrial (110)	209	24	4	28	3	26	29
Puente Hills Toyota	17070 E. Gale Ave.	Industry	106,352 sq ft	New Car Sales (841)	3,988	172	63	235	119	179	298
Puente Hills Volkswagen	17110 E. Gale Ave.	Industry	17,508 sq ft	New Car Sales (841)	656	28	11	39	20	29	49
Railroad Partners	17747 E. Railroad St.	Industry	45,600 sq ft	Light Industrial (110)	318	37	5	42	5	39	44
S&S Brothers, Inc.	17300 Railroad St.	Industry	17,422 Add sq ft	Light Industrial (110)	121	14	2	16	2	15	17
Trammel Crow Co.	se corner of Gale Ave, and Jellick Ave.	Industry	60,605 sq ft	Light Industrial (110)	422	49	7	56	7	52	59
Residential Development		La Puente	6 Units	Single Family Detached Housing (210)	57	1	4	5	4	2	6
Carwash and Lube		La Puente	3,845 sq ft	Automobile Care Center (840)	144	6	2	8	4	6	10
Industrial Park	18219 E. Valley Blvd.	County	9 units - 9.5 acres	Industrial Park (130)	492	59	12	71	15	54	69
Service Center for Repair of Power Units	491 Yorbita Road, # 7	County	.75 acres	Light Industrial (110)	39	5	2	7	1	4	5
Warehouse with office in Proposed Zone	491 Yorbita Road	County	1.38 acres	Light Industrial (110)	71	8	2	10	2	8	10
Shopping Center	18835 & 18859 Gale Avenue	County	14.055 acres	Specialty Retail (814)	728	88	18	106	22	80	102
					14,019	833	374	1,207	490	878	1,368

Source: Kimley-Horn and Associates, Inc., 9/2002.

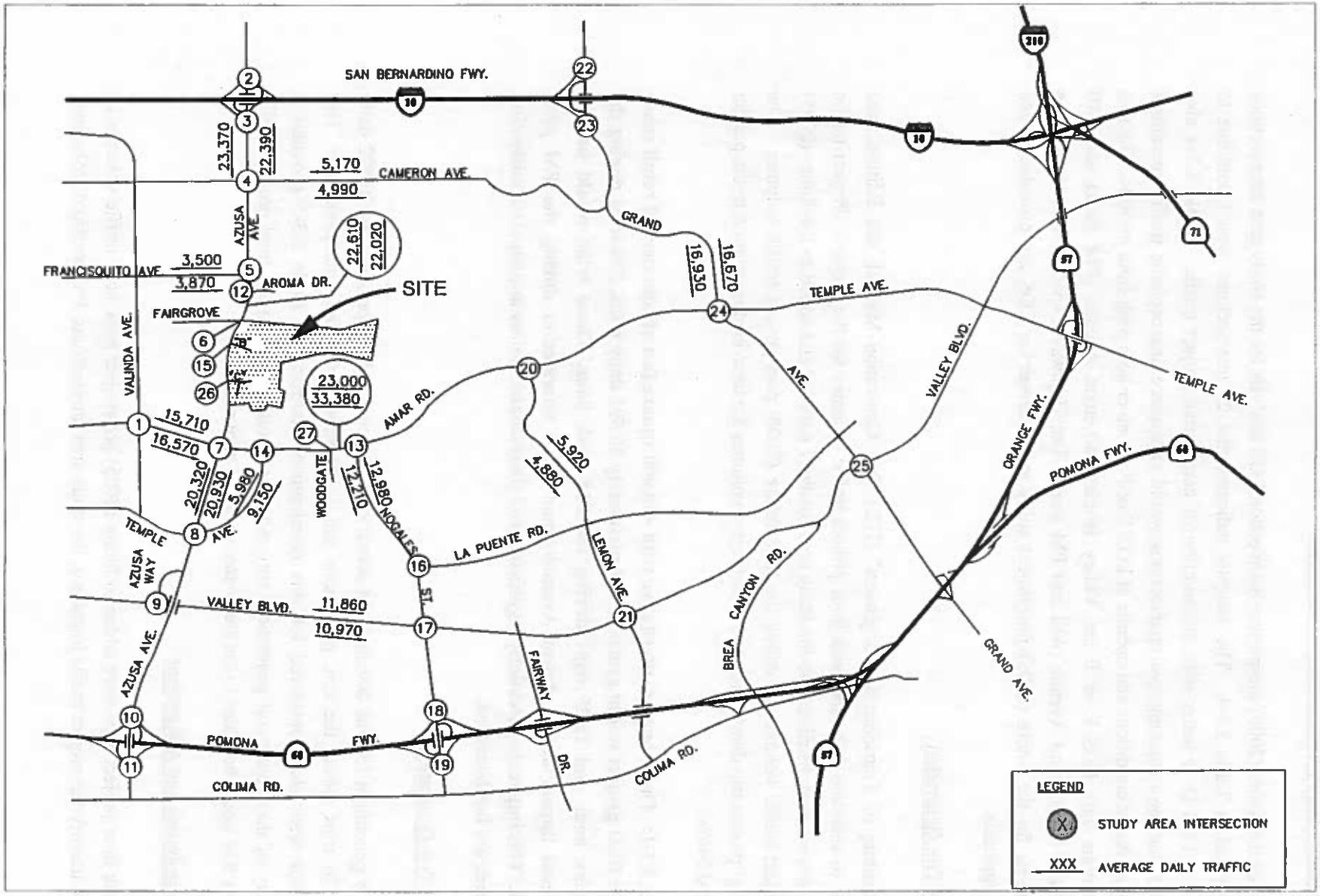


SOURCE: Kimley-Horn Associates, 2002

West Covina Sportsplex SEIR / 202434

Figure 3.3-5

Future (2005) Pre-Project Peak-Hour Traffic Volumes



SOURCE: Kimley-Horn Associates, 2002

Figure 3.3-6

Future (2005)
Pre-Project Average Daily Traffic (ADT) Volumes

Future (2005) Pre-Project Intersection Analysis

Results of the future (2005) pre-project intersection LOS analysis for the study area intersections are provided in Table 3.3-4. The analysis indicates that 25 intersections would continue to operate at LOS D or better with the addition of cumulative project traffic. Table 3.3-4 also indicates that the remaining two intersections would experience unacceptable traffic operations during the future conditions and operate at LOS E or F in one or both peak-hour periods. The two intersections with LOS E or F are Valley Boulevard/Lemon Avenue (PM peak) and I-10 westbound ramp/Grand Avenue (AM and PM peak). The Highway Capacity Manual analysis worksheets for the future (2005) pre-project study area intersection LOS are provided in the traffic appendix.

Project Trip Generation

The Institute of Transportation Engineers' (ITE) Trip Generation Manual, 6th Edition, was utilized to calculate daily and peak hour project traffic volumes for the project. Project traffic volumes were then distributed to the study area roadway network and added to the future (2005) pre-project traffic volumes to define the total future (2005) post-project traffic volumes. The details of project trip distribution and post-project volumes are described in relation to the project analyzed below:

Impact 3.3-1: The proposed alternative with 450,000 square feet of commercial retail space and the BLD project would generate approximately 20,592 daily trips, 576 trips during the AM peak hour and 1,425 trips during the PM peak hour. These trips would have a significant impact at the Azusa Avenue/Amar Road intersection during the PM peak period. This impact is potentially significant and unavoidable unless appropriate mitigation measures are implemented.

Project Trip Generation

The trip generation for this development scenario is expected to be approximately 20,592 daily trips, 576 trips during the a.m. peak hour and 1,425 trips during the p.m. peak hour. Trip reductions were also considered for this development alternative. Table 3.3-5 provides a summary of the project trip generation, trip reduction assumptions and the total project traffic volumes that would be added to the study area roadway network.

Trip Distribution and Assignment

The peak hour project trips were added to future (2005) pre-project peak hour traffic volumes in order to identify the project traffic impacts at the study area intersections. Project trip distribution

TABLE 3.3-4: FUTURE (2005) PRE-PROJECT INTERSECTION LEVEL OF SERVICE SUMMARY OF INTERSECTION OPERATIONS FOR 2005 BACKGROUND CONDITIONS

Intersection	A.M. Peak Hour V/C	A.M. Peak Hour LOS	P.M. Peak Hour V/C	P.M. Peak Hour LOS
1 Amar Rd./Valinda Ave.	44.9	D	38.5	D
2 I-10 WB Ramp/Azusa Ave.	11.2	B	17.6	C
3 I-10 EB Ramp/Azusa Ave.	13.6	B	22.1	C
4 Cameron Ave./Azusa Ave.	33.9	C	33.9	C
5 Francisquito Ave./Azusa Ave.	21.0	C	13.3	B
6 Fairgrove Ave./Azusa Ave.	7.8	A	7.2	A
7 Amar Rd./Azusa Ave.	38.9	D	44.7	D
8 Temple Ave./Azusa Ave.	24.0	C	32.2	C
9 Valley Blvd./Azusa Ave.	8.7	A	5.5	A
10 SR60 WB Ramp/Azusa Ave.	15.3	B	16.1	B
11 SR60 EB Ramp/Azusa Ave.	25.2	C	21.5	C
12 Aroma Dr./Azusa Ave.	12.3	B	13.4	B
13 Amar Rd./Nogales St.	23.5	C	25.7	C
14 Amar Rd./Temple Ave.	31.2	C	47.3	D
15 Amar Rd./Project Roadway - B	2.5	A	4.5	A
16 La Puente Rd./Nogales St.	28.2	C	24.5	C
17 Valley Blvd./Nogales St.	35.6	D	34.4	C
18 SR 60 WB Ramp/Nogales St.	32.7	C	24.3	C
19 SR 60 EB Ramp/Nogales St.	11.0	B	15.2	B
20 Amar Rd./Lemon Ave.	17.4	B	16.9	B
21 Valley Blvd./Lemon Ave.	34.3	C	**56.8**	E
22 I-10 WB Ramp/Grand Ave.	**109.4**	F	**63.7**	E
23 I-10 EB Ramp/Grand Ave.	10.5	B	12.6	B
24 Temple Ave./Amar Rd./Grand Ave.	28.7	C	30.5	C
25 Valley Blvd./Grand Ave.	39.8	D	34.2	C
26 Azusa Ave./Project Roadway - C	0.0	A	0.0	A
27 Amar Road/Woodgate Dr.	5.3	A	3.8	A

Notes:
*Numbers and LOS values in **bold** indicate unacceptable operating conditions.*

Level of Service	Average Vehicle Delay
A - Free flow operations with high speeds	0 - 10 seconds
B - Free flow operations with slight restrictions	10 - 20 seconds
C - Stable but restricted flow	20 - 35 seconds
D - Unstable-congested flow	35 - 55 seconds
E - Extremely limited maneuverability with poor driver comfort	55 - 80 seconds
F - Breakdown in flow with delays	more than 80 seconds

Source: Volume/Level of Service Capacity Highway Capacity Manual, 1997.

TABLE 3.3-5: SUMMARY OF WEEKDAY PROJECT TRAFFIC GENERATION
(with 450k sq.ft. of retail)

ITE TRIP GENERATION RATES FOR EACH LAND USE COMPONENT

Land Use	Trips Per	Trip Generation Rates* Daily Trips	A.M. Peak Hour Trips TOTAL	A.M. In	A.M. Out	P.M. Peak Hour Trips TOTAL	P.M. In	P.M. Out
Component A:								
Big League Dreams (Baseball Fields)[a,b,c]	Fields	200.00	N/A	N/A	N/A	33.33	16.67	16.67
Component B:								
Shopping Center (820)	KSF	47.94	1.07	0.66	0.42	4.49	2.15	2.33
Home Improvement Superstore (862) **	KSF	35.05	1.48	0.80	0.68	2.87	1.35	1.52
Component C:								
BKK Landfill (Closed)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Component D:								
18-Hole Golf Course (430)	Holes	35.74	2.22	1.75	0.47	2.74	1.21	1.53
Golf Driving Range (432)	Tees	14.00	0.42	0.29	0.13	1.25	0.53	0.73
Component E:								
Restaurant (831)	KSF	89.95	2.22	1.75	0.47	2.74	1.21	1.53

PROJECT TRIP GENERATION AFTER APPLICATION OF ITE RATES

Land Use	Description	Daily Trips	A.M. Peak Hour Trips TOTAL	A.M. In	A.M. Out	P.M. Peak Hour Trips TOTAL	P.M. In	P.M. Out
Component A:								
Big League Dreams (Baseball Fields)[a,b,c]	6 Fields	1,200	N/A	N/A	N/A	200	100	100
Component B:								
Shopping Center (820)	343 KSF	16,443	369	225	144	1,540	739	801
Home Improvement Superstore (862)	107 KSF	3,750	158	86	73	307	144	163
Component C:								
BKK Landfill (Closed)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Component D:								
18-Hole Golf Course (430)	18 Holes	643	40	32	8	49	22	28
Golf Driving Range (432)	60 Tees	840	25	17	8	75	32	44
Component E:								
Restaurant (831)	15 KSF	1,349	33	26	7	41	18	23
Total (Phase I + Phase II):		**24,226**	**625**	386	240	**2212**	1,055	1,158

TABLE 3.3-5: SUMMARY OF WEEKDAY PROJECT TRAFFIC GENERATION
(with 450k sq.ft. of retail) (cont.)

PROJECT TRIP GENERATION AFTER PASS-BY AND INTERNAL TRIP REDUCTION[e]

Land Use	Description	Daily Trips	A.M. Peak Hour Trips TOTAL	In	Out	P.M. Peak Hour Trips TOTAL	In	Out
Component A:								
Big League Dreams (Baseball Fields)[a,b,c]	6 Fields	**1,020**	N/A	N/A	N/A	170	85	85
Component B:								
Shopping Center (820) #	268 KSF	13,977	369	225	144	929	446	483
Home Improvement Superstore (862) ##	107 KSF	3,188	135	73	62	185	87	98
Component C:								
BKK Landfill (Closed)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Component D:								
18-Hole Golf Course (430)	18 Holes	547	21	15	7	42	19	23
Golf Driving Range (432)	60 Tees	714	23	15	7	64	27	37
Component E:								
Restaurant (831)	15 KSF	**1,147**	28	22	6	35	15	20
Total Project Trip Generation		**20,592**	**576**	349	225	**1,425**	679	747

Notes:
KSF = 1,000 square feet
(XXX) = ITE Land Use Code
* Trip generation rates are average rates, for each individual use, from the 1997 "ITE Trip Generation Manual" 6th Edition.
** Trip generation rates for the Shopping Center use were developed utilizing a regression analysis, described on page 22 of the ITE Trip Generation Manual User's Guide.
\# Pass-by trips account for 29% of PM 'shopping center' trips using ITE Trip Generation Handbook.
Pass-by trips account for 44% of PM 'home improvement superstore' trips using ITE Trip Generation Handbook.

(a) Includes concessions building
(b) Assumes similar trips as Chino Hills park
(c) Weekday operating hours are 5PM to 12AM, therefore negligible generation of morning peak hour is expected.
(d) Includes replica soccer stadium
(e) Assumes 15% internal capture between land uses

Source: Kimley-Horn and Associates, Inc., 9/2002.

is shown in Figures 3.3-7 and 3.3-8. Figure 3.3-9 shows post-project traffic volumes at each of the study intersections.

Intersection Analysis

Results of the future (2005) post-project peak hour intersection LOS analysis are provided in Table 3.3-6. The analysis indicates that twenty-four intersections would continue to operate at LOS D or better with the addition of project traffic. Table 3.3-6 also indicates that the remaining three intersections would experience unacceptable traffic operations during the future (2005) conditions and operate at LOS E or F in one or both peak traffic periods. Of those three intersections, only the Azusa Avenue/Amar Road would experience an increase greater than 2%. A 2% or more increase at intersections with LOS E or F is considered significant given the significance criteria described above.

Mitigation Measures

If the South Azusa Avenue Capacity Enhancement project improvements are implemented as part of the future roadway network, the following mitigation measures would be required at the Azusa Avenue/Amar Road intersection to mitigate project traffic to a less than significant level:

M-3.3-1 An exclusive southbound right-turn lane from southbound Azusa to westbound Amar including median modifications to extend turn-lane storage.

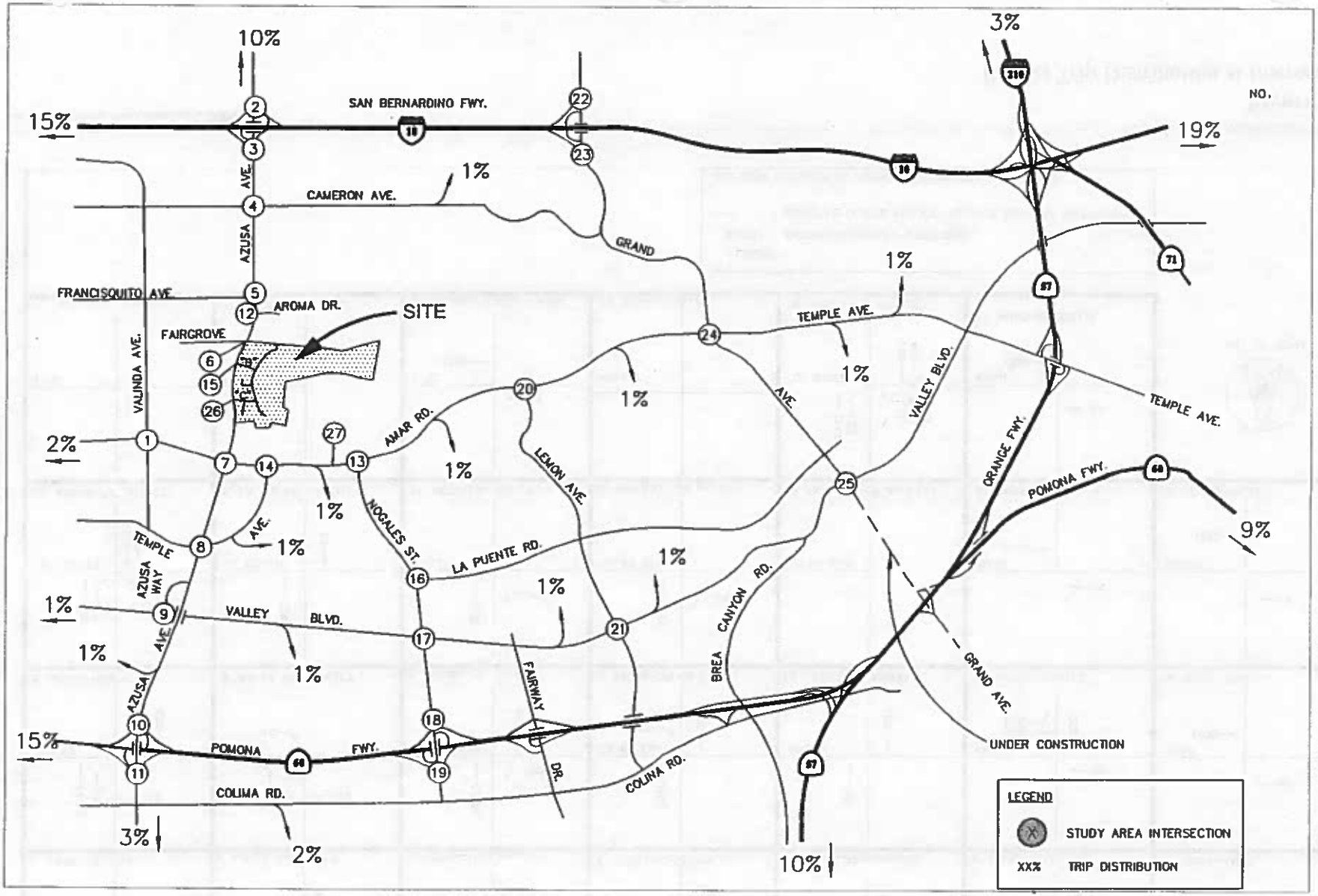
M-3.3-2 An exclusive, free-movement westbound right-turn lane from westbound Amar to northbound Azusa.

M-3.3-3 Roadway widening on the east side of Azusa for a transition lane into the through lane on northbound Azusa Avenue.

M-3.3-4 Signal improvements including timing, phasing and pole relocation.

The addition of the westbound right turn lane and the additional southbound left turn lane are both likely to require road widening and the removal of existing structures. The westbound right turn lane may affect the location of an existing gas pump at the Chevron gas station. Current right-of-way restrictions may limit efforts to add the additional southbound left turn lane. The estimated total design and construction costs of these improvements is approximately $800,000. Land acquisition costs have not been estimated.

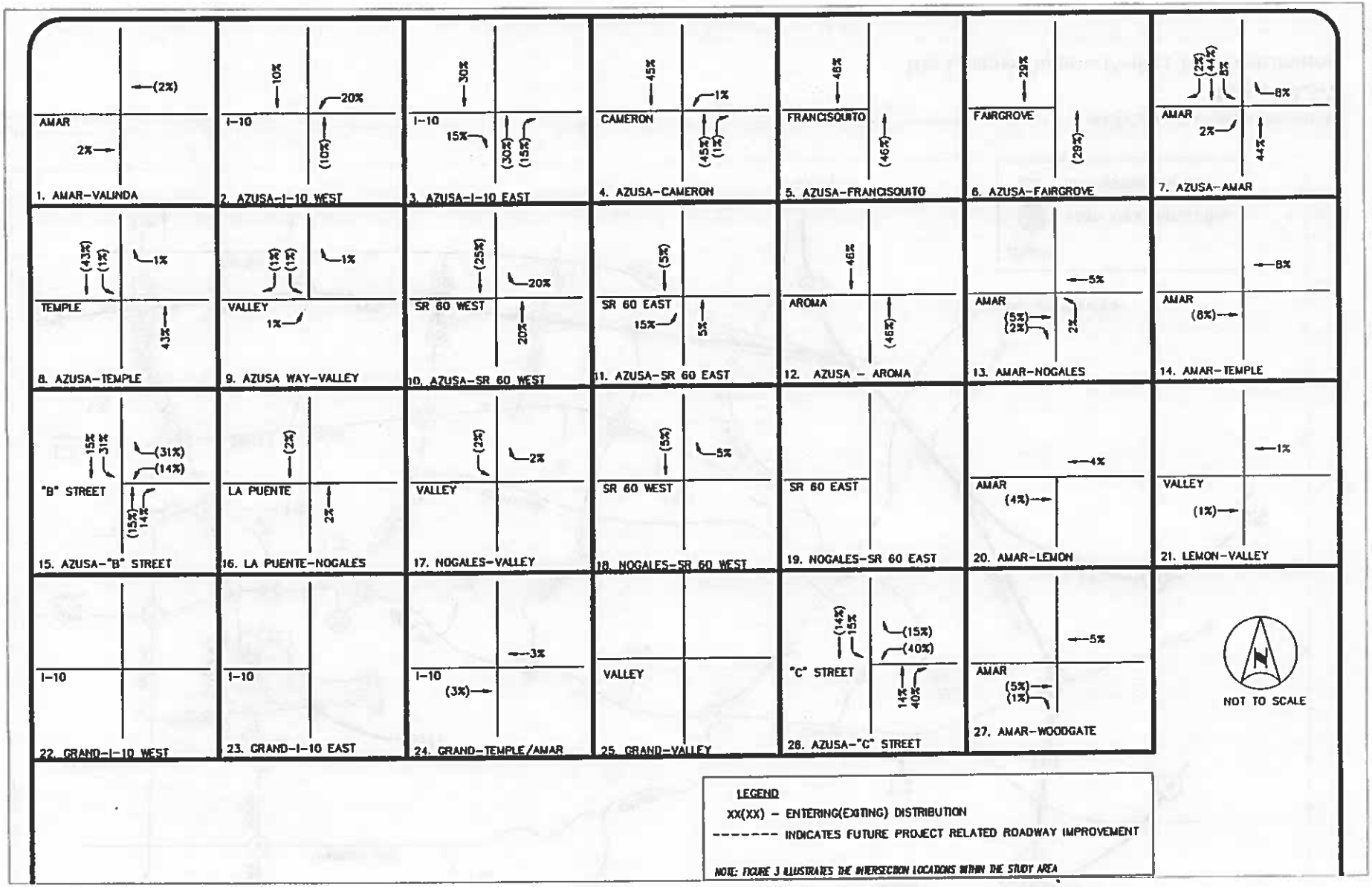
If the South Azusa Avenue Capacity Enhancement project improvements are not implemented, the following mitigation measure would also be required to reduce this impact to a less than significant level:



SOURCE: Kimley-Horn Associates, 2002

Figure 3.3-7

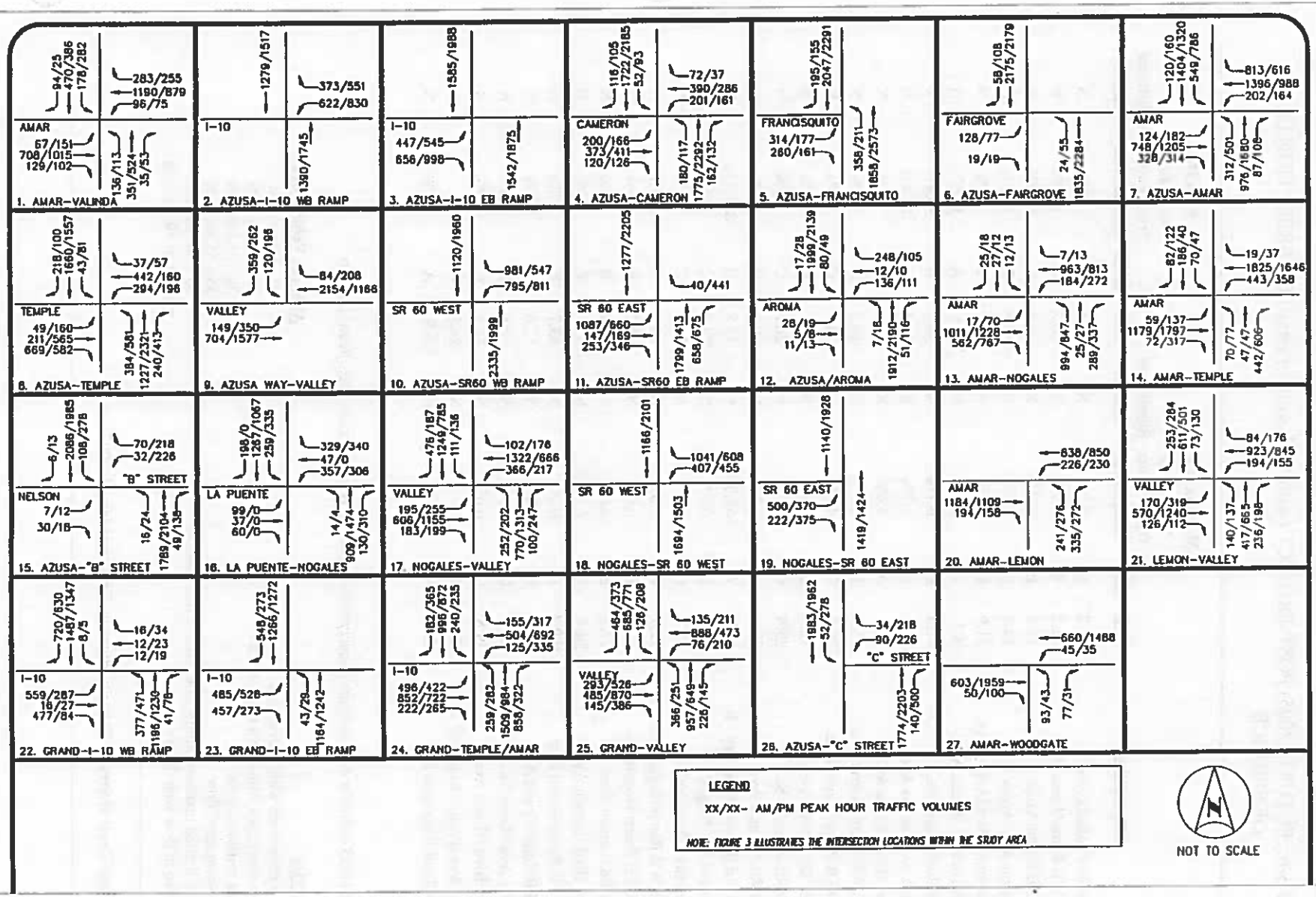
Big League Dreams Project Trip Distribution



SOURCE: Kimley-Horn Associates, 2002

Figure 3.3-8

Project Trip Distribution at Intersections



SOURCE: Kimley-Horn Associates, 2002

West Covina Sportsplex SEIR / 202434

Figure 3.3-9

Future (2005)

Post Project Development Traffic Volumes

TABLE 3.3-6: FUTURE (2005) POST-PROJECT (with 450k sq.ft. of retail) INTERSECTION LEVEL OF SERVICE

		A.M. Peak Hour				P.M. Peak Hour			
	Intersection	V/C	LOS	% Change from Future Pre-Project	Significant Impact	V/C	LOS	% Change from Future Pre-Project	Significant Impact
1	Amar Rd./Valinda Ave.	45.2	D	0.7%	N	38.6	D	0.3%	N
2	I-10 WB Ramp/Azusa Ave.	12.2	B	8.9%	N	20.2	C	14.8%	N
3	I-10 EB Ramp/Azusa Ave.	15.3	B	12.5%	N	26.5	C	19.9%	N
4	Cameron Ave./Azusa Ave.	34.8	C	2.7%	N	37.8	D	11.5%	N
5	Francisquito Ave./Azusa Ave.	21.9	C	4.3%	N	13.8	B	3.8%	N
6	Fairgrove Ave./Azusa Ave.	8.1	A	3.8%	N	8.1	A	12.5%	N
7	Amar Rd./Azusa Ave.	41.5	D	6.7%	N	**58.4**	**E**	**30.6%**	**Y**
8	Temple Ave./Azusa Ave.	24.4	C	1.7%	N	39.1	D	21.4%	N
9	Valley Blvd./Azusa Ave.	9.1	A	4.6%	N	5.6	A	1.8%	N
10	SR60 WB Ramp/Azusa Ave.	15.3	B	0.0%	N	16.5	B	2.5%	N
11	SR60 EB Ramp/Azusa Ave.	26.2	C	4.0%	N	23.1	C	7.4%	N
12	Aroma Dr./Azusa Ave.	12.9	B	4.9%	N	14.1	B	5.2%	N
13	Amar Rd./Nogales St.	23.6	C	0.4%	N	26.6	C	3.5%	N
14	Amar Rd./Temple Ave.	31.6	C	1.3%	N	49.3	D	4.2%	N
15	Amar Rd./Project Roadway - B	6.7	A	168.0%	N	15.8	B	251.1%	N
16	La Puente Rd./Nogales St.	28.2	C	0.0%	N	24.9	C	1.6%	N
17	Valley Blvd./Nogales St.	35.8	D	0.6%	N	34.8	C	1.2%	N
18	SR 60 WB Ramp/Nogales St.	32.7	C	0.0%	N	24.3	C	0.0%	N
19	SR 60 EB Ramp/Nogales St.	11.0	B	0.0%	N	15.2	B	0.0%	N
20	Amar Rd./Lemon Ave.	17.5	B	0.6%	N	16.9	B	0.0%	N
21	Valley Blvd./Lemon Ave.	34.4	C	0.3%	N	**57.6**	**E**	1.4%	N
22	I-10 WB Ramp/Grand Ave.	**109.4**	**F**	0.0%	N	**63.7**	**E**	0.0%	N
23	I-10 EB Ramp/Grand Ave.	10.5	B	0.0%	N	12.6	B	0.0%	N
24	Temple Ave./Amar Rd./Grand Ave.	28.8	C	0.3%	N	30.8	C	1.0%	N
25	Valley Blvd./Grand Ave.	39.8	D	0.0%	N	34.2	C	0.0%	N
26	Azusa Ave./Project Roadway - C	7.4	A	-	N	26.3	C	-	N
27	Amar Road/Woodgate Dr.	5.4	A	1.9%	N	3.9	A	2.6%	N

Notes:

Numbers and LOS values in bold indicate unacceptable operating conditions and significant impacts.

Level of Service	Average Vehicle Delay
A - Free flow operations with high speeds	0 - 10 seconds
B - Free flow operations with slight restrictions	10 - 20 seconds
C - Stable but restricted flow	20 - 35 seconds
D - Unstable-congested flow	35 - 55 seconds
E - Extremely limited maneuverability with poor driver comfort	55 - 80 seconds
F – Breakdown in flow with delays	more than 80 seconds

Source: Volume/Level of Service Capacity Highway Capacity Manual, 1997.

M-3.3-5 An additional westbound through lane on the east leg of Amar Road.

The estimated design and construction cost of this additional measure is approximately $300,000. Because of uncertainties regarding funding, it is not certain that any of these mitigation measures (M-3.3-1 through M-3.3-5) will be implemented. Without funding, this impact is considered unavoidable.

Residual Impact: This impact is considered significant and unavoidable unless funds are allocated to implement the mitigation measures above.

REFERENCES

Kimely Horn Associates. 2001 (October 21). Big League Dreams Development, Traffic Impact Analysis Report.

3.4 NOISE

3.4.1 APPROACH TO ANALYSIS

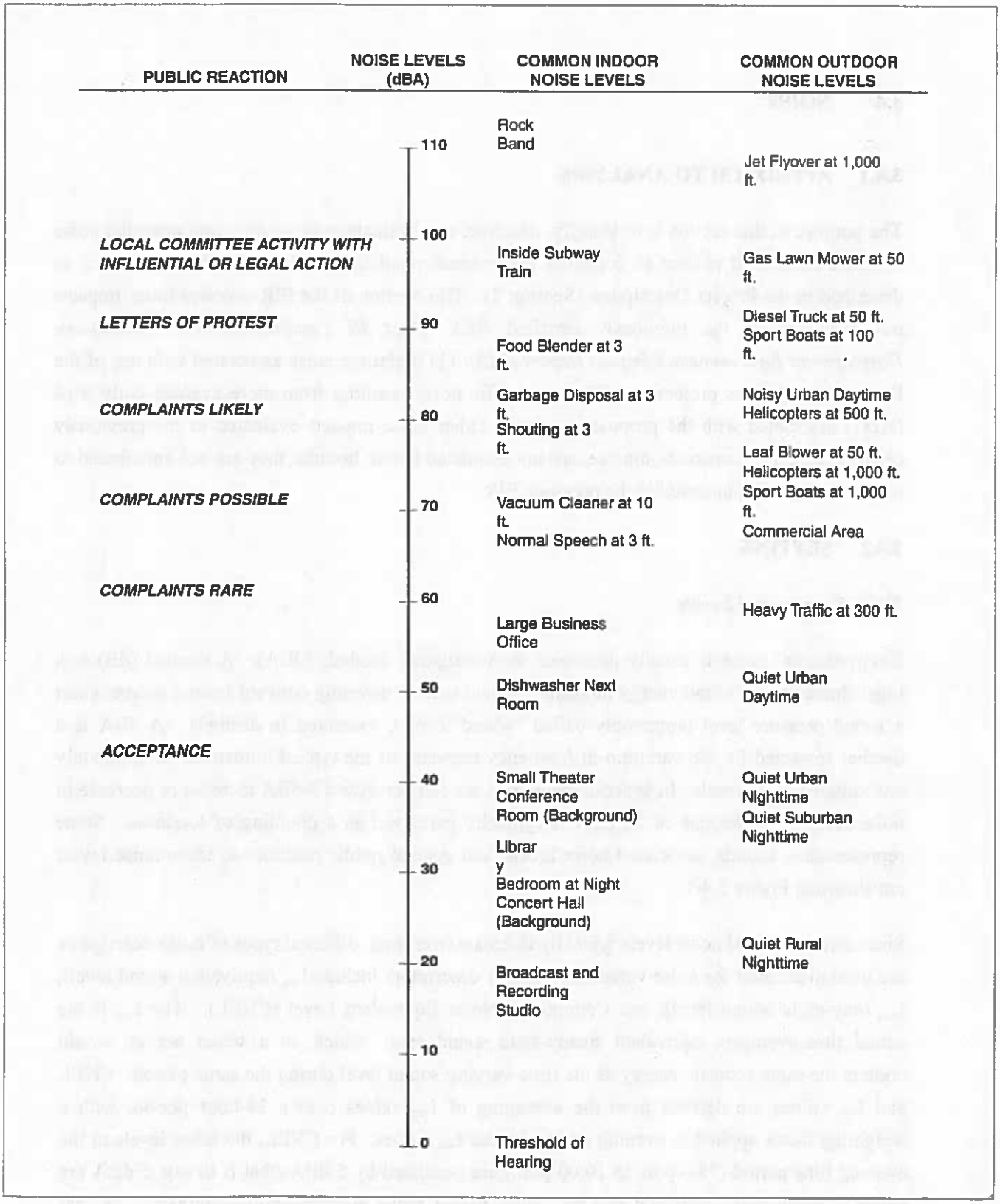
The purpose of this section is to identify, describe, and evaluate noise sources and potential noise conflicts associated project to construct commercial retail uses and commercial recreation as described in the Project Description (Section 2). This section of the EIR assesses those impacts not evaluated in the previously certified *BKK Class III Landfill Closure, Postclosure Development Environmental Impact Report (EIR):* (1) nighttime noise associated with use of the Big League Dreams project and (3) more traffic noise resulting from more average daily trips (ADT) associated with the proposed project. Other noise impacts evaluated in the previously certified EIR, i.e. construction noise, are not evaluated herein because they are not anticipated to reach the levels documented in the previous EIR.

3.4.2 SETTING

Noise Sources and Levels

Environmental noise is usually measured in A-weighted decibels (dBA). A decibel (dB) is a logarithmic unit of sound energy intensity. Sound waves, traveling outward from a source, exert a sound pressure level (commonly called "sound level"), measured in decibels. A dBA is a decibel corrected for the variation in frequency response of the typical human ear at commonly encountered noise levels. In general, the human ear can perceive a 3-dBA increase or decrease in noise levels; a difference of 10 dBA is typically perceived as a doubling of loudness. Some representative sounds, associated noise levels, and general public reactions to these noise levels are shown in Figure 3.4-1.

Since environmental noise levels typically fluctuate over time, different types of noise descriptors are used to account for noise variability. These descriptors include L_{eq} (equivalent sound level), L_{dn} (day-night sound level), and Community Noise Equivalent Level (CNEL). The L_{eq} is the actual time-averaged, equivalent steady-state sound level, which, in a stated period, would contain the same acoustic energy as the time-varying sound level during the same period. CNEL and L_{dn} values are derived from the averaging of L_{eq} values over a 24-hour period, with a weighting factor applied to evening and nighttime L_{eq} values. For CNEL, the noise levels in the evening time period (7:00 p.m. to 10:00 p.m.) are penalized by 5 dBA (that is to say, 5 dBA are added to noise level results to derive the CNEL value), while nighttime noise (10:00 p.m. to 7:00 a.m.) is penalized by 10 dBA. For L_{dn}, nighttime noise (10:00 p.m. to 7:00 a.m.) is penalized by 10 dBA. All Leq, CNEL and Ldn values reported herein reflect A-weighted decibels unless noted otherwise.



SOURCE: Caltrans Noise Manual California State Department of Transportation, March 1980.

Figure 3.4-1
Common Noise Levels and Public Reactions

Sound Propagation and Attenuation

Each source of noise can be categorized as either a "line source" or a "point source." For a "line source" of noise, such as a heavily traveled roadway, the noise level decreases by a nominal value of 3 dBA for each doubling of distance between the noise source and the noise receptor. In many cases, with the combined effects of environmental factors, such as wind conditions, temperature gradients, characteristics of the ground and the air, and the presence of vegetation, perceived noise levels decrease by 4.5 dBA for each doubling of distance.

The increase in noise attenuation in exterior environments is particularly perceived where the following conditions exist:

- a low percentage of truck traffic;
- the view of a roadway is interrupted by isolated buildings, clumps of bushes, and scattered trees;
- the intervening ground is soft or covered with vegetation; or
- the source or receptor is located more than three meters above the ground.

The nominal value of 3 dBA with each doubling of distance applies to sound propagation from a "line source" where the following conditions exist:

- noise travels to receptor locations over the top of a barrier greater than three meters in height; or
- there is a clear unobstructed view of the roadway, the ground is hard, no intervening structures exist, and the line-of-sight between the noise source and receptor averages more than three meters above the ground[1]

In an area that is free of barriers, the sound level resulting from a single "point source" of noise decreases by 6 dBA for each doubling of distance. A temporarily stationary mobile source, such as an idling truck or other heavy duty equipment operating within a confined area, such as a construction site, can also be considered a "point source" of noise, and is therefore subject to the same decrease in sound level.

1 California Department of Transportation, *Noise Manual*, 1980.

Sensitive Receptors

Some land uses are considered more sensitive to ambient noise levels than others due to the amount of noise exposure (in terms of both exposure time and "insulation" from noise) and the types of activities typically involved. Residences, schools, libraries, churches, hospitals, nursing homes, auditoriums, parks, and outdoor recreation areas are generally more sensitive to noise than are commercial and industrial land uses.

Sensitive receptors located in the project vicinity are primarily residential uses (single and multiple family) located to the west along Azusa Avenue, to the south along Amar Road, and to the north of the project site.

Existing Noise Sources

The noise environment at the project site is primarily influenced by traffic on Azusa Avenue. Ambient noise levels are produced primarily by traffic along Azusa Avenue and Amar Road.

Existing Noise Levels

Noise Monitoring Methodology

To assess existing noise levels in the vicinity of the project site, noise measurements were taken 50 feet from the centerline of Azusa Avenue on the project site on April 9, 2002 and August 28, 2002 to monitor daytime ambient noise levels. The measurements provided statistically relevant data for an hourly equivalent (L_{eq}) reading. 15-minute measurements were taken at the following locations:

(1) 802 Aschomb Drive (intersection with Sam Gerry Drive).

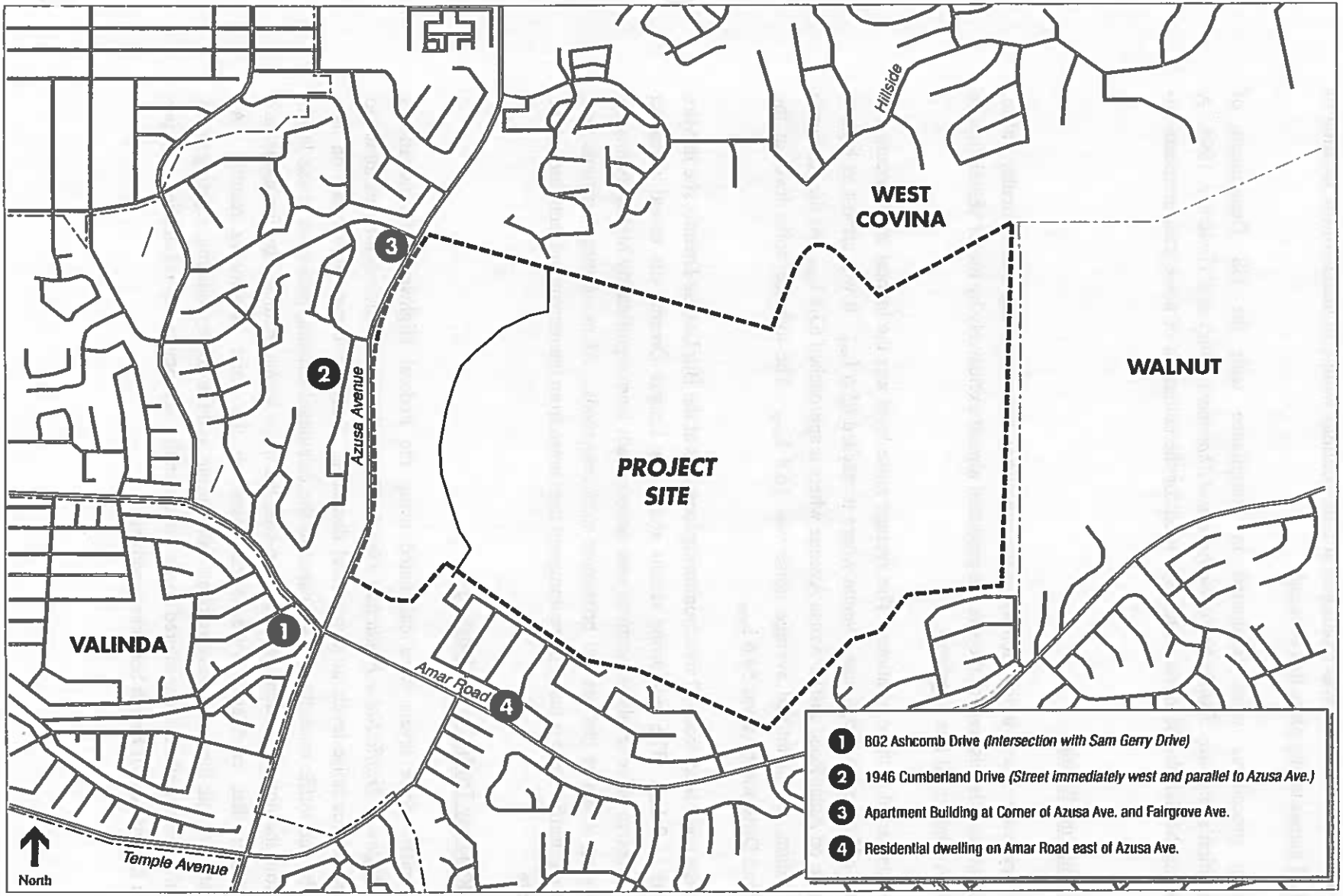
(2) 1946 Cumberland Drive (street immediately west and parallel to Azusa Avenue).

(3) Apartment Building at the corner of Azusa Avenue and Fairgrove Avenue.

(4) Residential dwelling on Amar Road east of Azusa Avenue.

Monitoring locations are shown on Figure 3.4-2.

To estimate evening noise resulting from the Big League Dreams project, noise was monitored at their existing facility in Mira Loma, located just east of Interstate 15 and south of the Pomona Freeway (State Route 60). Monitoring was conducted on Wednesday September 4, 2002 in the early evening. According to Big League Dreams officials, Wednesday night is the busiest



SOURCE: Environmental Science Associates, 2002

Figure 3.4-2
Noise Monitoring Locations

evening of the week. Noise was monitored at four locations within 50 meters of the location of the softball games taking place that evening.

Monitoring procedures were conducted in compliance with the US Department of Transportation's *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, 1995. A Gravimetrics Model db-308 noise meter was used for the collection of noise measurements on-site.

Noise Monitoring Results

The primary noise source in the vicinity of the site during the monitoring was vehicular traffic. Background noise levels west of the site are produced almost exclusively by motor vehicle traffic on Azusa Avenue in all four segments.

Noise levels varied at these locations. The average noise level was the highest at the location at the corner of Fairgrove and Azusa Avenue where it reached 65.6 L_{avg}. It was almost as high at the location on Amar Road east of Azusa Avenue where it approached 63.4 L_{avg}. At the Aschomb Drive location, the monitored average noise was 56.8 L_{avg}. The average noise level at the Cumberland Drive location was 54.6 L_{avg}.

The average noise level from all five monitoring locations at the Big League Dreams site in Mira Loma was 56.7 L_{avg}. The monitoring results at the Big League Dreams site reveal a distinct pattern. Ambient noise levels at locations near access roads were significantly higher than noise at monitoring locations that are not proximate to access roads. At monitoring locations near access roads, traffic noise is much more dominant than noise from the recreational activities at the project site.

Existing Roadway Traffic Noise Modeling

Existing traffic noise levels were calculated using the Federal Highway Administration's (FHWA) *Highway Traffic Noise Prediction Model*. The model uses traffic volumes as inputs to predict line-source noise levels at incremental distances. Traffic volumes were based on data provided by the traffic consultant. Compared to the calculated existing peak-hour noise levels derived from the noise measurements taken on-site, the noise levels predicted by the model are slightly higher than calculated noise levels based on the noise monitoring results. As demonstrated in both the noise measurements calculations and the noise modeling, existing noise levels at the project site are considered to be conditionally acceptable for residential uses per California Department of Health Services Standards.

Regulatory Setting

Various federal, state, and local agencies have developed guidelines for evaluating the compatibility of different land uses and various noise levels.

Federal Regulations

Federal regulations establish noise limits for medium and heavy trucks (more than 4.5 tons, gross vehicle weight rating) under the Code of Federal Regulations (CFR), Title 40, Part 205 Subpart B. The federal truck passby noise standard is 80 dBA at 15 meters (approximately 50 feet) from the vehicle pathway centerline. These standards are implemented through regulatory controls on vehicle manufacturers.

State Regulations and Compatibility Guidelines

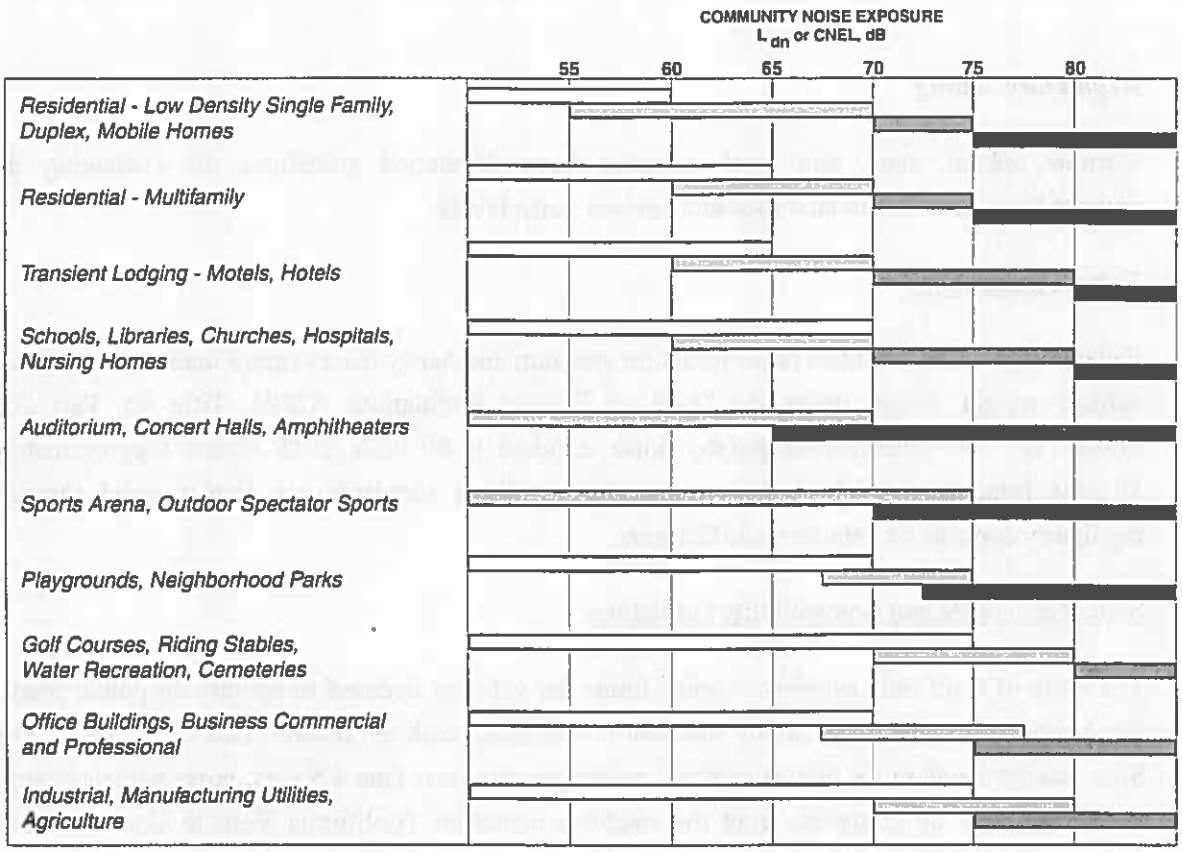
The State of California establishes noise limits for vehicles licensed to operate on public roads. For heavy trucks, the State passby standard is consistent with the federal limit of 80 dBA. The State passby standard for light trucks and passenger cars (less than 4.5 tons, gross vehicle rating) is also 80 dBA at 15 meters from the roadway centerline (California Vehicle Code Sections 23130 and 23130.5; 27150 et.seq.; 27204 and 27206). These standards are implemented through controls on vehicle manufacturers and by legal sanction of vehicle operators by state and local law enforcement officials.

The California Department of Health Services, in coordination with the Governor's office of Planning and Research, has established noise compatibility guidelines for different land uses. These guidelines are shown in Figure 3.4-3. According to these guidelines, noise levels exceeding 70 db, L_{dn} are normally unacceptable to residential uses; noise levels within 60 and 70 dB, L_{dn} are conditionally acceptable to such uses. Schools, libraries, churches, hospitals and nursing homes are treated as noise-sensitive uses which require acoustical studies within areas experiencing noise levels that exceed 60 dB, L_{dn}. The guidelines stress that modifications may be subject to modification to reflect the sensitivities of individual communities.

Local Regulations

Noise Element of West Covina General Plan. The City of West Covina's Noise Element established comprehensive goals and policies to address the City's noise concerns. The goals that are applicable to the project are listed as follows:

- Ensure that all areas of the City are free from excessive noise and that appropriate maximum levels be adopted for residential, commercial and industrial areas;



LEGEND:

NORMALLY ACCEPTABLE
Specified land use is satisfactory, based
upon the assumption that any building involved are of normal conventional construction, without any special noise insulation requirements.

CONDITIONALLY ACCEPTABLE
New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made.

Conventional construction, but with closed windows and
fresh air supply systems or air conditioning will normally suffice.

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

CLEARLY UNACCEPTABLE
New construction or development should generally not be undertaken.

SOURCE: California Department of Health. Guidelines for the Preparation and Content of Noise Elements of the General Plan. November 1990.

Figure 3.4-3
Noise and Land Use Compatibility Matrix Guidelines

- Reduce new noise sources to the maximum extent possible; and
- Reduce, to the extent possible, the impact of noise within the City.

The Noise Element policy that appears most relevant to the project is:

- Future projects within the City should reflect a consciousness on the part of the City regarding the attenuation of unnecessary noise near sensitive areas such as parks, hospitals, and residential neighborhoods.

Noise Ordinance

The City's Noise Ordinance includes noise regulations for addressing specific types of noise sources. The Noise Ordinance includes noise regulations for addressing specific noise sources.

The Ordinance limits the hours of construction and building projects to the hours of 7 a.m. to 6 p.m. Monday through Friday and between 8:00 a.m. and 5:00 p.m. on Saturdays; no construction activities are allowed on Sundays or legal holidays.

3.4.3 IMPACTS AND MITIGATION MEASURES

Thresholds of Significance

The CEQA Guidelines checklist provides the following thresholds for determining significance with respect to noise. Noise impacts would be considered significant if the project would:

- Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- Expose persons to or generate excessive groundborne vibration or groundborne noise levels.
- Create a substantially permanent increase (greater than 3 dBA) in ambient noise levels in the project vicinity above levels existing without the project.
- Create a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
- Be located within an airport land use plan or be located where such a plan has not been adopted and expose people residing or working in the project area to excessive noise levels.

- Be located within the vicinity of a private airstrip and expose people residing or working in the project area to excessive noise levels.

Construction Impacts

The previously certified EIR includes an assessment of construction noise impacts resulting from implementation of the Final Closure Plan (FCP) and construction of the Business Park. That document assessed and proposed mitigation for noise impacts associated with grading over 1 million cubic yards of soil. As indicated in the previously certified EIR, development would generate high noise levels intermittently during construction. This would be a short-term significant impact on residents adjacent to the project site. The previous EIR includes a series of construction noise mitigation measures which would apply to the project. These measures include compliance with the City of West Covina Noise Ordinance No. 1826, limiting the hours of construction, and utilizing construction equipment with approved and permitted noise shielding and muffling devices. In addition, there is a mitigation measure requiring the use of temporary noise barriers, mufflers and noise attenuating devices to reduce noise during construction. Since no additional grading or construction activities are anticipated in conjunction with the project evaluated in this SEIR, the mitigation measures from the previously certified EIR would apply to this project.

Impact 3.4-1: Upon completion of the proposed project, noise levels along local roadways resulting from project traffic are anticipated to increase.

Most of the noise generated by the implementation of the proposed project would primarily be traffic-generated noise (the project would contribute to an increase in local traffic volumes, resulting in higher noise levels along local roadways). Using the Federal Highway Administration's Highway Traffic Noise Prediction Model, traffic noise levels were analyzed for the five roadway segments described under existing conditions. The segments analyzed and results of the modeling are shown in Table 3.4-1.

The Federal Highway Administration (FHWA) model has been used to estimate existing and future noise levels in order to provide a consistent basis of analysis directly related to peak hour and daily traffic volume changes that would result from the proposed project. Traffic noise was analyzed under two scenarios:

(1) Future No Project Conditions (2005)

(2) Future 450,000 Square Foot Retail (2005)

TABLE 3.4-1: EXISTING AND PROJECTED PEAK-HOUR NOISE LEVELS ALONG SELECTED ROADWAYS (2005)

Modeled Roadway Segment			Future 2005 No New Project	Future 2005, 450K Retail	Worst Case Project Impact	Significant (Yes/No?
	From	To				
Azusa	Cameron	Francisquito	74.0	74.6	0.6	No
Azusa	Francisquito	Fairgrove	73.6	74.2	0.6	No
Azusa	Fairgrove	Amar	73.4	74.1	0.7	No
Amar	Valinda	Azusa	72.1	72.1	0.0	No
Amar	Azusa	Temple	72.0	72.1	0.1	No

Source: Environmental Science Associates, October 2002.

Table 3.4-1 shows calculated noise levels on five local street segments at distances of 15 meters from the centerline of Azusa Avenue and Amar Road.

In many cases, the noise levels predicted by the model are different from measured noise levels due to sound attenuation provided by site geometrics, which are not accounted for in the model.

In general, noise increases of less than 3-dBA are not noticeable, while a 3-dBA difference in noise levels is discernible due to the logarithmic nature of the acoustical scale. A 10 dBA increase is perceived as a doubling of loudness.

As shown in Table 3.4-1, noise levels in the year 2005 are expected to increase slightly in the project site vicinity as a result of the proposed project and the corresponding increase in traffic. The increase in noise due to traffic on local roadways generated by the proposed project is estimated to be no greater than 0.7 dBA over future (2005) conditions without the proposed project. These increases, which would remain under 3 dBA, would not be perceptible and would result in a less than significant impact to the ambient noise environment.

Mitigation Measures: Since this impact is less than significant, no mitigation measures are required.

Residual Impact: Less than significant.

Impact 3.4-2: Upon completion of the proposed project, nighttime noise due to recreational activities are anticipated to increase.

The proposed project would operate a Big League Dreams baseball/softball facility on northwest portion of the project site. Big League Dreams would consist of six scaled down replica major league baseball stadiums, a nine station batting cage, four beach volleyball courts, 2 playground/picnic areas, two family style restaurants, and one covered multi sport pavilion designed to accommodate indoor inline hockey, basketball, indoor soccer, volleyball, and corporate special events.

Big League Dreams would primarily operate on weeknights and all day on weekends. Weeknight activities would result in noise occurring at a noise sensitive time period. To assess the possible nighttime noise impacts associated with nighttime activities at Big League Dreams, an ESA technician took five 15 minute nighttime noise measurements at the Big League Dreams facility located in Mira Loma California (unincorporated Riverside County). All measurements occurred between 6:30 p.m. and 8:35 p.m. and at fields that had baseball or softball games occurring. Monitoring results are shown in Table 3.4-2.

As shown in Table 3.4-2, all noise measurements would fall into the normally acceptable noise level. In addition, the distance between the Big League Dreams facility and the closest sensitive receptor, (future housing development not yet built just north of Big League Dreams), is approximately 200 feet. At this distance, noise attenuation would reduce the average noise level heard by sensitive receptors to approximately 47 dBA. Due to the logarithmic nature of sound, and the high level of traffic along Azusa Avenue, the addition of 47 dBA to the ambient noise environment would not perceivably increase the noise level at sensitive receptors. This would be considered a less than significant impact. No mitigation measures would be required.

Mitigation Measures: Since this impact is less than significant, no mitigation measures are required.

Residual Impact: Less than significant.

TABLE 3.4-2: BIG LEAGUE DREAMS NOISE MONITORING, MIRA LOMA CALIFORNIA

Location	Start Time	End Time	Lavg	Lmax
Behind Polo Grounds along Bellgrave Avenue	18:30	18:45	57.8	64.5
Behind Forbes Field along Galena Avenue	18:55	19:10	54.3	64.6
Between Fenway Park and Pawtucket along Bellgrave Avenue	19:20	19:35	61.8	73.1
Behind Pawtucket Field	19:45	20:00	55.4	66.8
Behind Durham Field and Batting Cage along Galena Avenue	20:20	20:35	54.3	65.2

a. Monitoring done on September 4, 2002.

Source: Environmental Science Associates, October 2002.

REFERENCES

Beranek, L.L. 1954. Acoustics (New York: McGraw-Hill).

California Office of Planning and Research. 1987 (June). State of California General Plan Guidelines.

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Cornett, C. Lawrence and Hina, Charles E. 1979. *Methods for Predicting Noise and Vibration Impacts*, U.S. Dept. of Transportation, Transportation Systems Center.

Stevens, K.N., et al. 1955 (January). *Noise Control,* "A Community's Reaction to Noise: Can It Be Forecast?"

3.5 VISION AND GLARE

3.5.1 APPROACH TO ANALYSIS

Vision and glare are being evaluated in this EIR because the BLD project involves a substantial amount of nighttime activities in lighted facilities on a parcel adjacent to a major arterial (Azusa Avenue) proximate to residential uses located north and west of the site. The framework for this impact assessment is two-fold: (1) glare is a potential hazard to motorists along Azusa Avenue and (2) spill lighting is a potential nuisance and inconvenience to residential land uses located in the vicinity of the project site.

3.5.2 SETTING

Azusa Avenue is currently served by streetlights. There are no existing sources of light or glare, originating from the project site, visible to motorists on Azusa Avenue or to residential uses north and west of the project site. The only source of light currently originating from the BKK site are blinking lights on the communications tower on the northeast side of the site and security lighting in the office/facility area on the southern portion of the project site.

3.5.3 IMPACTS AND MITIGATION MEASURES

Thresholds of Significance

Appendix G of the State *CEQA Guidelines* lists the following significance criteria for light and glare:

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

Project Impacts

Impact 3.5-1: BLD's proximity to nearby residential uses and Azusa Avenue creates the potential to create a major new source of light and glare.

The BLD project will involve the use of stadium lighting at each of the four replica stadiums to be constructed. Although a lighting plan has not been submitted for review to the City, light poles will be placed around each stadium at an elevation between 60 to 80 feet. In general, the higher the elevation of the light standards, the better the lights can be aimed at the field and away from sensitive receptors (e.g. nearby residents, motorists on Azusa Avenue). BLD's lighting contractor utilizes a two-tiered reflector system that minimizes upward spill light and utilizes an aiming system that creates a single composite beam on each pole. According to information

provided by the contractor, the system proposed for the BLD site controls between 70% and 95% of spill light and glare while maintaining the required lighting levels for events. Lacking a lighting plan that specifies the location of poles, the configuration, intensity and directional patterns of the lights to be used at the site, it is not possible to determine whether potential impacts to residents and motorists in the vicinity of the project site will be reduced to a less than significant level.

Mitigation Measures: It is recommended that the following mitigation measures be implemented to reduce this impact to a less-than-significant level:

The City shall retain the services of a qualified lighting consultant to review the lighting plan to be submitted by BLD.

M-3.5-1 The City shall retain the services of a qualified lighting consultant to review the lighting plan to be submitted by BLD.

M-3.5-2 The lighting plan shall to be submitted by BLD shall include provisions which demonstrate how the plan has been formulated to minimize light and glare on nearby residents and Azusa Avenue motorists. To the extent feasible, lighting shall be directed away from Azusa Avenue and residential areas north of the site.

M-3.5-3 The lighting plan shall include provisions to limit glare from direct and indirect sources. To limit glare from indirect sources (e.g. reflective surfaces illuminated by direct sources) on Azusa Avenue, the plan shall evaluate the need for more dense vegetation along this arterial.

M-3.5-4 The plan shall also include procedures to respond to complaints by residents. These procedures shall involve City staff verification of complaints and fine tuning of the lighting system by BLD to respond to verified complaints.

Residual Impact: This impact is considered significant and unavoidable unless funds are allocated to implement the mitigation measures above.

Impact 3.5-2: A line of sight analysis conducted for residential areas in proximity to the landfill shows that the extension of the golf course into City-dedicated open space north of the project site will not result in a significant impact.

Compared to the previously certified EIR, this project involves the extension of the public golf course onto an approximate 13-acre open space area north of the project site. To assess the visual impacts of this extension, lines of sight between the extension area and three nearby residential

areas was evaluated. The lines of sight evaluated included: (1) homes directly east of the clubhouse (See Figure 2-4) in the City of Walnut, (2) homes almost due west of the clubhouse in the Fairgrove Avenue area, and (3) a future home development site located to the northwest of the project site. Due to elevation of intervening topography, there are no direct views of the extension area from these locations. This impact is considered less than significant.

Mitigation Measures: Since this impact is less than significant, mitigation measures are not required.

Residual Impact: Less than significant.

CHAPTER 4

CUMULATIVE IMPACTS

4.1 APPROACH TO ANALYSIS

A cumulative impact is created as a result of the combination of the project evaluated in the EIR together with other proposed and recently approved (but not yet constructed) projects. For purposes of this analysis, a proposed project is one where land use permit applications have been deemed complete by the jurisdiction in which it is located. A recent project is one that has been approved in the last three years. The purpose of this analysis is to disclose significant cumulative impacts resulting from the project in combination with other projects. §15130 of the State CEQA Guidelines require that the assessment of cumulative impacts include:

- Either: (A) a list of projects producing related or cumulative impacts, including those outside the control of the lead agency; or (b) a summary of projections contained in an adopted general plan or in a prior environmental document which has been adopted or certified which described or evaluated regional or areawide conditions contributing to cumulative impacts.

- A discussion of the geographic scope of the area affected by the cumulative effect,

- A summary of expected environmental effects to be produced by this projects; and,

- Reasonable, feasible options for mitigating or avoiding the project's contribution to significant cumulative effects.

4.2 PROJECTS WITH RELATED OR CUMULATIVE EFFECTS

This analysis relies on a list of projects that are current and reasonably foreseeable and that could have cumulative effects in conjunction with the project. This list (see Table 3.3-3) was compiled based on information provided by the cities of West Covina, Walnut, the City of Industry and other nearby jurisdictions. For analysis purposes, the related projects which serve as the basis for cumulative impact assessment are all those with a potential traffic impact on the roadway network evaluated in the traffic impact assessment (see Section 3.3).

One proposed project, which is not on the list, which would have a major impact on traffic and circulation is the Azusa Avenue Capacity Enhancement Study. This study, which is pending approval by the City, provides several alternative measures to increase the capacity and improve the performance of intersections on Azusa Avenue between Temple Street north to the I-10

freeway. Unlike the other projects which will increase cumulative traffic and related impacts (e.g. air and noise), this project will result in beneficial traffic impacts. Please note that the assessment of traffic impacts below does not assume the implementation of the Azusa Avenue Capacity Enhancement Project. Currently, implementation is considered problematic because the West Covina City Council has not endorsed or approved this study and because neither West Covina, Caltrans or the Federal Highway Administration have programmed funds to construct these improvements.

4.3 IMPACTS AND MITIGATION MEASURES

Land Use

The project's land use impacts on uses in the vicinity of the project site are evaluated in Section 3.1 of this EIR. One project listed in Table 3.3-3 that will be affected by the project is the Walnut Hills Development that is adjacent to the BKK Landfill project site in the City of Walnut. Since the Walnut Hills Development also includes golf, the portion of the project site closest to the proposed Walnut Hills Development is the 73-acre northeast parcel being developed as part of the public golf course. The proposed uses of these two sites appear compatible. There does not appear to be an adverse land use compatibility relationship between the project and other projects listed in Table 3.3-3.

Geological Conditions

The geologic impacts of the project are site-specific. There are no cumulative relationship between geological impacts of the project and the projects listed in Table 3.3-3.

Groundwater Quality

Ground water quality impacts related to implementation of the FCP and FPCMP were evaluated in the previously certified EIR. As discussed in Section 7, no significant impacts on groundwater quality are anticipated in conjunction with this project. Similarly, the projects in Table 3.3-3 are not of a type expected to result in a deterioration of groundwater quality. Accordingly, no cumulative impacts are likely to occur.

Surface Water Quality

As discussed in Section 7, no significant surface water quality impacts are anticipated in conjunction with the project. The project will have no effect on surface water quality at related project sites.

Biological Resources

The Walnut Hills Development shares many of the same biologic resource characteristics of the project site. The Walnut Land Company is a common developer on both sites. The company has indicated that it will jointly develop and implement biological resource mitigation programs for both sites. Since development throughout the San Jose Hills has already fragmented many habitats, the cumulative impact of this project is not considered significant.

Air

As indicated in Section 3.2, the project is likely to have an unavoidable impact on CO, NO_x, ROC and PM_{10} emissions that will greatly exceed the significance criteria of the SCAQMD. These impacts will occur as a result of project traffic. Traffic from the projects listed in Table 3.3-3 will further increase these emissions and further contribute to an unavoidable cumulative impact on air quality.

Traffic

Trip generation from cumulative projects within an approximate four-mile radius were identified in Table 3.3-3. The total cumulative project traffic is anticipated to increase existing traffic levels by 3% each year over the three year period between baseline conditions (2002) and project build out (2005). Results of the cumulative traffic analysis in Appendix E shows that a total of 25 of the project intersections would operate at LOS D or better with the addition of cumulative traffic and assumed roadway and intersection improvements. However, two intersections would experience unacceptable traffic operations during PM peak-hour periods: (1) Valley Boulevard/Lemon Avenue and (2) I-10 westbound off-ramp/Grand Avenue. Based on the traffic distribution in the Traffic Study (See Appendix E), little if any project-related traffic would utilize these intersections. Therefore mitigation measures at these locations have not been identified. Without mitigation, however, these cumulative traffic impacts are considered significant and unavoidable.

Hazards (Health Risk)

An assessment of health risks related to the project was presented in previously certified EIR. Since the HRA showed no significant health risk as related to proposed uses on the site and development in proximity to the site, no cumulative impacts are anticipated for other proposed projects at a greater distance from the site. A similar health risk assessment conducted for the City of Walnut, which evaluates risks related to the Class I (hazardous waste) landfill on the proposed Walnut Hills development also shows no significant project or cumulative impact. The potential health hazards evaluated in the previously certified EIR and in this document are

specific to the BKK site. The projects used for cumulative impact assessment purposes are not of the type to increase the types of health risks unique to landfills.

Noise

The increased level of traffic associated with cumulative development would result in increased noise on local roadways in the project area. The project specific noise impacts associated with the project are less-than-significant. Similarly, cumulative noise impacts are not considered significant because the anticipated increase will be less than 3 dBA, the minimum increase discernible to the human ear.

Visual/Aesthetic Resources

These impacts are site specific, no cumulative visual impacts are anticipated in conjunction with the project.

CHAPTER 5
PROJECT ALTERNATIVES

5.1 APPROACH TO ANALYSIS

The California Environmental Quality Act (CEQA) Guidelines require EIRs to describe and evaluate a range of reasonable alternatives to a project, or to the location of a project, that would feasibly attain most of the project objectives and avoid or substantially lessen significant project impacts. Since this SEIR evaluates a project alternative, the alternative evaluated in this section is compared to the project alternative evaluated in the body of the EIR.

The Guidelines set forth the following criteria for selecting alternatives:

- "An EIR shall describe *a range of reasonable alternatives to the project* (emphasis added), or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project..." An EIR must also consider "a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." "The lead agency is responsible for selecting a range of alternatives for examination and must publicly disclose its reasoning for selecting those alternatives" (§ 15126.6[a]).
- "The specific alternative of 'no project' shall also be evaluated along with its impact." (§15126.6[e]).

The CEQA Guidelines describe two types of alternatives that may be reviewed in an EIR: (1) alternatives *to* the project that are other projects entirely or other approaches to achieving the project objectives rather than the project (or modified project); and (2) alternatives *of* the project that include modified project components such as modified facilities, layout, size and scale.

5.2 SELECTION AND RATIONALE FOR SELECTION OF ALTERNATIVES

This SEIR evaluates an alternative *of* the project. The reason for this is the project's relationship to past disposal activities. The project is a key component of an overall plan to reclaim and redevelop a former disposal facility. The overall plan, which includes implementation of the FCP, FPCMP, and the public golf course, was evaluated in the previously certified EIR.

The alternatives described herein was selected to illustrate a different approach to development that could eliminate or reduce unavoidable impacts and achieve most objectives of the project. This basis of selection is consistent with the provisions of § 15126(f) of the *CEQA Guidelines*.

The alternatives were selected upon the completion of the impact assessment in the previous chapter. Since several unavoidable project impacts (traffic, air quality) relate to the development of the proposed commercial retail center, the alternatives selected for analysis focus on reducing traffic and related air quality impacts. The alternatives evaluated herein and the rationale for their consideration are described as follows:

- The "No Project" alternative: Under CEQA, the "no project" alternative is one that defines conditions if no discretionary approvals are granted for the project. Using this definition, the "no project" alternative means the development of the business park in accordance with the Specific Plan approved in conjunction with the previously certified EIR. It means that the BLD project would not occur and that commercial retail development would occur in accordance with the previously approved Specific Plan.

- Recreation alternative: Under this alternative, the entire project site would be developed for recreational use. The alternative would include the BLD project, the proposed public recreational uses at the site, and unspecified other public or privately-operated recreational uses elsewhere on the southern 30 acres of Parcel 1. This emphasis on recreation was selected because it is consistent with project objectives to structure the project to provide employment opportunities and regionally significant recreational and commercial opportunities. Its selection and evaluation allows a direct comparison of project-related traffic and air quality impacts and mitigation to those needed for this alternative. Implementation of this alternative would require a further modification to the deed restrictions which currently limit the extent of recreational use on the project site.

The identification alternatives selected is appropriate given the unavoidable impacts of the project. The following analysis includes a description of each alternative, a narrative summary of the major differences between each alternative and the project, and a discussion of which alternatives, if any, are environmentally superior to either of the project alternatives.

5.3 "NO PROJECT" ALTERNATIVE

5.3.1 DESCRIPTION

The "no project" alternative is defined as fully implementing the FCP and FPCMP, the BKK business park specific plan, and the public golf course and landfill specific plan. This is the project for which environmental impacts were evaluated in the previously certified EIR. Under the "no project" alternative, BKK would develop the Azusa Avenue frontage (Parcel 1) as described in the specific plan evaluated in the previous EIR. The specific plan calls for approximately 1,049,144 square feet of permitted and conditionally permitted commercial and

light industrial land uses. The circulation plan for this alternative would include the construction of proposed "A" Street.

5.3.2 SUMMARY OF IMPACTS

This alternative would result in the same impacts that were identified in the previously certified EIR. When compared to the alternative projects evaluated in this SEIR, this alternative would result in the following impacts:

- This alternative would result in the same (less than significant) impacts related to soils and geology; population and housing; groundwater quality; surface water quality; biological resources; cultural resources; public services; and utilities and service systems.

- In terms of noise, this alternative would generate somewhat less traffic noise than either of the alternative projects included in the project description. Both alternative projects will generate more, but a less than significant increase, in nighttime noise due to recreational activities during evening hours.

- This alternative eliminates the need for the additional environmental monitoring protocol being implemented to mitigate the potential land use, public health and safety impacts related to permitting outdoor recreational and park uses at the site. However, the implementation of the environmental monitoring protocol in conjunction with other protective measures to be implemented in conjunction with the FCP and FPCMP reduce development impacts to a less than significant level.

- Both this alternative and the project alternatives result in lighting and glare impacts that can reduced to a less than significant level with the implementation of the mitigation measures identified in Section 3.5 of this SEIR.

- This alternative will result in significant traffic impacts at eight intersections in the vicinity of the project site. Given uncertainties about funding for these improvements, these impacts were considered unavoidable in the previously certified EIR. Both project alternatives evaluated in this SEIR generate significant traffic impacts at only one intersection (Azusa Avenue and Amar Road).

- This alternative would have less daily traffic trips and therefore less impact on air quality than the project alternatives evaluated in the SEIR.

In summary, this alternative would have a far greater traffic impact than either of the project alternatives evaluated in the SEIR. The alternative would in less severe (although still significant and unavoidable) air quality impacts than either of the alternatives evaluated in the SEIR. With

these differential effects, this alternative is not considered environmentally superior to the project alternatives evaluated in the SEIR.

5.4 DEVELOPMENT OF ONLY RECREATIONAL USE

5.4.1 DESCRIPTION

Under this alternative, the entire project site (business park area) would be developed for recreational use; there would be no development of commercial retail uses. Full implementation of the FCP, FPCMP, and the Landfill Specific Plan would occur on the remainder of the BKK site. The golf course would be developed and constructed as proposed in the previously certified EIR.

5.4.2 SUMMARY OF IMPACTS

The major benefits of this alternative are to reduce the traffic and mobile air quality impacts of the project. Recreational uses tend to generate fewer daily trips than the type of commercial retail uses proposed with the project. When compared to the alternative projects evaluated in this SEIR, this alternative would result in the following impacts:

- This alternative would result in the same (less than significant) impacts related to soils and geology; population and housing; groundwater quality; surface water quality; biological resources; cultural resources; public services; and utilities and service systems.
- In terms of noise, this alternative would generate less traffic noise than either of the alternative projects included in the project description. This alternative would result in more nighttime noise than the project alternatives. However, this impact is not likely to be significant. Planned recreational uses related to the project alternatives are closer to nearby residential uses than the recreational areas to be added under this alternative.
- From a land use, public health and safety perspective this alternative would result in the need to apply the environmental monitoring protocol to be implemented in conjunction with the planned recreational uses on the north 70 acres of Parcel 1 to the south 30 acres of this parcel. With the implementation of these types of controls, this alternative will not result in significant impacts.
- Both this alternative and the project alternatives result in lighting and glare impacts that can reduced to a less than significant level with the implementation of mitigation measures identified in Section 3.5 of this SEIR.

- This alternative will in substantially less daily trips and related traffic impacts at nearby intersections than the project alternatives.
- Less daily trips will result in less severe air quality impacts than the project alternatives.

In summary, although this alternative would have result in less significant traffic and air quality impacts of the project. It is therefore considered environmentally superior to the project alternatives.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because it would have less impact than identified for the proposed project, the alternative of using the entire business park project site for recreational use is considered environmentally superior to the project. As indicated above, this alternative results in more beneficial air quality and traffic impacts than the project evaluated in the SEIR. It is also consistent with project objectives of providing employment opportunities and regionally significant recreational opportunities.

The "no project" alternative is not considered environmentally superior to the project. This impact worsens air quality impacts and traffic impacts at several intersections when compared to the project. The alternative does not otherwise mitigate or eliminate other unavoidable impacts of the project.

CHAPTER 6
GROWTH-INDUCING IMPACTS

6.1 APPROACH TO ANALYSIS

The CEQA Guidelines require that an EIR evaluate the growth-inducing impact of a proposed action. Section 15126(d) of the *Guidelines* define a growth-inducing impact as follows:

> The ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth is not assumed to be necessarily, beneficial, detrimental, or of little significance to the environment.

The environmental effects of a project's induced growth are secondary or indirect impacts. Secondary effects of growth can result in increased demand for community and/or public services, increased traffic, noise, air emissions and the conversion of undeveloped land to urban use.

Based on the CEQA definition above, assessing the growth inducement potential of the project involves identifying which aspects of the project may have growth-inducing impacts and making an assessment of whether the potential growth induced by the project would be consistent with the land use and growth management policies of communities affected by the project. It should be noted that a variety of factors might influence new development or population growth in areas near the project site. Key factors include regional economic conditions, interest rates, and the availability of adequate infrastructure (water service, sewers, schools, roadways etc.).

6.2 GROWTH INDUCING IMPACTS OF THE PROJECT

The project is comprised of several types of land uses including commercial recreational uses and a large area to be developed for commercial retail use. All of these land uses are considered "population-serving" or "growth-accommodating", i.e. they serve the existing demand for these types of land uses within the community. They are not the type of land uses (e.g. basic industry, manufacturing etc) that generate the demand for housing and other types of growth and development. Accordingly, the project is not viewed as growth-inducing from this perspective.

The project site is located within a developed community with access to all necessary public services and utilities. In contrast to development located at the fringe of urban areas, development at the project site can be characterized as "infill" development. Since development of the site will not require increased capacity or the extension of services and utilities to an

unserved area, the project is not likely to generate or induce the demand for additional unplanned development in the general vicinity of the project site.

Growth inducement can also be evaluated by comparing the employment growth resulting from the project to regional forecasts prepared by the Southern California Association of Governments (SCAG). The most recent forecasts approved by SCAG were published in conjunction with the 2001 Regional Transportation Plan (RTP). These forecasts show employment in West Covina increasing from 29,659 in 1997 to 32,000 in the year 2010. Full development of the project site may result in up to 950 additional jobs, or approximately 40% of the employment growth forecast by SCAG for the year 2010.

The project's growth-inducing impact is not considered significant for the following reasons:

- Job growth from the project is within the amount forecasted by SCAG,
- Anticipated job growth (e.g. recreational and retail commercial jobs) is not the type that will generate the demand for new housing. Project job growth is likely to have a minimal effect in generating demand for additional service jobs.
- The project will not generate the need for new or expanded public services.
- Because the area near the project site is already developed, even if the project was considered growth-inducing there are few, if any areas, near the project site where this growth could occur.

CHAPTER 7
OTHER TOPICS REQUIRED BY CEQA

7.1 LESS-THAN-SIGNIFICANT ENVIRONMENTAL EFFECTS

Section 3 of this document contains a comprehensive analysis of potentially significant impacts of the proposed project. This section of the SEIR identifies impacts that are considered less-than-significant and presents the rationale used to categorize these impacts in this manner.

Land Use and Planning

There is no potential impact to agricultural land or resources because no agricultural land is located on the project site. Other land use and planning impacts related to the project are discussed in Section 3.1 of this document.

Housing

The project will not result in the potential relocation or displacement of any existing housing units. This impact is, therefore, considered, less than significant.

Geological Conditions

The previously certified EIR evaluated potentially significant soils and geological impacts related to development at the project site. A letter received from DTSC raises concerns about how the previously certified EIR addressed several geological issues. These issues include seismic ground failure and settlement. While the commenter may not agree with the previously certified EIRs responses to these comments, there is no requirement under CEQA to revisit these issues after an EIR has been certified. This is especially true since these issues are more related to implementation of the FCP (evaluated in the previously certified EIR) than to the proposed project evaluated in this SEIR.

A DTSC response to the NOP for the SEIR also indicates that a portion of Parcel 1, proposed for development in this SEIR, was formally used for disposal activities in the 1960's and that contaminated soils may still be present and pose risks to human health. The letter states that DTSC has requested additional soil, soil gas and groundwater data be collected in this area and is currently working with BKK to resolve this matter. This issue was raised by other commenters in the previously certified EIR. The portion of Parcel 1 in question is a finger-shaped piece of land parallel to and just south of the existing landfill entrance road. Contaminated soils previously located in this area were removed in the past under the supervision of several regulatory agencies.

Although DTSC has raised questions about whether the cleanup standards used in the cleanup are as stringent as today's standards, there is no empirical data showing that the soils are actually contaminated in any way. Accordingly, this impact is not viewed as significant.

Water

The previously certified EIR evaluated potentially significant groundwater and surface water impacts related to the approval of the FCP and proposed development at the project site. In their September 19, 2002 response to the NOP for this SEIR, the DTSC raised concerns regarding the presence of 1,4 – Dioxane near the two drains in the Upper Detention Basin (UPD). Trace quantities, in the parts per billion (ppb) range, have been detected in proximity to the two drain pipes that empty into this basin. These drains are placed below the liner of the Class III landfill in an area where disposal occurred in the 1960's. Water quality sampling at the site boundary have not shown detectable quantities of this contaminant.

In view of the sampling results at the site boundary, these occurrences have not significantly affected off-site surface water quality. Continued monitoring and remedial action will be required in the future under the NPDES program, hence this impact is considered les than significant. The DTSC letter also raises concerns regarding potential contact with contaminated surface water. Potential contact, except by landfill workers, is unlikely. Any landfill workers in the vicinity of the basin(s) would be apprised of potential health risks. The UPD will be expanded as proposed in the FCP. The FCP also proposes to fill in the two lower detention basins. The new expanded basin will be physically separated and fenced off from the portions of the project site utilized by the public hence no significant impact is anticipated.

The same DTSC letter states that the SEIR should acknowledge the presence and potential impacts related to the presence of contaminated groundwater up and down gradient of Parcel 1 (where the proposed project land uses are located). Existing groundwater conditions were documented in the previously certified EIR. The previous EIR was certified in October 2000. At approximately the same time (September 2000), the USEPA issued a corrective action order for ground water contamination at the project site. That order requires the installation of extraction and monitoring wells at various locations around the project site. The order requires the new monitoring wells around Parcel 1. No extraction wells are required near Parcel 1. Under the order, BKK is required to monitor, extract and treat contaminated groundwater. Since the implementation of this order will improve ground water quality and since the project evaluated in this document will in no way result in conditions that lead to a deterioration of ground water quality, this impact is considered less than significant.

DTSC also requests that the SEIR acknowledge the Environmental Monitoring Protocol to be implemented by BKK for the northern 70 acres of Parcel 1. This protocol is being required by EPA in response to a request by the City to modify the deed restrictions for the site to allow for parks and recreational uses. For additional discussion of this Protocol, please see Section 3.1 of this SEIR. The protocol involves pre-construction sampling, post-construction sampling (prior to public access) and periodic monitoring. The program is designed to reduce potential exposure to contaminants from the inhalation of volatile organic compounds (VOCs) from subsurface soils and from the inhalation of VOCs volatilized from contaminated ground water. From a CEQA perspective, the implementation of this Environmental Monitoring Protocol provides a long-term measure to further mitigate impacts related to soil and/or groundwater to less than significant levels.

A second letter from DTSC raises several other issues. (1) The commenter asserts that irrigation of the golf course may result in increased contaminant mobility that could affect the Class I Landfill unit. This issue was addressed in the previously certified EIR. The proposed project evaluated in this SEIR does not include the golf course hence additional analysis is not warranted. (2) The commenter raises issues pertaining to the decommissioning of wells related to implementation of the closure plan. The previously certified EIR responded to this in the context of a question of how wells in the "A" street right-of-way may be relocated and how their design would minimize potential damage and tampering (provide FEIR citation). From an air and water quality perspective improperly decommissioned wells could provide a contaminant pathways. However, since the decommissioning of wells on the project site will occur in accordance with the applicable regulatory procedures, this impact is considered less than significant.

Air Quality

No aspect of the project will lead to the creation of objectionable odors. Similarly, the project does not involve air impacts of a magnitude that would result in a change in air moisture, temperature or climatic change.

Compared to the project evaluated in the previously certified EIR, the proposed project with 450,000 square feet of commercial retail space will result in less AM and PM peak hour trips. Average daily trips are greater for the proposed project than for the project evaluated in the previously certified EIR. Therefore, regional criteria pollutant emissions are evaluated in Section 3.2 of this EIR.

Noise

Average daily trips are greater for the proposed project than for the project evaluated in the previously certified EIR. Therefore, regional traffic are evaluated in Section 3.3 of this EIR. Land uses evaluated in the previously certified EIR were not considered likely to generate nighttime noise. Since the proposed project includes the Big League Dreams project with recreational activities in the evening, nighttime noise is also evaluated in Section 3.3 of this EIR.

Biological Resources

The previously certified EIR assessed potential impacts to biological resources. This document identified potentially significant impacts related to the loss of Coastal Sage Scrub (CSS) and potential impacts to the California gnatcatcher. A mitigation measure in the previously certified EIR required that the applicant conduct a pre-construction survey to establish the absence or presence of this species on the project site. In compliance with this mitigation measure, a survey was conducted by a licensed biologist in accordance with the current United States Fish and Wildlife Service (USFWS) protocol between June and August, 2002. This survey resulted in three detections, two in CSS near the northwest project boundary and one farther south in CSS along the Azusa Avenue frontage of the site. Discussions are currently underway with the U.S. Army Corps of Engineers (USACE) and the USFWS to mitigate this impact through the avoidance of habitat on the project site. It currently appears that it will be possible to fully mitigate this impact through the avoidance of habitat on the project site. The U.S. Fish and Wildlife Service issued a draft Biological Opinion (BO) on May 9, 2003, for review by the City Redevelopment Agency and BKK. The RDA and BKK responded with requested edits to the conservation measures of the BO. The USFWS is in the process of revising the conservation measures and anticipates finalizing the BO by the end of May 2003. Finalizing the BO is one of the last steps taken to prior to issuance of a Section 7 permit authorizing construction on the project site.

The previously certified EIR also identified potentially significant to jurisdictional wetlands and water-related features under the jurisdiction of the California Department of Fish and Game (CDFG) and the USACE. A mitigation measure in this environmental document call for the completion of wetlands delineation prior to construction. Another mitigation measure states that in the event that wetlands and non-wetlands water sources are found to be jurisdictional that permits be obtained from the USACE, CDFG and RWQCB. In compliance with these mitigation measures, the property owner (BKK) has completed a delineation and obtained a Nationwide Section 4 permit which expires on February 11, 2003. BKK has requested an extension of this permit. In response to this request, the USACE has asked to review the results of the gnatcatcher survey referred to above.

In compliance with other biological resource mitigation measures in the previously certified EIR, BKK has obtained a Streambed Alteration Agreement from the CDFG (April 12, 2001) and a Section 401 permit from the Regional Water Quality Control Board (March 13, 2001). Copies of the biological permits and related correspondence with the regulatory agencies is also provided in Appendix F.

As indicated in the project description (Section 2), the redesign of the golf course may involve the use of an approximate 13-acre area not previously considered as part of the BKK site. This is city-dedicated land for which a biological reconnaissance survey was conducted in conjunction with the previously certified EIR. This parcel is identified as California Walnut in the previously certified EIR. The implementation of mitigation measure 4.6-5 in the previously certified EIR will reduce the potential impact of development on this habitat. These mitigations include replacement at a 3:1 ratio, relocation on- or off-site, relocation methods approved by a City arborist, special construction techniques for development which encroaches on the feeder-zone or a twelve foot radius of the trunk, and several other measures.

Public Health and Safety

In terms of public health and safety, the major difference between the project evaluated in this SEIR and the project evaluated in the previously certified EIR is that the project evaluated in the SEIR introduces park and recreational uses to the mix of land uses proposed at the project site. As described in the Land Use Section of this document (Section 3.1), deed restrictions previously prohibited parks and recreational uses on the project site.

The previously certified EIR included a health risk assessment that showed that implementation of the FCP and FPCMP for the Class III (municipal solid waste) landfill would not pose a significant health risk to a variety of on- and off-site receptors including children and adult recreational users. Since that EIR was certified, additional measures to mitigate potential health risks have been required by USEPA. In September 2000, USEPA approved a Final Remedy Decision to remediate groundwater contamination from the Class I (hazardous waste) landfill. This decision requires the installation of extraction and monitoring wells at various locations around the project site. The order requires new monitoring wells around Parcel 1. No extraction wells are required near Parcel 1. Under the order, BKK is required to monitor, extract and treat contaminated groundwater. The implementation of this order will reduce health risks associated with baseline groundwater conditions around the project site.

Further, in response to the City's request to allow parks and recreational uses on the northern 70 acres of Parcel 1 in conjunction with the BLD project, USEPA and BKK have negotiated an Environmental Monitoring Protocol which is described under the discussion of water quality

impacts and included in Appendix C. Like the Final Remedy Decision, the implementation of this protocol provides additional safeguards to limit health risks related to the closure of the Class I and Class III landfills. The mitigative value of implementing the Final Remedy Decision and Environmental Monitoring Protocol will further reduce the significance of potential risks related to recreational users of the project site. It should be noted that the project change to allow recreational uses on the north 70 acres of Parcel 1 would be consistent with existing laws. All other prohibited uses (residential, day care) are prohibited by statute. There is no such statutory prohibition for recreational uses.

A letter received on the NOP from the DTSC indicates that BKK has postulated the occurrence of naturally occurring methane gas (methane) beneath the project site. Several years ago, BKK conducted tests to determine the origin of elevated methane concentrations on the project site. Laboratory procedures using carbon-dating established that the source was likely to be naturally occurring methane rather than the landfill. Irrespective of the source, the Hazards section of the previously certified EIR required the implementation of a series of mitigation measures to limit hazards associated with the migration of landfill gas. These measures include the installation of methane protection systems which include, at a minimum, protective membranes beneath building foundations; ongoing monitoring of landfill gas probes; the placement of additional probes near new on-site structures; methane sensors and alarms in new buildings; and the preparation of an emergency response plan to be implemented in the event that methane alarms are triggered. These mitigation measures would protect against the migration of methane irrespective of whether it originated in the landfill or in subsurface geologic formations.

Cultural Resources

There are no known paleontological, archaeological or historical resources on the project site.

Public Services and Utilities

The proposed project does not involve housing or otherwise effect capacity utilization of school facilities in the vicinity of the project site. The impacts on police and fire services were discussed in Section 4.10 of the previously certified EIR. Incrementally, the proposed project evaluated in this EIR generate the same or less impacts to police and fire services than the project evaluated in the previously certified EIR.

Energy

There is no direct relationship between the project and any adopted Energy Conservation Plan. Because the project evaluated in this EIR involves less urban development than the project

evaluated in the previous EIR, the project in this EIR will result in less demand for energy resources. Further, the site is not known to contain mineral resources.

Recreation

The project will introduce specific types of recreational activities not found in the project area. The project will not adversely affect existing recreational opportunities (e.g. Galster Park) in the project area.

7.2 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

The proposed project could result in significant adverse impacts. Mitigation measures proposed as part of the project (including those required by State and Federal regulations), as well as mitigation measures recommended by this SEIR would reduce most of the impacts to a less-than-significant level. The implementation of the proposed project would result in the following significant unavoidable impacts, even with the implementation of recommended mitigation measures:

- Air emissions (NO_x, CO, ROC and PM_{10}) resulting from project traffic to and from the project site.
- Air emissions (NO_x, CO, ROC and PM_{10}) resulting from cumulative projects planned in the vicinity of the project site.
- Project traffic impacts at the intersection of Azusa Avenue and Amar Road.
- Cumulative traffic impacts at the Valley Boulevard/Lemon Avenue intersection and the I-10 westbound off-ramp/Grand Avenue intersection.

7.3 RELATIONSHIP BETWEEN SHORT-TERM USES OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

This proposed project, to develop the site as described in this SEIR, should be viewed as an effort to reuse and/or reclaim what recently was an active waste disposal facility in the middle of an urban community. From a historical perspective, the project creates postclosure land uses that provide for the long-term enhancement and productivity of the project site. The development described herein would result in short-term, temporary environmental impacts related to traffic,

noise, and air quality. These impacts and mitigation measures that will minimize the effects of construction are fully described in Section 3 of this SEIR.

7.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE CAUSED IF THE PROPOSED ACTION IS IMPLEMENTED

Section 15126.2(c) of the CEQA Guidelines requires that an EIR identify significant irreversible environmental effects that would occur as a result of the project. This section states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of each resource makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as a highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Development of the entire BKK site was analyzed in the previous EIR. The previously proposed Technology Center included commercial and light industrial uses. The proposed Sportsplex project includes commercial retail and recreational uses. As with the previously proposed project, the construction of the Sportsplex project would result in an irretrievable and irreversible commitment of natural resources through the direct consumption of fossil fuels and the use of construction materials.

Although the project would commit the project site to development for the foreseeable future, the site is in the middle of an existing urbanized area. Accordingly, implementation of the project is not viewed as an action that would commit other nearby vacant parcels to development.

The proposed project evaluated in this EIR concerns alternative land use mixes of commercial recreational uses, pubic recreational uses, and commercial retail uses. The likelihood of the project resulting in irreversible accident from an accident (e.g. fire or explosion) is therefore considered low (a less-than-significant impact). The previously certified EIR addressed impacts related to irreversible accidents resulting from the implementation of the FCP and FPCMP.

CHAPTER 8

EIR AUTHORS, ORGANIZATIONS AND PERSONS CONSULTED

8.1 LEAD AGENCY PERSONNEL

This document and the supporting appendices were prepared under the direction of:

West Covina Redevelopment Agency

Chris Chung, Redevelopment Director
Michael Lee, Redevelopment Manager
Duran Villegas, Project Manager

West Covina Planning Department

Doug McIsaac, Planning Director
Jeff Anderson, Senior Planner

8.2 EIR AUTHORS AND CONSULTANTS

Environmental Science Associates
4221 Wilshire Boulevard, Suite 480
Los Angeles, California 90807

Mark Alpers, Project Director
Donna Chralowicz, Land Use, Lighting and Glare Growth Inducement
Sandra Hamlat, General Assistance with all sections.
John Herbig, Air Quality and Noise
Jeremy Buck, Graphics
Roger Jinks, Graphics
Melissa Gross, Word Processing/Report Production
Diara Wilson, Word Processing/Report Production

Kimley-Horn and Associates, Inc.
18425 Burbank Boulevard, Suite 509
Los Angeles, California 91356

Bill Dvorak, Project Manager (Traffic and Circulation)
Brian Marchetti, Traffic and Circulation

8.3 ORGANIZATIONS AND PERSONS CONSULTED

Lists of people and organizations consulted are provided in the list of references at the end of each section.

Form A

Notice of Completion & Environmental Document Transmittal

SCH # _____

Mail to: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044 916/445-0613

Project Title: West Covina Sportsplex and Associated Developments

Lead Agency: City of West Covina Redevelopment Agency — Contact Person: Doug McIsaac

Street Address: P.O. Box 1440 — Phone: (626) 939-8422

City: West Covina — Zip: 91793 — County: Los Angeles

Project Location:

County: Los Angeles — City/Nearest Community: West Covina

Cross Streets: N.E. of Asuza Avenue / Amar Road — Zip Code: 91793 — Total Acres: 100

Assessor's Parcel No. _____ — Section: _____ — Twp. _____ — Range: _____ — Base: _____

Within 2 Miles: State Hwy #: _____ — Waterways: Puente Creek, Walnut Creek, San Jose Creek, Lemon Creek

Airports: _____ — Railways: Union Pacific — Schools: 25 Elem & Middle, 4 High Schools

Document Type:

CEQA: ☒ NOP ☐ Early Cons ☐ Neg Dec ☐ Draft EIR ☐ Supplement/Subsequent EIR (Prior SCH No.)_____ ☐ Other _____

NEPA: ☐ NOI ☐ EA ☐ Draft EIS ☐ FONSI

Other: ☐ Joint Document ☐ Final Document ☐ Other_____

Local Action Type:

☐ General Plan Update ☒ General Plan Amendment ☐ General Plan Element ☐ Community Plan

☐ Specific Plan ☒ Master Plan ☐ Planned Unit Development ☐ Site Plan

☐ Rezone ☐ Prezone ☐ Use Permit ☐ Land Division (Subdivision, etc.)

☐ Annexation ☐ Redevelopment ☐ Coastal Permit ☐ Other_____

Development Type:

☐ Residential: *Units*_____ *Acres*_____

☐ Office: *Sq.ft.*_____ *Acres*_____ *Employees*_____

☒ Commercial: *Sq.ft.* _____ *Acres*_____ *Employees*_____

☐ Industrial: *Sq.ft.* _____ *Acres*_____ *Employees*_____

☐ Educational _____

☒ Recreational _____

☐ Water Facilities: *Type*_____ *MGD*_____

☐ Transportation: *Type*_____

☐ Mining: *Mineral*_____

☐ Power: *Type*_____ *Watts*_____

☐ Waste Treatment: *Type*_____

☐ Hazardous Waste: *Type*_____

☐ Other:_____

Funding (approx.): Federal $_____ State $_____ Total $_____

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☐ Agricultural Land ☒ Air Quality ☐ Archeological/Historical ☐ Coastal Zone ☐ Drainage/Absorption ☐ Economic/Jobs ☐ Fiscal

☐ Flood Plain/Flooding ☐ Forest Land/Fire Hazard ☐ Geologic/Seismic ☐ Minerals ☒ Noise ☐ Population/Housing Balance ☐ Public Services/Facilities ☐ Recreation/Parks

☐ Schools/Universities ☐ Septic Systems ☐ Sewer Capacity ☐ Soil Erosion/Compaction/Grading ☐ Solid Waste ☒ Toxic/Hazardous ☒ Traffic/Circulation ☐ Vegetation

☐ Water Quality ☐ Water Supply/Groundwater ☐ Wetland/Riparian ☐ Wildlife ☐ Growth Inducing ☒ Landuse ☐ Cumulative Effects ☐ Other _____

Present Land Use/Zoning/General Plan Designation:

Open Space/Specific Plan/Specific Plan

Project Description:

Development of the West Covina Sportsplex consisting of a Big League Dreams Sports Park, a commercial retail site, restaurant, and possible future development of soccer fields, a community center/gymnasium, and aquatic complex.

Revised 3-31-99

Reviewing Agencies Checklist

Form A, continued

KEY
S = Document sent by lead agency
X = Document sent by SCH
✓ = Suggested distribution

_____**Resources Agency**
_____Boating & Waterways
_____Coastal Commission
_____Coastal Conservancy
_____Colorado River Board
_____Conservation
_____Fish & Game
_____Forestry & Fire Protection
_____Office of Historic Preservation
_____Parks & Recreation
_____Reclamation Board
_____S.F. Bay Conservation & Development Commission
_____Water Resources (DWR)

Business, Transportation & Housing
_____Aeronautics
_____California Highway Patrol
_____CALTRANS District #_____
_____Department of Transportation Planning (headquarters)
_____Housing & Community Development

_____**Food & Agriculture**

Health & Welfare
_____Health Services _____

State & Consumer Services
_____General Services
_____OLA (Schools)

Environmental Protection Agency
_____Air Resources Board
_____California Waste Management Board
_____SWRCB: Clean Water Grants
_____SWRCB: Delta Unit
_____SWRCB: Water Quality
_____SWRCB: Water Rights
_____Regional WQCB #_____ (_____)

Youth & Adult Corrections
_____Corrections

Independent Commissions & Offices
_____Energy Commission
_____Native American Heritage Commission
_____Public Utilities Commission
_____Santa Monica Mountains Conservancy
_____State Lands Commission
_____Tahoe Regional Planning Agency

_____Other _____

Public Review Period (to be filled in by lead agency)

Starting Date 08/20/02 Ending Date 09/20/02

Signature _____ Date 08/20/02

Lead Agency (Complete if applicable):
Consulting Firm: West Covina Redevelopment Agency
Address: P.O. Box 1440
City/State/Zip: West Covina, CA 91793
Contact: Doug McIsaac
Phone: (626) 939-8422

Applicant: Environmental Science Associates
Address: 4221 Wilshire Blvd, Suite 480
City/State/Zip: Los Angeles, CA 90010
Phone: (323) 933-6111

For SCH Use Only:
Date Received at SCH _____
Date Review Starts _____
Date to Agencies _____
Date to SCH _____
Clearance Date _____
Notes:

NOTICE OF PREPARATION

To: Interested Parties

From: City of West Covina

Subject: Notice of Preparation of a Draft Supplemental Environmental Impact Report

The City of West Covina Redevelopment Agency will be the Lead Agency under the California Environmental Quality Act (CEQA) and will prepare a Supplemental Environmental Impact Report (SEIR) for the project identified below. The proposed design of this project has been altered since the Environmental Impact Report for the BKK Class III Landfill Closure and Postclosure Development was certified in October 2000. We request the views of your agency as to the scope and content of the environmental information that is relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the SEIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. Since the City has decided to prepare an SEIR, an Initial Study is not attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice. Please send your response to Doug Mc Isaac, Planning Director, at the address shown below. We will need the name for a contact person in your agency.

Project Title: West Covina Sportsplex and Associated Developments

Project Applicant: City of West Covina Redevelopment Agency

Date: August 19, 2002

Signature: _____

Doug Mc Isaac
Planning Director
City of West Covina
(939) 814-8422

Mail Comments to: Doug Mc Isaac
Planning Director
City of West Covina
P.O. Box 1440
West Covina, CA. 91793

INTRODUCTION

The City of West Covina (City) Redevelopment Agency (RDA) is proposing to facilitate the development of the West Covina Sportsplex (Sportsplex) and associated development on the property owned by the BKK Corporation. The Sportsplex would consist of a Big League Dreams (BLD) Sports Park, a commercial retail site, restaurant, 18-hole municipal golf course, and possibly the future development of soccer fields, a community center/gymnasium, and aquatic complex.

The City of West Covina certified an Environmental Impact Report (EIR) for the BKK Class III Landfill Closure and Postclosure Development Plan in October 2000. This EIR included a project-level assessment of the Final Closure Plan (FCP) and the Final Postclosure Maintenance Plan (FPCMP) for the inactive Class III (Municipal Solid Waste) Landfill, and a program-level assessment of Specific Plans for the development of the BKK Public Golf Course and the development of the BKK Technology Center. Since the certification of the EIR, development of the area designated for the Technology Center has been changed to consist of the Big League Dreams Sports Park and predominantly commercial retail use. This SEIR is being prepared to assess the impacts of these new land uses.

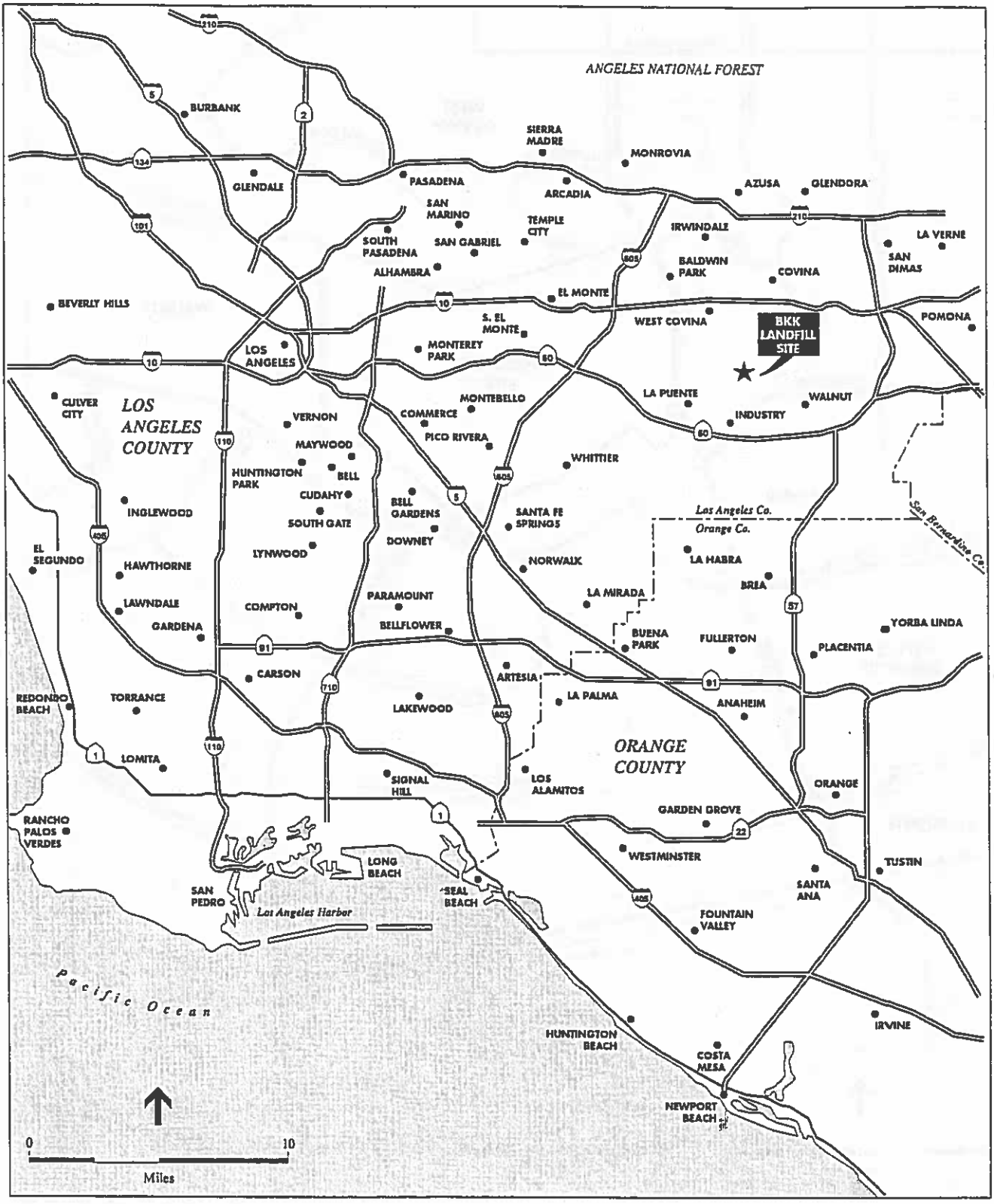
PROJECT LOCATION

The site is located in Los Angeles County in the City of West Covina, approximately 15 miles east of downtown Los Angeles. The San Bernardino Freeway (Interstate 10) lies approximately 2.5 miles north of the site, and the Pomona Freeway (State Route 60) is located approximately 2.5 miles south of the site. Azusa Avenue runs north-south along the western border of the property and provides primary access to the site. Nogales Street provides access from the south, forming a T-intersection at Amar Road, which runs east-west immediately south of the site. The regional location and general vicinity of the site are shown in Figures 1 and 2.

PROJECT BACKGROUND

The BKK Landfill commenced operation in 1963 on 130 acres for the acceptance of non-hazardous waste such as household and commercial waste and construction debris. In 1971, the City approved an expansion to 583 acres. In 1972, a 40-acre Class I (hazardous waste) unit opened and began receiving hazardous and non-hazardous wastes. This mixed cell was expanded to 140 acres in 1975. Approximately 3.9 million tons of hazardous and non-hazardous waste were disposed in the Class I area between 1972 and 1984 when BKK voluntarily ceased receiving hazardous wastes. Acceptance of non-hazardous wastes continued in this cell until 1987. Disposal of non-hazardous waste was then moved to a newly permitted lined Class III area.

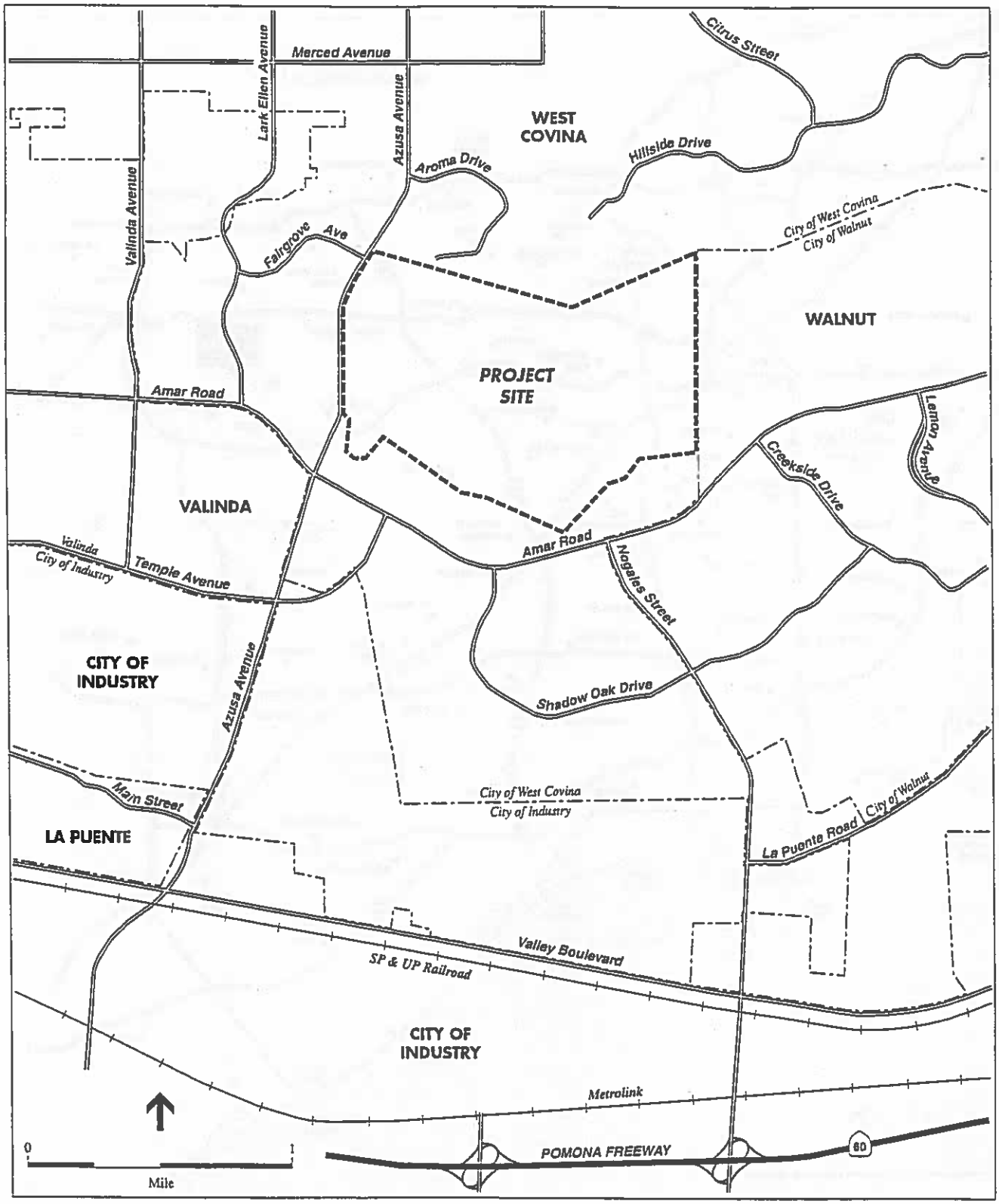
A final closure plan for the Class I landfill was approved by the U.S. Environmental Protection Agency (EPA), the Los Angeles Regional Water Quality Control Board (LARWQCB), and the Department of Toxic Substances Control (DTSC) in May 1989. The plan included a clay cap and



SOURCE: Environmental Science Associates

West Covina Sportsplex SEIR / 202434 ■

Figure 1
Regional Location Map



SOURCE: Environmental Science Associates

Figure 2
Vicinity Map

an extensive gas collection system. The Class III landfill was closed in September 1996. A Partial FCP and Partial FPCMP were approved thereafter by the California Integrated Waste Management Board (CIWMB). A leachate treatment plant processes leachate from the Class I and Class III landfills as well as condensate from the landfill gas collection systems, contaminated groundwater from the extraction wells, and other wastewater from the site.

The FCP and FPCMP, along with Specific Plans for the BKK Technology Center and BKK Public Golf Course and Landfill Site, were evaluated in the previously certified EIR and Health Risk Assessment. The Technology Center included office, retail, entertainment, high technology research warehouse, and other uses to be developed on a 101.2 acre area (Parcel 1) fronting Azusa Avenue on the west side of the site. The golf course Specific Plan includes maintenance of the inactive landfill, an 18-hole golf course and clubhouse, continued cogeneration energy production facilities; and the transitional use of the existing buildings, facilities, and vacant land on the northern and northeastern portion (Parcels 2 and 3) of the project site.

PROJECT DESCRIPTION

This Supplemental EIR is being prepared to evaluate aspects of the project that have changed since the EIR for the FCP, FPCMP, and post closure development was certified in October, 2000. The following aspects of the project have **not** changed and are therefore not evaluated in the Supplemental EIR:

- Implementation of the FCP and PCMP
- Development of a public golf course

The changes being evaluated in the Supplemental EIR involve changing land uses that front Azusa Avenue to accommodate the following four sets of actions:

- Development of approximately 37 acres into the Big League Dreams Sports Park on the northern portion of Parcel 1 consisting of the following facilities:
  - Six baseball/softball fields (6 replica ball fields)
  - A nine-station batting cage
  - One covered multi-sport pavilion designed to accommodate indoor inline hockey, basketball, indoor soccer, volleyball, and corporate or special events.
  - Four sand/beach volleyball courts
  - Two playgrounds and picnic areas
  - Two "Stadium Club" family-style restaurants
  - Lighting for all sports fields
  - Related parking and landscaping areas

- Development of approximately 31 to 41 acres on the southern portion of Parcel 1 into a 375,000 to 450,000 square foot commercial retail center consisting of a home improvement store and soft goods retailer as the major anchors with ancillary retail tenants.
- Development of approximately 2 acres on the northeastern corner of Parcel 1 into a 15,000 square foot restaurant pad.
- Possible future development of additional recreation uses on the approximately 31-acre center portion of Parcel 1 when funds are identified. The following facilities could be supported on the site:
  - 3 soccer fields (one being a replica stadium)
  - 14,000 to 30,000 square foot community center and gymnasium
  - Aquatic complex with up to two pools
  - Related parking and landscaped areas

POTENTIAL IMPACTS

The City of West Covina has identified several environmental issues to be analyzed in the SEIR. These issues are summarized below. Interested parties reviewing this NOP are invited to suggest additional issues to be evaluated.

Air Quality

A revised air quality analysis will be prepared to reflect the new land uses at the project site. If project and/or cumulative emissions exceed levels anticipated in the previously certified EIR, these impacts may be significant and unavoidable. The air quality analysis to be performed in the SEIR will quantify impacts using the EMFAC and URBEMIS models. Intersection level carbon monoxide emissions will be quantified using the CALINE model.

Land Use

The proposed BLD Sportsplex/Retail Center represents a completely different land use concept compared to the previously-approved technology center. Any resultant land use impacts will be assessed in the SEIR. Existing land use data will be updated and compatibility of the proposed project with existing uses and conformity with the General Plan and zoning for the site will be evaluated.

Lighting and Glare

The BLD project will involve nighttime activities at the site with substantially different lighting than anticipated in the previous Specific Plan. The proximity of the site to residential areas and Azusa Avenue makes this a potentially significant impact and will require the evaluation of lighting and glare impacts on residents and motorists in these areas. The analysis will involve observation of lighting and glare from operations at BLD's existing facility in the Coachella

Valley, review of lighting plans for the applicant's Chino Hills facility to determine applicability to the West Covina site, and recommendations for alternative lighting plans if necessary.

Noise

The BLD project will generate nighttime noise that was not evaluated in the previously certified EIR. The SEIR analysis will involve updated noise monitoring at sensitive receptor locations near the project site and estimating future noise levels based on anticipated traffic noise and nighttime noise. Nighttime noise levels will be estimated by monitoring noise levels at the BLD facility in Coachella Valley and/or by reviewing the environmental document prepared for the BLD Chino Hills facility to obtain information regarding nighttime noise that may be pertinent to the analysis.

Public Health and Safety

The BLD project and other recreational uses are being proposed on land immediately adjacent to the inactive Class III (solid waste) BKK Landfill. The previous EIR included a Health Risk Assessment (HRA) that assessed impacts to on-site recreational users of the project site (adults and children), off-site workers, and residents (adults and children). The previous HRA will be reviewed and updated, if necessary, to assess public health and safety impacts related to the project's proximity to the landfill.

Traffic

The revised land use concept for the project site will result in different traffic impacts on area intersections, both in terms of daily and peak-hour traffic. In addition, the approved Specific Plans for the Technology Center included the construction of "A" Street to accommodate traffic from the business park and golf course. It was also assumed that a substantial number of southbound trips on Azusa Avenue and westbound trips on Amar Road would use "A" Street and avoid the Azusa Avenue / Amar Road intersection. The revised project no longer includes the construction of the previously proposed "A" Street, which would result in a more significant impact and the need for more mitigation at the Azusa Avenue / Amar Road intersection. The SEIR will assess traffic impacts based on the results of a new traffic study which assesses project impacts without proposed "A" Street.

Roger Freisen
Director of Community Development
City of Walnut
355 S. Lemon Avenue, Unit G
Walnut, CA. 91789

Mike Kissell
Planning Director
City of Industry
15651 East Stafford Street
City of Industry, CA.91744

Planning Director
City of La Puente
15900 East Main Street
La Puente, CA. 91744

Carmen D. Santos-Prior
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA. 94105

Executive Officer
Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA. 90013

California-EPA
Department of Toxic Substances Control
1001 "I" Street
Sacramento, CA 95812

State Clearinghouse
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA. 96814

SCAG
Intergovernmental Review
818 West 7th Street, 12th Floor
Los Angeles, CA. 90017

South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-2000

US Department of the Interior
Fish and Wildlife Services
Division of Ecological Services
2730 Loker Avenue West
Carlsbad, CA 92008-6603

Mr. Stephen J. Buswell
IGR/CEQA Program Mgr
Department of Transportation, District 7
120 S. Spring Street
Los Angles, CA 90012

California Dept. of Fish and Game
South Coast Region
4949 Viewridge Avenue
San Diego, CA. 92123

CIWMB
Permitting and Enforcement Division
1001 "I" Street
Sacramento, CA 95812

County of Los Angeles
Department of Public Works
Planning Division
900 South Fremont Avenue
Alhambra, CA. 91803

Mr. Steve Samaniego
Director of Waste Management
City of West Covina
1444 W. Garvey Avenue
West Covina, CA. 91793

County Sanitation Districts of LA County
1955 Workman Mill Road
Whittier, CA. 90607-4998

ITHERN CALIFORNIA

ASSOCIATION of GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

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f (213) 236-1825

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RECE...
SEP 1 1
PLANNI...

September 9, 2002

Mr. Doug Mc Isaac
Planning Director
City of West Covina
P. O. Box 1440
West Covina, CA 91793

RE: SCAG Clearinghouse No. I 20020464 West Covina Sportsplex and Associated Developments

Dear Mr. Mc Isaac:

Thank you for submitting the **West Covina Sportsplex and Associated Developments** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **West Covina Sportsplex and Associated Developments**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **August 16-31, 2002** Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

WATER RECLAMATION
SOLID WASTE MANAGEMENT

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

JAMES F. STAHL
Chief Engineer and General Manager

September 12, 2002

File No: 15-00.04-00
21-00.04-00

Mr. Doug McIsaac, Planning Director
City of West Covina
P.O. Box 1440
West Covina, CA 91793

Dear Mr. McIsaac:

West Covina Sportsplex and Associated Developments

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Supplemental Environmental Impact Report for the subject project on August 21, 2002. We offer the following comments regarding sewerage service:

1. A portion of the area in question (APNs 8735-001-001, 8735-002-013, and 8735-002-004) is outside the jurisdictional boundaries of the Districts and, if planned for development, will require annexation into District No. 15 or District No. 21 before sewerage service can be provided. In order for a determination to be made regarding annexation fees, site plans should be submitted to Ms. Margarita Cabrera of this office, extension 2708.

2. Because of the project's location, the flow originating from the proposed project would have to be transported to the Districts' trunk sewer by local sewer(s) which are not maintained by the Districts. If no local sewer lines currently exist, it is the responsibility of the developer to convey any wastewater generated by the project to the nearest local sewer and/or Districts' trunk sewer. The following is a list of Districts' trunk sewers that service the project area.

Name	Location	Size (dia.)	Design Capacity (mgd)	Peak Flow (mgd)	Last Measured
Amar Road Trunk Sewer (District No. 15)	in Amar Road at Echelon Avenue	15"	2.3	0.9	2001
Amar Road Relief Trunk Sewer, Section 2 (District No. 15)	in Amar Road at Echelon Avenue	18"	3.8	1.7	2001
Nogales Street Trunk Sewer, Section 2 (District No. 21)	in Nogales Street at Amar Road	12"	3.3	0.4	2001
Cameron Trunk Sewer, Section 4 (District No. 22)	in Cameron Avenue at Fernwood Street	12"	3.2	0.7	2001

3. The wastewater generated by the proposed project will be treated at the San Jose Creek Water Reclamation Plant (WRP), located adjacent to the City of Industry. The San Jose Creek WRP has a design capacity of 100 mgd and currently processes an average flow of 88.2 mgd. Wastewater flows which exceed the capacity of the San Jose Creek WRP, and all sludge, are diverted to and treated at the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson.

4. The following table contains a breakdown of the expected average wastewater flow from the proposed project.

USE	AREA	GENERATION RATE	WASTEWATER FLOW (GALLONS/DAY)
Golf Course Facilities	20,500 sf	100 gallons/day/1,000 sf	2,050
Sports Park	37 acres	.006 avg cfs/ac	143,479
Retail Center	450,000 sf	325 gallons/day/1,000 sf	146,250
Restaurant	15,000 sf	1,000 gallons/day/1,000 sf	15,000
Additional Recreational Uses	31 acres	.006 avg cfs/ac	120,212
		TOTAL	426,991

A copy of the Districts' average wastewater generation factors is enclosed for your information.

5. The proposed project may require an amendment to a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at extension 2900, in order to reach a determination on this matter. If this update is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction.

6. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or **increasing the existing strength and/or quantity of wastewater attributable to a particular parcel or operation already connected.** This connection fee is required to construct an incremental expansion of the Sewerage System to accommodate the proposed project which will mitigate the impact of this project on the present Sewerage System. Payment of a connection fee will be required before a permit to connect to the sewer is issued. A copy of the Connection Fee Information Sheet is enclosed for your convenience. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

7. In order for the Districts to conform with the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into the Air Quality Management Plan, which is prepared by the South Coast Air Quality Management District in order to improve air quality in the South Coast Air Basin as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner which will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange,

San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels which are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 699-7411, extension 2717.

Very truly yours,

James F. Stahl

Ruth I. Frazen

Ruth I. Frazen
Engineering Technician
Planning & Property Management Section

RIF:eg

Enclosures

c: M. Cabrera

INFORMATION SHEET FOR APPLICANTS REQUESTING ANNEXATION TO A COUNTY SANITATION DISTRICT OF LOS ANGELES COUNTY

A. ELIGIBILITY CRITERIA FOR ANNEXATION TO A COUNTY SANITATION DISTRICT OF LOS ANGELES COUNTY

1) The property is contiguous to said County Sanitation District or, if not contiguous, may be drained by gravity to a trunk sewer of that District,

2) The property is not included in whole or in part in any other agency providing services similar to those of the said County Sanitation District, and

3) The property is to be benefitted by its inclusion in the said County Sanitation District.

B. HOW DO I INITIATE THE ANNEXATION APPLICATION PROCESS?

1a) WRITE TO: County Sanitation Districts of Los Angeles County
P.O. Box 4998, Whittier, CA 90607
Attn: Annexation Fee Program

The letter should contain the following information and support documentation about the property involved:

i) Property location (street address, city, zip and Thomas Brothers map, page, grid)

ii) In case of a recorded single lot, include the County Assessor's mapbook-page-parcel map with the parcel highlighted.

iii) In case of a tract or parcel map, include a copy of the tentative or final map plus a closed-survey engineering traverse around the boundary to be annexed to the centerline of any public street.

1b) CALL County Sanitation Districts of Los Angeles County
(See Item F for details)

2) Districts' staff will calculate the acreage involved and will provide the applicant with a quote of annexation fees to be paid. At this time, the applicant will also be provided with a *"Request for Annexation"* form along with necessary instructions.

3) An annexation application file will be opened upon submittal by applicant of all the required documents (refer to Section C) along with a check for the annexation fee made payable to:

County Sanitation Districts of Los Angeles County

C. WHAT DOCUMENTS DO I NEED TO FILE?

1) **"Request for Annexation" Form (5 pages):** All applicants must complete, in detail, and return the Request for Annexation form signed by the legal owner whose name appears on the current Los Angeles County assessment roll. See C4) for assistance in completing pages 4 and 5 of this form.

2) **Los Angeles County Local Agency Formation Commission Party Disclosure Form:** All applicants must complete and return the Party Disclosure Form pursuant to the Local Agency Formation Commission Party Disclosure Form Information Sheet.

3) **Annexation Fee payment** as stated in the quotation letter.

4) **Copy of Grant Deed** (Applicants must submit a copy of the Grant Deed which includes the legal description. Disregard this request if the proposed project is a tract/parcel map.)

5) **California Environmental Quality Act (CEQA)** All applicants are subject to CEQA. If the project is a single family home on septic tank, the project is exempt and the Notice of Exemption will be prepared by this office. All other applicants must provide two (2) copies of the Initial Study of Environmental Assessment and fourteen (14) copies each of the Negative Declaration and Notice of Determination approved by the affected city or by County Regional Planning. Or, two (2) copies each of the Final Environmental Impact Report (EIR) and the Notice of Determination approved by the affected city or by County Regional Planning Commission.

D. HOW MUCH DO I HAVE TO PAY?

The annexation fee consists of three processing fees. The **Annexation Processing Fees** table is attached. The Sanitation Districts, as the lead agency for the annexation, will collect the processing fees at time of annexation application. The three processing fees are for: 1) County Sanitation Districts of Los Angeles County (CSD), 2) Local Agency Formation Commission (LAFCO), and 3) State Board of Equalization (SBE). The LAFCO and SBE processing fees are subject to change without notice. If their fees increase before your application is processed by this office for submittal to these agencies, then you will be notified and the additional monies must be paid before the annexation procedure can be finalized.

E. HOW LONG DOES IT TAKE TO PROCESS MY ANNEXATION APPLICATION?

If the project is a recorded single family lot, Districts' staff will begin processing the annexation application as soon as the required forms are submitted and the annexation fees paid. Upon payment of the annexation fees, for all Sanitation Districts except 26 & 32, the applicant may pay the connection fees and proceed with the project.

If the project is a tract or parcel map, Districts' staff will begin processing the annexation application as soon as the required forms, annexation fees and a copy of the recorded tract/parcel map blueline are submitted. Upon payment of annexation fees, the applicant may have the original sewer map signed off. Also, for all Sanitation Districts except 26 & 32, the applicant may pay the connection fees. The annexation procedure cannot be completed until after receipt, in this office, of the recorded tract/parcel blueline map.

F. WHERE CAN I GET ADDITIONAL INFORMATION?

For additional information, please call:

County Sanitation Districts of Los Angeles County
(562) 699-7411, extension 2708
7:00 a.m. through 4:30 p.m., Monday through Thursday
7:00 a.m. through 3:30 p.m., Fridays, except holidays

ANNEXATION PROCESSING FEES FOR THE COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

COUNTY SANITATION DISTRICTS PROCESSING FEE	ACREAGE			FEE
	0.0	to	1.5	$800
	>1.5	to	5.0	$1,075
	>5.0	to	20.0	$215/Acre
	Over 20.0			$4,300 Plus $35/Additional Acre And Every Fraction Thereof

LOCAL AGENCY FORMATION COMMISSION FILING FEE[1]	ACREAGE			FEE
ANNEXATIONS AND DETACHMENTS	0.0	to	3.0 Acres	$2,000
	3.0	to	5.0	$2,500
	5.0	to	10.0	$3,000
	10.0	to	20.0	$3,500
	20.0	to	40.0	$4,000
	40.0	to	80.0	$5,000
	80.0	to	160.0	$6,000
	160.0+ Acres			$7,000
OTHER PROPOSALS	Special Reorganization			$10,000
	Incorporation/Disincorporation/Consolidation			$7,500
	District Formation			$7,500
	District Dissolution/Consolidation/Merger			$5,000
	District Dissolution for Inactivity			$2,000
	Establishment of Subsidiary District			$3,500
	Reorganizations			Basic Fee + 20%
	Detachments Due to Lack of Service			$1,000
	Establishment of new Sphere of Influence			Basic Fee + 20%
	Sphere of Influence Amend./Review			Basic Fee + 20%
	Sphere of Influence Amend. w/Annexation			$500
	Reconsideration of LAFCO Determinations			50% of Basic Fee
	Special District Study			Actual cost @ hourly rate
	Out of Agency Service Agreements			$2,000
	Map and Legal Description Review			$300
	Petition Verification			Actual Cost, as required by Registrar-Recorder
	Notice/Radius Map			Actual Cost

STATE BOARD OF EQUALIZATION[2]	ACREAGE			FEE
SINGLE AREA TRANSACTIONS	0.0	to	1.0	$300
	1.0	to	5.0	$350
	6.0	to	10.0	$500
	11.0	to	20.0	$800
	21.0	to	50.0	$1,200
	51.0	to	100.0	$1,500
	101.0	to	500.0	$2,000
	501.0	to	1,000.0	$2,500
	1,001.0	to	2,000.0	$3,000
	2,001.0 and above			$3,500
OTHER PROPOSALS	Deferral of Fees			$35
	Additional County per Transaction			$250
	Consolidation per District or Zone			$300
	Entire District Transaction			$300
	Coterminous Transaction			$300
	Dissolution or Name Change			$0

[1] Most recent LAFCO fee increase effective January 1, 2001.

[2] Most recent SBE fee increase effective December 2, 1998.

TABLE 1
LOADINGS FOR EACH CLASS OF LAND USE

DESCRIPTION	UNIT OF MEASURE	FLOW (Gallons per Day)	COD (Pounds per Day)	SUSPENDED SOLIDS (Pounds per Day)
RESIDENTIAL				
Single Family Home	Parcel	260	1.22	0.59
Duplex	Parcel	312	1.46	0.70
Triplex	Parcel	468	2.19	1.05
Fourplex	Parcel	624	2.92	1.40
Condominiums	Parcel	195	0.92	0.44
Single Family Home (reduced rate)	Parcel	156	0.73	0.35
Five Units or More	No. of Dwlg. Units	156	0.73	0.35
Mobile Home Parks	No. of Spaces	156	0.73	0.35
COMMERCIAL				
Hotel/Motel/Rooming House	Room	125	0.54	0.28
Store	1000 ft^2	100	0.43	0.23
Supermarket	1000 ft^2	150	2.00	1.00
Shopping Center	1000 ft^2	325	3.00	1.17
Regional Mall	1000 ft^2	150	2.10	0.77
Office Building	1000 ft^2	200	0.86	0.45
Professional Building	1000 ft^2	300	1.29	0.68
Restaurant	1000 ft^2	1,000	16.68	5.00
Indoor Theatre	1000 ft^2	125	0.54	0.28
Car Wash				
Tunnel - No Recycling	1000 ft^2	3,700	15.86	8.33
Tunnel - Recycling	1000 ft^2	2,700	11.74	6.16
Wand	1000 ft^2	700	3.00	1.58
Financial Institution	1000 ft^2	100	0.43	0.23
Service Shop	1000 ft^2	100	0.43	0.23
Animal Kennels	1000 ft^2	100	0.43	0.23
Service Station	1000 ft^2	100	0.43	0.23
Auto Sales/Repair	1000 ft^2	100	0.43	0.23
Wholesale Outlet	1000 ft^2	100	0.43	0.23
Nursery/Greenhouse	1000 ft^2	25	0.11	0.06
Manufacturing	1000 ft^2	200	1.86	0.70
Dry Manufacturing	1000 ft^2	25	0.23	0.09
Lumber Yard	1000 ft^2	25	0.23	0.09
Warehousing	1000 ft^2	25	0.23	0.09
Open Storage	1000 ft^2	25	0.23	0.09
Drive-in Theatre	1000 ft^2	20	0.09	0.05

TABLE 1

(continued)

LOADINGS FOR EACH CLASS OF LAND USE

DESCRIPTION	UNIT OF MEASURE	FLOW (Gallons per Day)	COD (Pounds per Day)	SUSPENDED SOLIDS (Pounds per Day)
COMMERCIAL				
Night Club	1000 ft²	350	1.50	0.79
Bowling/Skating	1000 ft²	150	1.76	0.55
Club	1000 ft²	125	0.54	0.27
Auditorium, Amusement	1000 ft²	350	1.50	0.79
Golf Course, Camp, and Park (Structures and Improvements)	1000 ft²	100	0.43	0.23
Recreational Vehicle Park	No. of Spaces	55	0.34	0.14
Convalescent Home	Bed	125	0.54	0.28
Laundry	1000 ft²	3,825	16.40	8.61
Mortuary/Cemetery	1000 ft²	100	1.33	0.67
Health Spa, Gymnasium				
With Showers	1000 ft²	600	2.58	1.35
Without Showers	1000 ft²	300	1.29	0.68
Convention Center, Fairground, Racetrack, Sports Stadium/Arena	Average Daily Attendance	10	0.04	0.02
INSTITUTIONAL				
College/University	Student	20	0.09	0.05
Private School	1000 ft²	200	0.86	0.45
Church	1000 ft²	50	0.21	0.11

INFORMATION SHEET FOR APPLICANTS
PROPOSING TO CONNECT OR INCREASE THEIR DISCHARGE TO
THE COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY SEWERAGE SYSTEM

THE PROGRAM

The County Sanitation Districts of Los Angeles County are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting to a Sanitation District's sewerage system. Your connection to a City or County sewer constitutes a connection to a Sanitation District's sewerage system as these sewers flow into a Sanitation District's system. The County Sanitation Districts of Los Angeles County provide for the conveyance, treatment, and disposal of your wastewater. **PAYMENT OF A CONNECTION FEE TO THE COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY WILL BE REQUIRED BEFORE A CITY OR THE COUNTY WILL ISSUE YOU A PERMIT TO CONNECT TO THE SEWER.**

I. WHO IS REQUIRED TO PAY A CONNECTION FEE?

(1) Anyone connecting to the sewerage system for the first time any structure located on a parcel(s) of land within a County Sanitation District of Los Angeles County.

(2) Anyone increasing the quantity of wastewater discharged due to the construction of additional dwelling units on or a change in land usage of a parcel already connected to the sewerage system.

(3) Anyone increasing the improvement square footage of a commercial or institutional parcel by more than 25 percent.

(4) Anyone increasing the quantity and/or strength of wastewater from an industrial parcel.

(5) If you qualify for an Ad Valorem Tax or Demolition Credit, connection fee will be adjusted accordingly.

II. HOW ARE THE CONNECTION FEES USED?

The connection fees are used to provide additional conveyance, treatment, and disposal facilities (capital facilities) which are made necessary by new users connecting to a Sanitation District's sewerage system or by existing users who significantly increase the quantity or strength of their wastewater discharge. The Connection Fee Program insures that all users pay their fair share for any necessary expansion of the system.

III. HOW MUCH IS MY CONNECTION FEE?

Your connection fee can be determined from the Connection Fee Schedule specific to the Sanitation District in which your parcel(s) to be connected is located. A Sanitation District boundary map is attached to each corresponding Sanitation District Connection Fee Schedule. Your City or County sewer permitting office has copies of the Connection Fee Schedule(s) and Sanitation District boundary map(s) for your parcel(s). If you require verification of the Sanitation District in which your parcel is located, please call the Sanitation Districts' information number listed under Item IX below.

IV. WHAT FORMS ARE REQUIRED*?

The Connection Fee application package consists of the following:

(1) Information Sheet for Applicants (this form)
(2) Application for Sewer Connection
(3) Connection Fee Schedule with Sanitation District Map (one schedule for each Sanitation District)

*Additional forms are required for Industrial Dischargers

V. WHAT DO I NEED TO FILE?

(1) Completed Application Form
(2) A complete set of architectural blueprints (not required for connecting one single family home)
(3) Fee Payment (checks payable to: County Sanitation Districts of Los Angeles County)
(4) Industrial applicants must file additional forms and follow the procedures as outlined in the application instructions

VI. WHERE DO I SUBMIT THE FORMS?

Residential, Commercial, and Institutional applicants should submit the above listed materials either by mail or in person to:

County Sanitation Districts of Los Angeles County
Connection Fee Program, Room 130
1955 Workman Mill Road
Whittier, CA 90601

Industrial applicants should submit the appropriate materials directly to the City or County office which will issue the sewer connection permit.

VII. HOW LONG DOES IT TAKE TO PROCESS MY APPLICATION?

Applications submitted by mail are generally processed and mailed within three working days of receipt. Applications brought in person are processed on the same day provided the application, supporting materials, and fee are satisfactory. Processing of large and/or complex projects may take longer.

VIII. HOW DO I OBTAIN MY SEWER PERMIT TO CONNECT?

An approved Application for Sewer Connection will be returned to the applicant after all necessary documents for processing have been submitted. Present this approved-stamped copy to the City or County Office issuing sewer connection permits for your area at the time you apply for actual sewer hookup.

IX. HOW CAN I GET ADDITIONAL INFORMATION?

If you require assistance or need additional information, please call the County Sanitation Districts of Los Angeles County at (562) 699-7411, extension 2727.

X. WHAT ARE THE DISTRICTS' WORKING HOURS?

The Districts' offices are open between the hours of 7:00 a.m. and 4:00 p.m., Monday through Thursday, and between the hours of 7:00 a.m. and 3:00 p.m. on Friday, except holidays. When applying in person, applicants must be at the Connection Fee counter at least 30 minutes before closing time.

P.O. Box 682, Walnut, CA 91788-0682
355 S. LEMON AVE. SUITE G and L
WALNUT, CALIFORNIA 91789-2018
Telephone (909) 595-7543
FAX (909) 595-6095
www.ci.walnut.ca.us

CITY OF WALNUT

September 18, 2002

Doug Mc Isaac, Planning Director
City of West Covina
P.O. Box 1440
West Covina, CA 91793

Subject: Notice of Preparation of a Draft Supplemental Environmental Impact Report
West Covina Sportsplex and Associated Developments

Dear Mr. Mc Issac,

Thank you for the opportunity to provide a response for the above referenced project. The City of Walnut Community Development Department has no comments at this time. However, we are looking forward to the review of the Draft Supplemental Environmental Impact Report when it is available.

If you have any questions please call the Community Development Department at (909) 595-7543 extension 140 or email me at RFriesen@ci.walnut.ca.us.

Sincerely,
Roger Friesen
Community Development Director

By: Laura Zingg
Associate Planner
355 S. Lemon Avenue Suite G
Walnut, CA 91789

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Fish and Wildlife Office
2730 Loker Avenue West
Carlsbad, California 92008

In Reply Refer To:
FWS-LA-3074.1

RECEIVED
SEP 18 2002
PLANNING DEPT.

Doug McIsaac
Planning Director
City of West Covina
P.O. Box 1440
West Covina, California 91793

Re: Notice of Preparation of a Draft Supplemental Environmental Impact Report for the BKK Class III Landfill Closure Development, City of West Covina, Los Angeles County, California

Dear Mr. McIsaac:

We have reviewed the above referenced Notice of Preparation (NOP) for a Draft Supplemental Environmental Impact Report (SEIR) received by our office on August 20, 2002. The project proposes to construct a new Sportsplex on the property owned by the BKK Corporation. The Sportsplex would consist of a Big League Dreams (BLD) Sports Park, a commercial retail site, restaurant, 18-hole municipal golf course, and possibly the future development of soccer fields, a community center/gymnasium, and aquatic complex.

We offer the following comments and recommendations regarding project-associated biological impacts based on our review of the NOP and our knowledge of declining habitat types and species within Los Angeles County. We provide these comments in keeping with our agency's mission to work "with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." Specifically, we administer the Endangered Species Act (Act) of 1973, as amended. We also provide comments on public notices issued for a Federal permit or license affecting the Nation's waters pursuant to the Clean Water Act.

To facilitate the evaluation of the proposed project from the standpoint of fish and wildlife protection, we request that the Draft SEIR contain the following specific information:

1. A description of the environment in the vicinity of the project from both a local and regional perspective, including an aerial photograph of the area with the project site outlined.

2. A complete discussion of the purpose and need for the project and each of its alternatives.

3. A complete description of the proposed project, including the limits of development, grading, and fuel modification zones.

4. Quantitative and qualitative assessments of the biological resources and habitat types that will be impacted by the proposed project and its alternatives. An assessment of direct, indirect, and cumulative project impacts to fish and wildlife associated habitats, particularly growth-accommodating effects of the project (e.g., increased population, increased development, increased traffic). All facets of the project (e.g., construction, implementation, operation, and maintenance) should be included in this assessment. Proposed developments in the surrounding area should be addressed in the analysis of cumulative impacts.

   This assessment should include a list of Federal candidate, proposed, or listed species; State-listed species; and locally sensitive species that are on or near the project site, including a detailed discussion of these species and information pertaining to their local status and distribution. We are particularly interested in any and all information and data pertaining to potential impacts to populations of federally listed species.

   The analysis of impacts to biological resources and habitat types should include detailed maps and tables summarizing specific acreages and locations of all habitat types, as well as the number and distribution of all Federal candidate, proposed, or listed species; State-listed species; and locally sensitive species, on or near the project site that may be affected by the proposed project or project alternatives.

5. A detailed discussion of measures to be taken to avoid, minimize, and offset impacts to biological resources.

6. A detailed analysis of impacts of the proposed project on the movement of wildlife and measures proposed to avoid, minimize, and offset impacts to wildlife movement.

7. An assessment of potential impacts to wetlands and jurisdictional waters of the United States. Section 404 of the Clean Water Act prohibits the unauthorized discharge of dredged or fill material into such waters, including wetlands. This section also provides that the U.S. Army Corps of Engineers (Corps) may issue permits for discharges of dredged or fill material into jurisdictional waters and wetlands. Potential areas of Corps jurisdiction should be evaluated and wetlands should be delineated using the methodology set forth in the Corps' Wetland Delineation Manual (Environmental Laboratory 1987). The Draft SEIR should disclose all impacts to jurisdictional waters and wetlands, and proposed measures to be taken to avoid and minimize impacts, and mitigate unavoidable impacts.

We appreciate the opportunity to comment on the referenced NOP for potential impacts on sensitive, threatened and endangered species, wildlife and wetlands. Should you have any questions pertaining to these comments, please contact Kerri Davis of my staff at (760) 431-9440.

Sincerely,

Jill Terp
for

Karen A. Evans
Assistant Field Supervisor

cc: Brad Henderson CDFG

State of California - The Resources Agency GRAY DAVIS, *Governor*

DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201

September 19, 2002

Doug Mc Isaac
Planning Director
City of West Covina
P.O. Box 1440
West Covina, CA 91793

BKK Class III Landfill Closure

AUG21, 2002-753

Dear Mr. Mc Isaac:

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced project, relative to impacts to biological resources. The BKK Landfill is known to be adjacent to a parcel the Pacific Park West (Tentative Tract 53354) project site. The Pacific Park West Site supports sensitive biological resources identified in 2001 including the federally-listed threatened coastal California gnatcatcher (*Polioptila californica*), coastal cactus wren (*Campylorhynchus brunneicapillus couesi*), and California walnut woodland and coastal sage scrub, both designated Rare Natural Communities. In addition, the Pacific Park West site supports coast live oak woodland, a vegetation community of local concern.

To enable Department staff to adequately review and comment on the proposed project, we recommend the following information be included in the Draft Environmental Impact Report (DEIR), as applicable:

1. A complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats.

   a. A thorough assessment of rare plants and rare natural communities, following the Department's May 1984 Guidelines (revised May 2000) for Assessing Impacts to Rare

Plants and Rare Natural Communities (Attachment 1).

b. A complete assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

c. Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, § 15380).

d. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 327-5960 to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, should be included.

a. CEQA Guidelines, § 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.

b. Project impacts should be analyzed relative to their effects on off-site habitats. Specifically, this should include nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed Natural Communities Conservation Planning (NCCP) reserve lands. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas, should be fully evaluated and provided.

c. A discussion of impacts associated with increased lighting, noise, human activity, changes in drainage patterns, changes in water volume, velocity, and quality, soil erosion, and /or sedimentation in streams and water courses on or near the project site, with mitigation measures proposed to alleviate such impacts should be included.

d. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

construction or over the life of the project. CESA Permits are issued to conserve, protect,

enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of a 2081 permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a 2081 permit. For these reasons, the following information is requested:

a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.

b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.

6. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.

a. If the site has the potential to support aquatic, riparian, or wetland habitat, a jurisdictional delineation of lakes, streams, and associated riparian habitats should be included in the DEIR, including a delineation of wetlands pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department[1]. Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

b. The project may require a Lake or Streambed Alteration Agreement, pursuant to Section 1600 *et seq.* of the Fish and Game Code, with the applicant prior to the applicant's commencement of any activity that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank (which may include associated riparian resources) of a river, stream or lake, or use material from a streambed. The Department's issuance of a Lake or Streambed Alteration Agreement for a project that is subject to CEQA will require CEQA compliance actions by the Department as a responsible agency.

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[1] Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

The Department as a responsible agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to Section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement[2].

The Department holds regularly scheduled pre-project planning/early consultation meetings. To make an appointment, please call our office at (858) 636-3160.

Thank you for this opportunity to comment. Questions regarding this letter and further coordination on these issues should be directed to Brad Henderson at (310) 214-9950.

Sincerely,

Donald R. Chadwick
Habitat Conservation Supervisor

Attachments

cc: Department of Fish and Game
File
San Diego
U.S. Fish and Wildlife Service
Kerri Davis
Carlsbad
State Clearinghouse
Sacramento

bjh

[2] A Streambed Alteration Agreement form may be obtained by writing to: Department of Fish and Game, 4949 Viewridge Avenue, San Diego, CA 92123, by calling (858) 636-3160, or by accessing the Department's web site at www.dfg.ca.gov/1600 .

Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities

State of California
THE RESOURCES AGENCY
Department of Fish and Game
December 9, 1983
Revised May 8, 2000

The following recommendations are intended to help those who prepare and review environmental documents determine when a botanical survey is needed, who should be considered qualified to conduct such surveys, how field surveys should be conducted, and what information should be contained in the survey report. The Department may recommend that lead agencies not accept the results of surveys that are not conducted according to these guidelines.

1. Botanical surveys are conducted in order to determine the environmental effects of proposed projects on all rare, threatened, and endangered plants and plant communities. Rare, threatened, and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare, threatened, and/or endangered under the following definitions:

   A species, subspecies, or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, or disease. A plant is "threatened" when it is likely to become endangered in the foreseeable future in the absence of protection measures. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

   Rare natural communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened, or endangered species. The most current version of the California Natural Diversity Database's List of California Terrestrial Natural Communities may be used as a guide to the names and status of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or to the extent that, rare, threatened, or endangered plants will be affected by a proposed project when:

   a. Natural vegetation occurs on the site, it is unknown if rare, threatened, or endangered plants or habitats occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
   b. Rare plants have historically been identified on the project site, but adequate information for impact assessment is lacking.

3. Botanical consultants should possess the following qualifications:

   a. Experience conducting floristic field surveys;
   b. Knowledge of plant taxonomy and plant community ecology;
   c. Familiarity with the plants of the area, including rare, threatened, and endangered species;
   d. Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
   e. Experience with analyzing impacts of development on native plant species and communities.

4. Field surveys should be conducted in a manner that will locate any rare, threatened, or endangered species that may be present. Specifically, rare, threatened, or endangered plant surveys should be:

   a. Conducted in the field at the proper time of year when rare, threatened, or endangered species are both evident and identifiable. Usually, this is when the plants are flowering.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via Facsimile and Certified US Mail
Certified Mail Receipt No. 7000 0520 0021 6107 7813
Return Receipt Requested

September 19, 2002

Douglas Mc Isaac, Director
Planning Department
City of West Covina
1444 West Garvey Avenue South
West Covina, CA 91790

Re: ***Notice of Preparation of a Draft Supplemental Environmental Impact Report - West Covina Sportsplex and Associated Developments***

Dear Mr. Mc Isaac:

We have reviewed the "Notice of Preparation of a Draft Supplemental Environmental Impact Report" for the West Covina Sportsplex and Associated Developments (West Covina project title), which the City of West Covina issued for public comment on August 19, 2002. The U.S. Environmental Protection Agency (USEPA) has reviewed the subject Notice of Preparation and has the following comments:

1. **Project Location Section:** The project will be located in Parcel 1 of the BKK Landfill site in West Covina. We recommend a map showing the location of this Parcel in reference to the rest of the site be included in the Supplemental EIR.

2. **Project Background Section:** USEPA is concerned that the Project Background completely ignores significant land use development issues related to Parcel 1 of the BKK Landfill site which are currently being addressed by USEPA. The City of West Covina, which is the Lead Agency under the California Environmental Quality Act (CEQA) for the preparation of the subject Notice of preparation and subsequent draft Supplemental Environmental Impact Report (Supplemental EIR), has been a party to the discussions of these issues.

   Specifically, in the Background section there is no mention of: (1) the City of West Covina's November 2001 request for USEPA to remove site-wide restrictions on parks and playgrounds for the northern 70 acres of Parcel 1, (2) USEPA's January 17, 2002 proposal (which was issued for public comment on the same date) to remove these restrictions for the northern 70 acres of Parcel 1, and (3) the Environmental Monitoring Protocol included in USEPA's January 17, 2002 proposal to remove the restrictions and BKK's agreement to implement this Environmental Monitoring Protocol (Monitoring Protocol or Protocol).

   Removal of these restrictions for the specified portion of Parcel 1 will allow land use developments involving parks or playgrounds to occur in the northern 70 acres of Parcel 1. These site-wide parks and playground land use restrictions are a requirement of the February 10, 2000 USEPA Ground Water Remedy Decision (Remedy Decision) for the BKK Landfill site. Therefore, USEPA proposed

In January 17, 2002 to modify its Remedy Decision to remove the parks and playgrounds restrictions for the northern 70 acres of Parcel 1. USEPA will make a final decision on the removal of the parks and playgrounds restrictions for the northern 70 acres of Parcel 1 after completing the negotiations on a Prospective Purchaser Agreement with the City of West Covina. A final decision to lift the restrictions would be a modification to USEPA's Remedy Decision.

The Project Background section states that the Class III landfill was closed in September 1996. This is inaccurate. The Class III landfill ceased accepting waste in September 1996 and is currently undergoing closure. This section also indicates that the on-site BKK Landfill leachate treatment plant (LTP) treats leachate from the closed hazardous waste (Class I) and Class III landfills, condensate from the landfills' gas collection systems, contaminated ground water from the extraction wells and other wastewater from the site. Based on the permits that regulate the operation of the LTP, it is not clear what the phrase "other wastewater from the site" refers to. Please note that the DTSC draft November 1999 Post-Closure permit (please refer to Part III.B-4 of this permit) for the closed Class I landfill defines the types of wastes that are acceptable for treatment at the LTP.

3. **Project Description Section:** USEPA has become aware of the potential future addition of an aquatic complex to the envisioned land use development for the northern 70 acres of parcel 1 through the City's August 19, 2002 Notice of Preparation.

4. **Potential Impacts Section:** This section is subdivided into Air Quality, Land Use, Lighting and Glare, Noise, Public Health and Safety, and Traffic sub-sections and states that these issues will be analyzed in the Supplemental EIR. Also, this Section invites interested parties to suggest additional issues to be evaluated.

   USEPA's comments on the Project Background section also applies to the Potential Impacts section of the Notice of Preparation. Specifically, the Public Health and Safety sub-section does not make reference to the Environmental Monitoring Protocol negotiated among USEPA, the City, California DTSC and BKK Corporation for the Big League Dreams commercial sports complex that the City plans to develop in the northern 70 acres of Parcel 1 of the BKK Landfill.

   The Monitoring Protocol involves three phases: (1) Pre-Construction Sampling, (2) Post-Construction Sampling (prior to public access) and (3) Periodic Monitoring. In general, the Monitoring Protocol requires that sampling of subsurface soil vapors, ambient air and indoor air be conducted in the area of the development. Indoor air sampling is to be conducted inside buildings to be used by the public, except for restaurants. The purpose of the Protocol and the work plan to implement it (still to be developed by BKK) is to ensure there is a system in place over the long term to monitor for, and respond to, any environmental releases that could possibly affect the 70 acres of Parcel 1. The Protocol and the future corresponding work plan will allow BKK Corporation to detect and mitigate any such releases to ensure protection of public health and safety. Therefore, USEPA believes and is requesting that the City include both the Environmental Monitoring Protocol and explanatory information regarding the Monitoring Protocol in the Supplemental EIR.

USEPA also requests that mitigation measures for the proposed Parcel 1 land use project incorporate the Monitoring Protocol requirements since the City was a party to the negotiations regarding these requirements. OK

The City also mentions that the previous Health Risk Assessment (HRA) included in the EIR that the City certified in the October 2000 for the BKK Class III Closure and Post Closure Development will be reviewed and updated, if necessary, to assess public health and safety impacts related to the project's proximity to the Class III landfill. USEPA notes that it provided significant comments on the City's previous draft EIR HRA which were not addressed to USEPA's satisfaction in the final June 2000 EIR. BKK Corporation's September 6, 2000 letter regarding BKK's commitment to address these issues should be reviewed and considered in conjunction with the Environmental Monitoring Protocol and any future agreements to be negotiated between BKK and DTSC for environmental sampling and monitoring at the southern 31.2 acres of Parcel 1 when developing the Supplemental EIR. Further, USEPA cautions that any updating of the previous HRA for the purposes of developing the Supplemental EIR does not supersede the Environmental Monitoring Protocol requirements that BKK agreed to implement for the northern 70 acres of Parcel 1 of their West Covina site and that were negotiated with the City's input. BKK Corporation is to implement the Protocol under USEPA's corrective action order on consent issued to BKK on September 14, 2000, as amended on January 22, 2002.

In addition to the above, USEPA emphasizes that it recommended in its September 9, 1999 comments to the previous EIR HRA that potential exposure pathways not be eliminated from the HRA and potential risks from these pathways be addressed in the EIR HRA. USEPA made these recommendations because there are a number of potential exposure pathways listed as "incomplete" in the conceptual site model presented in Figure 3-1 of the previous EIR HRA that the Agency believes may be current, or future, pathways of exposure. Relevant potential exposure pathways that USEPA identified in its September 9, 1999 comments include:

- Inhalation of volatile organic compounds (VOCs) from subsurface soil vapor gaining access to the interiors of current or future buildings on or adjacent to the BKK property,
- Inhalation of VOCs from subsurface soil vapor subsequent to release to ambient air, with resultant exposure to individuals outside or in current or future buildings on or adjacent to the BKK property, and
- Inhalation of VOCs volatilized from contaminated ground water to subsurface soil vapor, with subsequent exposure potential as per the first bullet above.

USEPA also emphasizes that potential exposure pathways should be eliminated from a risk assessment only when there is sufficient proof that they are incomplete, not just in the opinion of the risk assessor. Therefore, the pathways identified above should be properly addressed in any updates to the previous EIR HRA that will be used to support the future Supplemental EIR. These pathways were considered in the Environmental Monitoring Protocol.

The City is proposing to develop the southern 31 to 41 acres of Parcel 1 into a 375,000 to 450,000 square foot retail center. In light of the January 2002 Environmental Monitoring Protocol requirements that will be implemented in the northern 70 acres of Parcel 1, USEPA strongly recommends that the City implement environmental monitoring requirements in the southern portion of Parcel 1 that are similar in scope to those in this Environmental Monitoring Protocol.

In concluding, USEPA recommends that all of the above comments be addressed in the Supplemental EIR. Please call me at 415.972.3360 if you have any questions concerning this comment letter. Thank you.

Sincerely,

Carmen D. Santos, Project Manager
Waste Management Division
RCRA Corrective Action Office

cc: Steven L. Samaniego (City of West Covina)
Chris Hansen (BKK Corporation)
Phil Chandler (DTSC, Glendale)
Richard Allen (DTSC, Glendale)
Chris Guerre (DTSC, Cypress)
Larry Bowerman (USEPA)
Mimi Newton (USEPA)

Department of Toxic Substances Control

Edwin F. Lowry, Director
5796 Corporate Avenue
Cypress, California 90630

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

MEMORANDUM

TO: Richard Allen
Hazardous Substances Engineer
Southern California Permitting Branch

FROM: Chris A. Guerre, CHG
Senior Hazardous Substances Engineering Geologist
Geological Services Unit

DATE: September 19, 2002

SUBJECT: NOTICE OF PREPARATION FOR PARCEL 1
BKK LANDFILL, WEST COVINA, CALIFORNIA

PCA 11140

The Geological Services Unit (GSU) of the Department of Toxic Substances Control (DTSC) has reviewed the City of West Covina Redevelopment Agency's (West Covina) Notice of Preparation (NOP) for a draft Supplemental Environmental Impact Report (SEIR), dated August 19, 2002. The NOP identifies the project, and discusses project location and potential environmental effects related to the project. West Covina requests agency input regarding the scope and content of relevant environmental information associated with the project. The project focuses on a 101.2 acre area (Parcel 1) of the BKK Corporation (BKK) facility located just east of Azusa Avenue and its proposed change in land use from a business technology center to recreational and commercial uses. Comments are provided below to assist West Covina in assessing and addressing environmental issues which the GSU has recently been involved with or where the GSU has general concerns. Questions regarding this memo should be directed to Chris Guerre at (714) 484-5422 or email at *cguerre@dtsc.ca.gov*.

Comments

1. The second paragraph on page five of the NOP indicates that a previous EIR and health risk assessment was certified for the technology center project. Since then, the GSU has determined that portions of Parcel 1 are inadequately characterized with respect to soil, soil vapor, and groundwater contamination. Health risk assessments generally are not valid without proper and adequate site characterization data upon which they are based. West Covina must revise and/or supplement the existing health risk assessment to ensure new environmental issues on Parcel 1 are appropriately addressed.

2. As requested by West Covina on page six of the NOP, the following issues are suggested to be added to the Potential Impacts section of the NOP/SEIR:

   Decommissioning of Former Environmental Monitoring Devices: BKK has conducted environmental monitoring on Parcel 1 in the past. However, BKK has yet to properly decommission many devices (i.e., groundwater monitoring wells) on Parcel 1. Improperly decommissioned wells have potential, now and in the future, to allow contaminants to quickly migrate within or along a well with resulting adverse environmental impacts. The SEIR should address and ensure all environmental monitoring devises approved for decommissioning by regulating agencies are appropriately decommissioned and conducted with minimal environmental impact. DTSC and BKK correspondence related to this issue are attached for your reference. This reference list was provided to Steve Samaniego at the City of West Covina on July 3, 2002.

   Contaminated Surface Water on Parcel 1: This year, the GSU has discovered that surface water within detention basins on Parcel 1 are contaminated with 1,4 - Dioxane. While regulating agencies and BKK will be attempting to mitigate the contamination, the SEIR should acknowledge its presence, potential impacts to the project (i.e., contact with the contaminated water), and any needed mitigation measures.

   Contaminated Ground Water around Parcel 1: Contaminated ground water is located up (east) and down (west) gradient of Parcel 1. The SEIR should acknowledge its presence and potential impacts to the project (i.e., potential for contaminated ground water to off-gas and migrate to surface receptors now and in the future). The SEIR should address what appropriate environmental monitoring will be necessary to evaluate environmental impacts now and in the future (i.e., install groundwater wells immediately upgradient of Parcel 1 to monitor changes in water quality over time) and any necessary mitigation measures.

Contamination Associated with the Former 1960's Landfill and Former Landfill Operations: The southern portion of Parcel 1 used to be a landfill that started operations in the 1960's. Landfill operations that pose some potential environmental concern also occurred on this parcel. While trash associated with the 1960's landfill is reported to have been removed, insufficient data was collected to document that any remaining contaminated soils do not pose a threat to human health or the environment. The GSU has requested that additional soil, soil gas, and groundwater data be collected in this area and is currently working with BKK on this matter. DTSC and BKK correspondence related to this issue are attached for your reference. This reference list was provided to Steve Samaniego at the City of West Covina on July 3, 2002.

Environmental Monitoring for the Northern 70 Acres of Parcel 1: An arrangement was reached between the U.S. Environmental Protection Agency, BKK, DTSC, and the City of West Covina in the winter of 2001/2002 regarding short and long term environmental monitoring (soil, soil vapor, ambient air, and indoor air sampling/monitoring) for that portion of the parcel. BKK further agreed to conduct additional groundwater sampling on this portion of the parcel at the request of the GSU. The SEIR should acknowledge these arrangements and the known or potential environmental impacts they will be monitoring.

Potential Presence of Petrogenic Gas at the BKK Landfill Site: BKK has postulated that naturally occurring petrogenic gases (i.e., methane) occur on Parcel 1. The SEIR should evaluate what appropriate environmental monitoring will be necessary to evaluate environmental impacts from petrogenic gases in the short and long term.

3. **Project Location:** Only very general reference is made to the location of the project. As the Project Site identified on Figure 2 contains a Class I Hazardous Waste/Municipal Landfill, Class III Municipal Landfill, a Leachate Treatment Plant, and a former 1960's Landfill, a detailed figure will be required.

REFERENCE LIST PROVIDED TO CITY OF WEST COVINA

PARCEL 1

Agra Earth & Environmental Inc., November 25, 1992. Response to LEA Request, Soil and Water Sampling and Testing Program, Lower Retention Basin, BKK Corporation Landfill, West Covina, California (Note: City of West Covina took split sample data and should have additional data).

Agra Earth & Environmental Inc., May 16, 1991. Geotechnical Study, Proposed Scale Pad, BKK Landfill.

BKK Corporation, January 18, 2002. Non-Routine Groundwater Monitoring in Parcel 1 at BKK Landfill Site.

BKK Corporation, December 19, 2001. Decommission Five Inactive Groundwater Wells in Parcel 1 at BKK Landfill Site.

BKK Corporation, October 12, 2001. Parcel 1 at BKK Landfill Site.

BKK Corporation, July 10, 2001. Excavation of 1960s Trash Near West Entrance of BKK Landfill Site/Borehole Investigation Report Excavation of 1960s Trash from Area D BKK Landfill Site, West Covina, California.

BKK Corporation, July 11, 2001. Excavation of 1960s Trash From Old Area D at BKK Landfill Site.

BKK Corporation, June 25, 2001. Decommission Groundwater Monitoring Wells at BKK Landfill Site.

BKK Corporation, December 20, 2000. Excavation Soils Monitoring Plan for Business Park Development.

Byran A. Stirrat & Associates, March 8, 1988. Report of Geotechnical Services, Retention Basin Area, BKK Corporation Landfill, West Covina, California.

DTSC, August 16, 2002. Supplemental Data Submission, Southern 31 Acres of Parcel 1, BKK Landfill, West Covina, California.

DTSC, March 14, 2001, Business Park Development, Soil Monitoring Plan, BKK Landfill, West Covina, California.

DTSC, March 1, 2002, Request for Additional Data, Southern 31 Acres of Parcel 1, BKK Landfill, West Covina, California.

REFERENCE LIST PROVIDED TO CITY OF WEST COVINA (continued)

Environ, September 19, 1997. Field Report on HydroPunch Ground Water Investigation, BKK Landfill, West Covina, California.

Steve Janes, 02/26/02. Wells and Geology of the Western Entrance Area.

The Janes Network, October 31, 1997, Resource Conservation and Recovery Act Facility Investigation - Groundwater, BKK Landfill, West Covina, California.

Various Aerial Photographs

WELL DECOMMISSIONING

DTSC, February 8, 2002, Decommissioning and Replacement of Parcel 1 Groundwater Monitoring Wells, BKK Landfill Facility [EPA ID NO. CAD 067 786 749].

DTSC, November 15, 2001, Parcel 1 Well Decommissioning and Replacement.

DTSC, November 15, 2001, Groundwater Well Decommissioning, BKK Development Project, BKK Landfill, West Covina, California.

DTSC, January 12, 2001, Protecting, Reconfiguring, and Decommissioning Monitoring Wells Resulting from Proposed Golf Course and Business Park Construction Relative to BKK Corporations Closed Class I Landfill Unit.

DTSC, June 7, 2001, BKK Wells; Response to May 11, 2001 Letter.

DTSC, April 12, 2001, Groundwater Well Decommissioning, BKK Landfill, West Covina, California.

DTSC, May 11, 2001, Groundwater Well Decommissioning/Reconfiguration for Proposed Golf Course and Business Park Relative to BKK Corporations Closed Class I Landfill Unit.

DTSC, December 21, 2000, Golf Course/Business Park Impact to Existing Active and Inactive Groundwater Wells, BKK Landfill, West Covina, California.

METHANE GAS ISSUES

BKK Corporation, June 27, 2002. Petrogenic Gas at the Northwest Corner of BKK Landfill Site.

Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

September 20, 2002

CERTIFIED MAIL

Mr. Doug Mc Issac
City of West Covina
Local Enforcement Agency (LEA)
1444 West Garvey Avenue
West Covina, California 91790

CITY OF WEST COVINA NOTICE OF PREPARATION OF AMENDMENT TO DRAFT ENVIRONMENTAL IMPACT REPORT - BKK FINAL CLOSURE/POSTCLOSURE MAINTENANCE PLAN, 18-HOLE GOLF COURSE, SAN JOSE HILLS BUSINESS PARK, DATED AUGUST 19, 2002

Dear Mr. Mc Issac:

The Department of Toxic Substances Control (DTSC) has reviewed the Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (SEIR) dated August 19, 2002, which has been circulated by your agency in behalf of the City of West Covina. The comments provided below derive from our interests in the Class I Landfill post-closure care, operation of a Leachate Treatment Plant, and implementation of corrective action at the BKK Facility. A memorandum from DTSC's Geological Services Unit (GSU)which provides additional comments is attached.

- The development proposal could impact existing gas monitoring wells/probes; future groundwater extraction wells/piping; and present and future groundwater monitoring wells. Further, it might adversely constrain regulatory agency options for installation and operation of future extraction that might be required of BKK for the corrective action remedy.

- The SEIR needs to consider the closed Class I post-closure permit as part of the environment setting. Specifically, the proposed development must not interfere with the ability of the various regulatory agencies to investigate, oversee compliance, and remediate the closed Class I Landfill unit. This includes, but is not limited to, Class I and Class III Landfill unit

cap maintenance, operation and maintenance of the gas collection and treatment system(s), operation and maintenance of the leachate extraction and treatment systems, and operation and maintenance of present and future groundwater monitoring and extraction system(s).

- The 1997 plan proposed a golf course for post-closure use of the inactive Class III Landfill unit. Thus, there is a potential for increasing contaminant mobility due to irrigation from the golf course---even though the golf course would not be directly over the closed Class I Landfill unit. Similarly, irrigation on Parcel 1 may affect the local hydraulic regime and thereby impact contaminant migration. Therefore, the SEIR must adequately evaluate these potential impacts. Mitigation measures to minimize infiltration should be included in the SEIR and the issue needs to be addressed as an environmental effect to groundwater quality, quantity, perhaps flow direction, etc., in the water section. A no impact determination in the SEIR would be inaccurate.

- The 1997 plan stated that "If any well is destroyed or damaged during construction, the well will be decommissioned per all state and local requirements and a new well will be installed in the same water bearing zone as the original well." DTSC believes that the existing wells of the groundwater, gas and leachate monitoring and extraction networks must be affirmatively protected in the SEIR. Merely replacing them---at some unspecified time---could in fact have an adverse environmental effect, e.g. failing to detect a new release before dispersion of further contaminants off-site in either vadose zone or ground water. A no impact determination in the SEIR would be inaccurate.

- Above-grade well completions will be at risk from construction, maintenance vehicles, etc., and tampering from the public. The SEIR needs to deal with this issue.

- The issue of a less than significant impact from "seismic ground failure, including liquefaction" has not been satisfactorily resolved. The original 1997 IS checklist states that there is potential significant impact from "fault rupture" and "seismic ground shaking", and the original 1997 IS explanation of responses described at least one major fault and several subsidiaries that cross the facility. "Seismic ground failure" that may in fact occur from tectonic displacement or severe local shaking if any of the faults crossing the site is seismogenic, cannot be reduced to a level of

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To MARK ALPERS	From LYDIA DE ZARA	
Co./Dept.	Co.	
Phone # (323) 933-6111	Phone # (626) 939-8763	
Fax # (323) 934-1287	Fax # (626) 939-8667	

non-significance by maintenance measures. Localized shaking can in fact cause ground failure which can rupture landfill cover and trash cells---which together with the golf course surface water could represent a significant effect on surface water drainage, groundwater, and adjoining parcel, etc. The 1997 original IS checklist and explanations of responses were not satisfactory and did not treat potential problems from seismic damage to the gas collection systems on either the Class III or Class I Landfill units or even potential of increased out-gassing from shaking or site surface rupture. Finally, there is an issue of the effect of seismicity on out-gassing of the petrogenic methane that has been reported at the Facility.

- Given that the original 1997 IS explanation of responses admitted that "settlement" might occur and that the final cover would need to be maintained and repaired as this happened, gases—including vinyl chloride—might be emitted from the Class III prior to or during such repairs (this has occurred during inspections). The 1997 plan did not treat this. The original 1997 IS explanation of responses stated that inspection and repair---for objectionable odors---would reduce the impact to non-significance. It is believed that this is inaccurate and that impacts to the public and employees still may occur during repairs and that the potential impacts and more detailed mitigations need to be discussed in the SEIR.

- The original 1997 IS explanation of responses stated that there would be no alteration of air movement. Given the extensive landscaping, including trees, proposed in the 1997 plan, this was probably inaccurate. Any such effects should be addressed in the SEIR relative to the new project.

- The U.S. Fish and Wildlife Service (USFWS) has indicated that habitat for endangered species potentially exists on and adjacent to the BKK Facility. This was acknowledged by the original 1997 IS checklist and explanations of responses. However, that checklist indicated that there would be no impact to wetlands, e.g. riparian habitat from the proposed project. The USFWS indicated that some wetland habitat may exist along the residual Puente Creek stream-course near Amar. This implies that the original 1997 IS checklist was inaccurate and the explanation of responses incomplete. The detention basins and associated surface water need to be addressed in the SEIR relative to the USFWS indications.

- The project description should include citation of the various covenants to restrict use of property.

If you have questions regarding the foregoing, please call me at (818) 551 2921, or Richard Allen at (818) 551-2924.

Sincerely yours,

Philip B. Chandler, C. E. G.
Southern California Permitting Branch
Hazardous Waste Management Program

Certified Mail
7001 2510 0008 9505 1174
Return Receipt Requested

Enclosure

cc: Ms. Carmen Santos, Project Manager
RCRA Corrective Action Office (WST-5)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. Rick Moss, Division Chief
Permitting Division
Hazardous Waste Management Program
Department of Toxic Substances Control
1001 I Street, 11th Floor
P.O. Box 806
Sacramento, California 95812-0806

Mr. Guenther Moskat, Section Chief
Department of Toxic Substances Control
Planning and Environmental Analysis Section
1001 I Street, 22nd Floor
P.O. Box 806
Sacramento, California 95812-0806

cc: Ms. Marilee Hanson
Department of Toxic Substances Control
Office of Legal Counsel
1001 I Street, 23rd Floor
P.O. Box 806
Sacramento, California 95812-0806

Mr. Christopher Guerre
Department of Toxic Substances Control
Geology and Corrective Action Branch
5796 Corporate Avenue
Cypress, California 90630

Mr. Bill Bosan
Department of Toxic Substances Control
Southern California Permitting Branch
1011 North Grandview Avenue
Glendale, California 91201

Mr. Richard Allen
Department of Toxic Substances Control
Southern California Permitting Branch
1011 North Grandview Avenue
Glendale, California 91201

California Regional Water Quality Control Board

Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

320 W 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: http://www.swrcb.ca.gov/~rwqcb4

Gray Davis
Governor

September 20, 2002

RECEIVED
PLANNING DEPT.

Doug Mc Isaac
Planning Director
City of West Covina
P.O. Box 1440
West Covina, CA 91793

Response to Notice of Preparation (NOP) for West Covina Sportsplex and Associated Developments Subsequent Environmental Impact Report (SEIR)

Dear Mr. Isaac:

We appreciate the opportunity to review the NOP you have provided. For your information a list of permitting requirements and Regional Board contacts is attached.

The project site lies near the San Jose Creek in the San Gabriel River watershed, which was listed as impaired pursuant to Section 303(d) of the Clean Water Act. Impairments listed in areas at or down current from the proposed project include ammonia, DO, pH, metals, pesticides, PCBs, trash, odor and high coliform count, as shown in Attachment B. The Los Angeles Regional Water Quality Control Board will be developing Total Maximum Daily Loads (TMDLs) for the watershed, but the proposed project is expected to proceed before the applicable TMDLs are developed. In the interim, the Regional Board must carefully evaluate the potential impacts of new projects that may discharge to impaired water bodies. Please provide the following additional information for both the construction and operational phases of the project:

- Estimates of the amount (gal/day) of dry and wet season discharge from drainage structures;
- Estimates of concentrations and loads, if any, in lbs/day from point and non-point sources for the listed pollutants in attachment B;
- Surface water management for the stormwater, wash water, water used to irrigate the baseball/softball fields, playgrounds, and landscape areas, and other wastewater generated from the proposed project;
- Estimates of the amount of increased or decreased percolation due to the project;
- Description of the existing groundwater quality from wells at the subject site, or adjacent to the site.
- Estimates of the net change in cubic feet per second of surface water contributions under historic drought conditions (as compiled by local water purveyors, the Department of Water Resources, and others), and 10-year, 50-year and 100-year flood conditions; and

- Effects of the project on local groundwater conditions (water elevations, and net change in recharge in cubic feet per second) under the following conditions:
    - during construction, including effects of dewatering activities
    - under historic drought conditions and
    - under 10-year, 50-year and 100-year flood conditions.

Thank you for the opportunity to provide our initial comments during this stage of the proposed project planning process. We hope that these comments will provide early direction to the preparers of the environmental review documents and ensure an adequate analysis of water quality issues. If you have any questions please contact me at (213) 576-6690.

Sincerely,

Thanhloan Nguyen

Thanhloan Nguyen
Water Resource Control Engineer
TMDL Unit

Attachments (2)
cc: file

ATTACHMENT B

San Gabriel River Watershed

Constituents Causing Impairment

Parameter	Unit
Ammonia	mg/L
Arsenic Ralph G.	mg/L
Bacteria (coliform)	Organisms/100 mL
Chlordane	µg/L
Copper	mg/L
DDT	µg/L
Dissolved Oxygen	mg/L
Lead	mg/L
Mercury	mg/L
PCBs	µg/L
Trash	Lbs
Odor	threshold units
pH	pH units

ATTACHMENT A

✓ If the proposed project will result in a **discharge of dredge or fill into a surface water** (including a dry streambed), and is subject to a **federal license or permit**, the project may require a *Section 401 Water Quality Certification*, or waiver of Waste Discharge Requirements. For further information, please contact:

Jason Lambert, Nonpoint Source Unit at (213) 576-5733.

✓ If the project involves **inland disposal of nonhazardous contaminated soils and materials**, the proposed project may be subject to *Waste Discharge Requirements*. For further information, please contact:

Rodney Nelson, Landfills Unit, at (213) 576-6719.

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✓ If the overall project area is **larger than five acres**, the proposed project may be subject to the State *Board's General Construction Activity Storm Water Permit*. For further information, please contact:

Tracy Wooda, Statewide General Construction Activity Storm Water Permits at (213) 576-6684.

✓ If the project involves a facility that is proposing to discharge storm water associated with **industrial activity** (e.g., manufacturing, recycling and transportation facilities, etc.), the facility may be subject to the State Board's *General Industrial Activities Storm Water Permit*. For further information, please contact:

Kristie Chung, Statewide General Industrial Storm Water Permits at (213) 576-6807.

✓ If the proposed project involves requirements for new development and construction pertaining to **municipal storm water programs**, please contact:

Dan Radulescu, Municipal Storm Water Permits, Los Angeles County at (213) 576-6668;
Matt Yeager, Municipal Storm Water Permits, Ventura County at (213) 576-6749.

✓ The proposed project also shall comply with the local regulations associated with the applicable **Regional Board stormwater permit:**

Los Angeles County and Co-permittees:
NPDES No. CAS614001
Waste Discharge Requirements Order No. 96-054.

Long Beach County and Co-permittees:
NPDES CAS004003
Waste Discharge Requirements Order No. 99-060.

Ventura County and Co-permittees:
NPDES No. CAS004002
Waste Discharge Requirements Order No. 00-108.

****

✓ If the proposed project involves any construction and/or groundwater **dewatering to be discharged to surface waters**, the project may be subject to *NPDES/Waste Discharge Requirements*. For further information, please contact:

Augustine Anijielo, General Permitting and Special Projects Unit at (213) 576-6657 (All Region 4 Watersheds).

✓ If the proposed project involves any construction and/or groundwater **dewatering to be discharged to land or groundwater**, the project may be subject to *Waste Discharge Requirements*. For further information, please contact:

Kwang-il Lee, Non-Chapter 15 Unit, at (213) 576-6666 (All Region 4 Watersheds).

Proposal to Modify USEPA Remedy Decision

for

Contaminated Ground Water at the BKK Landfill
West Covina, California

Proposal to Modify Institutional Controls and Justification
First Modification to Remedy Decision

United States Environmental Protection Agency
Region 9

January 17, 2002

Proposal to Modify USEPA Remedy Decision
for
Contaminated Ground Water at the BKK Landfill
West Covina, California

January 17, 2002

First Remedy Decision Modification

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Proposal to Modify USEPA Remedy Decision
for
Contaminated Ground Water at the BKK Landfill
West Covina, California

First Remedy Decision Modification
January 17, 2002

I Executive Summary

USEPA proposes to partially remove the parks and playgrounds land use prohibition from the Remedy Decision for the BKK Landfill. Removal of the prohibition applies only to the northern 70 acres of Parcel 1. The City of West Covina is contemplating redevelopment of these 70 acres into a Big League Dreams sports complex facility. BKK Corporation will implement an environmental monitoring and response workplan to ensure there is a system in place over the long term to monitor for, and respond to, any environmental releases that could possibly affect the 70 acres of Parcel 1. The monitoring and response workplan will allow BKK to detect and mitigate any such releases to ensure protection of public health and safety. This workplan will include indoor air monitoring requirements for specific occupied building structures and soil and subsurface soil,vapor monitoring.

USEPA believes that development projects that focus on outdoor recreational activities are appropriate for the selected portion of Parcel 1 if constructed following State and local regulatory requirements, and technical recommendations from USEPA and DTSC. Given that projects involving parks and playgrounds are oriented to outdoor recreational activities, these types of projects are likely to minimize human exposures to any gaseous/vapor contamination that could possibly escape from the landfill, either via landfill gas/soil vapor migration or volatilization from contaminated ground water.

II Purpose and Introduction

The USEPA proposes to partially remove the parks and playgrounds land use prohibition, which is included in USEPA's February 10, 2000 *Remedy Decision for Contaminated Ground Water at the BKK Landfill in West Covina, California, United States Environmental Protection Agency Region 9* ("Remedy Decision").

On May 29, 2001, BKK Corporation (BKK) recorded an *Environmental Restriction, Covenant and Agreement to Restrict Use of Property* with the Los Angeles County Recorder's office for Parcel 1 of the BKK site ("Deed Restriction"). The California Department of Toxic Substances Control (DTSC), BKK and the City of West Covina ("City") are signatories to the Deed Restriction. The Parcel 1 covenant, in addition to the covenants for Parcels 2 and 3, addresses the land use prohibitions required in USEPA's Remedy Decision and in the California Health and Safety Code.

The partial removal of the parks and playgrounds prohibition applies only to the northern 70 acres portion of Parcel 1 of the BKK Landfill ("BKK site" or "BKK facility") in West Covina. Parcel 1 consists of approximately 101 acres along the western boundary of the BKK site, bordering Azusa Avenue. On November 14, 2001, the City requested USEPA to remove the parks and playgrounds prohibition from the Remedy Decision since the City is contemplating to redevelop these 70 acres into a Big League Dreams sports complex facility. The remedy modification is conditioned upon

BKK's agreement to develop and implement an environmental monitoring and response workplan in accordance with the attached Environmental Monitoring Protocol ("Monitoring Protocol"), which addresses monitoring requirements for any development project involving a park or playground, including the proposed Big League Dreams sports complex facility. USEPA is soliciting public comments on this proposal before it makes a decision to remove the parks and playgrounds restrictions for the specified portion of Parcel 1.

The proposed remedy modification is part of USEPA's Administrative Record for the BKK site and copies are available at USEPA Region 9, 75 Hawthorne Street, San Francisco, CA 94105. Copies of the proposed remedy modification are also available at the West Covina Public Library (Telephone # 626.962.3541), 1601 West Covina Parkway, West Covina, CA 91790.

III Public Participation

The public outreach activities for the modification of the Remedy Decision will be conducted jointly with DTSC in connection with DTSC's proposed modification of the Deed Restriction for Parcel 1 of the BKK site.

USEPA is soliciting comments from the public on this proposal to modify the Remedy Decision. A determination to modify the Remedy Decision will be made after considering public (including BKK's and the City's) comments. The 33-day public comment period begins on January 18, 2002 and ends on February 20, 2002. A public meeting and hearing will be conducted on February 20, 2002. If, at the close of the public comment period, USEPA modifies the Remedy Decision, the Deed Restriction will also need to be modified prior to any development of the northern 70 acres of Parcel 1 involving a park or playground. Pursuant to California Health and Safety Code Section 25202.6, DTSC is holding a public hearing on the proposed modification of the Deed Restriction. DTSC will conduct this hearing jointly with USEPA.

Joint USEPA and DTSC Public Meeting and Hearing
7:00 to 9:00 pm, Wednesday, February 20, 2002
West Covina City Hall Community Room
1444 West Garvey Avenue South
West Covina, CA

USEPA will make a short presentation and address questions on the proposed remedy modification at the public meeting and hearing. DTSC will make a short presentation on the proposed modification of the Deed Restriction that includes the park and playground prohibition. Once the official public hearing begins, USEPA and DTSC will be accepting comments, but will not be responding to questions.

If you cannot attend this meeting, you are encouraged to review and provide written comments on USEPA's proposed remedy modification during the public review and comment period.

PUBLIC REVIEW AND COMMENT PERIOD
January 18, 2002 to February 20, 2002

Please send your comments on the modification to the Remedy Decision postmarked not later than February 20, 2002 (the end of the comment period) to:

Carmen D. Santos, Project Manager
US Environmental Protection Agency R9
RCRA Corrective action Office, WST-5
San Francisco, CA 94105 or
santos.carmen@epa.gov, and

Phil Chandler, C.E.G., RGP, Unit Chief Southern California Permitting Branch
California DTSC
1011 N. Grandview Avenue
Glendale, CA 91201 or
PChandle@dtsc.ca.gov

IV Proposal to Modify Institutional Controls in the USEPA Remedy Decision

In February 2000, USEPA selected the ground water remedy for the BKK site in West Covina, California after considering public comments on USEPA's August 11, 1998 proposed ground water remedy. USEPA's justification for the selected groundwater remedy is documented in the Remedy Decision. The Remedy Decision requires BKK to install, operate and maintain a minimum of 61 new ground water and leachate extraction wells to remediate ground water and control further off-site movement of contaminated ground water.

The Remedy Decision requires that institutional controls (e.g., restrictions on land use) be implemented through restrictive land use covenants at the BKK site. The institutional controls, which are described in Section V-C-11 (pages 14-15) of the Remedy Decision, were incorporated into the selected remedy in response to comments on the remedy proposal and following corrective action program guidance available at the time of remedy selection.

USEPA proposes to modify Section V-C-11 (Institutional Controls), Paragraph (a) [page 15] of the Remedy Decision to remove the parks and playgrounds restriction for the northern 70 acres only of the 101.198-acre Parcel 1 of the BKK site. Paragraph (a), which is the prohibition including

restrictions on parks and playgrounds for the 583-acre BKK Landfill site (includes Parcel 1) and the subject of this Remedy Modification, states:

> "A prohibition that the 583-acre BKK facility shall not be used for residences, hospitals, schools, day-care centers, parks and playgrounds, or any permanently occupied human habitation."

USEPA proposes to modify the above prohibition by substituting the current paragraph Section V-C-11(a) with the following text:

> "A prohibition, pursuant to Article 11 of Chapter 6.5 of the California Health and Safety Code, that the southern thirty-one and 198/1000ths (31.198) acres of Parcel 1 and all of Parcels 2 and 3, shall not be used for residences, hospitals, schools, day-care centers, parks, playgrounds, or any permanently occupied human habitation. For purposes of this prohibition, a golf course is neither a park nor a playground.
>
> A prohibition, pursuant to Article 11 of Chapter 6.5 of the California Health and Safety Code, that the northern seventy (70) acres of Parcel 1 shall not be used for residences, hospitals, schools, day-care centers, or any permanently occupied human habitation."

A map depicting Parcel 1 and the northern 70 acres and southern 31.198 acres is included in this proposal.

A. Conditions to Remove Land Use Restrictions on Parks and Playgrounds for the Northern 70 Acres of Parcel 1 of the BKK Site

1. Removing the parks and playgrounds land use restriction is conditioned upon an enforceable agreement between USEPA and BKK whereby BKK agrees to implement an environmental monitoring and response workplan to be prepared by BKK for USEPA approval. The workplan is to be based on the requirements set forth in the attached Environmental Monitoring Protocol. BKK will implement the environmental monitoring and response workplan after it is approved. Further, BKK will be required to implement the workplan for any development of the northern 70 acres of Parcel 1 involving a park or playground. Implementation of the workplan will be enforced through a modification to the USEPA September 14, 2002 Resource Conservation and Recovery Act (RCRA) Section 3008(h) corrective action order on consent (please refer to Section VI below).

B. Environmental Monitoring Protocol

The purpose of the Environmental Monitoring Protocol (attached), and the required environmental monitoring and response workplan (to be prepared by BKK) is to ensure there is a system in place over the long term to monitor for, and respond to, any environmental releases

that could possibly affect the 70 acres of Parcel 1. The monitoring and response workplan will allow BKK to detect and mitigate any such releases to ensure protection of public health and safety. Further, the Monitoring Protocol includes indoor air monitoring requirements for specific occupied building structures and soil and subsurface soil vapor monitoring. This protocol involves three phases: (1) Pre-Construction Sampling, (2) Post-Construction Sampling prior to Public Access and (3) Periodic Monitoring.

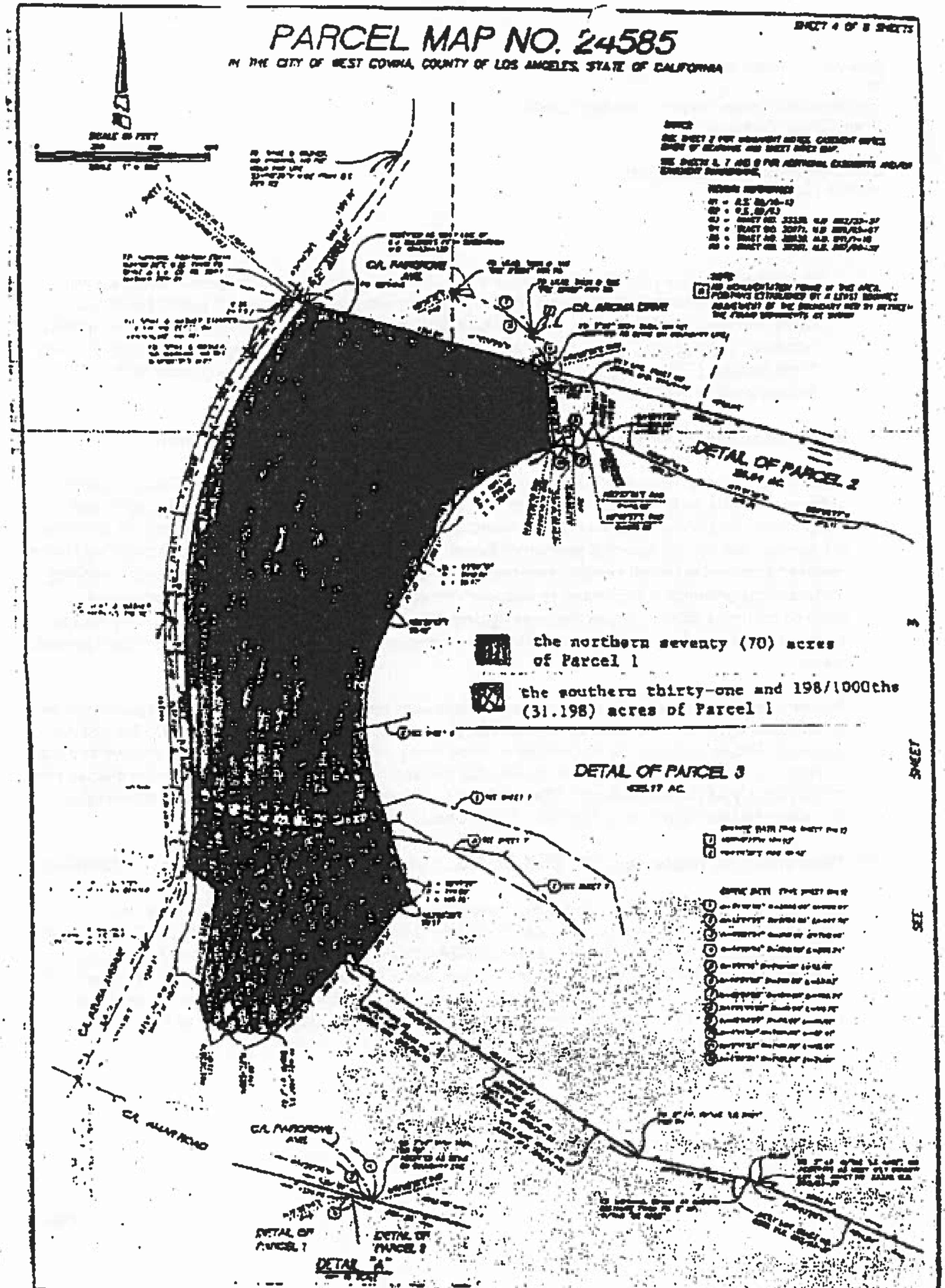
V Justification for Proposal to Remove the Parks and Playgrounds Prohibition

USEPA is proposing removal of the parks and playgrounds land use restriction on a 70-acre portion of Parcel 1 of the BKK site to allow use of this land for development projects involving parks and playgrounds. USEPA believes that development projects that focus on outdoor recreational activities are appropriate for the selected portion of Parcel 1 if constructed following State and local regulatory requirements and technical recommendations from USEPA and DTSC. Given that projects involving parks and playgrounds are oriented to outdoor recreational activities, these types of projects are likely to minimize human exposures to any gaseous/vapor contamination that could possibly escape from the landfill, either via landfill gas/soil vapor migration or volatilization from contaminated ground water.

Further, removal of the parks and playgrounds land use restriction is contingent upon approval of an enforceable environmental monitoring and response workplan to be submitted by BKK for USEPA approval. The purpose of the environmental monitoring and response workplan is to ensure there is a system in place over the long term to monitor for, and respond to, any environmental releases that could possibly affect the 70 acres of Parcel 1. This workplan will allow BKK to detect and mitigate any such releases to ensure protection of public health and safety.

VI Mechanism to Implement the BKK Environmental Monitoring and Response Workplan

BKK Corporation will implement the environmental monitoring and response workplan in accordance with the September 14, 2000 Resource Conservation and Recovery Act (RCRA), Section 3008(h) corrective action order on consent (USEPA Docket No. RCRA-9-2000-0003) after it is modified. USEPA and BKK will modify the consent order ("First Modification to Administrative Order on Consent") to address the proposal to modify the land use prohibitions required in the Remedy Decision and, if the Remedy Decision is modified, to require the implementation of the environmental monitoring and response workplan.


PARCEL MAP NO. 24585
IN THE CITY OF WEST COVINA, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
SHEET 4 OF 8 SHEETS
C/L AZUSA DRIVE
C/L AMAR ROAD
C/L FAIRGROVE AVE
DETAIL OF PARCEL 2
DETAIL OF PARCEL 3
DETAIL OF PARCEL 1
DETAIL OF PARCEL 2
DETAIL "A"
the northern seventy (70) acres of Parcel 1
the southern thirty-one and 198/1000ths (31.198) acres of Parcel 1

ENVIRONMENTAL MONITORING PROTOCOL FOR ANY DEVELOPMENT INVOLVING A PARK AND/OR PLAYGROUND ON THE NORTHERN 70 ACRES OF PARCEL 1 OF THE BKK LANDFILL PROPERTY IN WEST COVINA, CALIFORNIA

Wherever possible, the Final Workplan for an environmental monitoring and response program at this property shall build upon existing monitoring requirements that BKK will be required to meet for other regulatory agencies or commitments already made by BKK relating to development of this property. Applicable regulations and commitments include, but are not limited to, those set forth in:

* California Integrated Waste Management Board (IWMB) regulations at 27 CCR 21190 regarding Post-Closure Land Use at landfills,
* South Coast Air Quality Management District (SCAQMD) Rule 1150.1, "Control of Gaseous Emissions From Municipal Solid Waste Landfills" (Rule 1150.1), and
* The September 6, 2000 letter from BKK to U.S. EPA regarding the Environmental Impact Report for the development project at Parcel 1.
* Title 22 of the California Code of Regulations sections 66260 et seq. and any applicable federal regulations at 40 Code of Federal Regulations sections 260 et seq.

The Final Workplan shall address:

(1) Compliance with 27 CCR 21190(d), and specifically the requirement that "[t]he owner or operator shall demonstrate to the satisfaction of the enforcement authority that the [development] activities will not pose a threat to public health and safety, and the environment."

(2) The installation of a system of soil vapor monitoring probes along the perimeter of the BKK Class III landfill, in accordance with SCAQMD Rule 1150.1. In accordance with Rule 1150.1, these probes will be installed in clusters spaced 100 feet apart along the landfill perimeter. Each cluster generally consists of 4 probes installed at various depths specified in the Rule (clusters installed in areas with shallow groundwater will have fewer probes).

(3) The monitoring of perimeter soil vapor probes quarterly for methane, and for Toxic Air Contaminants (TACs) from at least one probe, in accordance with Rule 1150.1.

(4) The monitoring of upwind and downwind ambient air at the landfill quarterly for TACs, in accordance with Rule 1150.1.

(5) The construction of buildings at Parcel 1 in accordance with 27 CCR 21190(g).

(6) The periodic monitoring of gas, for methane, to be conducted inside all buildings and underground utilities on Parcel 1, in accordance with 27 CCR 21190(g).

Definitions.

"Occupied building" is a fully-enclosed structure intended for regular human occupancy (e.g., gymnasium, office, restaurant) and which is located within 1,000 feet of the Class III landfill boundary. This does not include minor structures such as ticket booths, bathrooms or dugouts.

"Probe cluster" refers to a set of multiple-depth probes, 2 to 4 in number, installed in a single location. For probe clusters installed at the perimeter of the Class III landfill, a "probe cluster" is the same as a "probe" as described in Attachment A, section 1.1.4, of Rule 1150.1. Probe clusters are installed for the purposes of sampling vapor at various specified depths below the soil surface.

"Special soil vapor probes" are individual (single) soil vapor probes installed immediately adjacent to and five (5) feet below the foundation of occupied buildings.

"Intermediate probe clusters" are probe clusters consisting of two probes, at different depths, to be installed at locations approximately two-thirds (2/3) of the distance between each occupied building and the perimeter of the Class III landfill (i.e., installed closer to the landfill perimeter than the occupied building[s]). Two intermediate probe clusters will be installed as sentinel soil vapor monitors for each occupied building. Where occupied buildings (e.g., office, restaurant[s]) are grouped sufficiently close together, one set of intermediate probe clusters can act as sentinel vapor monitors for more than one occupied building. Locations of intermediate probe clusters will be chosen to specifically:

(a) *target* any natural or man-made potential transmissive/conductive zones in subsurface soil which may promote soil vapor migration between the landfill and occupied buildings, and

(b) *avoid* probe cluster installation on ballfields (i.e., intermediate probe clusters will not be installed on fields of play at baseball or soccer fields).

BKK will consult with U.S. EPA and DTSC on the exact locations of each intermediate probe cluster, and the depth of the 2 probes within each cluster.

"Subset of Rule 1150.1 Table 2 analytes" is a subset of the "Supplemental Group" analytes specified in Table 2, Attachment A of Rule 1150.1. The composition of this subset of Table 2 analytes will not include dioxins or furans nor those constituents for which routine analytical capabilities are not readily available to BKK, the remainder to be negotiated between BKK, U.S. EPA and DTSC in the very near future.

"Tedlar bags" refers to collection of gas/vapor samples into Tedlar bags in accordance with Rule 1150.1 and specifically includes the provisions that such samples will be delivered to the analytical laboratory within twenty-four (24) hours of sample collection by ground transport.

Overview of Monitoring Program.

The Final Workplan shall address **three phases** for the sampling and monitoring workplan:

I. *Pre-construction sampling*, the purpose of which is to document the absence of contamination at the northern 70 acres of Parcel 1 prior to construction and to ensure that designers and developers of any parks and/or playgrounds are aware of any existing contamination that would require consideration during design and construction.

II. *Post-construction sampling prior to public access*, the purposes of which are to:

* Ensure that surface soils, especially at play areas, do not pose a potential health risk for members of the public using the facility,
* Ensure that construction activities have not adversely affected any soil vapor migration and accumulation characteristics on areas of property open to the general public, and
* Provide baseline measurements ("yardsticks") that will be used to compare the results of subsequent on-going periodic monitoring.

III. *Periodic monitoring* during operation of any parks and/or playgrounds, in order to:

* Monitor the continuing efficiency of the landfill gas collection system, and
* Ensure that no unforeseen events affecting the landfill or the subsurface result in human exposures creating a potential health risk at any parks and/or playgrounds.

The Final Workplan shall address appropriate mitigative measures to be taken upon finding soil contamination, soil vapor levels or indoor air levels in excess of the specified action levels (see below). Such mitigative measures, may include (but are not limited to):

* Identifying contaminated soils that should be removed, remediated or excluded for use at the eventual surface of the facility,
* Identifying "transmissive/conductive zones" on the property that should be the focus of soil vapor monitoring following completion of construction,
* Enhancing the performance of the landfill gas collection system at the perimeter of the Class III landfill, and
* Activating the soil vapor collection system to be installed beneath occupied buildings at the development.

Details of the Monitoring Program.

I. Pre-Construction Sampling.

The Final Workplan shall address sampling and analysis prior to construction, which is to be conducted for the purpose of documenting the absence on the relevant areas of the Parcel, prior to development, of soil vapor and soil contamination at levels of potential health concern. A related purpose is to ensure that the designer(s) and developer(s) of any parks and/or playgrounds are aware of any existing contamination that would require consideration during design and

construction. Another related purpose is to allow assessment of any potential impacts of soil contamination on groundwater.

I.A. Pre-Construction Soil Vapor Sampling.

The Final Workplan shall address soil vapor sampling prior to construction which shall focus on areas of the property where occupied buildings will be constructed. The intent is to document the absence in these locations of landfill-related soil vapor contamination at levels of potential health concern and to characterize any existing landfill-related soil vapor on, or impinging upon, the property.

In the event detectable landfill-related soil vapor is observed on the northern 70 acres of Parcel 1, these results can:

* *Provide baseline characterization of the existing soil vapor impacts for use in comparing the results of subsequent monitoring, and*
* *Identify impacted areas of the Parcel to be considered for subsequent monitoring in order to ensure soil vapor does not result in human exposures creating a potential health risk*

The Final Workplan shall address soil vapor to be sampled, prior to construction, from the following locations:

(1) The locations of eventual occupied buildings (e.g., gymnasiums, offices, restaurants): One round of soil vapor samples shall be collected at the locations of eventual occupied buildings. Soil vapor at these probes to be collected at a depth equal to 5 feet below the depth of the eventual building foundation, using Tedlar bags, SUMMA canisters or equivalent apparatus from a mobile laboratory, and analyzed for:
   * Total organic carbon (as methane).
   * Carcinogenic and TAC "core group" analytes (SCAQMD Rule 1150.1),

(2) Two soil vapor samples shall be collected and analyzed from locations on Lots 14 and 16, as defined on the attached map (Exhibit 1 to this attachment D, incorporated herein by reference) in the existing surface water drainage area, if required as per section I.B, below. The intent of this sampling is to confirm the lack of landfill-related contamination that could have been deposited there from different areas on the parcel, as well as to assess potential impacts from former site activities at this location.

(3) Three soil vapor samples shall be collected and analyzed from locations on Lots 7, 8, and 10 (as defined on Exhibit 1 hereto). The intent of this sampling is to confirm the lack of contamination that could have been released from the former 1960s landfill and equipment maintenance yard and to confirm the that clean fill materials were backfilled in this area.

The temporary vapor probes shall be installed approximately 5 feet below ground surface and may be sampled by a mobile laboratory for Primary Target Compounds listed in the Los

Angeles Regional Water Quality Control Board's Interim Guidance For Active Soil Gas Investigation (February 25, 1997). Alternatively, Tedlar bags (or SUMMA canisters) and Table 1 Core Group analytes specified in Attachment A, Rule 1150.1 may be selected for analysis.

Existing data and nearby gas probes may be utilized to address some of the data requests for items (2) and (3) above, provided the data and/or probes are deemed appropriate by U.S. EPA in consultation with DTSC.

I.B. Pre-Construction Soil Sampling.

The Final Workplan shall address one round of soil sampling, prior to construction. These soil samples to be collected and analyzed from the following locations:

(1) Shallow soil samples to be collected and analyzed from five (5) locations on Lots 13, 14, and 16 (as defined on Exhibit 1 hereto) at the existing surface water drainage area. The intent of this sampling is to confirm the lack of landfill-related contamination that could have been deposited there from different areas on the parcel. Boreholes shall be logged and completed to five (5) feet below ground surface or until competent bedrock is encountered, whichever is shallower. One sample per borehole shall be submitted for analyses based on field observations (i.e., odor/staining) and field screening results (PID/OVA). Only two of the five samples shall be analyzed for metals. If field data (i.e., OVA) suggest VOCs may be present, then vapor samples should be collected as specified in Section I.A (2) above.

Section I.B (1) pre-construction soil samples to be analyzed for:

* Metals by Method 6010B,
* Semi-volatile organic compounds (8270),
* Polyaromatic hydrocarbons (PAHs) by Method 8310

(2) Five (5) boreholes drilled on Lots 7, 8 and 10 (as defined on Exhibit 1 hereto), in the vicinity of the existing scale house - two samples to be collected from each borehole. The intent of this sampling is to confirm the lack of contamination that could have been released to the future parks and/or playgrounds area from the former 1960's landfill and the former equipment maintenance yard, and to confirm that clean fill materials were backfilled in this area. Two boreholes shall be located within the limits of fill associated with the 1989/90/91 excavations. These boreholes shall be drilled through the fill and five feet into bedrock. The three other boreholes should be drilled in Lots 7, 8, and 10 (as defined on Exhibit 1 hereto) just outside the limits of fill associated with the 1989/90/91 excavations. The depth of these three boreholes shall exceed the adjacent fill depth by five feet. Boreholes shall be logged and samples shall be collected at five foot intervals. Two samples per borehole shall be submitted for analyses based on field observations (i.e., odor/staining) and field screening results (PID/OVA)

Section I.B (2) pre-construction soil samples to be analyzed for:

* Metals by Method 6010B,
* Semi-volatile organic compounds (8270),
* Polyaromatic hydrocarbons (PAHs) by Method 8310
* Pesticides/Herbicides/Polychlorinated biphenyls by Method 8080 or current equivalent

Existing data may be utilized to address some of the data requests for this section, provided the data are deemed appropriate by U.S. EPA in consultation with DTSC.

II. Post-Construction Sampling Prior to Public Access

The Final Workplan shall address sampling and analysis, to be conducted following construction and prior to public access to any parks and/or playgrounds, for the purpose of documenting the absence of surface soil, soil vapor and indoor air contamination at levels of potential health concern at, or impinging upon, the newly completed facilities. The intent of this post-construction sampling will be to ensure that construction activities did not:

* alter soil vapor migration and/or accumulation characteristics in the sub-surface adjacent to or underneath the facilities in such a fashion that would create human exposures to landfill-related constituents that would be of potential health concern, or
* result in surface soil contamination that could adversely affect members of the public using the facilities.

This post-construction sampling will also provide baseline measurements ("yardsticks") that can be used later to compare the results of subsequent on-going periodic monitoring.

II.A. Sampling and Analysis of Surface Soil Post-Construction Prior to Public Access

The Final Workplan shall address one round of post-construction surface soil sampling to be conducted prior to public access to any parks and/or playgrounds developed on the property. The focus of such surface soil sampling shall be on recreational areas of the property where high levels of soil contact will occur for members of the public using the development (e.g., ball fields, play areas). The intent is to ensure, prior to use by the public of the parks and/or playgrounds, the absence in these locations of landfill-related contamination at levels of potential health concern.

Of specific concern to U.S. EPA and DTSC in this regard is the possibility that grading activities during construction may expose subsurface contamination which could subsequently end up at the surface in recreational or play areas. This concern does not apply to imported soil which has been certified "clean" by an analytical laboratory.

Up to ten (10) surface soil samples, composited no more than 4:1, shall be collected post-construction, from locations to be determined by U.S. EPA in consultation with DTSC and BKK once plans for construction are finalized, to be analyzed for:

* Metals by Method 6010B,

* Semi-volatile organic compounds (SVOCs) by Method 8270, and
* Polyaromatic hydrocarbons (PAHs) by Method 8310.

II.B. Initial Soil Vapor Sampling at Newly Constructed Parks and/or Playgrounds.

The Final Workplan shall address collection and analysis of a single round of soil vapor samples, to be performed prior to public access to any newly constructed parks and/or playgrounds. These post-construction soil vapor samples shall be collected using Tedlar bags, SUMMA canisters or equivalent apparatus from a mobile laboratory, from:

* the special soil vapor probes installed adjacent to the foundations of occupied buildings (e.g., gymnasium(s), office(s), restaurant(s)), and
* the intermediate vapor probe clusters (i.e., the sentinel soil vapor monitors for occupied buildings).

The intent of this initial round of soil vapor sampling is to document the absence of LFG-related soil vapor contamination at the newly constructed development and to establish a baseline for comparison with subsequent periodic soil vapor monitoring results. This initial soil vapor sampling will constitute the first round of periodic soil vapor monitoring specified under section III.A (below) of this protocol.

The analyte list for this initial soil vapor sampling round shall include:

* Methane and pressure, as per Rule 1150.1, and
* Table 1 Core Group analytes specified in Attachment A, Rule 1150.1

Note on Selection of Subset Table 2 Analytes for Subsequent Monitoring: In selecting analytes from the subset of Rule 1150.1 Table 2 analytes to be included in the special study of soil vapor in perimeter probe clusters (section II.C, below), periodic monitoring of soil vapor (section III.A, below) and periodic monitoring of indoor air (section III.B, below), it is the intent of U.S. EPA that the following scheme be followed:

(a) A sample of landfill gas (LFG) be analyzed for the entire subset of Rule 1150.1 Table 2 analytes.

(b) Samples of soil vapor collected from perimeter probes during the special study be analyzed for those subset of Rule 1150.1 Table 2 analytes present in the LFG sample at concentrations greater than soil vapor action levels.

(c) Soil vapor from periodic monitoring at the special soil vapor probes and intermediate probe clusters be analyzed for those subset of Rule 1150.1 Table 2 analytes present in the perimeter probes at concentrations greater than soil vapor action levels.

(d) Indoor air from periodic monitoring be analyzed for those subset of Rule 1150.1 Table 2 analytes present in the special soil vapor probes or intermediate probe clusters at concentrations greater than soil vapor action levels.

II.C. Special Study of Soil Vapor in Perimeter Probe Clusters at the Class III Landfill

The Final Workplan shall address 2 tasks to be completed for a special study of soil vapor in perimeter probe clusters at the Class III landfill:

* Determination of a focused analyte list, and
* Periodic sampling, for one year, and analysis of soil vapor from perimeter probes clusters at the Class III landfill.

Note: These tasks (sections II.C.1 and II.C.2) may be started, but need not be completed, prior to the general public gaining access to parks and/or playgrounds at the development.

II.C.1. Determination of Analytes From the Subset of Rule 1150.1 Table 2 Analytes

The Final Workplan shall address collection of a single sample of landfill gas (LFG) from one of the headers on the LFG collection system at the Class III landfill; this LFG sample to be analyzed for:

* Methane, as per Rule 1150.1,
* Table 1 Core Group analytes specified in Attachment A, Rule 1150.1, and
* Subset of Rule 1150.1 Table 2 analytes.

The header to be sampled will be chosen in consultation with U.S. EPA and DTSC.

The results of these analyses of header LFG shall be used to determine the analyte list for a special study of perimeter probe clusters at the Class III landfill. Specifically, any analytes from the subset of Rule 1150.1 Table 2 analytes which are detected in the header LFG sample at concentrations greater than soil vapor action levels ("Action Levels", below) shall be included as target analytes for the special study.

II.C.2 Special Study of Soil Vapor in Perimeter Probe Clusters at the Class III Landfill

The Final Workplan shall address a special study of Class III landfill perimeter probe clusters, those installed in accordance with Rule 1150.1, to be performed during the initial year of operation of any parks and/or playgrounds constructed on the northern 70 acres of Parcel 1. Th intent of this special study of perimeter probe clusters is to:

* Document the absence of any soil vapor releases from the Class III landfill that could potentially impact areas of the developed property open to the general public in a way that could result in human exposures creating a potential health risk,
* Ensure that construction activities did not affect any soil vapor migration and accumulation characteristics adjacent to, or on, areas of the property open to the general public in a way that could result in human exposures creating a potential health risk, and
* Provide baseline measurements ("yardsticks") that will be used to compare the results of subsequent on-going periodic monitoring.

The Final Workplan for the special study of perimeter probes shall address sampling of perimeter probe clusters to be performed bi-monthly for one year (i.e., a round of samples to be collected every two months for one year for a total of six (6) sampling events), using Tedlar bags, SUMMA canisters or equivalent apparatus from a mobile laboratory. During each bi-monthly sampling event, one soil vapor sample shall be collected from every probe cluster situated within 1000 feet of an occupied building at the newly completed development.

The analyte list for this special study of perimeter probes shall include:

* Methane and pressure, as per Rule 1150.1,
* Table 1 Core Group analytes specified in Attachment A, Rule 1150.1, and
* Any subset of Rule 1150.1 Table 2 analytes which were detected in the LFG sample at concentrations greater than the soil vapor action levels ("Action Levels", below).

Repetition of the Special Study: The Final Workplan shall address a repetition of the special study of perimeter probes to be performed during year 6 of operation of the parks and/or playgrounds . The intent of this repeated special study is to ensure that unforseen events affecting the landfill or the subsurface have not resulted in any soil vapor releases from the Class III landfill that could potentially impact areas of the developed property in a way that could result in result in human exposures creating a potential health risk.

* The repetition of the special study shall generally follow the plan for the original special study (i.e., one soil vapor sample collected bi-monthly, using Tedlar bags, SUMMA canisters or equivalent apparatus from a mobile laboratory, from every perimeter probe cluster situated within 1000 feet of an occupied building).
* Prior to repeating the special study, BKK shall consult with U.S. EPA and DTSC to determine if any changes to the analyte list are warranted (e.g., if all of the subset of Rule 1150.1 Table 2 analytes which were included in the original special study need to be included in the repeat).
* If the results of the repeat differ significantly from those of the initial special study, BKK shall consult with U.S. EPA and DTSC regarding any need for any follow-up investigation(s), otherwise no further repetition of the special study will be deemed warranted.

II.D. Sampling and Analysis of Indoor Air Post-Construction Prior to Public Access

The Final Workplan shall address one round of indoor air sampling, to be performed following construction and prior to public access, inside any occupied buildings, other than restaurants, (e.g., gymnasiums, offices) that have been constructed at the development. The purposes of this indoor air sampling and analysis are to:

* Document, prior to public access to the development, the absence in these buildings of landfill-related soil vapor contamination at levels of potential health concern,
* Provide data on indoor air vapor concentrations to validate the protectiveness of soil vapor action levels.

This initial indoor air sampling will constitute the first round of periodic indoor air monitoring specified under section III.B (below) of this protocol.

The Final Workplan shall address one round of post-construction indoor air samples to be collected in occupied buildings over a 24-hour period using SUMMA canisters and analyzed for:

* Methane, as per Rule 1150.1, and
* Table 1 Core Group analytes specified in Attachment A, Rule 1150.1

Note on Indoor Air Monitoring: The Final Workplan shall address sampling and analysis of ambient air to be performed coincidentally with indoor air. Since ambient air quality can have a major impact on indoor air quality, the two must be sampled at the same time and indoor air results shall be interpreted in relation to ambient air findings.

Therefore, the Final Workplan shall include one ambient air sample to be collected at a location at the newly completed parks and/or playgrounds which is central to the occupied buildings where indoor air is being sampled at the same time. The ambient air sample to be collected at the same time as indoor air sampling is being performed, over a 24-hour period using SUMMA canisters and analyzed for:

* Methane, as per Rule 1150.1, and
* Table 1 Core Group analytes specified in Attachment A, Rule 1150.1

Note: This ambient air sampling protocol assumes that indoor air sampling is conducted at all relevant occupied buildings during a single 24-hour period. If indoor air sampling extends over more than one 24-hour period, corollary ambient air sampling will be necessary.

III. Periodic Monitoring During Operation of Parks and/or Playgrounds

The Final Workplan shall address a periodic monitoring program to be performed during the operation of any parks and/or playgrounds constructed on the property. Periodic monitoring shall be performed for the purpose of monitoring the continuing efficiency of the landfill gas collection system and to ensure that no unforeseen events affecting the landfill or the subsurface underneath the development could result in on-site human exposures creating a potential health risk.

III.A. Periodic Monitoring of Soil Vapor

The Final Workplan shall address periodic soil vapor monitoring to focus on the boundary of the landfill, the intermediate probe clusters and the special soil vapor probes in the immediate vicinity of occupied buildings. The intent of on-going soil vapor monitoring is to:

* Document the continuing absence of landfill-related soil vapor contamination at levels of potential health concern for the general public and others occupying buildings on the property and otherwise using the recreational facilities thereon, and

* Provide an early warning in the circumstance that unforeseen events affecting the landfill or the subsurface create soil vapor conditions that could result in on-site human exposures creating a potential health risk

The Final Workplan shall address soil vapor sampling and analysis to be performed, on an on-going, periodic basis, from the following locations:

(1) Soil vapor sampling probe clusters installed at the boundary of the Class III landfill. The Final Workplan shall address the sampling and analysis of these perimeter probe clusters in accordance with SCAQMD Rule 1150.1, after completion of the special study of perimeter probes noted in section II.C, above.

(2) The immediate vicinity of any occupied buildings (e.g., gymnasiums, offices, restaurants) at the development. The Final Workplan shall address on-going, periodic sampling and analysis of soil vapor at the special soil vapor probes installed adjacent to these occupied buildings; sampling to occur quarterly (i.e., every three months) with soil vapor collected in Tedlar bags, SUMMA canisters or equivalent apparatus from a mobile laboratory and analyzed for the following:
   * Methane and pressure, as per Rule 1150.1,
   * Table 1 Core Group analytes specified in Attachment A, Rule 1150.1, and
   * Any constituents of the subset of Rule 1150.1 Table 2 analytes which were detected during the special study of perimeter probe clusters (section II.C, above) at concentrations greater than the soil vapor action levels ("Action Levels", below).

(3) Intermediate vapor sampling probe clusters installed as sentinel soil vapor monitors for occupied buildings at the development. The Final Workplan shall address on-going, periodic sampling and analysis of soil vapor at these intermediate vapor probes; sampling to occur quarterly (i.e., every three months) at each probe with soil vapor collected in Tedlar bags, SUMMA canisters or equivalent apparatus from a mobile laboratory and analyzed for the following:
   * Methane and pressure, as per Rule 1150.1,
   * Table 1 Core Group analytes specified in Attachment A, Rule 1150.1, and
   * Any constituents of the subset of Rule 1150.1 Table 2 analytes which were detected during the special study of perimeter probe clusters (section II.C, above) at concentrations greater than the soil vapor action levels ("Action Levels", below).

III.B. Periodic Monitoring of Indoor Air

The Final Workplan shall address indoor air sampling to be performed on a periodic monitoring basis inside any occupied buildings, *other than restaurants*, at the development (e.g., gymnasiums, offices). The purposes of this on-going periodic indoor air monitoring will be to:
* Document the continuing absence in these structures of landfill-related soil vapor contamination at levels of potential health concern, and

* Provide data on indoor air vapor concentrations to validate the continuing protectiveness of soil vapor action levels.

The Final Workplan shall address the collection and analysis of indoor air samples for periodic monitoring; indoor air samples to be collected quarterly (i.e., every three months) from one location inside each occupied building (other than restaurants), over a 24-hour period using SUMMA canisters, and analyzed for:

* Methane, as per Rule 1150.1,
* Table 1 Core Group analytes specified in Attachment A, Rule 1150.1, and
* Any constituents of the subset of Rule 1150.1 Table 2 analytes which were detected in either the special soil vapor probes or the intermediate probe clusters at concentrations greater than soil vapor action levels ("Action Levels", below).

As noted above for the post-construction indoor air sampling (section II.D), the Final Workplan shall also address sampling and analysis of ambient air to be performed coincidentally with indoor air monitoring. Therefore, the Final Workplan shall address sampling and analysis of one ambient air sample to be collected at a location central to the occupied buildings where indoor air is sampled. The ambient air sample shall be collected at the same time as indoor air sampling, over a 24-hour period using SUMMA canisters, and analyzed for:

* Methane, as per Rule 1150.1,
* Table 1 Core Group analytes specified in Attachment A, Rule 1150.1, and
* Any constituents of the subset of Rule 1150.1 Table 2 analytes which were detected in either the special soil vapor probes or the intermediate probe clusters at concentrations greater than soil vapor action levels ("Action Levels", below).

Note: Specification of a single ambient air sample in this protocol assumes that each periodic indoor air sampling is conducted during a single 24-hour period. If indoor air sampling extends over more than one 24-hour period, corollary ambient air sampling will be necessary.

ACTION LEVELS:

The Final Workplan shall identify the following action levels to be used by BKK, in consultation with U.S. EPA and DTSC, in determining appropriate responses to any finding of landfill-related contamination in soils, soil vapor and/or indoor air as a result of this monitoring program.

Note: Recognizing that these action levels are based on acceptable chronic exposure levels and that sporadic minor excursions in excess of these action levels do not necessarily constitute significant risks, following an initial year of operation of the parks and/or playgrounds and the monitoring program, BKK may request a reconsideration, by U.S. EPA and DTSC, of how the data are considered in applying the action levels.

Soil Action Levels:

The results of the post-construction/pre-occupation surface soil sampling shall be compared to Region 9 residential soil Preliminary Remediation Goals (PRGs). With respect to metals, regional background levels will also be used for comparison, as noted in the Region 9 PRG document.

Soil Vapor Action Levels:

The results of periodic soil vapor monitoring conducted post-construction prior to public access and during operation of the development will be compared to soil vapor action levels determined by multiplying each contaminant's indoor air chronic exposure action level (see below) by 100-fold (i.e., an attenuation factor (α) of 0.01 will be assumed for soil vapor potentially entering indoor air spaces occupied by people at the development). Thus:

Soil Vapor Action Level = 100 x Indoor Air Action Level

Note: This 0.01 value represents a site-specific application of the attenuation factor concept developed from the Johnson-Ettinger model for estimating indoor air impacts caused by soil vapor underlying occupied structures.

Indoor Air Action Levels:

The general basis of action levels for indoor air monitoring at the development shall be:

* Carcinogens: For each specific carcinogen addressed in this monitoring and response program, the indoor air action level shall be the Region 9 ambient air Preliminary Remediation Goal (PRG).

* Non-carcinogens: For each specific non-carcinogen addressed in this monitoring and response program, the indoor air action level shall be the *lower* of either 20% of the Region 9 ambient air PRG or OEHHA's chronic Reference Exposure Level (REL).

Notes regarding action levels:

1. For those chemicals having both a U.S. EPA, Region 9 PRG and a "Cal-modified" PRG (see PRG documentation), the Action Level for this monitoring program will be based on the "Cal-modified" PRG.
2. Cal/EPA OEHHA *Acute* RELs will be used to determine any need for any emergency response actions based on indoor air monitoring results.
3. Recognizing that contaminants in ambient air are major contributors to indoor air contamination and that ambient air quality in the West Covina area is seriously affected by

multiple sources within the Los Angeles air basin, the indoor air action levels are to be applied as follows:

* For contaminants detected in indoor air at concentrations greater than action levels and which are not typically found in ambient air in the greater West Covina area, wind direction will be assessed and/or other actions will be taken to evaluate the likely source of the contaminant. If it is determined that these contaminants originated from landfill-related activities at the BKK Landfill site, the indoor air action level will be as noted above.

* For those contaminants typically found in ambient air in the greater West Covina area (e.g., benzene), the indoor air action level will be the concentration measured in ambient air *plus* the ambient air PRG (for carcinogens) or 20% of the ambient air PRG, or OEHHA Chronic REL (for non-carcinogens), thus:

Action Level (carcinogens) = Ambient Air Conc. + R9 PRG*

Action Level (non-carcinogens) = Ambient Air Conc. + 20% R9 PRG* (or OEHHA REL)

* except as noted above (#1), where the Cal-modified PRG will substitute for the R9 PRG.

RESPONSE ACTIONS:

The Final Workplan shall address the following mitigation measures in the event action levels are exceeded:

Adjustment of the LFG collection system: The Final Workplan will address adjustment of the LFG collection system at the perimeter of the Class III landfill as follows: In the event of soil vapor concentrations at the landfill perimeter probes exceeding soil vapor action levels, BKK shall adjust the LFG collection system to increase collection efficiency in the area(s) of affected probes. Immediately subsequent to any adjustment of the LFG collection prompted by exceedance of a soil vapor action level, confirmatory organic vapor analyzer (OVA) sampling of affected soil vapor probes shall be conducted to confirm the effectiveness of the mitigation procedure

Activation of the Passive Vapor Barrier: The Final Workplan will address activation of the passive vapor barrier underneath occupied buildings as follows: It is U.S. EPA's understanding that occupied buildings on the northern seventy (70) acres of Parcel 1 (e.g., gymnasiums, offices, restaurants) will be constructed in accordance with California Title 27 (27 CCR 21190(g)).

In the event of one or more of the following:

* exceedance of soil vapor action level(s) in the special soil vapor probes in the immediate vicinity of any occupied building,

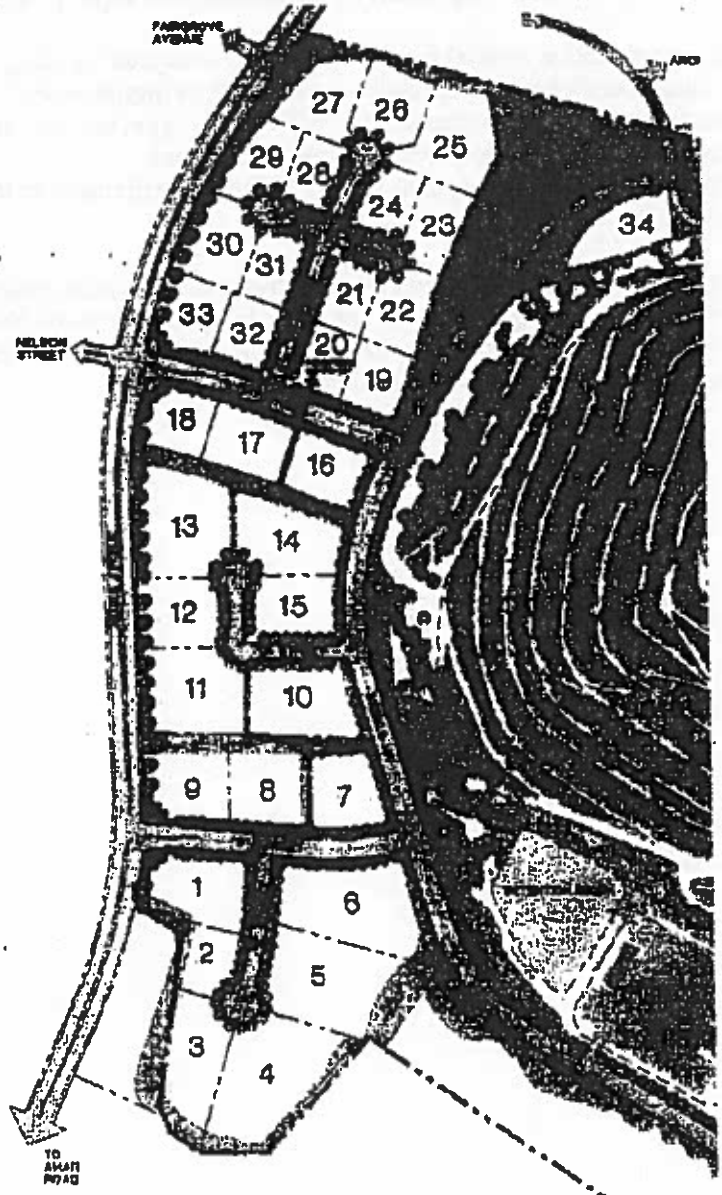
* exceedance of soil vapor action level(s) in any of the intermediate vapor probe clusters, and/or
* exceedance of indoor air action level(s) in indoor air at any occupied building,

the Final Workplan shall specify how the following actions will be implemented:

* Activation of the system installed pursuant to 27 CCR 21190 (g) at the occupied building(s) affected by, or nearest to, elevated soil vapor concentrations, and
* Adjustment of the LFG collection system to increase collection efficiency in the area(s) likely to impact of affected probes.

Immediately subsequent to any implementation of mitigative responses prompted by exceedance of a soil vapor (at either the special soil vapor probes or the intermediate probe clusters) and/or indoor air action level, confirmatory sampling of affected soil vapor probe(s) or indoor air shall be conducted to confirm the effectiveness of the mitigation procedure.

ATTACHMENT 12
EXHIBIT 1



ATTACHMENT D
EXHIBIT 1

This Exhibit 1 is intended only to define lot numbers within the northern seventy (70) acres of Parcel 1 for the purposes of identifying sampling locations referenced in this Environmental Monitoring Protocol, i.e., lots 7 through 34. Thus, depictions of streets and the like within this Exhibit are not relevant to this Protocol. Morever, for the purposes of this Protocol, the boundaries of the northern seventy (70) acres of Parcel 1 are defined in Attachment 8 to this Order (Attachment A to the First Modification to Administrative Order on Consent)

ESTIMATED EMISSIONS FROM OPERATIONS 2005/ 450,000 SQUARE FEET RETAIL

Vehicle Inputs	
Number of Visitors	20592
% Dropped OFF	100.00%
Average Trip Distance (One Way)	10
Number of Employees	0
Average Trip Distance (One Way/ Miles)	0
Number of Buses	0
Average Trip Distance (One Way/ Miles)	0
Number of Delivery Trucks	0
Average Trip Distance (One Way/ Miles)	15

Total Trips, POV (One Way)	20592
Total trips Bus/Truck (One Way)	0
VMT Auto	411840
VMT Bus/Truck	0

Energy Inputs	
Offsite Electrical Usage (kwh/ft²/year)*	0
Project Square Footage	0
Natural Gas Usage Rate (ft³/ft²/month)**	0

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

Assumptions Used in EMFAC7G For Automobiles			
Chosen Speed	25	% LDA	70.00%
% Cold Start	20.00%	%LDT	30.00%
% Hot Start	80.00%	Season	winter

Assumptions Used in EMFAC7G For Bus/Trucks			
Chosen Speed	25	%HDD	100.00%
Season	summer		

EMFAC7G Inputs	LDA Grams/Mile	LDT Grams/Mile	HDD Grams/Mile
Carbon Monoxide (CO)	1.87	2.34	8.35
Reactive Organic Compounds (ROC)	0.03	0.03	0.98
Nitrogen Oxides (NOx)	0.2	0.34	5.73
Sulfur Oxides (SOx)	NA	NA	NA
Particulates (PM10)	0	0	0.26

Source: EMFAC7G

Bus/Truck Emissions	EMFAC7G Emissions Factor. Grams/Mile	Est. Emissions lbs/day
Carbon Monoxide (CO)	8.35	0.00
Reactive Organic Compounds (ROC)	0.98	0.00
Nitrogen Oxides (NOx)	5.73	0.00
Sulfur Oxides (SOx) *	0	0.00
Particulates (PM10)	0.26	0.00

Source: Emission Factors From EMFAC7G at 70 Deg Fahrenheit at Chosen Speed

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds (ROC)	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL ON-SITE NATURAL GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Organic	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

*Source: Table A9-5-L SCAQMD CEQA Handbook

POV Emissions				
	EMFAC7G Emissions Factor. Grams/Mile	Cold Start Emissions Factor. Grams/Mile	Hot Start Emissions Factor. Grams/Mile	Est. Emissions lbs/day
Carbon Monoxide (CO)	2.01	6.57	1.68	2198.40
Reactive Organic Compounds (ROC)	0.03	0.61	0.17	62.45
Nitrogen Oxides (NOx)	0.24	0.38	0.46	257.66
Sulfur Oxides (SOx) *	0.00	0.00		0.00
Particulates (PM10)	0.00	0.00		0.00

Source: Emission Factors From EMFAC7G at 70 Deg Fahrenheit at Chosen Speed

*Source: Table A9-5-L SCAQMD CEQA Handbook

Fugitive Dust Emissions from project-related trips on local roads			
	PM10 grams/VMT		lbs/day
Local Streets	0.42		382.8

Source: Air Resources Board Recommended

Total Operational Emissions					
Air Pollutant	Mobile (lbs/day)	Energy (lbs/day)	Total (lbs/day)	SCAQMD Sig Thresholds lb/day	Significant?
Carbon Monoxide (CO)	2,198.40	0.00	2,198.40	550	YES
Reactive Organic Compounds (RO	62.45	0.00	62.45	55	YES
Nitrogen Oxides (NOx)	257.66	0.00	257.66	55	YES
Sulfur Oxides (SOx)	0.00	0.00	0.00	150	NO
Particulates (PM10)	382.81	0.00	382.81	150	YES

Criteria Air Pollutant Emissions from Off-Site Energy and On-Site Natural Gas Usage
375,000 Square Feet Industrial

Industrial Park	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	10.5
Project Square Footage	0
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

Large Industrial Park	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	10.5
Project Square Footage	0
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Manufacturing	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	10.5
Project Square Footage	0
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

Office	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	12.95
Project Square Footage	0
Natural Gas Usage Rate (ft^3/ft^2/month)**	2

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)		
Usage rate per day* = 0.00 kwh/day		
Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)		
Usage rate per day* = 0.00 kwh/day		
Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)		
usage rate per day = 0.0000 cubic feet/day		
Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)		
usage rate per day = 0.0000 cubic feet/day		
Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Shopping Center	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	13.55
Project Square Footage	375000
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

Research and Development	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	11.55
Project Square Footage	0
Natural Gas Usage Rate (ft^3/ft^2/month)**	2

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)		
Usage rate per day* = 18,921.23 kwh/day		
	Emission Factor	Est. Emissions

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)		
Usage rate per day* = 0.00 kwh/day		
	Emission Factor	Est. Emissions

Air Pollutant	(lbs/MWh)	(lbs/day)
Carbon Monoxide (CO)	0.2	2.784
Reactive Organic Compounds	0.01	0.139
Nitrogen Oxides (NOx)	1.15	16.009
Sulfur Oxides (SOx)	0.12	1.671
Particulates (PM10)	0.04	0.557

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

Air Pollutant	(lbs/MWh)	(lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0363 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.725
Reactive Organic Compounds (ROC)	5.3	0.192
Nitrogen Oxides (NOx)	120	4.350
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.007

Source: Table A912-B of the CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Specialty Retail	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	13.55
Project Square Footage	0
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

Warehousing	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	4.35
Project Square Footage	0
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Fast Food Restaurant	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	47.45
Project Square Footage	15000
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

Gas Station with Convenience Store	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	53.3
Project Square Footage	0
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 1,950.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.390
Reactive Organic Compounds	0.01	0.020
Nitrogen Oxides (NOx)	1.15	2.243
Sulfur Oxides (SOx)	0.12	0.234
Particulates (PM10)	0.04	0.078

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0015 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)

Carbon Monoxide (CO)	20		0.029
Reactive Organic Compounds (ROC)	5.3		0.008
Nitrogen Oxides (NOx)	120		0.174
Sulfur Oxides (SOx)	Negligible		
Particulates (PM10)	0.2		0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Carbon Monoxide (CO)	20		0.000
Reactive Organic Compounds (ROC)	5.3		0.000
Nitrogen Oxides (NOx)	120		0.000
Sulfur Oxides (SOx)	Negligible		
Particulates (PM10)	0.2		0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Total Operational Emissions

Air Pollutant	Energy (lbs/day)	Natural Gas (lbs/day)	Total (lbs/day)	SCAQMD Sig Thresholds lb/day	Significant?
Carbon Monoxide (CO)	3.17	0.75	3.93	550	NO
Reactive Organic Compounds	0.16	0.20	0.36	55	NO
Nitrogen Oxides (NOx)	18.25	4.52	22.78	55	NO
Sulfur Oxides (SOx)	1.90	0.00	1.90	150	NO
Particulates (PM10)	0.63	0.01	0.64	150	NO

Criteria Air Pollutant Emissions from Off-Site Energy and On-Site Natural Gas Usage
450,000 Square Feet Industrial

Industrial Park	
Energy Inputs	
Offsite Electrical Usage (kwh/ft²/year)*	10.5
Project Square Footage	
Natural Gas Usage Rate (ft³/ft²/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

Large Industrial Park	
Energy Inputs	
Offsite Electrical Usage (kwh/ft²/year)*	10.5
Project Square Footage	
Natural Gas Usage Rate (ft³/ft²/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Manufacturing	
Energy Inputs	
Offsite Electrical Usage (kwh/ft²/year)*	10.5
Project Square Footage	
Natural Gas Usage Rate (ft³/ft²/month)**	2.9

Office	
Energy Inputs	
Offsite Electrical Usage (kwh/ft²/year)*	12.95
Project Square Footage	
Natural Gas Usage Rate (ft³/ft²/month)**	2

*Source: Table A9-11-A CEQA AQMD Handbook
**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook
*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

*Source: Table A9-11-A CEQA AQMD Handbook
**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook
*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Shopping Center	
Energy Inputs	
Offsite Electrical Usage (kwh/ft²/year)*	13.55
Project Square Footage	450000
Natural Gas Usage Rate (ft³/ft²/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook
**Source: Table A9-12-A CEQA AQMD Handbook

Research and Development	
Energy Inputs	
Offsite Electrical Usage (kwh/ft²/year)*	11.55
Project Square Footage	0
Natural Gas Usage Rate (ft³/ft²/month)**	2

*Source: Table A9-11-A CEQA AQMD Handbook
**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 16,705.48 kwh/day

Air Pollutant	Emission Factor	Est. Emissions

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor	Est. Emissions

Air Pollutant	(lbs/MWh)	(lbs/day)
Carbon Monoxide (CO)	0.2	3.341
Reactive Organic Compounds	0.01	0.167
Nitrogen Oxides (NOx)	1.15	19.211
Sulfur Oxides (SOx)	0.12	2.005
Particulates (PM10)	0.04	0.668

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

Air Pollutant	(lbs/MWh)	(lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0435 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.870
Reactive Organic Compounds (ROC)	5.3	0.231
Nitrogen Oxides (NOx)	120	5.220
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.009

Source: Table A912-B of the CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Specialty Retail	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	13.55
Project Square Footage	0
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

Warehousing	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	4.35
Project Square Footage	0
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Fast Food Restaurant	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	47.45
Project Square Footage	15000
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

Gas Station with Convenience Store	
Energy Inputs	
Offsite Electrical Usage (kwh/ft^2/year)*	53.3
Project Square Footage	0
Natural Gas Usage Rate (ft^3/ft^2/month)**	2.9

*Source: Table A9-11-A CEQA AQMD Handbook

**Source: Table A9-12-A CEQA AQMD Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 1,950.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.390
Reactive Organic Compounds	0.01	0.020
Nitrogen Oxides (NOx)	1.15	2.243
Sulfur Oxides (SOx)	0.12	0.234
Particulates (PM10)	0.04	0.078

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

ESTIMATED EMISSIONS FROM ADDITIONAL OFF-SITE ELECTRICAL GENERATION (Stationary Source)

Usage rate per day* = 0.00 kwh/day

Air Pollutant	Emission Factor (lbs/MWh)	Est. Emissions (lbs/day)
Carbon Monoxide (CO)	0.2	0.000
Reactive Organic Compounds	0.01	0.000
Nitrogen Oxides (NOx)	1.15	0.000
Sulfur Oxides (SOx)	0.12	0.000
Particulates (PM10)	0.04	0.000

Source: Table A9-11-B of the CEQA Air Quality Handbook

*Source: Table A9-11-A of the SCAQMD CEQA Air Quality Handbook

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0015 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)

GAS CONSUMPTION (Stationary Source)

usage rate per day = 0.0000 cubic feet/day

Air Pollutant	Emission Factor (lbs/MCF)	Est. Emissions (lbs/day)

Carbon Monoxide (CO)	20	0.029
Reactive Organic Compounds (ROC)	5.3	0.008
Nitrogen Oxides (NOx)	120	0.174
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Carbon Monoxide (CO)	20	0.000
Reactive Organic Compounds (ROC)	5.3	0.000
Nitrogen Oxides (NOx)	120	0.000
Sulfur Oxides (SOx)	Negligible	
Particulates (PM10)	0.2	0.000

Source: Table A912-B of the CEQA Air Quality Handbook

Total Operational Emissions

Air Pollutant	Energy (lbs/day)	Natural Gas (lbs/day)	Total (lbs/day)	SCAQMD Sig Thresholds lb/day	Significant?
Carbon Monoxide (CO)	3.73	0.90	4.63	550	NO
Reactive Organic Compounds	0.19	0.24	0.42	55	NO
Nitrogen Oxides (NOx)	21.45	5.39	6.85	55	NO
Sulfur Oxides (SOx)	2.24	0.00	2.24	150	NO
Particulates (PM10)	0.75	0.01	0.76	150	NO

Traffic Impact Analysis Report

Big League Dreams Development

Prepared for:

Environmental Science Associates

And

The City of West Covina

099014001

TRAFFIC IMPACT ANALYSIS REPORT

BIG LEAGUE DREAMS DEVELOPMENT

Prepared for:

Environmental Science Associates
4221 Wilshire Boulevard, Suite 480
Los Angeles, California 90010

And

The City of West Covina

Prepared by:

Kimley-Horn and Associates, Inc.
Los Angeles Office
18425 Burbank Boulevard, Suite 509
Tarzana, CA 91356

October 21, 2002
099014001

EXECUTIVE SUMMARY

- A total of twenty-seven (27) intersections were analyzed for peak hour operations as part of this study. Twenty-five intersections exist now, and two would be constructed as part of the project.

- The existing (2002) analysis indicates that six (6) intersections are currently operating at unacceptable conditions (LOS E or F) in either the a.m. or p.m. peak hours. The future (2005) analysis assumes that improvements will be in-place to achieve acceptable operations, such as traffic signal modifications, striping changes, and the construction of additional turn lanes.

- The future (2005) pre-project analysis indicates that with the addition of cumulative project traffic and the existing intersection deficiencies improved, there would be two (2) intersections operating at unacceptable levels. If the existing intersection deficiencies are not improved, eleven (11) intersections would operate at unacceptable levels. These deficiencies would exist even if the Big League Dreams project was not constructed.

- The proposed Big League Dreams (BLD) development would be located on the BKK landfill site in the City of West Covina, and is anticipated to be fully operational in 2005. Two development alternatives analyzed in this traffic study are described below, with a trip generation summary.
  - **Development Alternative 1** includes an 18-hole golf course with driving range, clubhouse and banquet facilities, a Big League Dreams baseball recreational facility, soccer fields and 375,000 square feet of regional-serving retail. This alternative would generate about 1,500 fewer daily trips
  - **Development Alternative 2** includes an 18-hole golf course with driving range, clubhouse and banquet facilities, a Big League Dreams baseball recreational facility and 450,000 square feet of regional-serving retail.

Project Generation Summary Comparison			
	Daily Trips	AM Peak Hour Trips	PM Peak Hour Trips
Development Alternative 1	18,114	527	1,300
Development Alternative 2	20,592	576	1,425

- Azusa Avenue would provide primary access to the development. Two new on-site roadways would be constructed to provide signalized access to/from Azusa Avenue. 'A' Street, proposed with previous development proposals for the site, will not be constructed. Improvements included as part of the City's *South Azusa Avenue Capacity Enhancement Project* were assumed to be in place for the future (2005) post-project analysis, in order to define project-specific impacts. However, the improvements were not assumed to be in-place for the effort to define the recommended project mitigation measures.

- The future (2005) post-project analysis of the two development alternatives indicates that there would be no measurable difference in the level of traffic impacts between the two alternatives.

- Development of the project would result in a significant impact at one intersection: Amar/Azusa. The related improvements to the Amar/Azusa intersection need to be considered as part of the improvement identified in the South Azusa Avenue Capacity Enhancement project. The BLD share of the improvement would be approximately $500,000. Details of the full improvement are included in the Appendix.

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1.0 INTRODUCTION

This Traffic Impact Analysis (TIA) documents the evaluation of potential traffic impacts from development of the proposed Big League Dreams development project. A detailed analysis has been completed to assess existing and future operating conditions of the adjacent intersections and roadway network. The proposed project would be developed on the western portion of the 656-acre BKK Landfill site, located approximately 2.5 miles north of State Route 60 and 2.5 miles south of Interstate 10, on the eastern side of Azusa Avenue in the City of West Covina. **Figure 1** illustrates the project vicinity.

Kimley-Horn and Associates, Inc. was retained by Environmental Science Associates to perform this traffic impact analysis as part of an environmental document. The information in this report addresses current and future traffic operating conditions, project trip generation and distribution, project-related impacts on the surrounding street system and recommended measures to mitigate any project traffic impacts.

The methodology used to complete this report is consistent with the guidelines established in the Congestion Management Program (CMP) for Los Angeles County, which are also the guidelines typically used by the City of West Covina. Intersection operations are described in terms of level-of-service (LOS) and delay (in seconds) in order to be consistent with the current Highway Capacity Manual methodology for defining operational characteristics. Previously used methods provided volume-to-capacity (V/C) calculations instead of actual delay.

1.1 Project Description

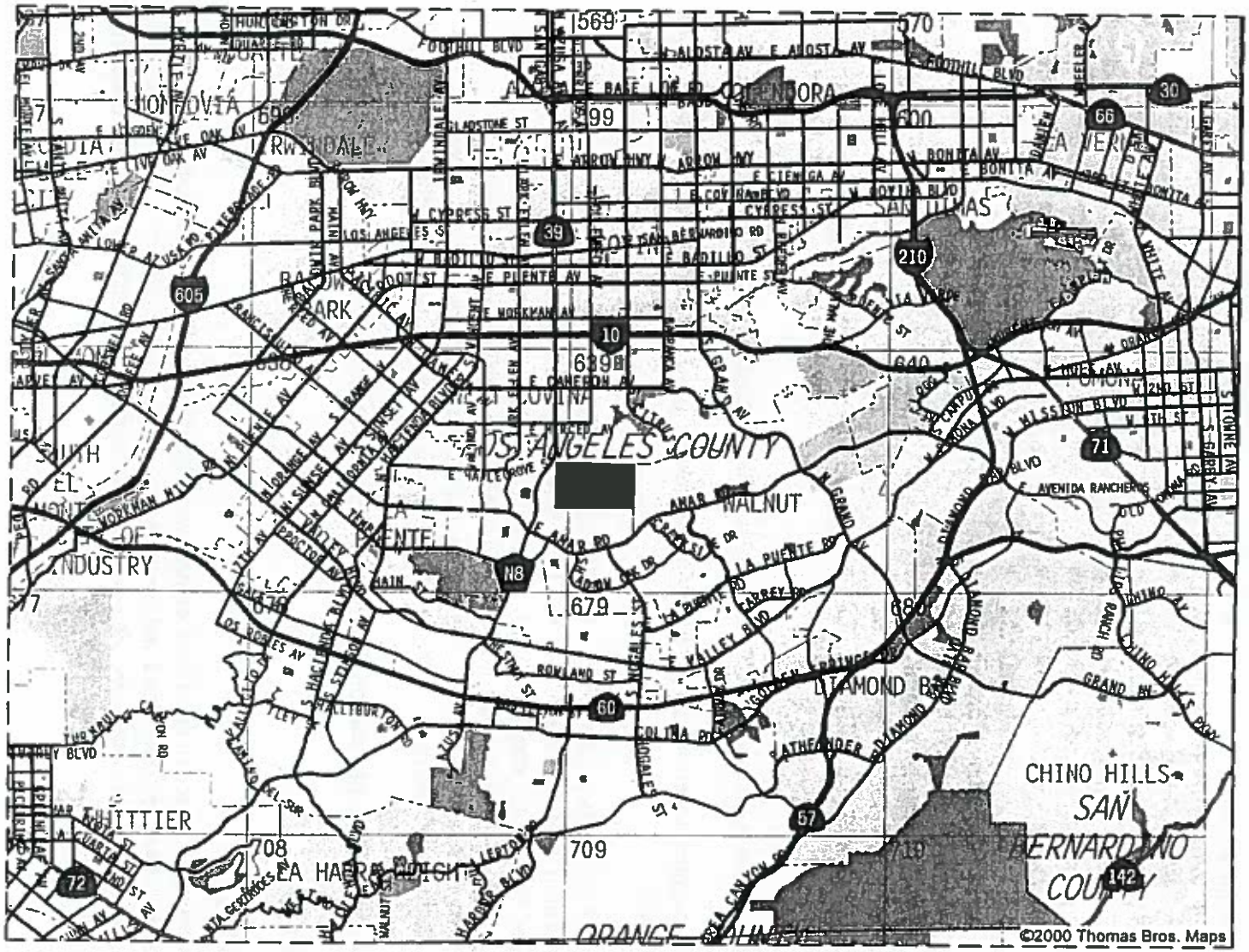
The Big League Dreams development project is expected to include the development of an 18-hole golf course with driving range, clubhouse and banquet facilities, a commercial retail center and the Big League Dreams development. Big League Dreams is a combination of baseball fields with scaled-down architectural imitations of historic Major League Baseball venues. This facility would be a private venue with customers paying a fee to utilize each field.

Two alternative development scenarios were analyzed as part of this TIA document. A description of the two alternatives is provided below:

Alternative 1: An 18-hole golf course with driving range, clubhouse and banquet facilities, a Big League Dreams baseball recreational facility, soccer fields and 375,000 square feet of regional-serving retail.

Alternative 2: An 18-hole golf course with driving range, clubhouse and banquet facilities, a Big League Dreams baseball recreational facility and 450,000 square feet of regional-serving retail.

The anticipated year of completion and full occupancy of the project is 2005. The landfill site includes a closed Class I landfill, an inactive Class III landfill, ancillary buildings, processing facilities, vacant land areas, and natural hillsides. Azusa Avenue will provide primary access to the proposed development. Two access roadways would connect Azusa Avenue to the site (identified in this report as B Street and C Street). The previously proposed A street is not part of the project.



NOT TO SCALE

LEGEND

PROJECT LOCATION

FIGURE 1
VICINITY MAP

BIG LEAGUE DREAMS

099014001\dwg\figures.dwg

Kimley-Horn and Associates, Inc.

1.2 Project Study Area

Twenty-seven intersections were analyzed for peak hour operations in this TIA document. The intersection locations are listed below.

- 1. Amar Road – Valinda Avenue
- 2. Azusa Avenue - I-10 West
- 3. Azusa Avenue - I-10 East
- 4. Azusa Avenue – Cameron Avenue
- 5. Azusa Avenue – Francisquito Avenue
- 6. Azusa Avenue – Fairgrove Avenue
- 7. Azusa Avenue – Amar Road
- 8. Azusa Avenue – Temple Avenue
- 9. Azusa Way - Valley Boulevard
- 10. Azusa Avenue - SR 60 West
- 11. Azusa Avenue - SR 60 East
- 12. Azusa Avenue – Aroma
- 13. Amar Road – Nogales Street
- 14. Amar Road – Temple Avenue
- 15. Azusa Avenue – "B" Street *
- 16. La Puente Road - Nogales Street
- 17. Nogales Street - Valley Boulevard
- 18. Nogales Street - SR 60 West
- 19. Nogales Street - SR 60 East
- 20. Amar Road - Lemon Avenue
- 21. Lemon Road - Valley Boulevard
- 22. Grand Avenue - I-10 West
- 23. Grand Avenue - I-10 East
- 24. Grand Avenue - Temple/Amar
- 25. Grand Avenue - Valley Boulevard
- 26. Azusa Avenue – "C" Street *
- 27. Amar Road – Woodgate Drive

** One or more approaches of these intersections would be access points to the Big League Dreams project site.*

Twelve (12) roadway segments were analyzed for daily operations in this TIA document. The roadway segments are listed below.

- Amar Road, west of Azusa Avenue
- Grand Avenue, north of Temple Avenue
- Amar Road, east of Temple Avenue
- Cameron Avenue, east of Azusa Avenue
- Nogales Street, south of Amar Road
- Lemon Avenue, south of Amar Road
- Azusa Avenue, north of Temple Avenue
- Temple Avenue south of Amar Road
- Azusa Avenue north of Cameron Avenue
- Azusa Avenue north of Fairgrove Street
- Francisquito Avenue, west of Azusa Ave.
- Valley Boulevard west of Nogales Street

Figure 2 illustrates the study area intersection and roadway segment locations.

1.3 Study Methodology

Study Area Intersections

The study area intersections analyzed in this TIA document were determined through consultation with City of West Covina staff. Azusa Avenue/Amar Road and Azusa Avenue/Cameron Avenue are CMP intersections within the project study area. Performance reporting on CMP intersections and roadway segments is required by Los Angeles County for submittal by local cities.

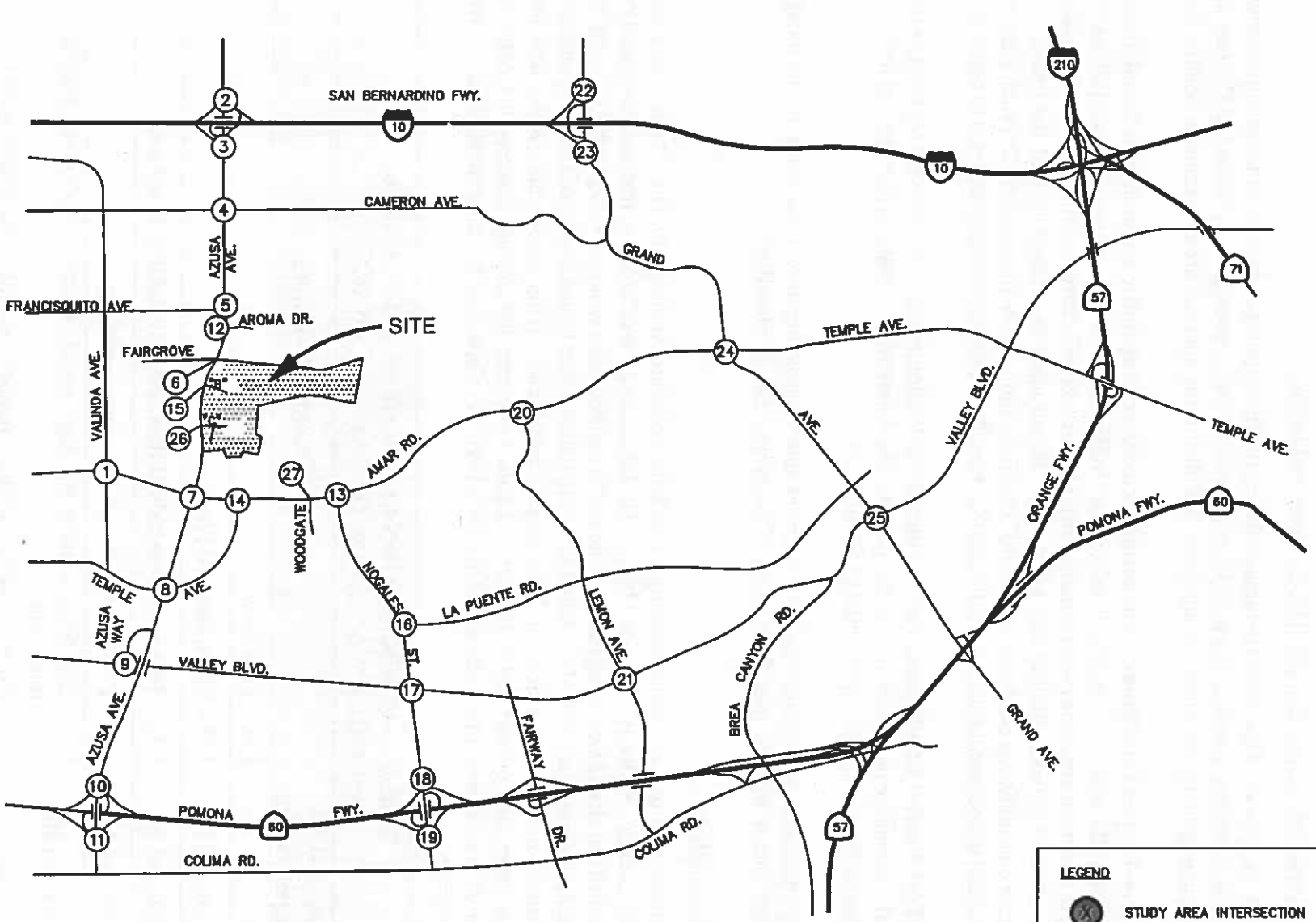


FIGURE 2
STUDY INTERSECTION AND ROADWAY SEGMENT LOCATIONS

BIG LEAGUE DREAMS

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Study Analysis Periods

The three analysis periods included in this TIA are described below.

Existing (2002) Conditions. This period includes existing traffic volumes and utilizes the existing roadway network and intersection lane geometry for peak hour analysis. Existing average daily traffic (ADT) were also compared with existing daily capacities for analysis. Results of this analysis are presented in Section 2.0.

Future (2005) Pre-Project Conditions. This period includes existing traffic volumes plus the addition of cumulative project traffic and ambient growth of regional traffic. Lists of cumulative (planned projects and projects currently under construction) were obtained from Los Angeles County for unincorporated areas, and from the cities of West Covina, Walnut and La Puente. Based upon an examination of the traffic to be generated by these cumulative projects, existing (2002) traffic volumes were increased by 2% each year, over the three-year period to account for the cumulative traffic. Results of this analysis are presented in Section 3.0.

Future (2005) Post-Project Conditions. The two alternative developments were analyzed for this period to determine which alternative had more of a traffic impact. The Alternative 1 analysis is presented in Section 4.0, and the Alternative 2 analysis is presented in Section 5.0.

The 2005 pre-project and post-project analysis assumes that improvements will be made to the existing deficient intersections so that the specific impacts of the project can be identified.

Level of Service Analysis

The study area intersections were analyzed using SYNCHRO software, version 5.0. The City of West Covina has traditionally used the Highway Capacity Manual (HCM) method for calculating intersection operations, including a level-of-service (LOS) designation. The HCM method used volume-to-capacity (V/C) ratios to describe intersection operations until 1997, when V/C calculations were replaced with calculations describing the average number of seconds of delay a driver would experience. This report utilizes the new delay methodology to determine project traffic impacts. **Table 1** presents the average intersection delay (per vehicle) ratio and the corresponding LOS, under the 1997 Highway Capacity Manual analysis utilized within the Synchro program.

TABLE 1 –INTERSECTION LEVEL OF SERVICE UNDER 1997 HIGHWAY CAPACITY MANUAL ANALYSIS

Seconds of Delay (average per vehicle)	Related LOS Rating
10 or less	A – Free Flow
Between 10 and 20	B – Unconstrained Flow
Between 20 and 35	C – Somewhat constrained flow, maneuverability is reduced
Between 35 and 55	D – Constrained flow, little maneuverability
Between 55 and 80	E – Significant vehicle queuing; not all vehicles clear intersection in one cycle
Greater than 80	F – Excessive delay; vehicles require more than one signal cycle to clear the intersection

Source: 1997 Highway Capacity Manual

Significance Thresholds

The Los Angeles County Congestion Management Program (CMP) guidelines require that intersection analysis be calculated to determine if a project will create more than a 2% change in the volume-to-capacity (V/C) ratio of a CMP intersection. Since the 1997 Highway Capacity Manual (HCM) utilizes average vehicle delay for analysis of LOS instead of V/C ratios, we have applied the same 2% threshold to changes in intersection delay to define project traffic impacts on the study intersections.

The definition of a project traffic impact on an intersection is defined as:

- At LOS A, B ,C, or D: A 2.0% increase in intersection delay is significant if it results in LOS E or F.
- At LOS E or F: A 2.0% increase in intersection delay is significant, even if the LOS does not change.

2.0 EXISTING CONDITIONS

2.1 Roadway Characteristics

A description of study area roadways providing primary travel routes to and from the proposed site is provided below.

Freeways:

San Bernardino Freeway (I-10) is located about two and one-half miles north of the site. I-10 is an eight-lane facility and provides access to San Bernardino County to the east, and to the Los Angels area to the west; and, via its interchange with the Orange Freeway (SR-57), to the Orange County area to the south. North of the site, interchanges with I-10 are provided at Azusa Avenue and Grand Avenue.

Pomona Freeway (SR-60) is located about two and one-half miles south of the site. SR-60 is an eight-lane facility that provides access to Riverside County to the east; downtown Los Angeles to the west; and Orange County to the south via its interchange with the Orange Freeway (SR-57). South of the site, interchanges with SR-60 are provided at Azusa Avenue, Nogales Street, Fairway Drive, Lemon Avenue, Brea Canyon Road, and Grand Avenue.

Major North–South Surface Streets:

Azusa Avenue is a major north-south arterial providing access to the San Bernardino Freeway, the Cities of Covina and Azusa, and the Angeles National Forest to the north. Azusa Avenue also provides access to the Pomona Freeway and (via Colima Road), the Cities of La Habra and La Mirada, and Orange County to the southwest. Within the study area, Azusa Avenue provides six travel lanes between Colima Road and Francisquito Avenue. With the exception of six lanes in the immediate vicinity of the San Bernardino Freeway, four travel lanes are provided north of Francisquito Avenue. A raised center median exists along the project site frontage. On-street parking is prohibited in most areas, but it is permitted within the four-lane section between Francisquito Avenue and South Garvey Avenue. Traffic signals and left-turn storage lanes are provided at all major intersections. Azusa Avenue forms the western boundary of the Project site, and provides grade-separated access across the railroad lines between Valley Boulevard and SR-60.

Nogales Street is a north-south roadway with four travel lanes. A raised center median is present between Amar and La Puente Roads, as well as south of Valley Boulevard. A two-way continuous left-turn lane is provided between La Puente Road and Valley Boulevard. Bicycle lanes are provided between Amar Road and Valley Boulevard, with on-street parking permitted south of Valley Boulevard. Left-turn lanes and traffic signals are provided at all major intersections. Nogales Street provides access to the Pomona Freeway, although the railroad crossings between Valley Boulevard and the freeway are at grade. North of Amar Road, Nogales Street is a two-lane, local residential street with no outlet to other arterial roadways.

Lemon Avenue is a north-south facility providing four travel lanes south of Amar Road. On its north end, Lemon Avenue terminates at Amar Road. To the south, it joins the Pomona Freeway (60) and terminates at Colima Road. No on-street parking is permitted. Traffic signals, left-turn storage lanes, and right-turn lanes are provided at all major intersections.

Grand Avenue is a major north-south arterial providing access to I-10 and SR-60 within the project study area. No on-street parking is permitted. It provides four through lanes with traffic signals, left-turn storage lanes, and right-turn lanes at all major intersections.

Major East-West Surface Streets:

Cameron Avenue is an east-west arterial that provides four travel lanes. Cameron Avenue terminates on the east at Grand Avenue. Traffic signals, left-turn storage lanes, and right-turn lanes are located at all major intersections. No on-street parking is permitted.

Francisquito Avenue is a minor east-west surface street, terminating on the west at Azusa Avenue. It is a two-lane roadway with one lane in each direction.

Fairgrove Street is a minor east-west surface street that dead-ends at Azusa Avenue at the study site. It provides two travel lanes with both left and right turns permitted.

Amar Road / Temple Avenue: Amar Road is a major east-west arterial with four through lanes. East of Grand Avenue, Amar Road continues as Temple Avenue to SR-57 and beyond. It has landscaped medians, and bicycle lanes are present along portions of the road. Traffic signals and double left-turn lanes at the Azusa Avenue intersection are provided. No on-street parking is permitted.

Valley Boulevard is a major east-west arterial that provides access to Azusa Avenue to the west and to the Orange Freeway (SR-57) and Corona Expressway (SR-71) to the east, The roadway continues into El Monte on the west, and into Pomona as Holt Avenue on the east. Traffic signals, double left-turn lanes, and right-turn lanes are provided at the Azusa Avenue and Grand Avenue intersections. At-grade rail crossings exist near the Grand Avenue and Temple Avenue intersections. No on-street parking is permitted.

La Puente Road is a minor arterial that terminates on its west-end at Nogales Street (at Nogales High School), and on its east-end at Grand Avenue. It provides two through lanes with dedicated left-turn and right-turn lanes at major intersections. No on-street parking is permitted.

Colima Road is an east-west arterial that runs north of and parallel to the SR-60. This roadway intersects with Azusa Avenue to the west, before continuing on to Whittier on its western end. On its eastern end, it turns into Golden Springs Drive in Diamond Bar, and has an interchange with the SR-60 eastbound, immediately west of the SR-57.

2.2 Study Area Transit Service

The Los Angeles County Metropolitan Transportation Authority (MTA) provides local and freeway-oriented bus services in the general vicinity of the project site. However, only one bus route (Line 280) provides transit service within convenient walking distance of the site. Line 280 runs along Azusa Avenue throughout the study area, providing local service to the City of Industry and the Puente Hills Mall to the south, and to the Cities of Covina and Azusa to the north.

Two routes (Lines 178 and 486) provide service along Amar Road in the vicinity of Azusa Avenue. Line 178 provides local service to the Cities of West Covina, El Monte, and the El Monte Bus Station to the west and to the City of Walnut and Cal-Poly Pomona to the east. Line 486 provides peak-hour express service from downtown Los Angeles (via the El Monte Busway to the east) to the City of Industry and Puente Hills Mall to the south. However, with the exception of the extreme southwest corner of the Project site, these lines are more than one-quarter of a mile from the site. One-quarter mile is commonly considered to be the maximum walking distance to a transit stop.

Two Southern California Regional Rail Authority commuter train lines (known as Metrolink) provide service from the San Gabriel Valley to downtown Los Angeles. The lines start inbound routes from Riverside San Bernardino. The closest stations to the project site are in Covina and Baldwin Park (San Bernardino Line), and in Industry (Riverside Line).

2.3 Traffic Volumes and Intersection Analysis

Only 25 of the 27 study area intersections are included in the existing (2002) analysis of intersection operations. Two project roadways that would not exist until the project is constructed would form the other two intersections. The existing intersection lane geometry is illustrated in **Figure 3**. Existing (2002) a.m. and p.m. weekday peak-hour traffic volumes at each study intersection are illustrated on **Figure 4.**

Table 2 summarizes the existing (2002) intersection LOS during a.m. and p.m. weekday peak hours at the study area intersections. The analysis indicates that 19 intersections currently operate at LOS D or better in both peak hour periods. However, six intersections operate at unacceptable levels (LOS E or F) in one or more peak hour periods. The intersections are listed below. The Highway Capacity Manual analysis worksheets for the 25 existing (2002) study area intersection LOS are provided in **Appendix A.**

Existing (2002) Intersections That Operate at Unacceptable Levels	
• Azusa Avenue/Amar Road	• Nogales Street/Valley Boulevard
• Azusa Avenue/Temple Avenue	• I-10 WB Ramp/Grand Avenue
• Amar Road/Temple Avenue	• Grand Avenue/Temple/Amar

The existing (2002) Average Daily Traffic (ADT) volumes on the study area roadway segments are provided in **Figure 5.**

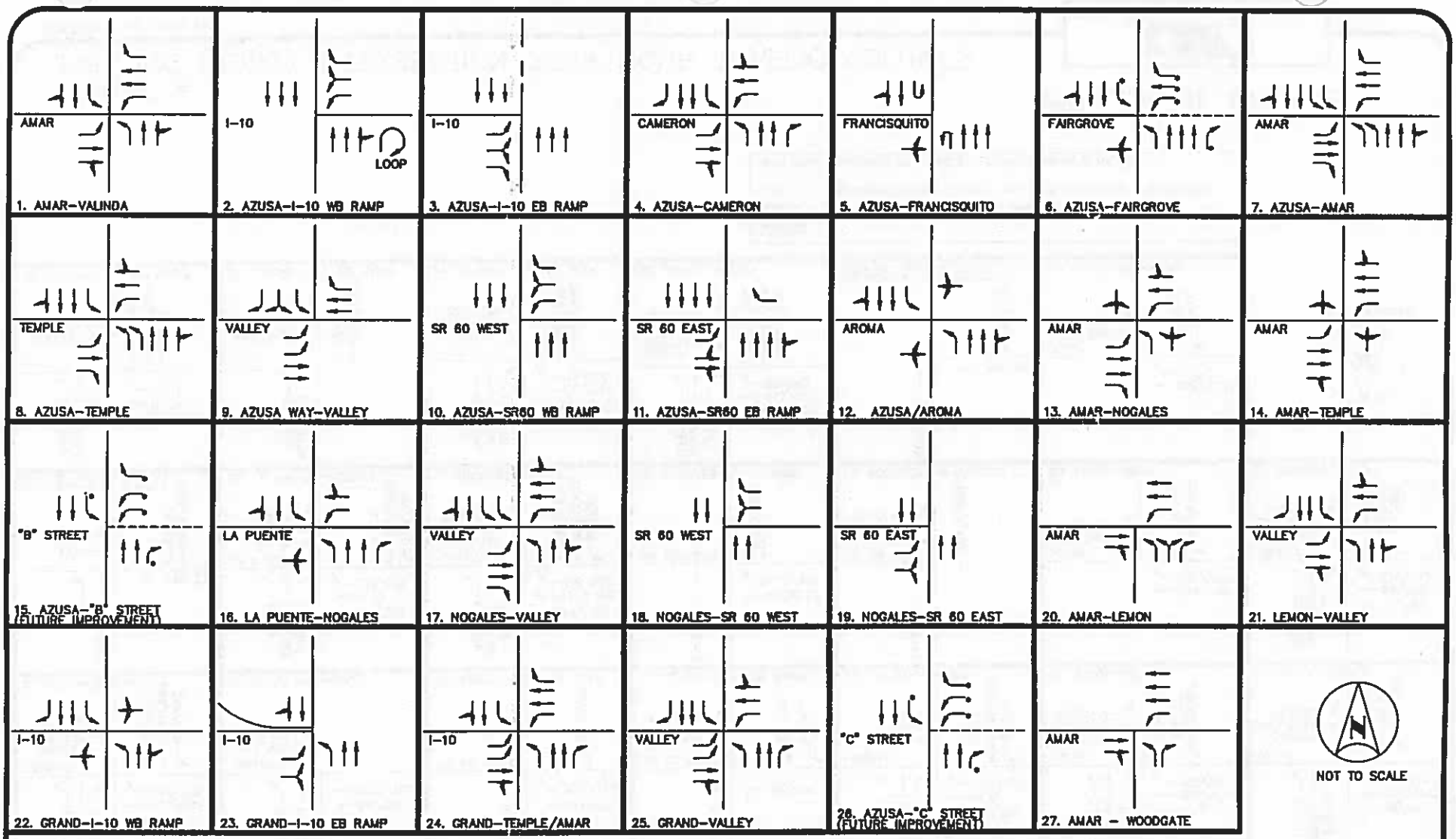

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FIGURE 3
EXISTING (2002) INTERSECTION LANE GEOMETRY

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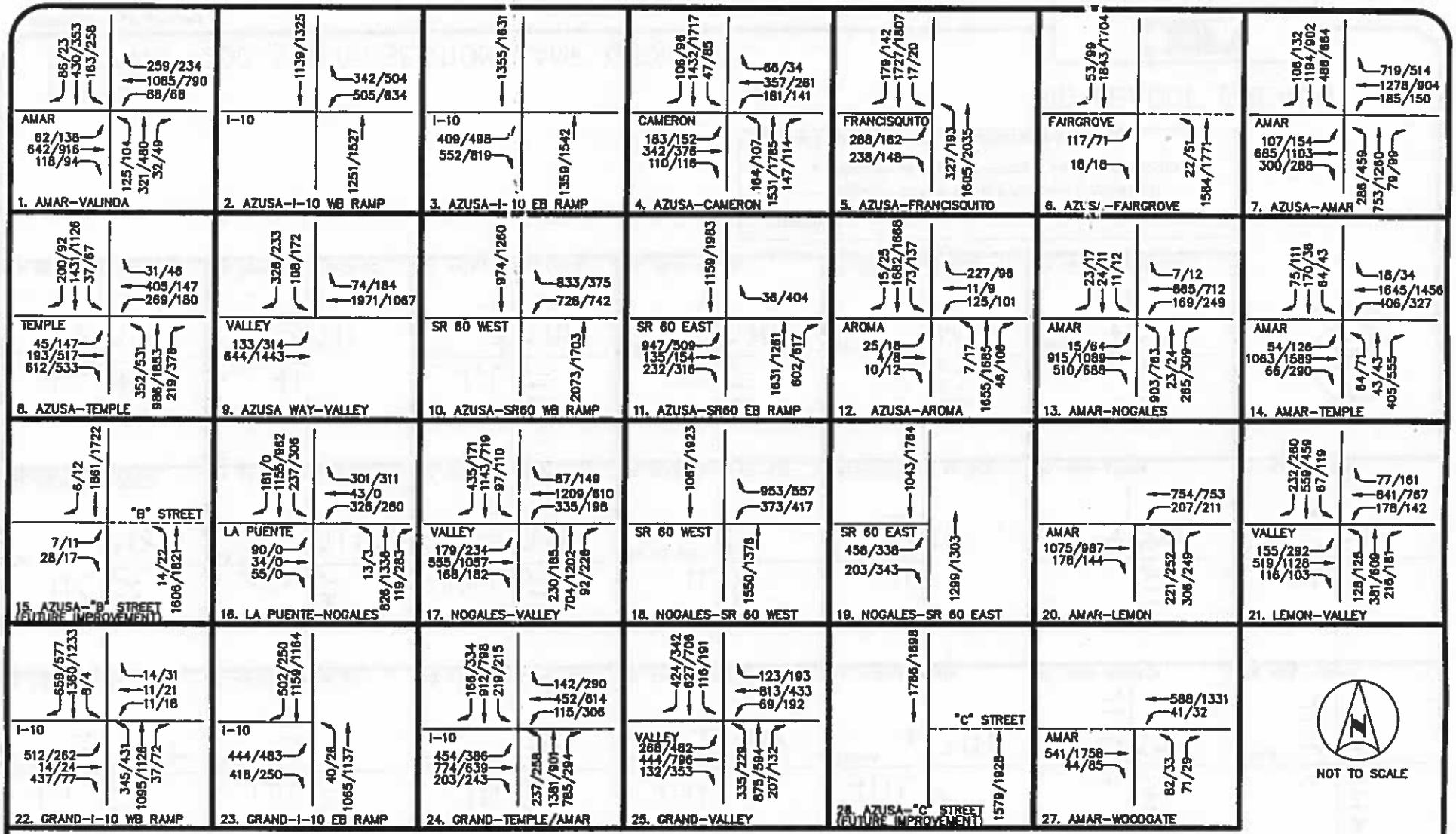

FIGURE 4
EXISTING (2002) INTERSECTION PEAK HOUR TRAFFIC VOLUMES

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TABLE 2 - EXISTING LEVELS OF SERVICE (LOS)
BIG LEAGUE DREAMS

	INTERSECTION	A.M. PEAK HOUR		P.M. PEAK HOUR	
		Average Delay (seconds)	LOS	Average Delay (seconds)	LOS
1	Amar Rd./Valinda Ave.	36.2	D	34.2	C
2	I-10 WB Ramp/Azusa Ave.	9.9	A	14.9	B
3	I-10 EB Ramp/Azusa Ave.	11.7	B	19.1	B
4	Cameron Ave./Azusa Ave.	38.2	D	42.5	D
5	Francisquito Ave./Azusa Ave.	46.9	D	18.7	B
6	Fairgrove Ave./Azusa Ave.	7.1	A	6.7	A
7	Amar Rd./Azusa Ave.	44.2	D	**62.2**	**E**
8	Temple Ave./Azusa Ave.	29.8	C	**62.5**	**E**
9	Valley Blvd./Azusa Way	7.0	A	5.1	A
10	SR60 WB Ramp/Azusa Ave.	13.7	B	14.2	B
11	SR60 EB Ramp/Azusa Ave.	24.6	C	19.9	B
12	Aroma Dr./Azusa Ave.	10.6	B	12.1	B
13	Amar Rd./Nogales St.	34.0	C	43.3	D
14	Amar Rd./Temple Ave.	32.7	C	**64.4**	**E**
15	Amar Rd./Project Roadway - B	*			
16	La Puente Rd./Nogales St.	24.7	C	25.8	C
17	Valley Blvd./Nogales St.	**97.0**	**F**	**64.6**	**E**
18	SR 60 WB Ramp/Nogales St.	43.6	D	33.2	C
19	SR 60 EB Ramp/Nogales St.	11.4	B	16.4	B
20	Amar Rd./Lemon Ave.	15.6	B	15.2	B
21	Valley Blvd./Lemon Ave.	30.9	C	44.2	D
22	I-10 WB Ramp/Grand Ave.	**101.6**	**F**	54.5	D
23	I-10 EB Ramp/Grand Ave.	9.3	A	11.6	B
24	Temple Ave./Amar Rd./Grand Ave.	**58.2**	**E**	**69.4**	**E**
25	Valley Blvd./Grand Ave.	40.3	D	46.9	D
26	Azusa Ave./Project Roadway - C	*			
27	Amar Rd./Woodgate	5.2	A	3.9	A

Notes:

*Intersections with Level of Service 'E' or 'F' are indicated in **bold**.*
** These intersections will exist only after the project is constructed, and therefore are not analyzed in the existing or future pre-project periods.*

Level of Service	Average Vehicle Delay
A - Free flow operations with high speeds	0 - 10 seconds
B - Free flow operations with slight restrictions	10 - 20 seconds
C - Stable but restricted flow	20 - 35 seconds
D - Unstable-congested flow	35 - 55 seconds
E - Extremely limited maneuverability with poor driver comfort	55 - 80 seconds
F - Breakdown in flow with delays	more than 80 seconds

Source: Volume/Level of Service Capacity
Highway Capacity Manual, 1997

Kimley-Horn and Associates, Inc., 09/2002

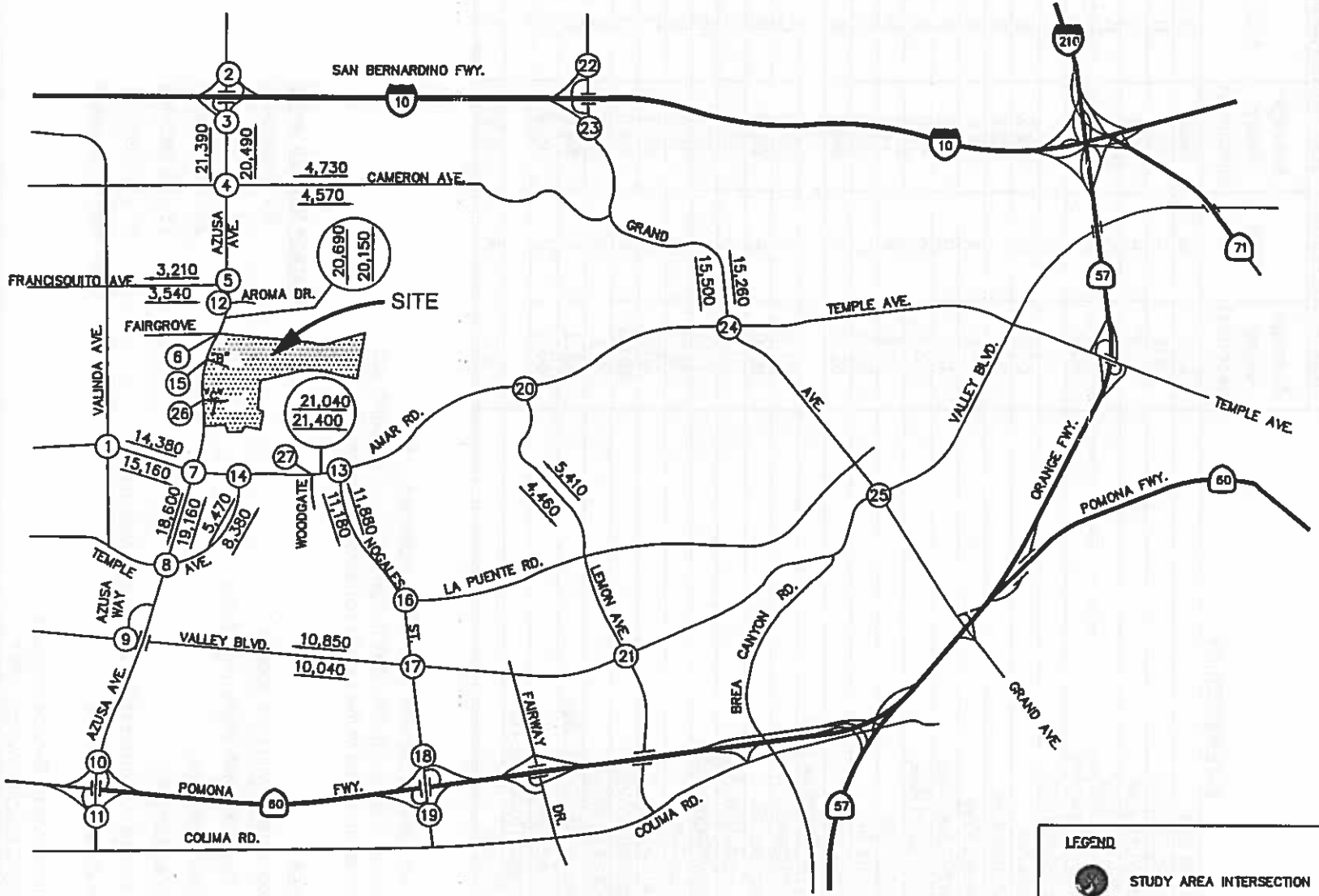

FIGURE 5
EXISTING (2002) AVERAGE DAILY TRAFFIC (ADT) VOLUMES

BIG LEAGUE DREAMS

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3.0 FUTURE (2005) PRE-PROJECT CONDITIONS

Future (2005) pre-project intersection operating conditions were analyzed to determine the peak hour LOS. To estimate the future (2005) pre-project traffic volumes, existing (2002) traffic volumes were increased by adding traffic from approved and pending projects as well as ambient growth in the existing traffic.

The analysis also assumed an improved existing network by including new striping, signal traffic modifications and additional turn-lanes in the LOS calculations. Assuming that these improvements are in place, this helps to identify the traffic impacts that the cumulative projects will have in the future that would result even if the Big League Dreams project was not constructed. The following sections provide a summary of this analysis.

3.1 Future Intersection to Mitigate Configurations

The future (2005) pre-project and post-project analysis assumes that the intersection deficiencies would be improved to an acceptable LOS as mitigation for the impacts from cumulative projects. This allows for the Big League Dreams development traffic to be analyzed independently so that the project traffic impacts can be specifically identified. Some of the roadway improvements are expected to be completed as part of the ***South Azusa Avenue Capacity Enhancement Project.***

The capacity enhancement project would result in a consistent six-lane South Azusa Avenue facility between I-10 and the City's southern boundary. Additional turn lanes at key South Azusa Avenue intersections and "turn-out lanes" for buses at the bus stops would also be included. It should be noted that none of the assumed improvements are fully funded, and no specific construction schedules are known. These future intersection improvements are included, however, in order to separate pre-project deficiencies from Big League Dreams project impacts.

Section 6.0 of this report describes the recommendation for defining the Big League Dreams project traffic impacts and mitigation. The recommended mitigations are based upon the percentage contribution of project traffic to each impacted intersection and the increased level of delay that would be experienced at each intersection because of the addition of project traffic.

The Big League Dreams development also includes the construction of two access roadways that would form two new intersections with South Azusa Avenue.

3.2 Cumulative Project Traffic

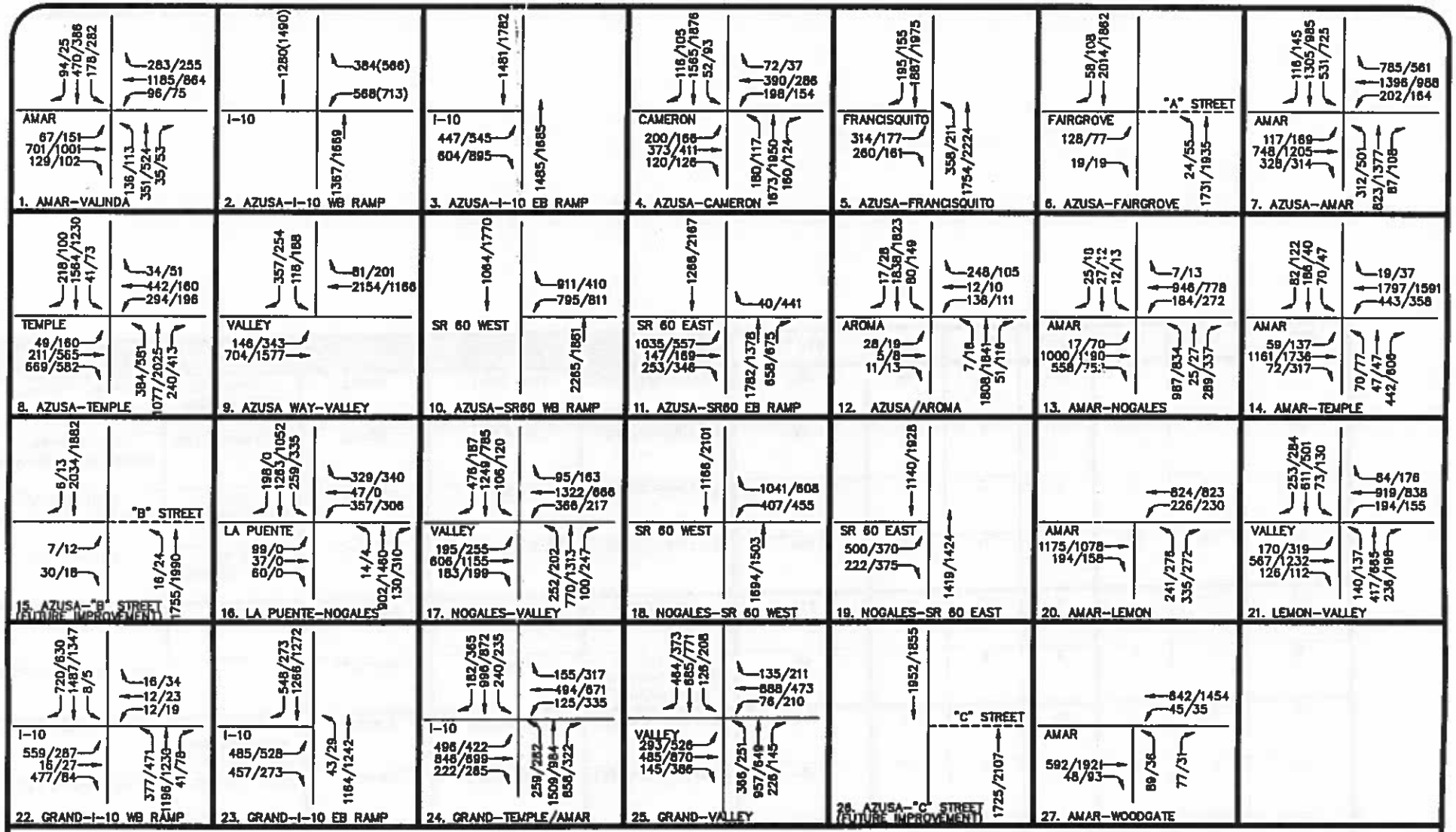
Cumulative projects include approved and pending projects located within an approximate four-mile radius from the project site. The trip generation expected from these projects was calculated in order to determine the total daily and peak hour traffic volumes produced by these developments. **Table 3** summarizes cumulative project trip generation. The total cumulative project traffic is assumed to increase existing traffic levels by 3% each year over the three-year period between 2002 (existing) and 2005 (future project year). Future (2005) pre-project peak hour traffic volumes at the study area intersections are provided in **Figure 6**. The future (2005) pre-project ADT volumes on the study area roadway segments are provided in **Figure 7**.

Table 3
Summary of Traffic Volumes for Approved/Pending Projects within San Jose Hills Business Park Vicinity

Project	Location	Jurisdiction	Sq ft/Units	Land Use	Daily Trips	AM Peak Hour			PM Peak Hour		
						In	Out	Total	In	Out	Total
Walnut Hills Development	NW corner of the City, N of Amar & E of of the BKK	Walnut Hills	268 units (3,362,657 sq ft)	Residential Planned Development (270)	2,010	30	107	137	108	58	166
Walnut Hills Development	NW corner of the City, N of Amar & E of of the BKK	Walnut Hills	18-hole	Golf Course (430)	643	32	8	40	22	28	50
Millie's @ Snow Creek Village	21627 Valley Blvd.	Snow Creek	5,090 sq ft	High Turnover (Sit-down) Rest (832)	663	24	23	47	33	22	55
Applebee's @ Snow Creek Village	21625 Valley Blvd.	Snow Creek	6,458 sq ft	High Turnover (Sit-down) Rest (832)	842	31	29	60	42	28	70
Extra Space Storage	20671 Valley Blvd.	Walnut	76,915 sq ft	Mini-Warehousing (151)	192	7	5	12	10	10	20
Walnut Grove	Francesca Avenue	Walnut Grove	108 units	Residential Condominiums (230)	633	8	40	48	39	19	58
Castlehill Plaza	20003 Valley Blvd.	Walnut	32,910 sq ft	General Office Bldg (710)	362	45	6	51	8	41	49
Carrara Marble Company of America	15000 Phoenix Drive	Industry	28,720 sq ft	Light Industrial (110)	200	23	3	26	3	25	28
Continental Marketing Services, Inc.	15375 E. Proctor	Industry	106,300 sq ft	Light Industrial (110)	741	86	12	98	12	92	104
Gyangyi Group (USA) Industrial Building	17665 E. Rowland St.	Industry	7,903 sq ft	Light Industrial (110)	55	6	1	7	1	7	8
Max Group	16605 Gale Avenue	Industry	14,620 Add sq ft	Light Industrial (110)	102	12	2	14	2	13	15
Morningstar Foods, Inc.	18275 E. Arenth Ave.	Industry	5,500 Add sq ft	Light Industrial (110)	38	4	1	5	1	5	6
MSC Investments, LLC	17009 Evergreen Pl.	Industry	42,080 sq ft	Light Industrial (110)	293	34	5	39	5	36	41
O'Connell Industrial Building	West side of Hatcher aVe; s/o Rowland Ave.	Industry	30,000 sq ft	Light Industrial (110)	209	24	4	28	3	26	29
Puente Hills Toyota	17070 E. Gale ave.	Industry	106,352 sq ft	New Car Sales (841)	3,988	172	63	235	119	179	298

Table 3
Summary of Traffic Volumes for Approved/Pending Projects within San Jose Hills Business Park Vicinity

Project	Location	Jurisdiction	Sq ft/Units	Land Use	Daily Trips	AM Peak Hour			PM Peak Hour		
						In	Out	Total	In	Out	Total
Puente Hills Volkswagen	17110 E. Gale Ave.	Industry	17,508 sq ft	New Car Sales (841)	656	28	11	39	20	29	49
Railroad Partners	17747 E.Railroad St.	Industry	45,600 sq ft	Light Industrial (110)	318	37	5	42	5	39	44
S&S Brothers, Inc.	17300 Railroad St.	Industry	17,422 Add sq ft	Light Industrial (110)	121	14	2	16	2	15	17
Trammel Crow Co.	se corner of Gale Ave, and Jellick Ave.	Industry	60,605 sq ft	Light Industrial (110)	422	49	7	56	7	52	59
Residential Development		La Puente	6 Units	Single Family Detached Housing (210)	57	1	4	5	4	2	6
Carwash and Lube		La Puente	3,845 sq ft	Automobile Care Center (840)	144	6	2	8	4	6	10
Industrial Park	18219 E. Valley Blvd.	County	9 units - 9.5 acres	Industrial Park (130)	492	59	12	71	15	54	69
Service Centerf for Repair of Power Units	491 Yorbita Road, # 7	County	.75 acres	Light Industrial (110)	39	5	2	7	1	4	5
Warehouse with office in Proposed Zone	491 Yorbita Road	County	1.38 acres	Light Industrial (110)	71	8	2	10	2	8	10
Shopping Center	18835 & 18859 Gale Avenue	County	14.055 acres	Specialty Retail (814)	728	88	18	106	22	80	102
					14,019	833	374	1,207	490	878	1,368



BIG LEAGUE DREAMS

FIGURE 6
FUTURE (2005) PRE–PROJECT PEAK–HOUR TRAFFIC VOLUMES

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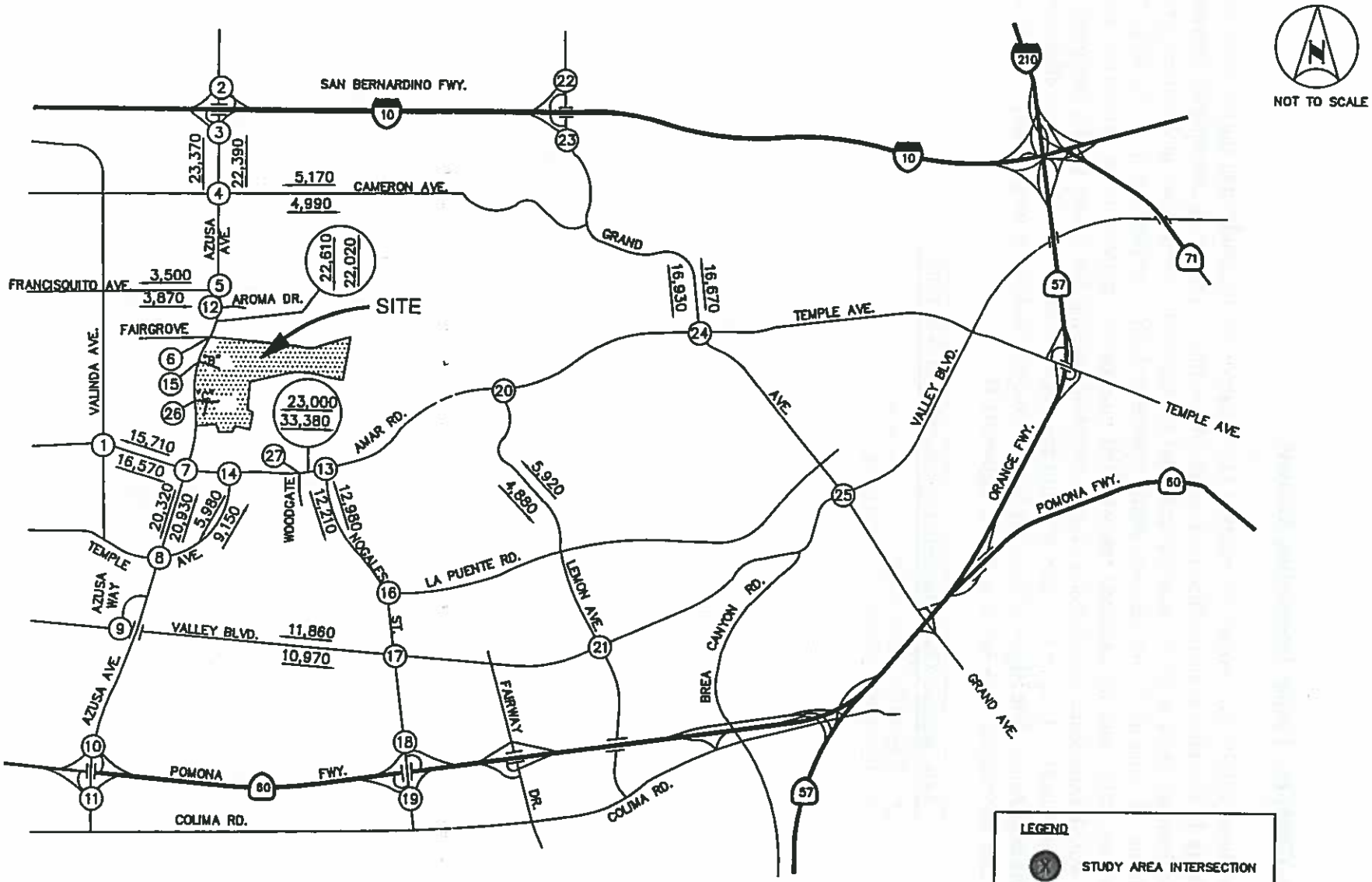

FIGURE 7 – FUTURE (2005)
PRE-PROJECT AVERAGE DAILY TRAFFIC (ADT) VOLUMES

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3.3 Future (2005) Pre-Project Intersection Analysis

Results of the future (2005) pre-project intersection LOS analysis for the study area intersections are provided in **Table 4**. The table indicates that the average delay at many of the study area intersections can be expected to decrease because of the improvements that are assumed to be in place in the future, pre-project conditions. A total of 25 intersections would operate at LOS D or better with the addition of cumulative project traffic and the assumed roadway and intersection improvements. However, two intersections would experience unacceptable traffic operations during the future (2005) pre-project conditions and operate at LOS E or F in one or both peak-hour periods. These two intersections are identified in the table below. The Highway Capacity Manual analysis worksheets for the future (2005) pre-project study area intersection LOS are provided in **Appendix B**.

Intersections Operating with Unacceptable LOS in 2005
• Valley Blvd. / Lemon Ave.
• I-10 westbd. off-ramp / Grand Avenue

TABLE 4
FUTURE (2005) PRE-PROJECT INTERSECTION LEVEL OF SERVICE
SUMMARY OF INTERSECTION OPERATIONS
FOR 2005 BACKGROUND CONDITIONS

		A.M. PEAK HOUR		P.M. PEAK HOUR	
	INTERSECTION	Average Delay (seconds)	LOS	Average Delay (seconds)	LOS
1	Amar Rd./Valinda Ave.	44.9	D	38.5	D
2	I-10 WB Ramp/Azusa Ave.	11.2	B	17.6	C
3	I-10 EB Ramp/Azusa Ave.	13.6	B	22.1	C
4	Cameron Ave./Azusa Ave.	33.9	C	33.9	C
5	Francisquito Ave./Azusa Ave.	21.0	C	13.3	B
6	Fairgrove Ave./Azusa Ave.	7.8	A	7.2	A
7	Amar Rd./Azusa Ave.	38.9	D	44.7	D
8	Temple Ave./Azusa Ave.	24.0	C	32.2	C
9	Valley Blvd./Azusa Ave.	8.7	A	5.5	A
10	SR60 WB Ramp/Azusa Ave.	15.3	B	16.1	B
11	SR60 EB Ramp/Azusa Ave.	25.2	C	21.5	C
12	Aroma Dr./Azusa Ave.	12.3	B	13.4	B
13	Amar Rd./Nogales St.	23.5	C	25.7	C
14	Amar Rd./Temple Ave.	31.2	C	47.3	D
15	Amar Rd./Project Roadway - B	2.5	A	4.5	A
16	La Puente Rd./Nogales St.	28.2	C	24.5	C
17	Valley Blvd./Nogales St.	35.6	D	34.4	C
18	SR 60 WB Ramp/Nogales St.	32.7	C	24.3	C
19	SR 60 EB Ramp/Nogales St.	11.0	B	15.2	B
20	Amar Rd./Lemon Ave.	17.4	B	16.9	B
21	Valley Blvd./Lemon Ave.	34.3	C	**56.8**	**E**
22	I-10 WB Ramp/Grand Ave.	**109.4**	**F**	**63.7**	**E**
23	I-10 EB Ramp/Grand Ave.	10.5	B	12.6	B
24	Temple Ave./Amar Rd./Grand Ave.	28.7	C	30.5	C
25	Valley Blvd./Grand Ave.	39.8	D	34.2	C
26	Azusa Ave./Project Roadway - C	0.0	A	0.0	A
27	Amar Road/Woodgate Dr.	5.3	A	3.8	A

*Numbers and LOS values in **bold** indicate unacceptable operating conditions.*

Notes:

Level of Service	Average Vehicle Delay
A - Free flow operations with high speeds	0 - 10 seconds
B - Free flow operations with slight restrictions	10 - 20 seconds
C - Stable but restricted flow	20 - 35 seconds
D - Unstable-congested flow	35 - 55 seconds
E - Extremely limited maneuverability with poor driver comfort	55 - 80 seconds
F - Breakdown in flow with delays	more than 80 seconds

Source: Volume/Level of Service Capacity
Highway Capacity Manual, 1997

Kimley-Horn and Associates, Inc., 09/2002

4.0 FUTURE (2005) DEVELOPMENT ALTERNATIVE 1

4.1 Project Trip Generation

The Institute of Transportation Engineers' (ITE) Trip Generation Manual, 6th Edition, was used to calculate daily and peak hour project trips for each of the two development alternatives. The trip generation for this Development Alternative 1 is expected to be approximately 18,114 daily trips, 527 trips during the a.m. peak hour and 1,300 trips during the p.m. peak hour.

Trip generation was calculated for each of the different land uses and internal "trip capture" was assumed. This means that not all of the trips generated by the site would be new trips that utilize the adjacent roadway network and study area intersections. Some of the trips would only occur on-site, and other trips would simply happen to "pass-by" the site. Therefore, a reduction in the trip generation of certain proposed uses was assumed. This reduction is consistent with The Institute of Transportation Engineers Trip Generation methodology for a mixed-use development such as Big League Dreams. **Table 5** provides a summary of the Development Alternative 1 project trip generation, trip reduction assumptions and the total number of project trips that would be added to the future (2005) study area roadway network.

4.2 Trip Distribution and Assignment

The trip distribution for the project trips was estimated based upon site location and the regional freeway network, and adjacent land uses within the project study area. Approximately 20% of the project traffic would have origins/destinations within the study area. Project trips were then distributed to the study area roadway network and added to the future (2005) pre-project traffic volumes to represent the future (2005) post-project traffic volumes. The project trip distribution percentages applied to the study area roadway network are illustrated in **Figure 8**. The trip distribution percentages are illustrated at the intersection level in **Figure 9.** The future (2005) post-project peak hour volumes for Development Alternative 1 are illustrated on **Figure 10**. The future (2005) post-project ADT volumes for Development Alternative 1 are illustrated on **Figure 11**.

4.3 Future Post-Project Intersection Analysis

Results of the future (2005) post-project, Development Alternative 1 peak hour intersection analysis are provided in **Table 6**. The analysis indicates that 24 intersections would operate at LOS D or better with the addition of project traffic. Three intersections would experience unacceptable traffic operations of LOS E or F in the future pre-project period, in one or both peak hour periods. The intersections are listed below. The Highway Capacity Manual analysis worksheets for the future (2005) post-project (Development Alternative 1) period are provided in **Appendix C**.

Intersections Impacted By Cumulative Projects in 2005	Additional Intersection Impacted By BLD Development Alternative 1
• Valley Blvd. / Lemon Ave.	• Amar Road/Azusa Avenue
• I-10 westbd. off-ramp / Grand Avenue	

TABLE 5

SUMMARY OF WEEKDAY PROJECT TRAFFIC GENERATION
BIG LEAGUE DREAMS PROJECT (with 375k sq.ft. of retail)

ITE TRIP GENERATION RATES FOR EACH LAND USE COMPONENT

LAND USE	TRIPS PER:	DAILY TRIPS	TRIP GENERATION RATES* AM PEAK HOUR TRIPS TOTAL	In	Out	PM PEAK HOUR TRIPS TOTAL	In	Out
COMPONENT A:								
BIG LEAGUE DREAMS (BASEBALL FIELDS)[a,b,c]	FIELDS	200.00	N/A	N/A	N/A	33.33	16.67	16.67
COMPONENT B:								
SOCCER FIELDS[b,c,d]	FIELDS	120.00	N/A	N/A	N/A	20.00	10.00	10.00
COMMUNITY CENTER (495)	KSF	22.88	2.68	1.42	1.26	2.26	0.84	1.42
COMPONENT C:								
SHOPPING CENTER (820)	KSF	47.94	1.07	0.66	0.42	4.49	2.15	2.33
HOME IMPROVEMENT SUPERSTORE (862) **	KSF	35.05	1.48	0.80	0.68	2.87	1.35	1.52
COMPONENT D:								
BKK LANDFILL (CLOSED)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
COMPONENT E:								
18-HOLE GOLF COURSE (430)	HOLES	35.74	2.22	1.75	0.47	2.74	1.21	1.53
GOLF DRIVING RANGE (432)	TEES	14.00	0.42	0.29	0.13	1.25	0.53	0.73
COMPONENT F:								
RESTAURANT (831)	KSF	89.95	2.22	1.75	0.47	2.74	1.21	1.53

PROJECT TRIP GENERATION AFTER APPLICATION OF ITE RATES

LAND USE	DESCRIPTION	DAILY TRIPS	AM PEAK HOUR TRIPS TOTAL	In	Out	PM PEAK HOUR TRIPS TOTAL	In	Out
COMPONENT A:								
BIG LEAGUE DREAMS (BASEBALL FIELDS)[a,b,c]	6 FIELDS	1,200	N/A	N/A	N/A	200	100	100
COMPONENT B:								
SOCCER FIELDS[b,c,d]	3 FIELDS	360	N/A	N/A	N/A	60	30	30
COMMUNITY CENTER (495)	14 KSF	320	38	20	18	32	12	20
COMPONENT C:								
SHOPPING CENTER (820)	268 KSF	12,848	288	176	112	1,203	577	626
HOME IMPROVEMENT SUPERSTORE (862)	107 KSF	3,750	158	86	73	307	144	163
COMPONENT D:								
BKK LANDFILL (CLOSED)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
COMPONENT E:								
18-HOLE GOLF COURSE (430)	18 HOLES	643	40	32	8	49	22	28
GOLF DRIVING RANGE (432)	60 TEES	840	25	17	8	75	32	44
COMPONENT F:								
RESTAURANT (831)	15 KSF	1,349	33	26	7	41	18	23
SUBTOTAL PHASE I (COMPONENT A,B,E):		3,364	103	69	34	416	195	221
SUBTOTAL PHASE II (COMPONENT C,D,F):		17,948	480	287	192	1,551	740	811
Total (PHASE I + PHASE II):		21,311	582	356	226	1,967	935	1,032

PROJECT TRIP GENERATION AFTER PASS-BY AND INTERNAL TRIP REDUCTION[e]

LAND USE	DESCRIPTION	DAILY TRIPS	AM PEAK HOUR TRIPS TOTAL	IN	OUT	PM PEAK HOUR TRIPS TOTAL	IN	OUT
COMPONENT A:								
BIG LEAGUE DREAMS (BASEBALL FIELDS)[a,b,c]	6 FIELDS	1,020	N/A	N/A	N/A	170	85	85
COMPONENT A SUBTOTAL:		1,020	N/A	N/A	N/A	170	85	85
COMPONENT B:								
SOCCER FIELDS[b,c,d]	3 FIELDS	306	N/A	N/A	N/A	51	26	26
COMMUNITY CENTER (495)	14 KSF	272	32	17	15	27	10	17
COMPONENT B SUBTOTAL:		578	32	17	15	78	35	42
COMPONENT C:								
SHOPPING CENTER (820) #	268 KSF	10,921	288	176	112	726	348	378
HOME IMPROVEMENT SUPERSTORE (862) ##	107 KSF	3,188	135	73	62	185	87	98
COMPONENT C SUBTOTAL:		14,109	423	248	174	911	436	476
COMPONENT D:								
BKK LANDFILL (CLOSED)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
COMPONENT D SUBTOTAL:		N/A	N/A	N/A	N/A	N/A	N/A	N/A
COMPONENT E:								
18-HOLE GOLF COURSE (430)	18 HOLES	547	21	15	7	42	19	23
GOLF DRIVING RANGE (432)	60 TEES	714	23	15	7	64	27	37
COMPONENT E SUBTOTAL:		1,261	44	30	13	106	46	61
COMPONENT F:								
RESTAURANT (831)	15 KSF	1,147	28	22	6	35	15	20
COMPONENT F SUBTOTAL:		1,147	28	22	6	35	15	20
Total Project Trip Generation		**18,114**	**527**	**317**	**208**	**1,300**	**617**	**683**

KSF = 1,000 square feet
(XXX) = ITE Land Use Code
* Trip generation rates are average rates, for each individual use, from the 1997 "ITE Trip Generation Manual" 6th Edition.
** Trip generation rates for the Shopping Center use were developed utilizing a regression analysis, described on page 22 of the ITE Trip Generation Manual User's Guide.
# Pass-by trips account for 29% of PM 'shopping center' trips using ITE Trip Generation Handbook.
Pass-by trips account for 44% of PM 'home improvement superstore' trips using ITE Trip Generation Handbook.
(a) Includes concessions building
(b)Assumes similar trips as Chino Hills park
(c) Weekday operating hours are 5PM to 12AM, therefore negligible generation of morning peak hour is expected.
(d) Includes replica soccer stadium
(e) Assumes 15% internal capture between land uses

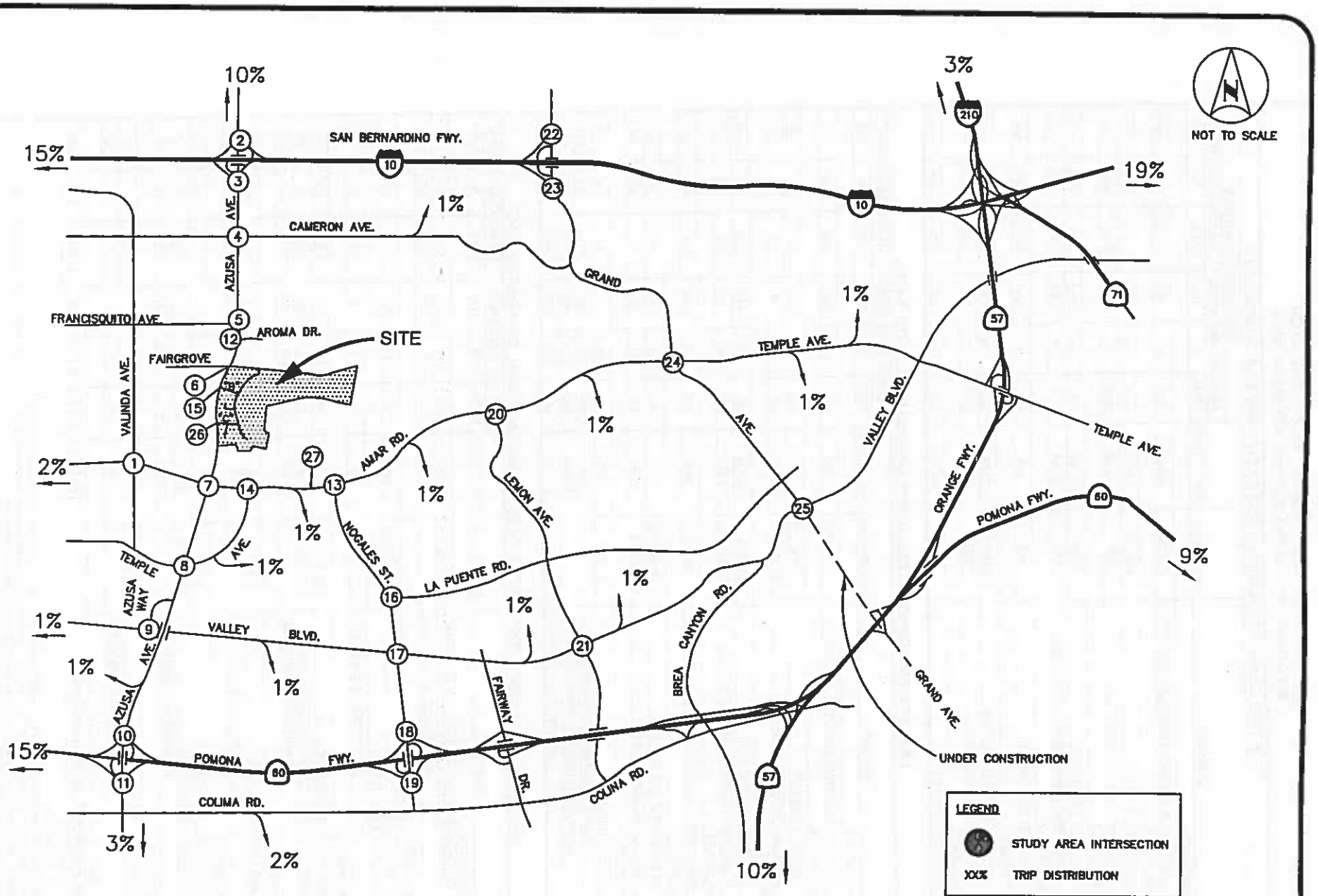

FIGURE 8
BIG LEAGUE DREAMS PROJECT TRIP DISTRIBUTION

BIG LEAGUE DREAMS

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Kimley-Horn and Associates, Inc.

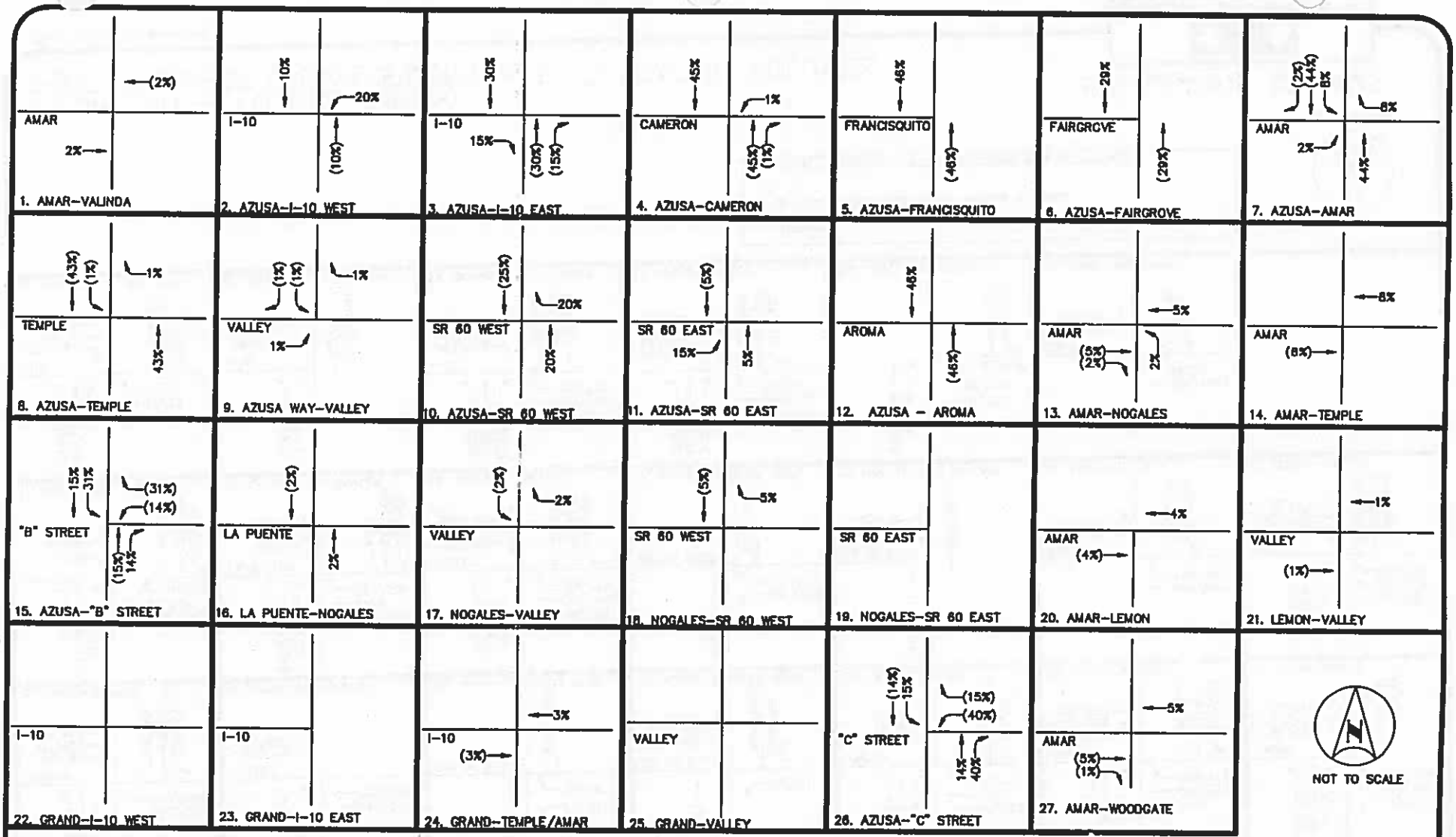

FIGURE 9
PROJECT TRIP DISTRIBUTION AT STUDY AREA INTERSECTIONS

BIG LEAGUE DREAMS

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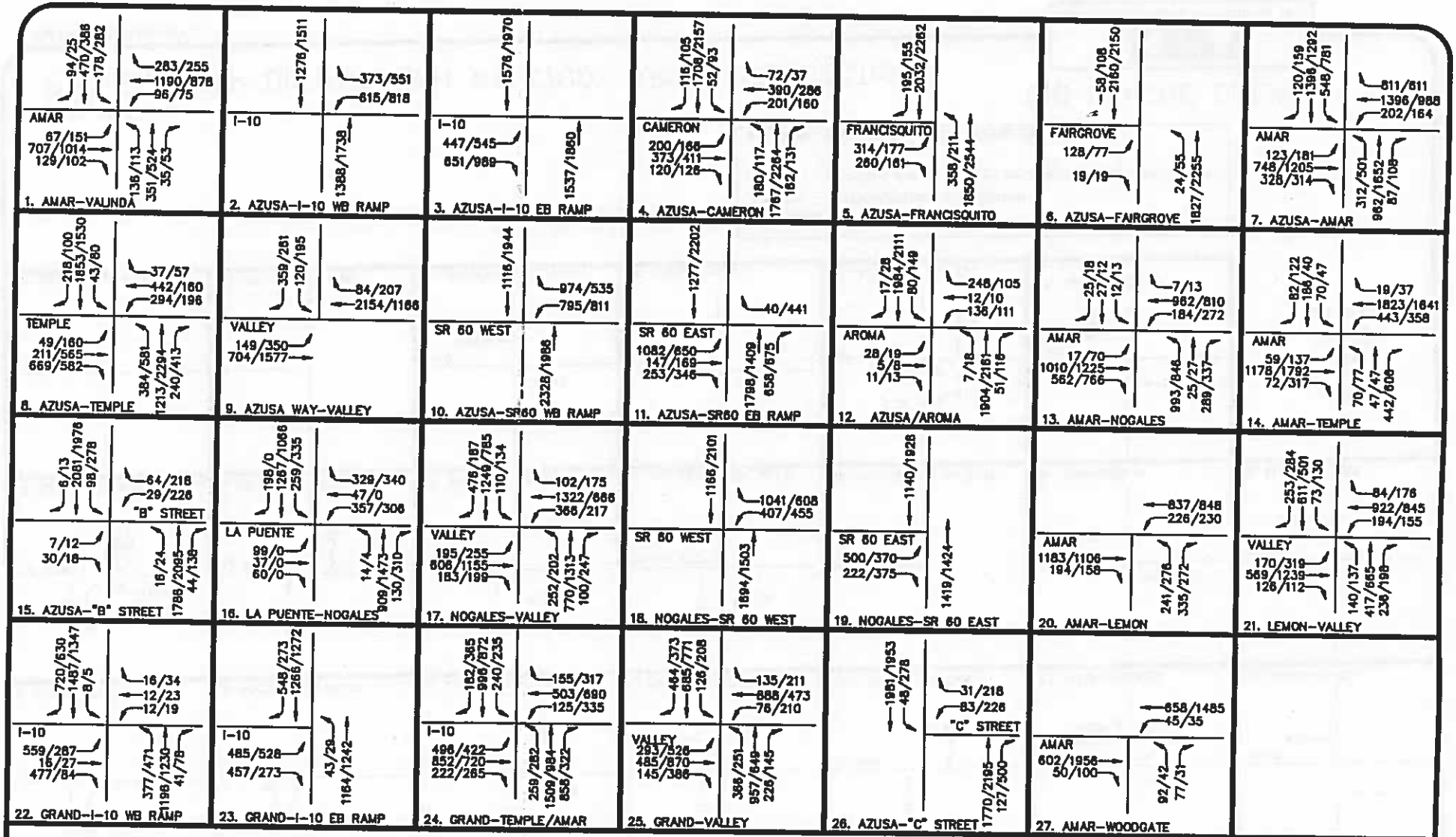

FIGURE 10 – FUTURE (2005) POST-PROJECT (DEVELOPMENT ALT.1) TRAFFIC VOLUMES

BIG LEAGUE DREAMS

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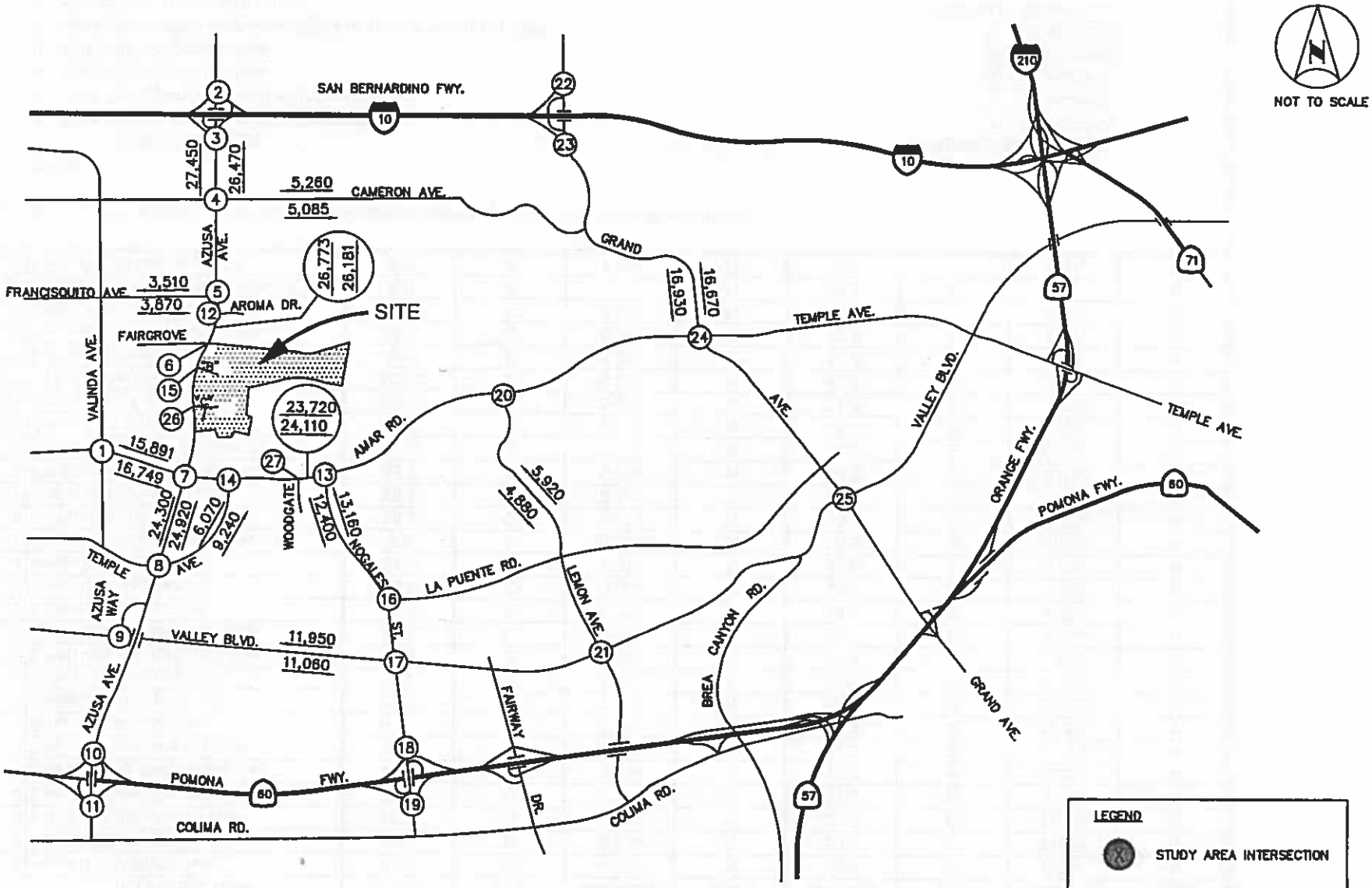

BIG LEAGUE DREAMS

FIGURE 11 – FUTURE (2005)
POST–PROJECT (DEVELOPMENT ALT. 1) ADT VOLUMES

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TABLE 6
FUTURE (2005) POST-PROJECT (375,000 SQ.FT. RETAIL) INTERSECTION LEVEL OF SERVICE
BIG LEAGUE DREAMS

	INTERSECTION	A.M. PEAK HOUR				P.M. PEAK HOUR			
		Average Delay (seconds)	LOS	Change from 2005 Background	Significant Impact	Average Delay (seconds)	LOS	Change from 2005 Background	Significant Impact
1	Amar Rd./Valinda Ave.	45.2	D	0.7%	N	38.6	D	0.3%	N
2	I-10 WB Ramp/Azusa Ave.	12.1	B	8.0%	N	20.1	C	14.2%	N
3	I-10 EB Ramp/Azusa Ave.	15.0	B	10.3%	N	25.9	C	17.2%	N
4	Cameron Ave./Azusa Ave.	34.7	C	2.4%	N	37.0	D	9.1%	N
5	Francisquito Ave./Azusa Ave.	21.7	C	3.3%	N	13.7	B	3.0%	N
6	Fairgrove Ave./Azusa Ave.	8.0	A	2.6%	N	8.0	A	11.1%	N
7	Amar Rd./Azusa Ave.	41.5	D	6.7%	N	**56.9**	**E**	**27.3%**	Y
8	Temple Ave./Azusa Ave.	24.4	C	1.7%	N	38.8	D	20.5%	N
9	Valley Blvd./Azusa Ave.	9.1	A	4.6%	N	5.6	A	1.8%	N
10	SR60 WB Ramp/Azusa Ave.	15.3	B	0.0%	N	16.4	B	1.9%	N
11	SR60 EB Ramp/Azusa Ave.	25.6	C	1.6%	N	23.1	C	7.4%	N
12	Aroma Dr./Azusa Ave.	13.1	B	6.5%	N	14.0	B	4.5%	N
13	Amar Rd./Nogales St.	23.5	C	0.0%	N	26.7	C	3.9%	N
14	Amar Rd./Temple Ave.	31.6	C	1.3%	N	49.0	D	3.6%	N
15	Amar Rd./Project Roadway - B	6.5	A	160.0%	N	15.3	B	240.0%	N
16	La Puente Rd./Nogales St.	28.2	C	0.0%	N	25.4	C	3.7%	N
17	Valley Blvd./Nogales St.	35.7	D	0.3%	N	34.8	C	1.2%	N
18	SR 60 WB Ramp/Nogales St.	32.7	C	0.0%	N	24.3	C	0.0%	N
19	SR 60 EB Ramp/Nogales St.	11.0	B	0.0%	N	15.2	B	0.0%	N
20	Amar Rd./Lemon Ave.	17.5	B	0.6%	N	16.9	B	0.0%	N
21	Valley Blvd./Lemon Ave.	34.3	C	0.0%	N	**57.6**	**E**	1.4%	N
22	I-10 WB Ramp/Grand Ave.	**109.4**	**F**	0.0%	N	**63.7**	**E**	0.0%	N
23	I-10 EB Ramp/Grand Ave.	10.5	B	0.0%	N	12.6	B	0.0%	N
24	Temple Ave./Amar Rd./Grand Ave.	28.8	C	0.3%	N	30.8	C	1.0%	N
25	Valley Blvd./Grand Ave.	39.8	D	0.0%	N	34.2	C	0.0%	N
26	Azusa Ave./Project Roadway - C	6.8	A	-	N	25.7	C	-	N
27	Amar Road/Woodgate Dr.	5.4	A	1.9%	N	3.9	A	2.6%	N

*Numbers and LOS values in **bold** indicate unacceptable operating conditions and significant impacts.*

Notes:

Level of Service

A - Free flow operations with high speeds
B - Free flow operations with slight restrictions
C - Stable but restricted flow
D - Unstable-congested flow
E - Extremely limited maneuverability with poor driver comfort
F - Breakdown in flow with delays

Average Vehicle Delay
0 - 10 seconds
10 - 20 seconds
20 - 35 seconds
35 - 55 seconds
55 - 80 seconds
more than 80 seconds

Source: Volume/Level of Service Capacity
Highway Capacity Manual, 1997

Kimley-Horn and Associates, Inc., 09/2002

5.0 FUTURE (2005) DEVELOPMENT ALTERNATIVE 2

5.1 Project Trip Generation

The trip generation Development Alternative 1 is expected to be approximately 20,592 daily trips, 576 trips during the a.m. peak hour and 1,425 trips during the p.m. peak hour. Trip reductions were also considered for this development alternative.

Table 7 provides a summary of the Development Alternative 2 project trip generation, trip reduction assumptions and the total number of project trips that would be added to the future (2005) study area roadway network.

5.2 Trip Distribution and Assignment

The trip distribution percentages for this development alternative are the same as Development Alternative 1.

The peak hour project trips were added to future (2005) pre-project peak hour traffic volumes in order to identify the project traffic impacts at the study area intersections. The resulting future (2005) post-project peak hour volumes are illustrated on **Figure 12**. The future (2005) ADT volumes for Development Alternative 2 are illustrated on **Figure 13**.

5.3 Future Post-Project Intersection Analysis

Results of the future (2005) post-project, Development Alternative 2 peak hour intersection analysis are provided in **Table 8**. The analysis indicates that same 24 intersections that would operate at LOS D or better with the addition of Development Alternative 1 project traffic will operate at acceptable conditions with Development Alternative 2. And, the same three intersections would operate at unacceptable conditions. The intersections are listed below. The Highway Capacity Manual analysis worksheets for the future (2005) post-project (Development Alternative 2) study intersections are provided in **Appendix D**.

Intersections Impacted By Cumulative Projects in 2005	Additional Intersection Impacted By BLD Development Alternative 2
• Valley Blvd. / Lemon Ave.	• Amar Rd./Azusa Avenue
• I-10 westbd. off-ramp / Grand Avenue	

TABLE 7

SUMMARY OF WEEKDAY PROJECT TRAFFIC GENERATION
BIG LEAGUE DREAMS PROJECT (with 450k sq.ft. of retail)

ITE TRIP GENERATION RATES FOR EACH LAND USE COMPONENT

LAND USE	TRIPS PER:	DAILY TRIPS	TRIP GENERATION RATES*					
			AM PEAK HOUR TRIPS			PM PEAK HOUR TRIPS		
			TOTAL	In	Out	TOTAL	In	Out
COMPONENT A:								
BIG LEAGUE DREAMS (BASEBALL FIELDS)[a,b,c]	FIELDS	200.00	N/A	N/A	N/A	33.33	16.67	16.67
COMPONENT B:								
(replaced with additional retail under this scenario)								
COMPONENT C:								
SHOPPING CENTER (820)	KSF	47.94	1.07	0.66	0.42	4.49	2.15	2.33
HOME IMPROVEMENT SUPERSTORE (862) **	KSF	35.05	1.48	0.80	0.68	2.87	1.35	1.52
COMPONENT D:								
BKK LANDFILL (CLOSED)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
COMPONENT E:								
18-HOLE GOLF COURSE (430)	HOLES	35.74	2.22	1.75	0.47	2.74	1.21	1.53
GOLF DRIVING RANGE (432)	TEES	14.00	0.42	0.29	0.13	1.25	0.53	0.73
COMPONENT F:								
RESTAURANT (831)	KSF	89.95	2.22	1.75	0.47	2.74	1.21	1.53

PROJECT TRIP GENERATION AFTER APPLICATION OF ITE RATES

LAND USE	DESCRIPTION	DAILY TRIPS	AM PEAK HOUR TRIPS			PM PEAK HOUR TRIPS		
			TOTAL	In	Out	TOTAL	In	Out
COMPONENT A:								
B'G LEAGUE DREAMS (BASEBALL FIELDS)[a,b,c]	6 FIELDS	1,200	N/A	N/A	N/A	200	100	100
COMPONENT B:								
(replaced with additional retail under this scenario)								
COMPONENT C:								
SHOPPING CENTER (820)	343 KSF	16,443	369	225	144	1,540	739	801
HOME IMPROVEMENT SUPERSTORE (862)	107 KSF	3,750	158	86	73	307	144	163
COMPONENT D:								
BKK LANDFILL (CLOSED)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
COMPONENT E:								
18-HOLE GOLF COURSE (430)	18 HOLES	643	40	32	8	49	22	28
GOLF DRIVING RANGE (432)	60 TEES	840	25	17	8	75	32	44
COMPONENT F:								
RESTAURANT (831)	15 KSF	1,349	33	26	7	41	18	23
Total (PHASE I + PHASE II):		24,226	625	386	240	2212	1,055	1,158

PROJECT TRIP GENERATION AFTER PASS-BY AND INTERNAL TRIP REDUCTION[e]

LAND USE	DESCRIPTION	DAILY TRIPS	AM PEAK HOUR TRIPS			PM PEAK HOUR TRIPS		
			TOTAL	IN	OUT	TOTAL	IN	OUT
COMPONENT A:								
BIG LEAGUE DREAMS (BASEBALL FIELDS)[a,b,c]	6 FIELDS	1,020	N/A	N/A	N/A	170	85	85
COMPONENT B:								
(replaced with additional retail under this scenario)								
COMPONENT C:								
SHOPPING CENTER (820) #	268 KSF	13,977	369	225	144	929	446	483
HOME IMPROVEMENT SUPERSTORE (862) ##	107 KSF	3,188	135	73	62	185	87	98
COMPONENT D:								
BKK LANDFILL (CLOSED)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
COMPONENT E:								
18-HOLE GOLF COURSE (430)	18 HOLES	547	21	15	7	42	19	23
GOLF DRIVING RANGE (432)	60 TEES	714	23	15	7	64	27	37
COMPONENT F:								
RESTAURANT (831)	15 KSF	1,147	28	22	6	35	15	20
Total Project Trip Generation		**20,592**	**576**	349	225	**1,425**	679	747

KSF = 1,000 square feet
(XXX) = ITE Land Use Code
* Trip generation rates are average rates, for each individial use, from the 1997 "ITE Trip Generation Manual" 6th Edition.
** Trip generation rates for the Shopping Center use were developed utilizing a regression analysis, described on page 22 of the ITE Trip Generation Manual User's Guide.
# Pass-by trips account for 29% of PM 'shopping center' trips using ITE Trip Generation Handbook.
Pass-by trips account for 44% of PM 'home improvement superstore' trips using ITE Trip Generation Handbook.
(a) Includes concessions building
(b)Assumes similar trips as Chino Hills park
(c) Weekday operating hours are 5PM to 12AM, therefore negligible generation of morning peak hour is expected.
(d) Includes replica soccer stadium
(e) Assumes 15% internal capture between land uses

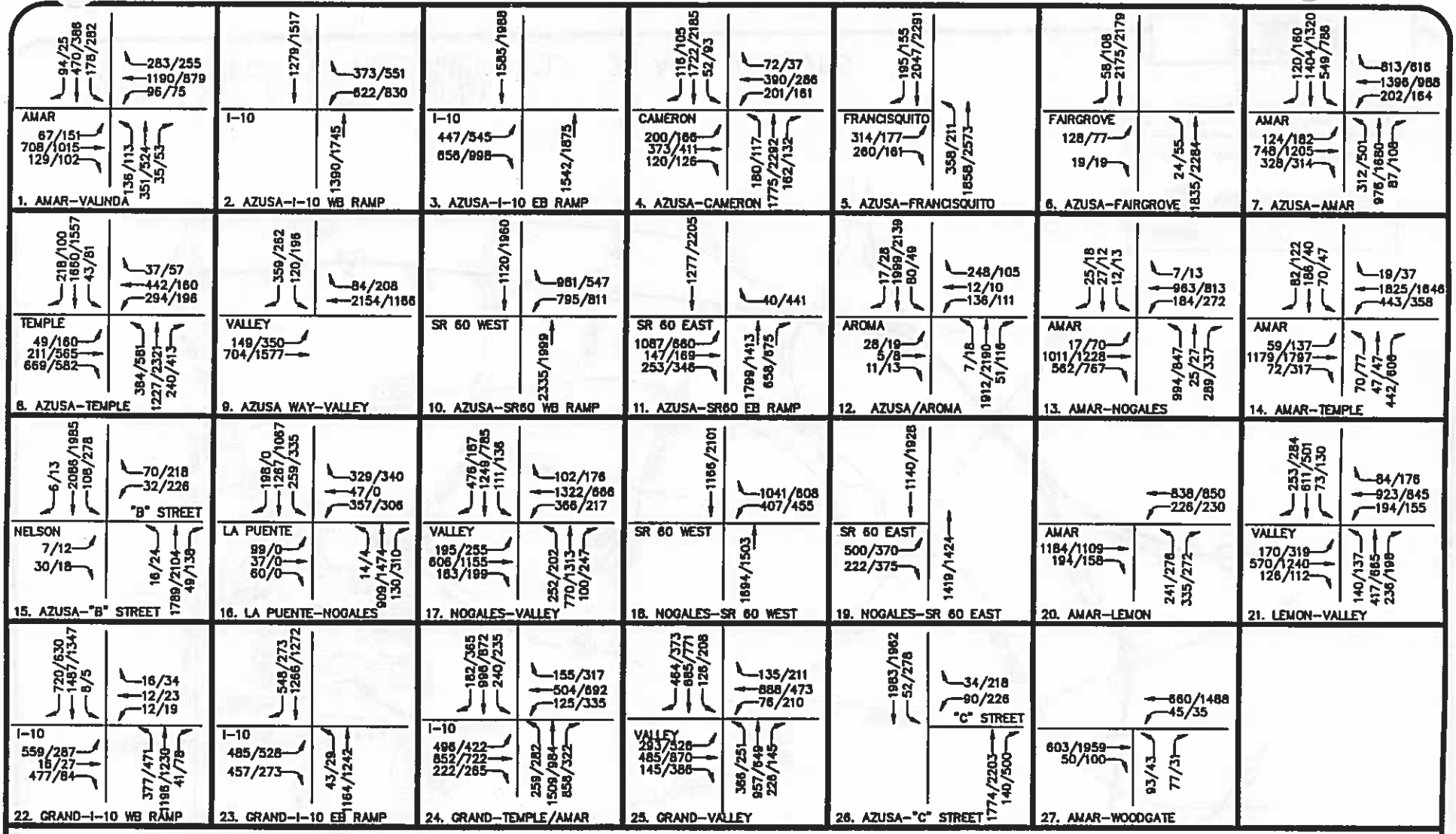

FIGURE 12 – FUTURE (2005) POST–PROJECT (DEVELOPMENT ALT. 2) TRAFFIC VOLUMES

BIG LEAGUE DREAMS

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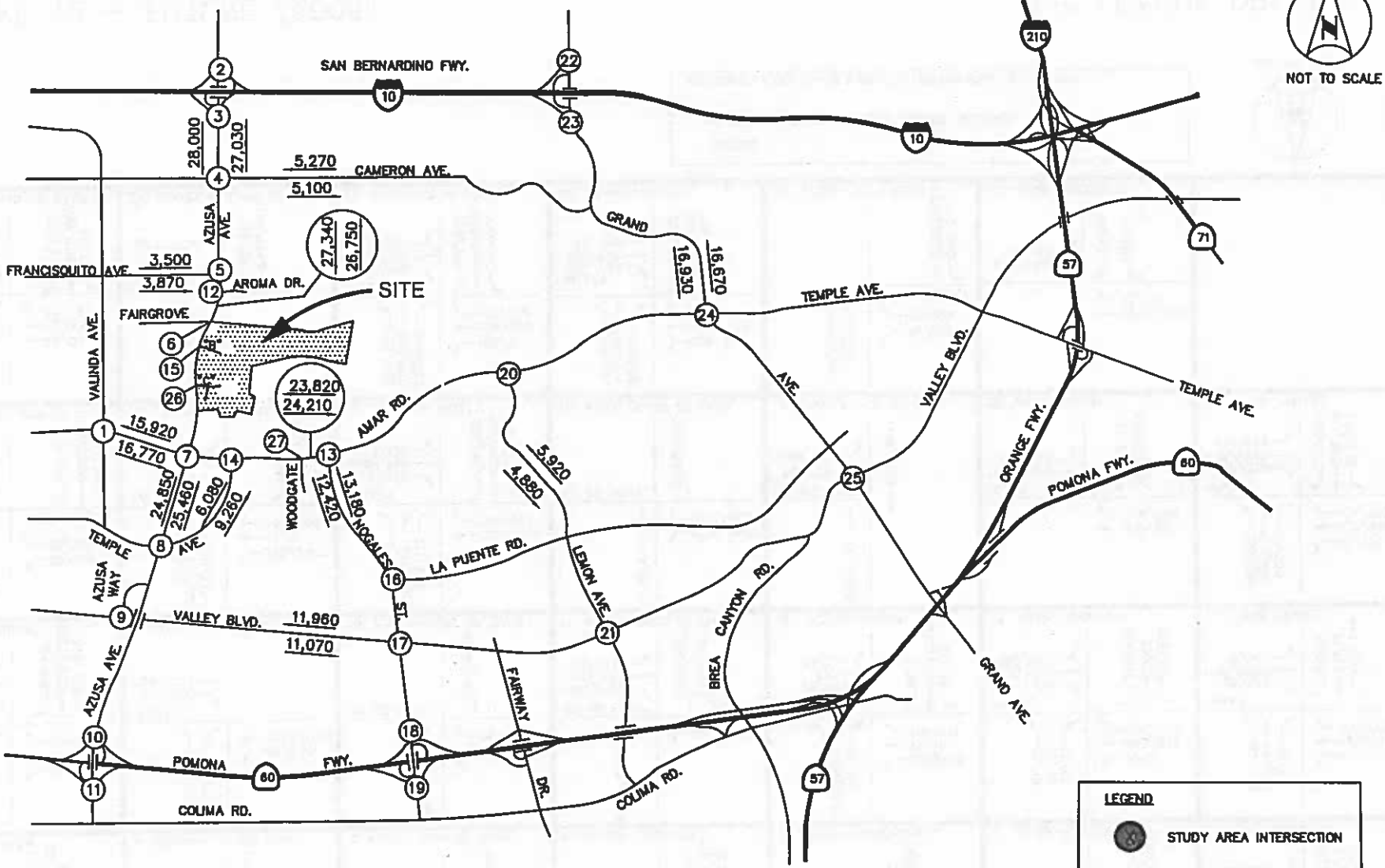
Kimley–Horn and Associates, Inc.



BIG LEAGUE DREAMS

FIGURE 13 – FUTURE (2005)
POST–PROJECT (DEVELOPMENT ALT. 2) ADT VOLUMES

Kimley–Horn and Associates, Inc.

TABLE 8
FUTURE (2005) POST-PROJECT (450,000 SQ. RETAIL) INTERSECTION LEVEL OF SERVICE
BIG LEAGUE DREAMS

	INTERSECTION	A.M. PEAK HOUR				P.M. PEAK HOUR			
		Average Delay (seconds)	LOS	% Change from Future Pre-Project	Significant Impact	Average Delay (seconds)	LOS	% Change from Future Pre-Project	Significant Impact
1	Amar Rd./Valinda Ave.	45.2	D	0.7%	N	38.6	D	0.3%	N
2	I-10 WB Ramp/Azusa Ave.	12.2	B	8.9%	N	20.2	C	14.8%	N
3	I-10 EB Ramp/Azusa Ave.	15.3	B	12.5%	N	26.5	C	19.9%	N
4	Cameron Ave./Azusa Ave.	34.8	C	2.7%	N	37.8	D	11.5%	N
5	Francisquito Ave./Azusa Ave.	21.9	C	4.3%	N	13.8	B	3.8%	N
6	Fairgrove Ave./Azusa Ave.	8.1	A	3.8%	N	8.1	A	12.5%	N
7	Amar Rd./Azusa Ave.	41.5	D	6.7%	N	**58.4**	**E**	**30.6%**	**Y**
8	Temple Ave./Azusa Ave.	24.4	C	1.7%	N	39.1	D	21.4%	N
9	Valley Blvd./Azusa Ave.	9.1	A	4.6%	N	5.6	A	1.8%	N
10	SR60 WB Ramp/Azusa Ave.	15.3	B	0.0%	N	16.5	B	2.5%	N
11	SR60 EB Ramp/Azusa Ave.	26.2	C	4.0%	N	23.1	C	7.4%	N
12	Aroma Dr./Azusa Ave.	12.9	B	4.9%	N	14.1	B	5.2%	N
13	Amar Rd./Nogales St.	23.6	C	0.4%	N	26.6	C	3.5%	N
14	Amar Rd./Temple Ave.	31.6	C	1.3%	N	49.3	D	4.2%	N
15	Amar Rd./Project Roadway - B	6.7	A	168.0%	N	15.8	B	251.1%	N
16	La Puente Rd./Nogales St.	28.2	C	0.0%	N	24.9	C	1.6%	N
17	Valley Blvd./Nogales St.	35.8	D	0.6%	N	34.8	C	1.2%	N
18	SR 60 WB Ramp/Nogales St.	32.7	C	0.0%	N	24.3	C	0.0%	N
19	SR 60 EB Ramp/Nogales St.	11.0	B	0.0%	N	15.2	B	0.0%	N
20	Amar Rd./Lemon Ave.	17.5	B	0.6%	N	16.9	B	0.0%	N
21	Valley Blvd./Lemon Ave.	34.4	C	0.3%	N	**57.6**	**E**	1.4%	N
22	I-10 WB Ramp/Grand Ave.	**109.4**	**F**	0.0%	N	**63.7**	**E**	0.0%	N
23	I-10 EB Ramp/Grand Ave.	10.5	B	0.0%	N	12.6	B	0.0%	N
24	Temple Ave./Amar Rd./Grand Ave.	28.8	C	0.3%	N	30.8	C	1.0%	N
25	Valley Blvd./Grand Ave.	39.8	D	0.0%	N	34.2	C	0.0%	N
26	Azusa Ave./Project Roadway - C	7.4	A	-	N	26.3	C	-	N
27	Amar Road/Woodgate Dr.	5.4	A	1.9%	N	3.9	A	2.6%	N

*Numbers and LOS values in **bold** indicate unacceptable operating conditions and significant impacts.*

Notes:

Level of Service

A - Free flow operations with high speeds
B - Free flow operations with slight restrictions
C - Stable but restricted flow
D - Unstable-congested flow
E - Extremely limited maneuverability with poor driver comfort
F - Breakdown in flow with delays

Average Vehicle Delay

0 - 10 seconds
10 - 20 seconds
20 - 35 seconds
35 - 55 seconds
55 - 80 seconds
more than 80 seconds

Source: Volume/Level of Service Capacity
Highway Capacity Manual, 1997

Kimley-Horn and Associates, Inc., 09/2002

6.0 CONCLUSIONS AND RECOMMENDATIONS

- Six of the study area intersections currently (2002 conditions) operate at unacceptable levels-of-service. The City is aware that these congested intersections exist and understand that there are no defined, funded construction projects to address the intersection deficiencies. The intersections and recommended improvements are identified below. The following improvements were assumed to be in place for the future (2005) pre-project analysis.

Existing (2002) Unacceptable Intersection	Recommended Improvement
• Azusa Avenue/Amar Road	• An exclusive southbound right-turn lane, an additional westbound thru-lane, a 2nd exclusive westbound right-turn lane, and additional eastbound left-turn lane and traffic signal improvements
• Nogales Street/Valley Boulevard	• Traffic signal improvements
• Azusa Avenue/Temple Avenue	• Exclusive northbound right-turn lane
• I-10 WB Ramp/Grand Avenue	• Ramp and traffic signal improvements
• Amar Road/Temple Avenue	• Traffic signal improvements
• Grand Avenue/Temple/Amar	• Striping and traffic signal improvements

- In (2001), the City obtained State funding to complete an environmental analysis, an engineering feasibility study and development of conceptual design alternatives for improvements to South Azusa Avenue and the primary intersections within the City limits. A draft report was submitted to Caltrans for review in June 2002. Caltrans approval is required to move forward with design and construction of the improvements identified in the draft report. The design funding has been temporarily suspended pending Caltrans review and MTA funding availability. No construction funding has been identified. The construction cost estimate has not been finalized, but is expected to cost between $3 and $6 million, depending upon right-of-way requirements and property costs.
- The future (2005) pre-project analysis indicates that traffic from approved and pending developments would require improvements in addition to those identified above for the existing intersection deficiencies. Most of the improvements that would be required are identified in the Azusa Avenue Capacity Enhancement Project report. This includes significant improvements to the Azusa Avenue/Amar Road intersection.
- The future (2005) post-project analysis indicates that development of the Big League Dreams development project (either alternative) would result in even more impacts to the Azusa/Amar intersection.
- Realistically, none of the improvements required to improve the either the existing or the future pre-project intersection deficiencies will be in place before construction of the project if it is approved. Therefore, the project's traffic contribution to the future (2005) impacted intersections was calculated on a percentage basis. The result of the calculation is that the project would be responsible for approximately $500,000 of the total construction costs required for the Azusa Avenue/Amar Road improvement. Detailed calculations and improvement descriptions are provided in Appendix E. The following improvement should be made with the $500,000.

Azusa Avenue/Amar Road	Exclusive southbound right-turn lane and traffic signal improvements.

7.0 SITE ACCESS AND CONSTRUCTION

No detailed site plan was available for the Big League Dreams development at the time this traffic analysis was completed. Therefore, no detailed on-site circulation recommendations can be defined. However, general circulation and site access guidelines are described in the following sections.

7.1 Site Access

Project site access will be provided via Azusa Avenue with two new roadways – "B" Street and "C" Street. Both of these roadways were analyzed as 4-lane facilities (2 ingress and 2 egress lanes), and as signalized intersections with Azusa Avenue. The intersections were analyzed as unsignalized to determine whether or not traffic signals would be warranted. The unsignalized analysis indicated that operations in the p.m. peak period would be unacceptable - LOS E.

Therefore, it is recommended that both project roadways be signalized. The traffic signal timing should be coordinated with the other traffic signals along Azusa Avenue.

Both site roadways should have median breaks on Azusa Avenue to allow for full access into and out-of the site at the signalized intersections.

7.2 Construction Traffic

This section presents a discussion of construction traffic, schedule and routes. In addition, traffic-related mitigation measures are also suggested in the following sections to ensure that disruption to the adjacent residents, businesses, and circulation within the area is minimized.

Construction work should be limited to the hours between 7:00 am and 6:00 pm. When feasible, materials being delivered to the site during the construction period should be scheduled for the least inconvenience to the public, or during non-peak commute hours to limit congestion.

The impact of construction traffic on the adjacent roadway operations within the study area will be temporary, but could last up to 2 years. The effects of the additional construction-related trips (i.e., trucks and construction employee trips) on the street system is considered to be negligible since these trips can be scheduled and their frequency increased during off-peak hours.

The specifics of a work-zone traffic control plan, which includes the use of flag personnel and lane channelization devices should be established in accordance with City guidelines. Flag personnel should be available at all times when construction traffic is present to ensure vehicle and pedestrian safety, and be used whenever trucks entering or leaving the project site may impede the flow of adjacent street traffic. The Contractor should ensure the safety of pedestrians by installing a construction fence on the project's perimeter.

7.3 Truck Routes and Staging Areas

The contractor should provide an estimate of truck volume and schedule. All earth-moving and ready-mix trucks should be equipped with two-way radios in order for the drivers at the staging areas to be linked to a traffic controller at the job site. The trucks should follow a City approved route to the job site – which would likely be Azusa Avenue to/from I-10 and SR-60.

The undercarriage and wheel areas of all trucks leaving the site during excavation operations should be hosed-down before entering City streets. If there is any accumulation of construction mud at the entrances to the project site or nearby streets, such areas should be cleaned.

7.4 Construction Parking

Construction-related parking (for construction employees) should be prohibited on all public streets. The Contractor should submit and obtain approval of a construction-parking program, which reflects the schedule of construction activities and locations of construction parking.

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
VENTURA FIELD OFFICE
2151 ALESSANDRO DRIVE, SUITE 255
VENTURA, CALIFORNIA 93001

March 6, 2001

REPLY TO
ATTENTION OF

Office of the Chief
Regulatory Branch

Mr. Paul Edelman
Santa Monica Mountains Conservancy
5810 Ramirez Canyon Road
Malibu, California 90265

Dear Mr. Edelman:

Recently, the Corps of Engineers Los Angeles District Regulatory Branch (Corps) accepted a proposal for payment of in-lieu mitigation fees to offset impacts to waters of the United States associated with BKK Corporation's proposed construction of a business park and golf course (Corps File No. 991582100-MDC). The project site is located in the City of West Covina, Los Angeles County, California.

The proposed project would result in permanent impacts to approximately 0.05 acres of waters of the United States. The Corps is adopting the California Regional Water Quality Control Board's mitigation ratio of 3:1 offsite compensatory mitigation for these impacts. Consequently, the total required mitigation is 0.15 acres. The Corps approves of the recommendation by BKK Corporation, through their authorized agent Vandermost Consulting Services, that they satisfy the offsite compensatory mitigation requirement by payment of in-lieu mitigation fees to the Santa Monica Mountains Conservancy.

We hereby request the Santa Monica Mountains Conservancy accept $15,000 (equivalent to 0.15 acres at $100,000 per acre) of project funds for use in implementing an aquatic habitat restoration/preservation project. Prior to expenditure of the funds, the Corps must be notified in writing, and shall confirm in writing, that the proposed expenditure meets the Corps' designated purpose.

We appreciate your assistance regarding this matter. If you have any questions, please contact Mark Cohen of my staff at (805) 585-2140.

Sincerely,

David Castanon

David J. Castanon
Chief, North Coast Section

CF: Sheri Cohen, Vandermost Consulting
Tony Klecha, RWQCB

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O BOX 532711
LOS ANGELES, CALIFORNIA 90053-2325

REPLY TO
ATTENTION OF

March 20, 2001

Office of the Chief
Regulatory Branch

DEPARTMENT OF THE ARMY NATIONWIDE PERMIT AUTHORIZATION

BKK Corporation
c/o Vandermost Consulting Services, Inc.
Attention: Sheri Cohen
27312 Calle Arroyo
San Juan Capistrano, CA 92675

Dear Ms. Cohen:

This is in reply to your request (No. 991582100-MDC) dated October 6, 1999, for Department of the Army authorization to permanently impact 0.05 acres of waters of the U.S. to discharge fill material associated with the construction of a business park and golf course in an unnamed tributary to Puente Creek in the City of West Covina, Los Angeles County, California. The applicant's work will impact two drainages, one measuring 1,875 square feet and located in the northeast corner of the site, and the other measuring 400 square feet and located on the western boundary of the site near Azusa Road.

The Corps of Engineers has determined that your proposed activity complies with the terms and conditions of nationwide permit 26 as described in enclosure 1. Furthermore, you must comply with the following non-discretionary Special Condition:

> To compensate for adverse impacts to the aquatic environment, the permittee shall create 0.15 acres of riparian habitat. Due to the lack of a suitable on-site location for mitigation, the permittee has elected to pursue an in-lieu fee agreement with the Santa Monica Mountains Conservancy (the Conservancy). Under the proposed agreement, the Conservancy will accept a payment of $15,000 for use in implementing an aquatic habitat restoration/preservation project. The commencement of work associated with this permit is conditioned on the Corps' receipt and approval of this in-lieu fee agreement

This letter of verification is valid for a period not to exceed two years unless the nationwide permit is modified, reissued, revoked, or expires before that time. Presently, nationwide permit 26 is scheduled to expire on February 11, 2002. It is incumbent upon you to remain informed of changes to the nationwide permits. We will issue a public notice announcing the changes when they occur. Furthermore, if you commence or are under contract to commence this activity before the date the nationwide permit is modified or revoked, you will have twelve months from the date of the modification or revocation to complete the

activity under the present terms and conditions of the nationwide permit.

A nationwide permit does not grant any property rights or exclusive privileges. Also, it does not authorize any injury to the property or rights of others or authorize interference with any existing or proposed Federal project. Furthermore, it does not obviate the need to obtain other Federal, state, or local authorizations required by law.

Thank you for participating in our regulatory program. If you have any questions, please contact Mark Cohen of my staff at (805) 585-2140.

Sincerely,

David Castanon
Chief, North Coast Section

Enclosure

LOS ANGELES DISTRICT
U.S. ARMY CORPS OF ENGINEERS

CERTIFICATION OF COMPLIANCE WITH DEPARTMENT OF THE ARMY NATIONWIDE PERMIT

Permit Number: *991582100-MDC*

Name of Permittee: *BKK Corporation*

Date of Issuance: *March, 20 2001*

Upon completion of the activity authorized by this permit and any mitigation required by the permit, sign this certification and return it to the following address:

U.S Army Corps of Engineers
Regulatory Branch
ATTN: CESPL-CO-R-991582100-MDC
P.O. Box 532711
Los Angeles, California 90053-2325

Please note that your permitted activity is subject to a compliance inspection by an Army Corps of Engineers representative. If you fail to comply with this nationwide permit you may be subject to permit suspension, modification, or revocation procedures as contained in 33 CFR 330.5 or enforcement procedures such as those contained in 33 CFR 326.4 and 326.5.

I hereby certify that the work authorized by the above referenced permit has been completed in accordance with the terms and conditions of the said permit, and required mitigation was completed in accordance with the permit condition(s).

_____ _____

Signature of Permittee Date

NATIONWIDE PERMIT NUMBER 26 TERMS AND CONDITIONS

1. Nationwide Permit 26 Terms:

Your activity is authorized under 26 and is subject to the following terms:

26. Fills Within 100-Year Floodplains. For purposes of this general condition, 100-year floodplains will be identified through the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps or FEMA-approved local floodplain maps.

(a) Discharges Below Headwaters. Discharges of dredged or fill material into waters of the United States resulting in permanent, above-grade fills within the 100-year floodplain at or below the point on a stream where the average annual flow is five cubic feet per second (i.e., below headwaters) are not authorized by NWPs 29, 39, 40, 42, 43, and 44. For NWPs 12 and 14, the prospective permittee must notify the District Engineer in accordance with General Condition 13 and the notification must include documentation that any permanent, above-grade fills in waters of the United States within the 100-year floodplain below headwaters comply with FEMA or FEMA-approved local floodplain construction requirements.

(b) Discharges in Headwaters (i.e., above the point on a stream where the average annual flow is five cubic feet per second).

(1) Flood Fringe. Discharges of dredged or fill material into waters of the United States resulting in permanent, above-grade fills within the flood fringe of the 100-year floodplain of headwaters are not authorized by NWPs 12, 14, 29, 39, 40, 42, 43, and 44, unless the prospective permittee notifies the District Engineer in accordance with General Condition 13. The notification must include documentation that such discharges comply with FEMA or FEMA-approved local floodplain construction requirements.

(2) Floodway. Discharges of dredged or fill material into waters of the United States resulting in permanent, above-grade fills within the floodway of the 100-year floodplain of headwaters are not authorized by NWPs 29, 39, 40, 42, 43, and 44. For NWPs 12 and 14, the permittee must notify the District Engineer in accordance with General Condition 13 and the notification must include documentation that any permanent, above grade fills proposed in the floodway comply with FEMA or FEMA-approved local floodplain construction requirements.

2. Nationwide Permit General Conditions

The following general conditions must be followed in order for any authorization by a NWP to be valid:

1. Navigation. No activity may cause more than a minimal adverse effect on navigation.
2. Proper Maintenance. Any structure or fill authorized shall be properly maintained, including maintenance to ensure public safety.
3. Soil Erosion and Sediment Controls. Appropriate soil erosion and sediment controls must be used and maintained in effective operating condition during construction, and all exposed soil and other fills, as well as any work below the ordinary high water mark or high tide line, must be permanently stabilized at the earliest practicable date.
4. Aquatic Life Movements. No activity may substantially disrupt the movement of those species of aquatic life indigenous to the waterbody, including those species that normally migrate through the area, unless the activity's primary purpose is to impound water. Culverts placed in streams must be installed to maintain low flow conditions.
5. Equipment. Heavy equipment working in wetlands must be placed on mats, or other measures must be taken to minimize soil disturbance.
6. Regional and Case-By-Case Conditions. The activity must comply with any regional conditions that may have been added by the division engineer (see 33 CFR 330.4(e)) and with any case specific conditions added by the Corps or by the State or tribe in its Section 401 water quality certification and Coastal Zone Management Act consistency determination.
7. Wild and Scenic Rivers. No activity may occur in a component of the National Wild and Scenic River System; or in a river officially designated by Congress as a "study river" for possible inclusion in the system, while the river is in an official study status; unless the appropriate Federal agency, with direct management responsibility for such river, has determined in writing that the proposed activity will not adversely affect the Wild and Scenic River designation, or study status. Information on Wild and Scenic Rivers may be obtained from the appropriate Federal land management agency in the area (e.g., National Park Service, U.S. Forest Service, Bureau of Land Management, U.S. Fish and Wildlife Service).
8. Tribal Rights. No activity or its operation may impair reserved tribal rights, including, but not limited to, reserved water rights and treaty fishing and hunting rights.
9. Water Quality.
   (a) In certain States and tribal lands an individual 401 water quality certification must be obtained or waived (See 33 CFR 330.4(c)).
   (b) For NWPs 12, 14, 17, 18, 32, 39, 40, 42, 43, and 44, where the State or tribal 401 certification (either generically or individually) does not require or approve a water quality management plan, the permittee must include design criteria and techniques that will ensure that the authorized work does not result in more than minimal degradation of water quality. An important component of a water quality management plan includes stormwater management that minimizes degradation of the downstream aquatic system, including water quality. Refer to General Condition 21 for stormwater management requirements. Another important component of a water quality management plan is the establishment and maintenance of vegetated buffers next to open waters, including streams. Refer to General Condition 19 for vegetated buffer requirements for the NWPs.
10. Coastal Zone Management. In certain states, an individual state coastal zone management consistency concurrence must be obtained or waived (see Section 330.4(d)).
11. Endangered Species.
    (a) No activity is authorized under any NWP which is likely to jeopardize the continued existence of a threatened or endangered species or a species proposed for such

designation, as identified under the Federal Endangered Species Act, or which will destroy or adversely modify the critical habitat of such species. Non-federal permittees shall notify the District Engineer if any listed species or designated critical habitat might be affected or is in the vicinity of the project, or is located in the designated critical habitat and shall not begin work on the activity until notified by the District Engineer that the requirements of the Endangered Species Act have been satisfied and that the activity is authorized. For activities that may affect Federally-listed endangered or threatened species or designated critical habitat, the notification must include the name(s) of the endangered or threatened species that may be affected by the proposed work or that utilize the designated critical habitat that may be affected by the proposed work. As a result of formal or informal consultation with the FWS or NMFS, the District Engineer may add species-specific regional endangered species conditions to the NWPs.

(b) Authorization of an activity by a nationwide permit does not authorize the "take" of a threatened or endangered species as defined under the Federal Endangered Species Act. In the absence of separate authorization (e.g., an ESA Section 10 Permit, a Biological Opinion with "incidental take" provisions, etc.) from the U.S. Fish and Wildlife Service or the National Marine Fisheries Service, both lethal and non-lethal "takes" of protected species are in violation of the Endangered Species Act. Information on the location of threatened and endangered species and their critical habitat can be obtained directly from the offices of the U.S. Fish and Wildlife Service and National Marine Fisheries Service or their world wide web pages at http://endangered.fws.gov/ and http://www.nmfs.noaa.gov/prot_res/esahome.html, respectively.

12. Historic Properties. No activity which may affect historic properties listed, or eligible for listing, in the National Register of Historic Places is authorized, until the DE has complied with the provisions of 33 CFR Part 325, Appendix C. The prospective permittee must notify the District Engineer if the authorized activity may affect any historic properties listed, determined to be eligible, or which the prospective permittee has reason to believe may be eligible for listing on the National Register of Historic Places, and shall not begin the activity until notified by the District Engineer that the requirements of the National Historic Preservation Act have been satisfied and that the activity is authorized. Information on the location and existence of historic resources can be obtained from the State Historic Preservation Office and the National Register of Historic Places (see 33 CFR 330.4(g)). For activities that may affect historic properties listed in, or eligible for listing in, the National Register of Historic Places, the notification must state which historic property may be affected by the proposed work or include a vicinity map indicating the location of the historic property.

13. Notification.

(a) Timing: Where required by the terms of the NWP, the prospective permittee must notify the District Engineer with a preconstruction notification (PCN) as early as possible. The District Engineer must determine if the PCN is complete within 30 days of the date of receipt and can request the additional information necessary to make the PCN complete only once. However, if the prospective permittee does not provide all of the requested information, then the District Engineer will notify the prospective permittee that the PCN is still incomplete and the PCN review process will not commence until all of the requested information has been received by the District Engineer. The prospective permittee shall not begin the activity:

(1) Until notified in writing by the District Engineer that the activity may proceed under the NWP with any special conditions imposed by the District or Division Engineer; or

(2) If notified in writing by the District or Division Engineer that an individual permit is required; or

(3) Unless 45 days have passed from the District Engineer's receipt of the complete notification and the prospective permittee has not received written notice from the District or Division Engineer. Subsequently, the permittee's right to proceed under the NWP may be modified, suspended, or revoked only in accordance with the procedure set forth in 33 CFR 330.5(d)(2).

(b) Contents of Notification: The notification must be in writing and include the following information:

(1) Name, address, and telephone numbers of the prospective permittee;

(2) Location of the proposed project;

(3) Brief description of the proposed project; the project's purpose; direct and indirect adverse environmental effects the project would cause; any other NWP(s), regional general permit(s), or individual permit(s) used or intended to be used to authorize any part of the proposed project or any related activity; and

(4) For NWPs 7, 12, 14, 18, 21, 34, 38, 39, 40, 42, and 43, the PCN must also include a delineation of affected special aquatic sites, including wetlands, vegetated shallows (e.g., submerged aquatic vegetation, seagrass beds), and riffle and pool complexes (see paragraph 13(f));

(5) For NWP 7, Outfall Structures and Maintenance, the PCN must include information regarding the original design capacities and configurations of those areas of the facility where maintenance dredging or excavation is proposed.

(6) For NWP 14, Linear Transportation Crossings, the PCN must include a compensatory mitigation proposal to offset permanent losses of waters of the United States and a statement describing how temporary losses of waters of the United States will be minimized to the maximum extent practicable.

(7) For NWP 21, Surface Coal Mining Activities, the PCN must include an Office of Surface Mining (OSM) or state-approved mitigation plan.

(8) For NWP 27, Stream and Wetland Restoration, the PCN must include documentation of the prior condition of the site that will be reverted by the permittee.

(9) For NWP 29, Single-Family Housing, the PCN must also include:

(i) Any past use of this NWP by the individual permittee and/or the permittee's spouse;

(ii) A statement that the single-family housing activity is for a personal residence of the permittee;

(iii) A description of the entire parcel, including its size, and a delineation of wetlands. For the purpose of this NWP, parcels of land measuring 1/4 acre or less will not require a formal on-site delineation. However, the applicant shall provide an indication of where the wetlands are and the amount of wetlands that exists on the property. For parcels greater than 1/4 acre in size, a formal wetland delineation must be prepared in accordance with the current method required by the Corps. (See paragraph 13(f));

(iv) A written description of all land (including, if available, legal descriptions) owned by the prospective permittee and/or the prospective permittee's spouse, within a one mile radius of the parcel, in any form of ownership (including any land owned as a partner, corporation, joint tenant, co-tenant, or as a tenant-by-the-entirety) and any land on which a purchase and sale agreement or other contract for sale or purchase has been executed;

(10) For NWP 31, Maintenance of Existing Flood Control Projects, the prospective permittee must either notify the District Engineer with a PCN prior to each

maintenance activity or submit a five year (or less) maintenance plan. In addition, the PCN must include all of the following:

(i) Sufficient baseline information so as to identify the approved channel depths and configurations and existing facilities. Minor deviations are authorized, provided the approved flood control protection or drainage is not increased;

(ii) A delineation of any affected special aquatic sites, including wetlands; and,

(iii) Location of the dredged material disposal site.

(11) For NWP 33, Temporary Construction, Access, and Dewatering, the PCN must also include a restoration plan of reasonable measures to avoid and minimize adverse effects to aquatic resources.

(12) For NWPs 39, 43, and 44, the PCN must also include a written statement to the District Engineer explaining how avoidance and minimization of losses of waters of the United States were achieved on the project site.

13) For NWP 39, Residential, Commercial, and Institutional Developments, the PCN must include a compensatory mitigation proposal that offsets unavoidable losses of waters of the United States or justification explaining why compensatory mitigation should not be required.

(14) For NWP 40, Agricultural Activities, the PCN must include a compensatory mitigation proposal to offset losses of waters of the United States.

(15) For NWP 43, Stormwater Management Facilities, the PCN must include, for the construction of new stormwater management facilities, a maintenance plan (in accordance with State and local requirements, if applicable) and a compensatory mitigation proposal to offset losses of waters of the United States.

(16) For NWP 44, Mining Activities, the PCN must include a description of all waters of the United States adversely affected by the project, a description of measures taken to minimize adverse effects to waters of the United States, a description of measures taken to comply with the criteria of the NWP, and a reclamation plan (for aggregate mining activities in isolated waters and non-tidal wetlands adjacent to headwaters and any hard rock/mineral mining activities).

(17) For activities that may adversely affect Federally-listed endangered or threatened species, the PCN must include the name(s) of those endangered or threatened species that may be affected by the proposed work or utilize the designated critical habitat that may be affected by the proposed work.

(18) For activities that may affect historic properties listed in, or eligible for listing in, the National Register of Historic Places, the PCN must state which historic property may be affected by the proposed work or include a vicinity map indicating the location of the historic property.

(19) For NWPs 12, 14, 29, 39, 40, 42, 43, and 44, where the proposed work involves discharges of dredged or fill material into waters of the United States resulting in permanent, above-grade fills within 100-year floodplains (as identified on FEMA's Flood Insurance Rate Maps or FEMA-approved local floodplain maps), the notification must include documentation demonstrating that the proposed work complies with the appropriate FEMA or FEMA-approved local floodplain construction requirements.

(c) Form of Notification: The standard individual permit application form (Form ENG 4345) may be used as the notification but must clearly indicate that it is a PCN and must include all of the information required in (b) (1)-(19) of General Condition 13. A letter containing the requisite information may also be used.

(d) District Engineer's Decision: In reviewing the PCN for the proposed activity, the District Engineer will determine whether the activity authorized by the NWP will result in more than minimal individual or cumulative adverse environmental effects or may be contrary to the public interest. The prospective permittee may, optionally, submit a proposed mitigation plan with the PCN to expedite the process and the District Engineer will consider any proposed compensatory mitigation the applicant has included in the proposal in determining whether the net adverse environmental effects to the aquatic environment of the proposed work are minimal. If the District Engineer determines that the activity complies with the terms and conditions of the NWP and that the adverse effects on the aquatic environment are minimal, the District Engineer will notify the permittee and include any conditions the District Engineer deems necessary.

Any compensatory mitigation proposal must be approved by the District Engineer prior to commencing work. If the prospective permittee is required to submit a compensatory mitigation proposal with the PCN, the proposal may be either conceptual or detailed. If the prospective permittee elects to submit a compensatory mitigation plan with the PCN, the District Engineer will expeditiously review the proposed compensatory mitigation plan. The District Engineer must review the plan within 45 days of receiving a complete PCN and determine whether the conceptual or specific proposed mitigation would ensure no more than minimal adverse effects on the aquatic environment. If the net adverse effects of the project on the aquatic environment (after consideration of the compensatory mitigation proposal) are determined by the District Engineer to be minimal, the District Engineer will provide a timely written response to the applicant stating that the project can proceed under the terms and conditions of the nationwide permit.

If the District Engineer determines that the adverse effects of the proposed work are more than minimal, then he will notify the applicant either: (1) that the project does not qualify for authorization under the NWP and instruct the applicant on the procedures to seek authorization under an individual permit; (2) that the project is authorized under the NWP subject to the applicant's submission of a mitigation proposal that would reduce the adverse effects on the aquatic environment to the minimal level; or (3) that the project is authorized under the NWP with specific modifications or conditions. Where the District Engineer determines that mitigation is required in order to ensure no more than minimal adverse effects on the aquatic environment, the activity will be authorized within the 45-day PCN period, including the necessary conceptual or specific mitigation or a requirement that the applicant submit a mitigation proposal that would reduce the adverse effects on the aquatic environment to the minimal level. When conceptual mitigation is included, or a mitigation plan is required under item (2) above, no work in waters of the United States will occur until the District Engineer has approved a specific mitigation plan.

(e) Agency Coordination: The District Engineer will consider any comments from Federal and State agencies concerning the proposed activity's compliance with the terms and conditions of the NWPs and the need for mitigation to reduce the project's adverse effects on the aquatic environment to a minimal level.

For activities requiring notification to the District Engineer that result in the loss of greater than 1/2 acre of waters of the United States, the District Engineer will, upon receipt of a notification, provide immediately (e.g., via facsimile transmission, overnight mail, or other expeditious manner), a copy to the appropriate offices of the Fish and Wildlife Service, State natural resource or water quality agency, EPA, State Historic Preservation Officer (SHPO), and, if appropriate, the National Marine Fisheries Service. With the exception of NWP 37, these agencies will then have 10 calendar days from the date the material is transmitted to telephone or fax the District Engineer notice that

they intend to provide substantive, site-specific comments. If so contacted by an agency, the District Engineer will wait an additional 15 calendar days before making a decision on the notification. The District Engineer will fully consider agency comments received within the specified time frame, but will provide no response to the resource agency, except as provided below. The District Engineer will indicate in the administrative record associated with each notification that the resource agencies' concerns were considered. As required by Section 305(b)(4)(B) of the Magnuson-Stevens Fishery Conservation and Management Act, the District Engineer will provide a response to National Marine Fisheries Service within 30 days of receipt of any Essential Fish Habitat conservation recommendations. Applicants are encouraged to provide the Corps multiple copies of notifications to expedite agency notification.

(f) Wetlands Delineations: Wetland delineations must be prepared in accordance with the current method required by the Corps. For NWP 29 see paragraph (b)(9)(iii) for parcels less than 1/4 acre in size. The permittee may ask the Corps to delineate the special aquatic site. There may be some delay if the Corps does the delineation. Furthermore, the 45-day period will not start until the wetland delineation has been completed and submitted to the Corps, where appropriate.

14. Compliance Certification. Every permittee who has received a Nationwide permit verification from the Corps will submit a signed certification regarding the completed work and any required mitigation. The certification will be forwarded by the Corps with the authorization letter. The certification will include: a.) A statement that the authorized work was done in accordance with the Corps authorization, including any general or specific conditions; b.) A statement that any required mitigation was completed in accordance with the permit conditions; and c.) The signature of the permittee certifying the completion of the work and mitigation.

15. Use of Multiple Nationwide Permits. The use of more than one NWP for a single and complete project is prohibited, except when the acreage loss of waters of the United States authorized by the NWPs does not exceed the acreage limit of the NWP with the highest specified acreage limit. For example, if a road crossing over tidal waters is constructed under NWP 14, with associated bank stabilization authorized by NWP 13, the maximum acreage loss of waters of the United States for the total project cannot exceed 1/3 acre.

16. Water Supply Intakes. No activity, including structures and work in navigable waters of the United States or discharges of dredged or fill material, may occur in the proximity of a public water supply intake except where the activity is for repair of the public water supply intake structures or adjacent bank stabilization.

17. Shellfish Beds. No activity, including structures and work in navigable waters of the United States or discharges of dredged or fill material, may occur in areas of concentrated shellfish populations, unless the activity is directly related to a shellfish harvesting activity authorized by NWP 4.

18. Suitable Material. No activity, including structures and work in navigable waters of the United States or discharges of dredged or fill material, may consist of unsuitable material (e.g., trash, debris, car bodies, asphalt, etc.) and material used for construction or discharged must be free from toxic pollutants in toxic amounts (see Section 307 of the Clean Water Act).

19. Mitigation. The project must be designed and constructed to avoid and minimize adverse effects to waters of the United States to the maximum extent practicable at the project site (i.e., on site). Mitigation will be required when necessary to ensure that the adverse effects to the aquatic environment are minimal. The District Engineer will consider the factors discussed below when determining the acceptability of appropriate and practicable mitigation necessary to offset adverse effects on the aquatic environment that are more than minimal.

(a) To be practicable, the mitigation must be available and capable of being done considering costs, existing technology, and logistics in light of the overall project purposes. Examples of mitigation that may be appropriate and practicable include, but are not limited to: reducing the size of the project; establishing and maintaining wetland or upland vegetated buffers to protect open waters such as streams; and replacing losses of aquatic resource functions and values by creating, restoring, enhancing, or preserving similar functions and values, preferably in the same watershed;

(b) The District Engineer will require restoration, creation, enhancement, or preservation of other aquatic resources in order to offset the authorized impacts to the extent necessary to ensure that the adverse effects on the aquatic environment are minimal. An important element of any compensatory mitigation plan for projects in or near streams or other open waters is the establishment and maintenance, to the maximum extent practicable, of vegetated buffers next to open waters on the project site. The vegetated buffer should consist of native species. The District Engineer will determine the appropriate width of the vegetated buffer and in which cases it will be required. Normally, the vegetated buffer will be 25 to 50 feet wide on each side of the stream, but the District Engineer may require wider vegetated buffers to address documented water quality concerns. If there are open waters on the project site and the District Engineer requires compensatory mitigation for wetland impacts to ensure that the net adverse effects on the aquatic environment are minimal, any vegetated buffer will comprise no more than 1/3 of the remaining compensatory mitigation acreage after the permanently filled wetlands have been replaced on a one-to-one acreage basis. In addition, compensatory mitigation must address adverse effects on wetland functions and values and cannot be used to offset the acreage of wetland losses that would occur in order to meet the acreage limits of some of the NWPs (e.g., for NWP 39, 1/4 acre of wetlands cannot be created to change a 1/2 acre loss of wetlands to a 1/4 acre loss; however, 1/2 acre of created wetlands can be used to reduce the impacts of a 1/3 acre loss of wetlands). If the prospective permittee is required to submit a compensatory mitigation proposal with the PCN, the proposal may be either conceptual or detailed.

(c) To the extent appropriate, permittees should consider mitigation banking and other appropriate forms of compensatory mitigation. If the District Engineer determines that compensatory mitigation is necessary to offset losses of waters of the United States and ensure that the net adverse effects of the authorized work on the aquatic environment are minimal, consolidated mitigation approaches, such as mitigation banks, will be the preferred method of providing compensatory mitigation, unless the District Engineer determines that activity-specific compensatory mitigation is more appropriate, based on which is best for the aquatic environment. These types of mitigation are preferred because they involve larger blocks of protected aquatic environment, are more likely to meet the mitigation goals, and are more easily checked for compliance. If a mitigation bank or other consolidated mitigation approach is not available in the watershed, the District Engineer will consider other appropriate forms of compensatory mitigation to offset the losses of waters of the United States to ensure that the net adverse effects of the authorized work on the aquatic environment are minimal.

20. Spawning Areas. Activities, including structures and work in navigable waters of the United States or discharges of dredged or fill material, in spawning areas during spawning seasons must be avoided to the maximum extent practicable. Activities that result in the physical destruction (e.g., excavate, fill, or smother downstream by substantial turbidity) of an important spawning area are not authorized.

21. Management of Water Flows. To the maximum extent practicable, the activity must be designed to maintain preconstruction downstream flow conditions (e.g., location, capacity,

and flow rates). Furthermore, the activity must not permanently restrict or impede the passage of normal or expected high flows (unless the primary purpose of the fill is to impound waters) and the structure or discharge of dredged or fill material must withstand expected high flows. The activity must, to the maximum extent practicable, provide for retaining excess flows from the site, provide for maintaining surface flow rates from the site similar to preconstruction conditions, and must not increase water flows from the project site, relocate water, or redirect water flow beyond preconstruction conditions. In addition, the activity must, to the maximum extent practicable, reduce adverse effects such as flooding or erosion downstream and upstream of the project site, unless the activity is part of a larger system designed to manage water flows.

22. Adverse Effects From Impoundments. If the activity, including structures and work in navigable waters of the United States or discharge of dredged or fill material, creates an impoundment of water, adverse effects on the aquatic system caused by the accelerated passage of water and/or the restriction of its flow shall be minimized to the maximum extent practicable.

23. Waterfowl Breeding Areas. Activities, including structures and work in navigable waters of the United States or discharges of dredged or fill material, into breeding areas for migratory waterfowl must be avoided to the maximum extent practicable.

24. Removal of Temporary Fills. Any temporary fills must be removed in their entirety and the affected areas returned to their preexisting elevation.

25. Designated Critical Resource Waters. Critical resource waters include, NOAA-designated marine sanctuaries, National Estuarine Research Reserves, National Wild and Scenic Rivers, critical habitat for Federally listed threatened and endangered species, coral reefs, State natural heritage sites, and outstanding national resource waters or other waters officially designated by a State as having particular environmental or ecological significance and identified by the District Engineer after notice and opportunity for public comment. The District Engineer may also designate additional critical resource waters after notice and opportunity for comment.

(a) Except as noted below, discharges of dredged or fill material into waters of the United States are not authorized by NWPs 7, 12, 14, 16, 17, 21, 29, 31, 35, 39, 40, 42, 43, and 44 for any activity within, or directly affecting, critical resource waters, including wetlands adjacent to such waters. Discharges of dredged or fill materials into waters of the United States may be authorized by the above NWPs in National Wild and Scenic Rivers if the activity complies with General Condition 7. Further, such discharges may be authorized in designated critical habitat for Federally listed threatened or endangered species if the activity complies with General Condition 11 and the U.S. Fish and Wildlife Service or the National Marine Fisheries Service has concurred in a determination of compliance with this condition.

(b) For NWPs 3, 8, 10, 13, 15, 18, 19, 22, 23, 25, 27, 28, 30, 33, 34, 36, 37, and 38, notification is required in accordance with General Condition 13, for any activity proposed in the designated critical resource waters including wetlands adjacent to those waters. The District Engineer may authorize activities under these NWPs only after he determines that the impacts to the critical resource waters will be no more than minimal.

26. Fills Within 100-Year Floodplains. For purposes of this general condition, 100-year floodplains will be identified through the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps or FEMA-approved local floodplain maps.

(a) Discharges Below Headwaters. Discharges of dredged or fill material into waters of the United States resulting in permanent, above-grade fills within the 100-year floodplain at or below the point on a stream where the average annual flow is five cubic feet per second (i.e., below headwaters) are not authorized by NWPs 29, 39, 40, 42, 43, and 44. For NWPs 12 and 14, the prospective permittee must notify the District Engineer in accordance with General Condition 13 and the notification must include documentation that any permanent, above-grade fills in waters of the United States within the 100-year floodplain below headwaters comply with FEMA or FEMA-approved local floodplain construction requirements.

(b) Discharges in Headwaters (i.e., above the point on a stream where the average annual flow is five cubic feet per second).

(1) Flood Fringe. Discharges of dredged or fill material into waters of the United States resulting in permanent, above-grade fills within the flood fringe of the 100-year floodplain of headwaters are not authorized by NWPs 12, 14, 29, 39, 40, 42, 43, and 44, unless the prospective permittee notifies the District Engineer in accordance with General Condition 13. The notification must include documentation that such discharges comply with FEMA or FEMA-approved local floodplain construction requirements.

(2) Floodway. Discharges of dredged or fill material into waters of the United States resulting in permanent, above-grade fills within the floodway of the 100-year floodplain of headwaters are not authorized by NWPs 29, 39, 40, 42, 43, and 44. For NWPs 12 and 14, the permittee must notify the District *Engineer in accordance with General Condition 13 and the notification must include documentation that any permanent, above grade fills proposed in the floodway comply with FEMA or FEMA-approved local floodplain construction requirements.*

3. Further information:

A. Congressional Authorities: You have been authorized to undertake the activity described above pursuant to:

( ) Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403).

( ) Section 404 of the Clean Water Act (33 U.S.C. 1344).

B. Limits of this authorization.

1. This permit does not obviate the need to obtain other Federal, state, or local authorizations required by law.

2. This permit does not grant any property rights or exclusive privileges.

3. This permit does not authorize any injury to the property or rights of others.

4. This permit does not authorize interference with any existing or proposed Federal project.

C. Limits of Federal Liability. In issuing this permit, the Federal Government does not assume any liability for the following:

1. Damages to the permitted project or uses thereof as a result of other permitted or unpermitted activities or from natural causes.

2. Damages to the permitted project or uses thereof as a result of current or future activities undertaken by or on behalf of the United States in the public interest.

3. Damages to persons, property, or to other permitted or unpermitted activities or structures caused by the activity authorized by this permit.

4. Design or construction deficiencies associated with the permitted work.

5. Damage claims associated with any future modification, suspension, or revocation of this permit.

D. Reliance on Applicant's Data: The determination of this office that issuance of this permit is not contrary to the public interest was made in reliance on the information you provided.

E. Reevaluation of Permit Decision. This office may reevaluate its decision on this permit at any time the circumstances warrant. Circumstances that could require a reevaluation include, but are not limited to, the following:

1. You fail to comply with the terms and conditions of this permit.

2. The information provided by you in support of your permit application proves to have been false, incomplete, or inaccurate (See 4 above).

3. Significant new information surfaces which this office did not consider in reaching the original public interest decision.

Such a reevaluation may result in a determination that it is appropriate to use the suspension, modification, and revocation procedures contained in 33 CFR 330.5 or enforcement procedures such as those contained in 33 CFR 326.4 and 326.5. The referenced enforcement procedures provide for the issuance of an administrative order requiring you to comply with the terms and conditions of your permit and for the initiation of legal action where appropriate. You will be required to pay for any corrective measure ordered by this office, and if you fail to comply with such directive, this office may in certain situations (such as those specified in 33 CFR 209.170) accomplish the corrective measures by contract or otherwise and bill you for the cost.

F. This letter of verification is valid for a period not to exceed two years unless the nationwide permit is modified, reissued, revoked, or expires before that time.

G. You must maintain the activity authorized by this permit in good condition and in conformance with the terms and conditions of this permit. You are not relieved of this requirement if you abandon the permitted activity, although you may make a good faith transfer to a third party in compliance with General Condition H below. Should you wish to cease to maintain the authorized activity or should you desire to abandon it without a good faith transfer, you must obtain a modification of this permit from this office, which may require restoration of the area.

H. If you sell the property associated with this permit, you must obtain the signature of the new owner in the space provided and forward a copy of the permit to this office to validate the transfer of this authorization.

I. You must allow representatives from this office to inspect the authorized activity at any time deemed necessary to ensure that it is being or has been accomplished with the terms and conditions of your permit.

VANDERMOST CONSULTING SERVICES, INC.
Government Affairs • Community Relations • Regulatory Assistance

April 22, 2002

Mr. Mark Cohen
U.S. Army Corps of Engineers
2151 Alessandro Dr., #255
Ventura, CA 93001

Subject: San Hose Hills Project NWP # 26 (No. 991582100-MDC)

Dear Mark:

On behalf of BKK Corporation, Vandermost Consulting Services, Inc. (VCS) submitted a Section 404 application on October 6, 1999 for the San Jose Hills Development, including a technology park, golf course, and clubhouse located in West Covina, CA. As described in the application, impacts to "waters of the U.S." total 0.05 acre of ephemeral, non-wetland waters.

The Corps issued a Nationwide Permit (NWP) # 26 on March 20, 2001, which is attached as Appendix A. According to the January 15, 2002 Federal Register Notice, NWP # 26 expired on February 11, 2002. The NWP program was reissued on March 18, 2002. The project as originally proposed has not changed and based on our review, meets the requirements of the new NWP # 39 and related general conditions.

Please let this letter serve as a request for reauthorization under the March 18, 2002 NWP # 39. Please contact me at 949-489-2700 ext. 206 with any questions.

Sincerely,

Sherri Cohen
Project Manager

cc: Jacquie Smith, San Jose Hills Development

27312 Calle Arroyo • San Juan Capistrano, California 92675
949.489.2700 • Fax 949.489.0309

inston H. Hickox
Secretary for
Environmental
tion

California Regional Water Quality Control Board

Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura Counties)

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: http://www.swrcb.ca.gov/rwqcb4

Gray Davis
Governor

Jacquie Smith
BKK Corporation
2210 South Azusa Avenue
West Covina, CA 91792

CONDITIONAL CERTIFICATION FOR PROPOSED SAN JOSE HILLS DEVELOPEMENT PROJECT (Corps' Project No. 1999-15821-MC), PUENTE CREEK, CITY OF WEST COVINA, LOS ANGELES COUNTY (File No. 00-148)

Dear Ms. Smith:

Regional Board staff has reviewed your request on behalf of BKK Corporation (the Applicant) for a Clean Water Act Section 401 Water Quality Certification for the above referenced project. Your application was deemed complete on February 28, 2001.

I hereby certify that there is a reasonable assurance that the discharge from the San Jose Hills Development Project, as proposed and described in Attachment A, if performed in accordance with all applicable water quality objectives, prohibitions, and policies set forth in the *Water Quality Control Plan, Los Angeles Region* (1994), and in accordance with the conditions specified in Attachment B, will comply with the applicable water quality standards and other appropriate requirements, including the provisions of Sections 301, 302, 303, 306, and 307 of the Clean Water Act.

The Applicant shall be liable civilly for any violations of this certification in accordance with the California Water Code. This Certification does not eliminate the Applicant's responsibility to comply with any other applicable laws, requirements and/or permits.

Should you have questions concerning this certification action, please contact Anthony Klecha, Lead, Section 401 Program, at (213) 576-6785.

Dennis A. Dickerson
Executive Officer

March 13, 2001
Date

DISTRIBUTION LIST

Sherri Cohen
Vandermost Consulting Services, Inc.
27312 Calle Arroyo
San Juan Capistrano, CA 92675

Oscar Balaguer
State Water Resources Control Board
Division of Water Quality
P.O. Box 944213
Sacramento, CA 94244-2130

Leslie Mac Nair
California Department of Fish and Game
Streambed Alteration Team
4949 View Ridge Avenue
San Diego, CA 92123

Mark Cohen
U.S. Army Corps of Engineers
Regulatory Branch, Ventura Field Office
2151 Alessandro Drive, Suite 255
Ventura, CA 93001

Steven John
U.S. Environmental Protection Agency
c/o U.S. Army Corps of Engineers
Regulatory Branch, Los Angeles District
P.O. Box 532711
Los Angeles, CA 90053-2325

Director of Water Division (WTR-1)
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Ken Berg
U.S. Fish and Wildlife Service
2730 Loker Avenue West
Carlsbad, CA 92008

ATTACHMENT A

Project Information
File No. 00-148

1. Applicant:

BKK Corporation
2210 South Azusa Avenue
West Covina, CA 91792
Phone: (626) 965-0911 Fax: (626) 965-9569

2. Applicant's Agent:

Sherri Cohen
Vandermost Consulting Services, Inc.
27312 Calle Arroyo
San Juan Capistrano, CA 92675
Phone: (949) 489-2700 x206 Fax: (949) 489-0309

3. Project Name:

San Jose Hills Development

4. Project Location:

City of West Covina, Los Angeles County

5. Type of Project:

Business park & golf course development

6. Project Description:

The proposed project involves the construction of a technology park and an 18-hole public golf course and clubhouse on approximately 276 acres. The BKK property totals approximately 656 acres, and includes a closed Class I Landfill (Mixed-hazardous and Non-hazardous Municipal Solid Waste), a closed Class III Landfill (Non-hazardous Municipal Solid Waste), related ancillary uses, and approximately 73 acres of undisturbed hillside. Seven holes of the golf course and most of the driving range will be located on 50 acres of the top deck of closed Class III Landfill. The remaining 11 holes and clubhouse will be built on non-landfill area north and notheast of the closed landfills. No development will occur on the closed Class I Landfill.

7. Federal Agency/Permit:

U.S. Army Corps of Engineers
NWP No. 26 (Permit No. 1999-15821-MC)

8. Other Required Regulatory Approvals:

California Department of Fish and Game
Streambed Alteration Agreement (Notification No. 5-256-00)

Project Information
File No. 00-148

9.	California Environmental Quality Act (CEQA) Compliance:	The West Covina City Council approved the project's Final Environmental Impact Report (SCH No. 98061114) on October 17, 2000.
10.	Receiving Water:	Unnamed drainages tributary to Puente Creek (Hydrologic Unit No. 405.41)
11.	Designated Beneficial Uses:	MUN, GWR, REC-1, REC-2, WARM, WILD
12.	Impacted Waters of the United States:	Non-wetland waters (vegetated streambed): 0.053 permanent acres
13.	Dredge Volume:	0 cubic yards
14.	Related Projects Implemented/to be Implemented by the Applicant:	None
15.	Avoidance/ Minimization Activities:	The Applicant has proposed to implement several Best Management Practices (BMPs) during construction, including, but not limited to: • Visual monitoring of runoff shall be conducted; • Visual monitoring shall be conducted to detect erosion; • Temporary runoff diversion structures shall be constructed, as necessary, to limit severe erosion and protect stockpiles of earth and other construction related materials from being transported from the site by the force of wind or water; • In accordance with NPDES requirements, a Storm Water Pollution Prevention Plan shall be prepared and implemented to identify monitoring and soil stabilization and control practices during construction;

- Construction activities shall be curtailed during precipitation events that may result in significant runoff;

- Fuels, oils, solvents and other toxic materials will be stored in accordance with their listing and are not to contaminate the soil and surface waters. All approved storage containers are to be protected from the weather. Spills will be cleaned up immediately and disposed of in a proper manner. Spills may not be washed into the drainage system;

- Excess or waste concrete may not be washed into the public way or any other drainage system;

- Trash and construction related solid waste shall be deposited into a covered receptacle to prevent contamination of rainwater and dispersal by wind; and

- Sediments and other materials may not be tracked from the site by vehicle traffic. The construction entrance roadways must be stabilized so as to inhibit sediments from being deposited into the public way. Accidental depositions must be swept up immediately and may not be washed down by rain or other means.

In addition, the following BMPs will be implemented to reduce pesticide leaching and runoff from the proposed golf course:

- Avoid the use of herbicides, fertilizers and artificial irrigation within the natural plant communities; and

- Apply non-specific pesticides to control pest populations only when necessary (not as a preventative measure) and when public access is prohibited.

16. Proposed Compensatory Mitigation:

The Applicant has proposed to contribute in-lieu fees to the Santa Monica Mountains Conservancy for the creation or restoration of 0.15 acres of comparable habitat (an approximate 3:1 mitigation ratio).

ATTACHMENT B

Conditions of Certification
File No. 00-148

STANDARD CONDITIONS

Pursuant to §3860 of Title 23 of the California Code of Regulations (23 CCR), the following three standard conditions shall apply to this project:

1. This certification action is subject to modification or revocation upon administrative or judicial review, including review and amendment pursuant to §13330 of the California Water Code and Article 6 (commencing with 23 CCR Section 3867).

2. This certification action is not intended and shall not be construed to apply to any activity involving a hydroelectric facility and requiring a Federal Energy Regulatory Commission (FERC) license or an amendment to a FERC license unless the pertinent certification application was filed pursuant to 23 CCR Subsection 3855(b) and the application specifically identified that a FERC license or amendment to a FERC license for a hydroelectric facility was being sought.

3. Certification is conditioned upon total payment of any fee required pursuant to 23 CCR Chapter 28 and owed by the Applicant.

ADDITIONAL CONDITIONS

Pursuant to 23 CCR Section 3859(a), the Applicant shall comply with the following additional conditions:

1. The Applicant shall submit to this Regional Board copies of any other final permits and agreements required for this project, including, but not limited to, the U.S. Army Corps of Engineers' Section 404 Permit and the California Department of Fish and Game's Streambed Alteration Agreement. **These documents shall be submitted prior to any discharge to waters of the state.**

2. Fueling, lubrication, maintenance, operation, and storage of vehicles and equipment shall not result in a discharge or a threatened discharge to waters of the state. At no time shall the Applicant use any vehicle or equipment which leaks any substance that may impact water quality. Staging and storage areas for vehicles and equipment shall be located outside of waters of the state.

3. No construction material, spoils, debris, or any other substances associated with this project that may adversely impact water quality standards, shall be located in a manner which may result in a discharge or a threatened discharge to waters of the state.

4. No activities shall involve wet excavations (i.e., no excavations shall occur below the seasonal high water table). A minimum **5-foot** buffer zone shall be maintained above the

existing groundwater level. If groundwater dewatering is proposed or anticipated, the Applicant shall file a **Report of Waste Discharge** to this Regional Board and obtain any necessary NPDES permits/Waste Discharge Requirements prior to discharging waste. Sufficient time should be allowed to obtain any such permits (generally 180 days). If groundwater is encountered without the benefit of appropriate permits, the Applicant shall cease all activities in the areas where groundwater is present, file a Report of Waste Discharge to this Regional Board, and obtain any necessary permits prior to discharging waste.

5. All surface water inflows shall be diverted away from areas undergoing grading, construction, excavation, vegetation removal, and/or any other activity which may result in a discharge to the receiving water. If surface water diversions are anticipated, the Applicant shall develop and submit a **Surface Water Diversion Plan** to this Regional Board. The plan shall include the proposed method and duration of diversion activities, erosion and sediment controls, and a map or drawing indicating the locations of diversion and discharge points. The plan shall be submitted prior to any surface water diversions. If surface flows are present, then upstream and downstream monitoring for pH, temperature, dissolved oxygen, turbidity, and total suspended solids shall be implemented. These constituents shall be monitored on a **daily** basis during the first week of diversion activities, and then on a **weekly** basis, thereafter, until the in-stream work is complete. Results of the analyses shall be submitted to this Regional Board by the **15th** day of each subsequent sampling month. A map or drawing indicating the locations of sampling points shall be included with each submittal. Diversion activities shall not result in the degradation of beneficial uses or exceedance of water quality objectives of the receiving waters. Any such violations may result in corrective and/or enforcement actions, including increased monitoring and sample collection.

6. The Applicant shall restore all areas of temporary disturbance which could result in a discharge or a threatened discharge to waters of the state. Restoration shall include grading of disturbed areas to pre-project contours and revegetation with native species. The Applicant shall implement appropriate Best Management Practices to control erosion and runoff from areas associated with this project.

7. The Applicant shall provide COMPENSATORY MITIGATION for the proposed permanent impacts to **0.053 acres** of waters of the United States by providing adequate funding to the Santa Monica Mountains Conservancy for the creation or restoration of a minimum of **0.15 acres** of streambed/riparian habitat within waters of the United States (an approximate 3:1 mitigation ratio).

8. The Applicant shall collect and analyze STORM WATER DISCHARGES generated from surface runoff over the proposed golf course and driving range. Samples shall be collected **annually** during the discharge from the first storm event of the wet season (October 1 – May

31) and analyzed for herbicides (EPA Method 515.2), chlorinated pesticides (EPA Method 508), total nitrogen (nitrate, nitrite, ammonia, and organic nitrogen), and total phosphorus. Results of the analyses shall be submitted to this Regional Board within **thirty (30) days** of sample collection. Sampling shall commence upon completion of the constructed golf course and driving range and shall continue annually for a minimum of **five (5) years.**

9. Prior to any discharge into waters of the state, the Applicant shall submit to this Regional Board a copy of the final agreement (including cost, size and location of mitigation area, and description and duration of mitigation activities) made between the Applicant and the Santa Monica Mountains Conservancy regarding the required compensatory mitigation effort.

10. All communications regarding this project and submitted to this Regional Board shall identify the Project File Number **00-148.** Submittals shall be sent to the attention of the Nonpoint Source Unit.

11. Any modifications of the proposed project may require submittal of a new Clean Water Act Section 401 Water Quality Certification application and appropriate filing fee.

12. The project shall comply with the local regulations associated with the Regional Board's **Municipal Stormwater Permit** issued to Los Angeles County and co-permittees under NPDES No. CAS614001 and Waste Discharge Requirements Order No. 96-054. This includes the Standard Urban Stormwater Mitigation Plan (SUSMP) and all related implementing local ordinances and regulations for the control of stormwater pollution from new development and redevelopment.

GRAY DAVIS, Governor

ATE OF CALIFORNIA-THE RESOURCES AGENCY
EPARTMENT OF FISH AND GAME
est Region
wridge Avenue
an Diego, California 92123
(858) 467-4201
AX (858) 467-4235

April 12, 2001

San Jose Hills Development
Attn: Jacquie Smith
2210 South Azuza Avenue
West Covina, CA 91792

Dear Ms. Smith:

Enclosed is Streambed Alteration Agreement #5-256-00 that authorizes work on the BKK Final Closure project impacting San Jose Creek in Los Angeles County. This action is authorized under Section 1600 of the Fish and Game Code and has been approved by the California Department of Fish and Game. Pursuant to the requirements of the California Environmental Quality Act (CEQA), the Department filed a Notice of Determination (NOD) on the project on 04/12/01. Under CEQA regulations, the project has a 30-day statute of limitations on court challenges of the Department's approval under CEQA.

The Department believes that the project fully meets the requirements of the Fish and Game Code and CEQA. However, if court challenges on the NOD are received during the 30-day period, then an additional review or even modification of the project may be required. If no comments are received during the 30-day period, then any subsequent comments need not be responded to. This information is provided to you so that if you choose to undertake the project prior to the close of the 30-day period, you do so with the knowledge that additional actions may be required based on the results of any court challenges that are filed during that period.

Please contact Streambed Alteration Program Staff at (858) 636-3160 if you have any questions regarding the Streambed Alteration Agreement.

Sincerely,

C.F. Raysbrook
Regional Manager

CALIFORNIA DEPARTMENT OF FISH AND GAME
4949 Viewridge Ave.
San Diego, CA 92123

February 5, 2001

Notification No. 5-256-00(revision 2)
Page 1 of 7

AGREEMENT REGARDING PROPOSED STREAM OR LAKE ALTERATION

THIS AGREEMENT, entered into between the State of California, Department of Fish and Game, hereinafter called the Department, and Jacquie Smith of San Jose Hills Development,2210 South Azusa Ave., West Covina, CA 91792, Phone (626) 965-0911 ext. 332; State of California: hereinafter called the Operator, is as follows:

WHEREAS, pursuant to Section 1603 of California Fish and Game Code, the Operator, on the 13th day of September, 2000, notified the Department that they intend to divert or obstruct the natural flow of, or change the bed, channel, or bank of, or use material from the streambed(s) of, the following water(s): unnamed drainages, tributary to San Jose Creek, Los Angeles County, California; (USGS Map: Baldwin Park; Range: 10 W, Township: 1.2 S; Los Angeles County Thomas Guide: Page 638 J5, 639 A-5 & B-5).

WHEREAS, the Department (represented by Leslie S. MacNair through a site visit on 7 October 1999, and subsequent information) has determined that such construction may substantially adversely affect those existing fish and wildlife resources within unnamed drainages, tributary to San Jose Creek, specifically identified as follows: **Amphibians:** western toad, Pacific tree frog, black-bellied salamander, and Pacific slender salamander; **Reptiles:** western fence lizard, southern alligator lizard, side-blotched lizard, western skink, western whiptail, gopher snake, common kingsnake, western rattlesnake, night snake, and California whipsnake; **Birds:** American kestrel, great horned owl, red-tailed hawk, Cooper's hawk, Ferruginous hawk, sharp-shinned hawk, Golden eagle, Nuttall's woodpecker, northern flicker, ruby-crowned kinglet, yellow-rumped warbler, loggerhead shrike, western bluebird, western scrub-jay, mourning dove, Anna's hummingbird, oak titmouse, wrentit, California quail, spotted towhee, California towhee, California thrasher, blue-gray gnatcatcher, hermit thrush, cedar waxwing, American robin, purple finch, cactus wren, house wren, Rufous-crowned sparrows, golden-crowned sparrow, white-crowned sparrow, Grasshopper sparrow, savannah sparrow, Say's phoebe, American pipit, western meadowlark, Bewick's wren, California towhee, Lawrence's goldfinch, and songbirds; **Mammals:** mule deer, dusky-footed wood rat, coyote, pallid bat, black-tailed jackrabbit, California vole, California ground squirrel, California pocket mouse, California mouse, raccoon, ornate shrew, brush mouse, broad-footed mole, deer mouse, striped skunk, western gray squirrel, Botta's pocket gopher, Pacific kangaroo rat, desert cottontail; **Vegetation and Vegetation Communities** which provides habitat for those species: Coast Live Oak Woodland, Walnut Woodland, sumac chaparral, Mexican Elderberry Woodland, mulefat scrub, coastal sage scrub, needlegrass grassland, non-native grassland, and all other fish and wildlife resources in the area.

THEREFORE, the Department hereby proposes measures to protect fish and wildlife resources during the Operator's work. The Operator hereby agrees to accept the following measures/conditions as part of the proposed work.

If the Operator's work changes from that stated in the notification specified above, this Agreement is no longer valid and a new notification shall be submitted to the Department of Fish and Game. Failure to comply with the provisions of this Agreement and with other pertinent code sections, including but not limited to Fish and Game Code Sections 5650, 5652, 5937, and 5948, may result in prosecution.

Nothing in this Agreement authorizes the Operator to trespass on any land or property, nor does it relieve the Operator of responsibility for compliance with applicable federal, state, or local laws or ordinances. A consummated Agreement does not constitute Department of Fish and Game endorsement of the proposed operation, or assure the Department's concurrence with permits required from other agencies.

s Agreement becomes effective the date of Department's signature and terminates January 1, 2004 for project construction only. This Agreement shall remain in effect for that time necessary to satisfy the terms/conditions of this Agreement. Any provisions of the agreement may be amended at any time provided such amendment is agreed to in writing by both parties. Mutually approved amendments become part of the original agreement and are subject to all previously negotiated provisions.

1. The following provisions constitute the limit of activities agreed to and resolved by this Agreement. The signing of this Agreement does not imply that the Operator is precluded from doing other activities at the site. However, activities not specifically agreed to and resolved by this Agreement shall be subject to separate notification pursuant to Fish and Game Code Sections 1600 et seq.

2. The Operator proposes to alter the streams' bed and banks to construct a technology park along the western boundary and an 18-hole public golf course and clubhouse located along the north and northeastern edge of the property. The project will impact two unnamed drainages, representing a total of approximately 0.27 acre of stream channel. Drainage A is approximately 0.26 acre and is approximately 760 feet long by 15 feet wide and supports California walnut, poison oak, toyon, and mulefat. Drainage B contains mulefat and is approximately 0.01 acre and is approximately 100 feet in length and 6 feet wide. In addition, the project will impact 66 coast live oak and 1,438 walnut trees within the entire project site.

3. The agreed work includes activities associated with No. 2 above. The project area is located in the City of West Covina, north of Amar Road, east of Azusa Road, and west of the Walnut Hills/City of West Covina border, in two unnamed drainages, tributary to San Jose Creek in Los Angeles County. Specific work areas and mitigation measures are described on/in the plans and documents submitted by the Operator, including the "BKK Class III Landfill Closure, Postclosure Development Draft Environmental npact Report, July 1999," and "BKK Class III Landfill Closure, Postclosure Development Final Environmental Impact Report (SCH #: 98061114), June 2000", both prepared by: Environmental Science Associates for the City of West Covina, and shall be implemented as proposed unless directed differently by this agreement.

4. The Operator shall not permanently impact more than 0.27 acre of stream bed and bank with oak/walnut woodland and mulefat scrub habitat.

5. The Operator shall mitigate at a 3:1 replacement-to-impact ratio for the permanent loss to stream beds and its associated riparian habitat with the creation of 0.81 acre of riparian habitat on-site or off-site at a Department approved location. The riparian mitigation site, for impacts to stream beds with mulefat scrub habitat, shall be vegetated with native riparian trees (i.e. willows, sycamores, oaks, and walnuts) and appropriate understory (i.e. mulefat, mugwort, monkey flower).

6. The Operator shall mitigate for impacts to oak/walnut woodland habitat with the creation of oak/walnut woodland habitat area at Department approved location(s) on-site. The oak/walnut woodland habitat area(s) to be created shall be large enough to accommodate the replacement trees as required in Condition 7 of this Agreement.

7. Any oak trees damaged/destroyed within the entire project site (not just within the drainages) shall be replaced in-kind at a 5:1 ratio. Any walnut trees damaged/destroyed within the entire project site (not just within the drainages) shall be replaced in-kind at a 2:1 ratio. All replacement trees shall be planted within the on-site oak/walnut woodland creation areas, to be approved by the Department. Due to the large number of oak and walnut replacement trees, the planting of oaks and walnut trees and its associated understory may be phased over four years following the completion of cut and fill activities on-site. A minimum of one-fourth of the total required number of trees shall be planted each year within the oak/walnut woodland mitigation sites. The installation of the oaks and walnuts, and its associated understory, shall be completed no later than 5 years following the completion of the cut and fill portion of

ıe project. All trees shall be monitored for size and survival for a minimum of five years after they were planted and results shall be included in the annual mitigation monitoring report. Any replacement trees that do not survive shall be replaced in-kind and these trees shall be monitored for a minimum of five years. The oak and walnut replacement trees shall be tagged with an identification number when planted for easy reference during monitoring.

8. A tree inventory shall be **submitted with the final mitigation plan.** The tree inventory shall describe the number of trees to be damaged/removed, by species and size classes. The location and number of trees to be planted as mitigation, and proposed phasing (to meet the requirements specified in this Agreement) shall also be included with the final mitigation plan.

9. The installation of the riparian mitigation site shall be completed within 6 months following the completion of the cut and fill portion of the golf course and no later than **March 1, 2003.** The installation of first phase of the oak and walnut woodland habitat areas shall be completed within 6 months following the completion of the cut and fill portion of the project and no later than **March 1, 2003.**

10. All mitigation sites shall be monitored for a minimum of five years after planting. All non-native vegetation shall be removed from the mitigation areas (riparian and oak/walnut woodland mitigation areas) throughout the 5-year monitoring period.

11. All mitigation/revegetation site(s) shall be planted with native understory plant species to ensure that the ecosystem values are replaced, not just the trees. Understory plant species shall be included in the riparian and oak/walnut woodland revegetation areas. The plant palettes shall be included in the final mitigation plan for each habitat type.

12. **Prior to the initiation of any project activities and no later than** ~~90~~ 120 D.C. **days after signature to this agreement,** the Operator shall submit to the Department for review and approval a mitigation plan designed to meet the identified mitigation requirements and objectives described in this Agreement. The plan shall include the following for each of the mitigation areas (riparian and oak/walnut woodland creation sites):

(A) location(s) of proposed mitigation;
(B) plant palette for each habitat type;
(C) planting plan for each mitigation area (planting locations, numbers, sizes and densities by species of trees and understory plants);
(D) phasing for the planting of oak and walnut woodland habitat;
(E) monitoring and maintenance procedures/timeline;
(F) details on monitoring that include performance standards (tree measurements, survival, and percent cover standards for planted species), monitoring methodology, reporting requirements, and contingency measures;
(G) maintenance (weed control, irrigation requirements, and plant replacement);
(H) description of plans for invasive removal activities including monitoring and maintenance objectives to prevent the re-invasion of undesirable weeds for a minimum of five years.

Revegetation shall use only native species. Project activities may commence upon, but not before, written Department approval of the Operator's mitigation plan.

13. The mitigation sites shall meet all the requirements below.
(A) All planting (except for oaks and walnuts which shall be replaced in-kind as described in Condition 7 of this Agreement) shall have a minimum of 80% survival the first year and 100% survival thereafter and shall attain 75% cover after 3 years and 90% cover after 5 years. If the survival and cover requirements have not been met, the Operator is responsible for replacement planting to achieve these requirements. Replacement plants shall be monitored with the same survival and growth requirements for 5 years after planting (replaced).

B) The site shall not contain more than 5 percent exotic plant species for the Department to deem the site successful. Exotic removal shall be conducted throughout the 5-year monitoring and maintenance period.

(C) Irrigation of the mitigation site(s) shall only be used to help the plants become established during the first two years following planting. Watering/irrigation of the site(s) shall be discontinued at least two years prior to completion of the monitoring period for the site(s) to be deemed successful by the Department.

14. The mitigation sites shall be monitored once a month for the first two years, and quarterly for the following three years. A qualified biologist will monitor the sites and will be responsible for coordination with the landscape maintenance coordinator and the Operator. The monitoring of the mitigation sites shall include monitoring the general health of the trees and understory species, monitoring the adequacy of drainages, measuring the size of trees and percent cover of understory species, weed removal, irrigation status (if any), and the number and locations of plants replaced.

15. All planting should be done between October 1 and April 30 to take advantage of the winter rainy season, otherwise supplemental watering should be used to help the plants become established.

16. Annual mitigation reports shall be submitted to the Department each year, for a minimum of 5 years after planting, and until the Department has deemed the site successful. This report shall include the survival, percent cover, and height of tree and shrub species. The number by species of plants replaced, an overview of the revegetation effort, and the method used to assess these parameters, and any remedial measures taken shall also be included. The report shall also include information regarding exotic vegetation removal including the amount removed and treated, frequency and timing, disposal specifics, and a summary of the general success and failures. The report shall also include wildlife observed at the site during monitoring surveys. Photos from designated photo stations shall be included.

17. The Operator shall not remove vegetation from the project site from March 1 to August 15 to avoid impacts to nesting birds. However, the Operator may remove vegetation during this time if a qualified biologist conducts a survey for nesting birds within three days prior to the vegetation removal, and ensures no nesting birds shall be impacted by the project. These surveys shall include the areas within 200 feet of the edge of the proposed impact area(s). If active nests are found, a minimum 300-foot (500 feet for raptors) fence barrier shall be erected around the nest site. No habitat removal or any other work shall occur within the fenced nest zone even if the nest continues active beyond August 15, until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. The Operator shall submit the mapped survey results to the Department for review and approval prior to vegetation removal to ensure full avoidance measures are in place.

18. If construction activities are going to occur during the breeding season for raptors (January through July), the Operator shall have a qualified biologist survey the site for raptor nests prior to removing vegetation from the site. If an active raptor's nest is found, the nest site shall be fenced a minimum of 500 feet in all directions, and this area shall not be disturbed until the young have fledged and the nest becomes inactive. Be advised, it is unlawful to take, possess, or destroy any birds, nest, or eggs of any birds-of-prey.

19. The Operator shall avoid take of all fully protected species as required under the Fish and Game Code Section 3511 (Birds), including the white-tailed kite and golden eagle. Take, as defined in the Fish and Game Code, means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.

20. If threatened or endangered species occur within the proposed work area, or could be impacted by the work proposed, the Operator shall obtain the required state and federal threatened and endangered

species permits.

21. The perimeter of the work site shall be adequately flagged to prevent damage to adjacent habitat.

22. Disturbance or removal of vegetation shall not exceed the limits approved by the Department. The disturbed portions of any stream channel shall be restored. Restoration shall include the revegetation of stripped or exposed areas with vegetation native to the area.

23. No equipment shall be operated in ponded or flowing areas. When work in a flowing stream is unavoidable, the entire stream flow shall be diverted around the work area by a barrier, temporary culvert, new channel, or other means approved by the Department. Construction of the barrier and/or the new channel shall normally begin in the downstream area and continue in an upstream direction, and the flow shall be diverted only when construction of the diversion is completed. Channel bank or barrier construction shall be adequate to prevent seepage into or from the work area. Channel banks or barriers shall not be made of earth or other substances subject to erosion unless first enclosed by sheet piling, rock riprap, or other protective material. The enclosure and the supportive material shall be removed when the work is completed and removal shall normally proceed from downstream in an upstream direction. The Operator shall obtain all written approvals from the Department prior to initiation of construction activities.

24. Installation of bridges, culverts, or other structures shall be such that water flow is not impaired. Bottoms of temporary culverts shall be placed at stream channel grade; bottoms of permanent culverts shall be placed at or below stream channel grade.

25. Preparation shall be made so that runoff from steep, erodible surfaces will be diverted into stable areas with little erosion potential. Frequent water checks shall be placed on dirt roads, cat tracks, or other work trails to control erosion.

26. Water containing mud, silt or other pollutants from aggregate washing or other activities shall not be allowed to enter a lake or flowing stream or placed in locations that may be subjected to high storm flows.

27. Silty/turbid water shall not be discharged into the stream. Such water shall be settled, filtered, or otherwise treated prior to discharge.

28. Precautions to minimize turbidity/siltation shall be taken into account during project planning and implementation. This may require that the work site be isolated and /or the construction of silt catchment basins, so that silt, or other deleterious materials are not allowed to pass to downstream reaches. The placement of any structure or materials in the stream for this purpose, not included in the original project description, shall be coordinated with the Department. Coordination shall include the negotiation of additional Agreement provisions.

29. Structures and associated materials not designed to withstand high seasonal flows shall be removed to areas above the high water mark before such flows occur.

30. Staging/storage areas for equipment and materials shall be located outside of the stream.

31. If a stream's low flow channel, bed or banks/lake bed or banks have been altered, these shall be returned as nearly as possible to their original configuration and width, without creating future erosion problems.

32. Spoil sites shall not be located within a stream/lake, where spoil shall be washed back into a stream/lake, or where it will cover aquatic or riparian vegetation.

No equipment maintenance shall be done within or near any stream channel where petroleum products or other pollutants from the equipment may enter these areas under any flow.

34. Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous to aquatic life, resulting from project related activities, shall be prevented from contaminating the soil and/or entering the waters of the state. These materials, placed within or where they may enter a stream/lake, by Operator or any party working under contract, or with the permission of the Operator, shall be removed immediately.

35. No debris, soil, silt, sand, bark, slash, sawdust, rubbish, cement or concrete or washings thereof, oil or petroleum products or other organic or earthen material from any construction, or associated activity of whatever nature shall be allowed to enter into or placed where it may be washed by rainfall or runoff into, waters of the State. When operations are completed, any excess materials or debris shall be removed from the work area. No rubbish shall be deposited within 150 feet of the high water mark of any stream or lake.

36. The Operator shall comply with all litter and pollution laws. All contractors, subcontractors and employees shall also obey these laws and it shall be the responsibility of the operator to ensure compliance.

37. The Operator shall request an extension of this agreement prior to its termination. Extensions may be granted for up to 12 months from the date of termination of the agreement and are subject to Departmental approval. The extension request and fees shall be submitted to the Department's Region 5 Office at the above address. If the Operator fails to request the extension prior to the agreement's termination then the Operator shall submit a new notification with fees and required information to the Department. Any activities conducted under an expired agreement is a violation of Fish and Game Code Section 1600 et. seq. The Operator may request up to a maximum of 2 extension of this agreement.

38. The Operator shall **provide a copy of this Agreement to all contractors, subcontractors, and the Operator's project supervisors. Copies of the** Agreement **shall be readily available at work sites at all times during periods of active work** and must be presented to any Department personnel, or personnel from another agency upon demand.

39. The Department reserves the right to enter the project site at any time to ensure compliance with terms/conditions of this Agreement.

40. The Operator **shall** notify the Department, **in writing, at least five (5) days prior to initiation of construction (project) activities and at least five (5) days prior to completion of construction (project) activities.** Notification shall be sent to the Department at 4949 Viewridge Ave, San Diego, CA 92123. Attn: Streambed Alteration Team. SAA # 5-256-00.

STREAMBED ALTERATION CONDITIONS FOR NOTIFICATION NUMBER: 5-256-00

. The Department reserves the right to suspend or cancel this Agreement, after giving notice to the Operator, if the Department determines that the Operator has breached any of the terms or conditions of this Agreement, or for other reasons, including but not limited to the following:

a. The Department determines that the information provided by the Operator in support of the Notification/Agreement is incomplete or inaccurate;

b. The Department obtains new information that was not known to it in preparing the terms and conditions of the Agreement;

c. The project or project activities as described in the Notification/Agreement have changed;

d. The conditions affecting fish and wildlife resources change or the Department determines that project activities will result in a substantial adverse effect on the environment.

CONCURRENCE

(Operator's name)

Jacqueline Smith 2/13/01
(signature) (date)

JACQUELINE SMITH, PROJECT ADMINISTRATION
(Print Name & Title)

California Dept. of Fish and Game

C.F. Raysbrook 04/12/01
(signature) (date)

C. F. Raysbrook, Regional Manager
(Name & Title)

Streambed Agreement Prepared By: Leslie S. MacNair, Environmental Specialist III

VANDERMOST CONSULTING SERVICES, INC.
Government Affairs • Community Relations • Regulatory Assistance

August 10, 2001

Mr. Don Chadwick
California Department of Fish and Game
4949 View Ridge Road
San, Diego, CA 92123

Dear Don,

On behalf of BKK Corporation, Vandermost Consulting Services, Inc. (VCS) is providing compliance documents to the California Department of Fish and Game in accordance with the Section 1603 Streambed Alteration Agreement (SAA) #5-256-00 dated April 12, 2001, for the San Jose Hills Development.

In compliance with Special Condition #12 of the Section 1603 SAA, we have enclosed the Habitat Mitigation and Monitoring Plan (HMMP) for CDFG approval.

As discussed in the attached HMMP, golf course grading is expected to begin December 2003 and end May 2005. Grading will occur in phases over the two-year period, and installation of the required mitigation areas within the golf course will follow the grading phases. The required timing of the installation of the mitigation areas is addressed in condition 9 of the SAA, which states:

> *The installation of the riparian mitigation site shall be completed within 6 months following the completion of the cut and fill portion of the golf course and no later that March 1, 2003. The installation of the first phase of the oak and walnut woodland habitat areas shall be completed within 6 months following the completion of the cut and fill portion of the project and no later that March 1, 2003.*

Due to project schedule changes since the signature of the SAA, the timing of this condition no longer coincides with the project schedule. Therefore, we request that this condition be revised to allow for the complete installation of the riparian mitigation area and the oak/walnut mitigation within 6 months following the completion of the cut and fill portion of the golf course, without absolute ending dates.

27312 Calle Arroyo • San Juan Capistrano, California 92675
949.489.2700 • Fax 949.489.0309

We appreciate your consideration of this request. Please provide written concurrence that the mitigation schedule and the attached HMMP and have been approved by the Department by signing below. Thank you for your attention to this project. Please contact me at (949) 489-2700 ext. 206 with any questions.

Sincerely,

Sherri Cohen

Sherri Cohen
Project Manager

Cc. Jacquie Smith, San Jose Hills Development

Approved by:

for Don Chadwick
California Department of Fish and Game

10/12/01
Date