2539 East Garvey Avenue Project

Draft

Initial Study – Mitigated Negative Declaration

prepared by

Bently Real Estate
1932 East Garvey Avenue
West Covina, California 91791
Contact: Jeffrey P. Tuck, A.I.A.

prepared with the assistance of

Rincon Consultants, Inc.
250 East 1st Street, Suite 1400
Los Angeles, California 90012

October 2020

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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Initial Study

1. Project Title

2539 East Garvey Avenue Project

2. Lead Agency Name and Address

City of West Covina
1444 West Garvey Avenue, Suite 317
West Covina, California 91790

3. Contact Person and Phone Number

Jo-Anne Burns, Planning Manager
(626) 939-8761

4. Project Sponsor's Name and Address

Bently Real Estate
1932 East Garvey Avenue South
West Covina, California 91791

5. Project Location

The project site is located at 2539 and 2505 East Garvey Avenue North in the city of West Covina, California. The project site encompasses 160,176 square feet (sf), or approximately 3.67 acres, and consists of two adjacent parcels, which are identified as Assessor Parcel Numbers (APNs) 8453-015-030 and 8453-015-020. The project site is bordered by a car dealership to the north, East Garvey Avenue to the east and south, and single-family residential development and a preschool to the west. The site is regionally accessible from the San Bernardino Freeway (Interstate 10, or I-10) and locally accessible from North Citrus Street and East Garvey Avenue. Figure 1 shows the location of the project site in the region and Figure 2 depicts the location of the site in its neighborhood context.

6. Existing Setting

The project site is in an urban area, which has been previously graded and developed, and is surrounded by roads and urban structures (i.e., residential, office, and commercial buildings). Existing development on the site until recently included three commercial buildings associated with former car dealerships and several surface parking lots. Two of the former car dealership buildings have been demolished as of August 2020, leaving only the former Lotus dealership building in the southwest corner of the site. Vegetation on the project site is limited to a few trees (eight palms and one ficus tree located along the eastern boundary of the parcel located at 2505 East Garvey Avenue North),

hedges, ruderal vegetation, and minimal ornamental landscaping. Figure 3 provides photos of the current site condition.

7. General Plan Designation

Commercial (C)

8. Zoning

Medium Commercial (C-2)

9. Description of Project

The 2539 East Garvey Avenue Project (hereafter referred to as "proposed project" or "project") involves the demolition of three former car dealership buildings located at 2539 and 2505 East Garvey Avenue North (totaling approximately 24,650 sf) and the construction in their place of three new, single-story commercial buildings totaling 46,955 sf on the 3.67-acre project site. Two of the former car dealership buildings have been demolished as of August 2020, leaving only the former Lotus dealership building in the southwest corner of the site. The three new commercial buildings would include one 34,860 sf building that would provide retail space for the major tenant of the commercial development, one 7,595 sf building that would house multi-tenant retail uses in five storefronts, and one 4,500 sf restaurant with a 525-sf patio. The proposed project would provide 199 parking spaces, including 11 handicap spaces, 21 compact spaces, and 167 standard parking spaces. The project would also include 19,200 sf of landscaped area. Infrastructure improvements associated with the proposed project include replacing the sidewalk on the north side of East Garvey Avenue North and relocating an existing storm drain catch basin on East Garvey Avenue North.

Vehicles would be able to access the proposed project and associated surface parking lot via two entrances off East Garvey Avenue North, one entrance in the northeastern portion of the site and one to the south. Pedestrians would be able to access the proposed commercial buildings via the sidewalk along East Garvey Avenue North. Table 1 provides details of the proposed buildings and Figure 4 shows the proposed site plan. Figure 5 through Figure 8 illustrate the building elevations and perspective. Figure 9 and Figure 10 illustrate the main tenant and multitenant retail block perspectives, respectively. Figure 11 shows the conceptual landscape plan for the project site.

Construction

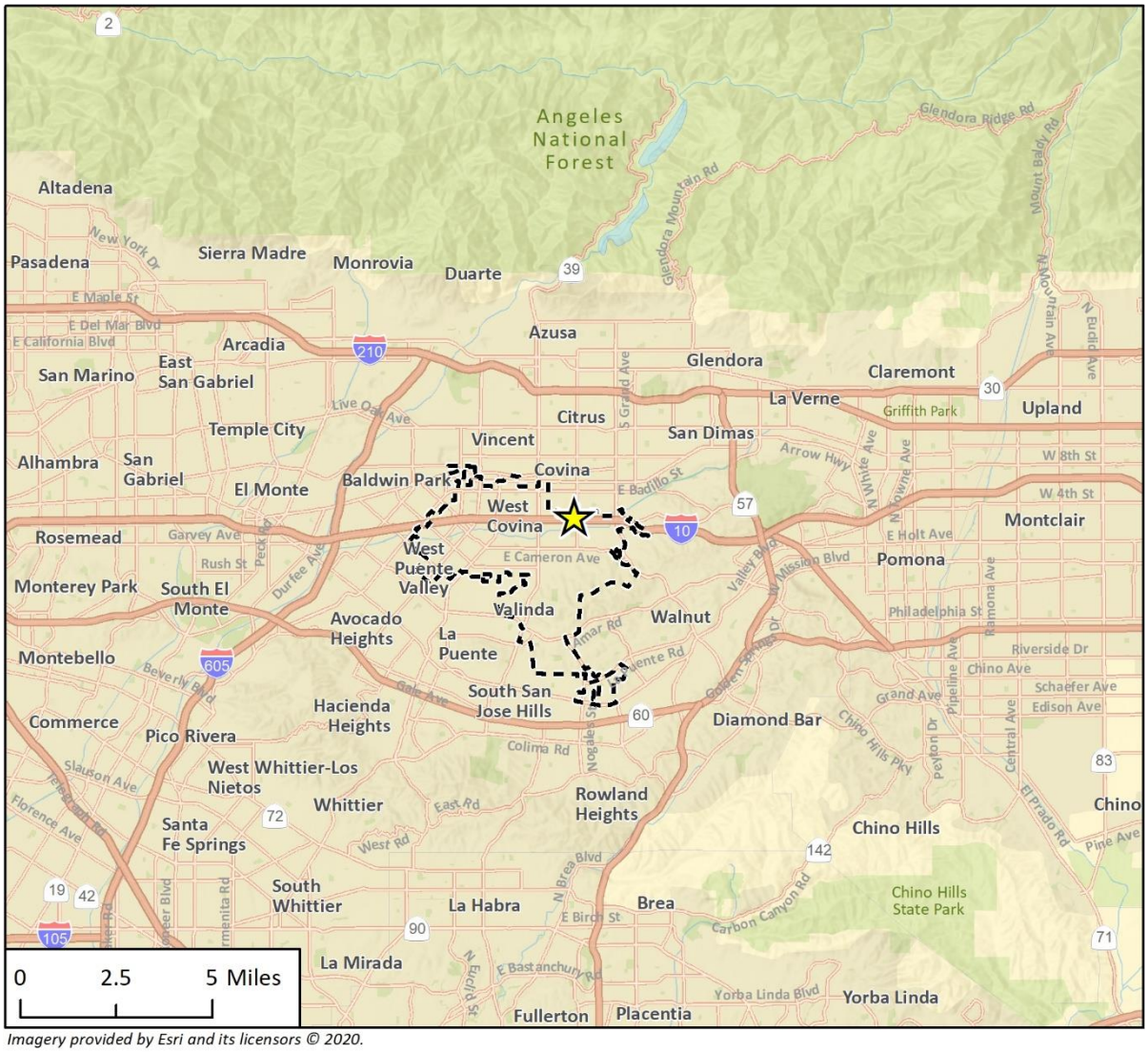
The construction process would include demolition of approximately 24,650 sf of existing commercial buildings located at the project site. Construction phasing would include demolition, site preparation, grading, building construction, asphalt paving, and architectural coating. Construction of the proposed project (including demolition of the former car dealerships currently or formerly located on the project site) is anticipated to occur over an approximately 11-month period, which began in July 2020 with demolition activities, and which would end in June 2021. Minor construction by the tenants involving hand tools for the setup of the interior of the stores would be anticipated to be finalized in November 2021. Construction would occur Monday through Saturday between the hours of 7:00 a.m. and 6:00 p.m. Operation of the project would be anticipated to commence in late 2021.

Table 1 Project Summary

Buildings	
Main Tenant	34,860 sf
Multi-Tenant Retail Block	7,595 sf
Restaurant	4,500 sf
Total	46,955 sf
Maximum Height	
Main Tenant	36’-8”
Multi-Tenant Retail Block	22’-3”
Restaurant	30’-0”
Landscaping and Parking	
Landscape area	19,200 sf (12% of site)
Standard	167 stalls
Compact	21 stalls
Handicap	11 stalls
Total	199 stalls

sf: square feet

Figure 1 Regional Location



Imagery provided by Esri and its licensors © 2020.

Project Location

City of West Covina

N

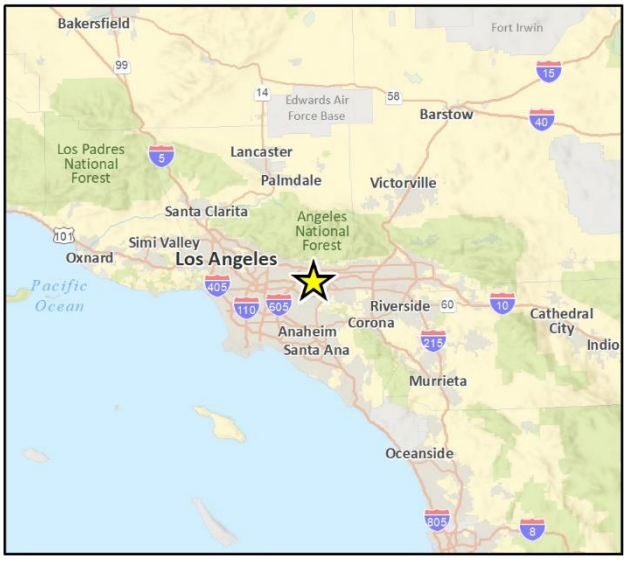


Figure 2 Project Location

Imagery provided by Microsoft Bing and its licensors © 2020.

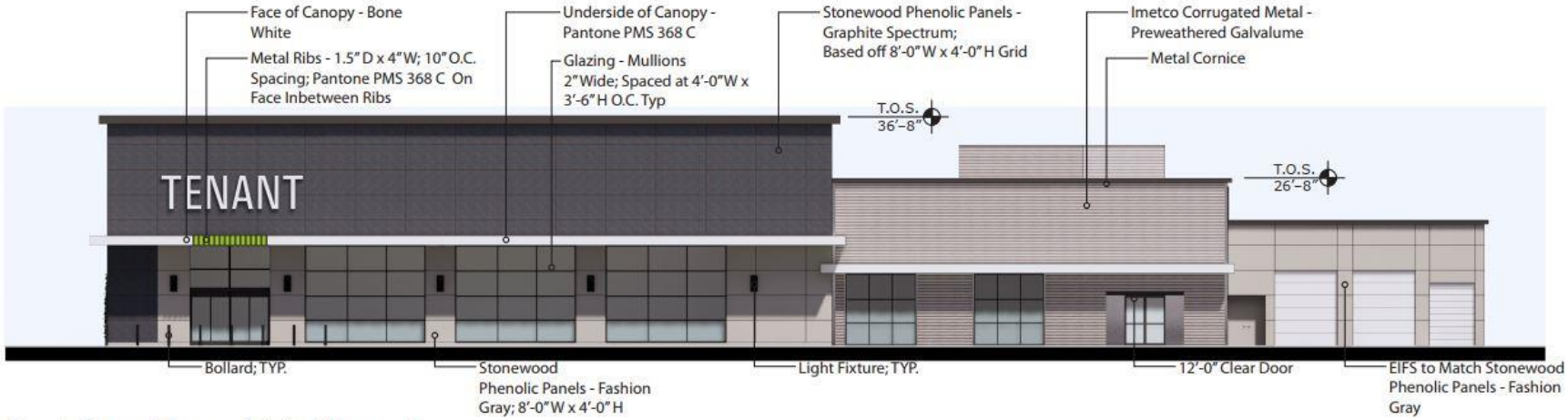
Figure 3 Site Photos

View of project site and demolished materials pertaining to former auto dealerships.

View of existing Lotus dealership building located at the southwest corner of the project site.

Figure 4 Project Site Plan

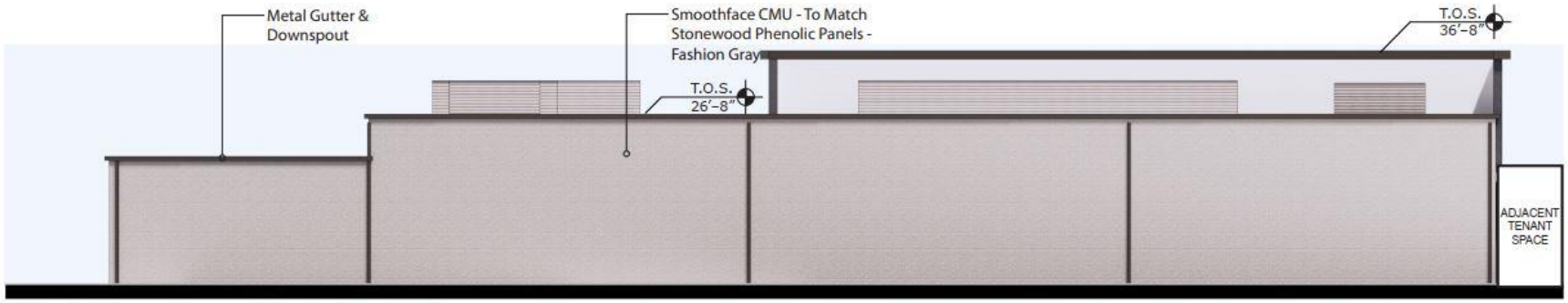
Figure 5 Main Tenant Building Elevations (East and South)



East Elevation - Main Tenant

South Elevation - Main Tenant

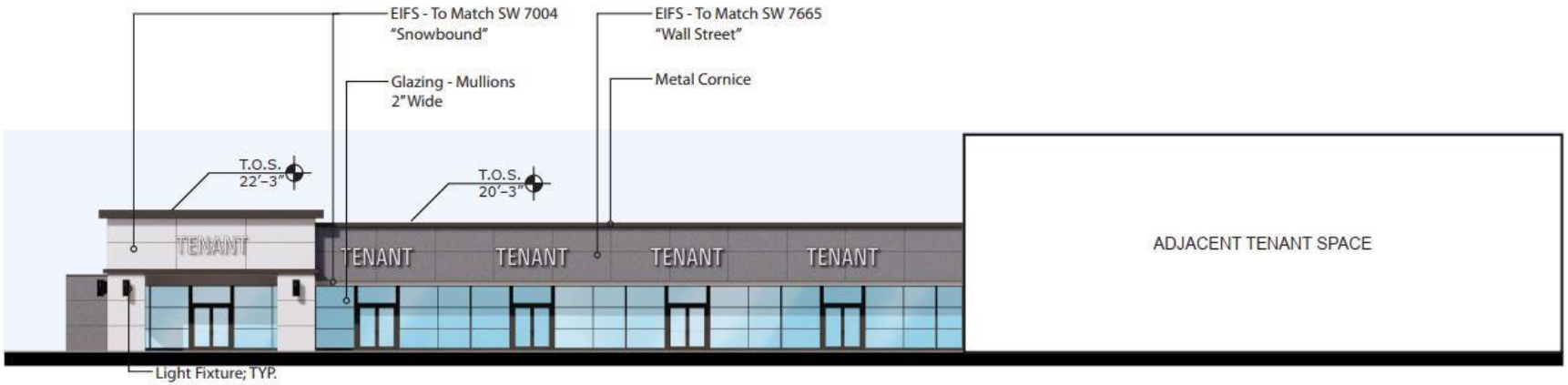
Figure 6 Main Tenant Building Elevations (West and North)



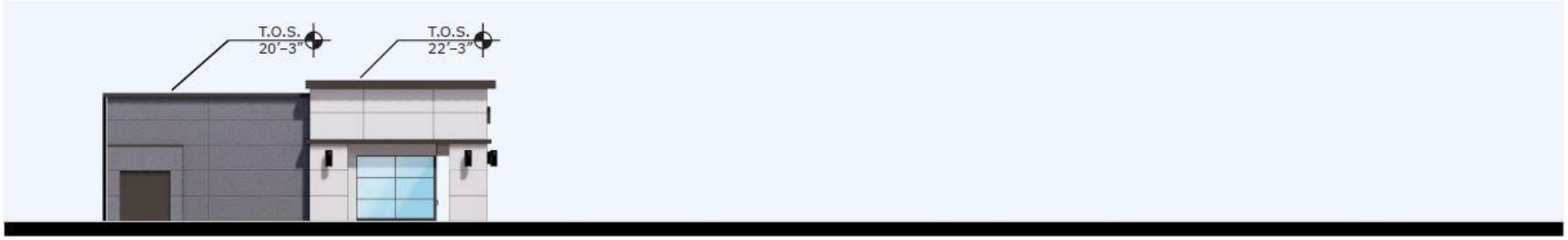
West Elevation - Main Tenant

North Elevation - Main Tenant

Figure 7 Multi-Tenant Retail Block Elevations (East and South)



East Elevation - Retail Block



South Elevation - Retail Block

Figure 8 Multi-Tenant Retail Block Elevation (West)

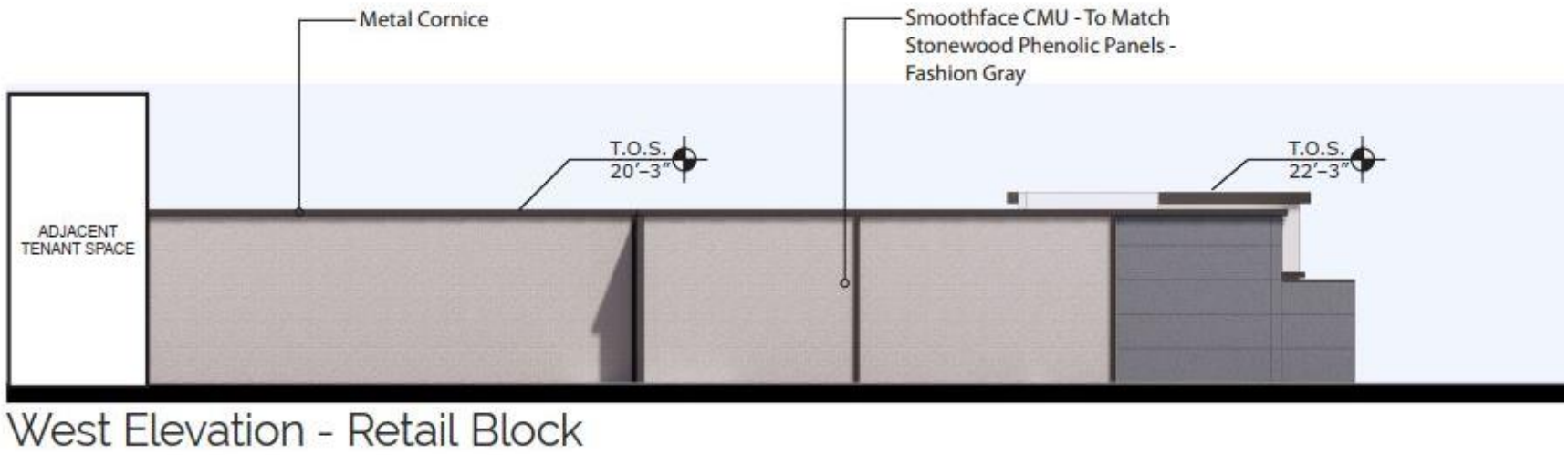


Figure 9 Main Tenant Building Perspective

Figure 10 Multi-Tenant Retail Block Perspective

Figure 11 Landscape Plan

PLANT SCHEDULE

TREES	QTY	BOTANICAL / COMMON NAME
	3	BAUHINIA X BLAKEANA / HONG KONG ORCHID TREE
	9	CUPANIOPSIS ANACARDIOIDES / CARROT WOOD
	10	JACARANDA MIMOSIFOLIA / JACARANDA
	6	LOPHOSTEMON CONFERTUS / BRISBANE BOX
	6	PODOCARPUS GRACILIOR / FERN PINE
	5	RHUS LANCEA / AFRICAN SUMAC
	7	SYAGRUS ROMANZOFFIANA / QUEEN PALM

SHRUBS	QTY	BOTANICAL / COMMON NAME
	24	ACACIA CULTRIFORMIS / KNIFE ACACIA
	65	CALLISTEMON VIMINALIS 'LITTLE JOHN' / DWARF WEEPING BOTTLEBRUSH
	140	HEMEROCALLIS X 'BITSY' / YELLOW DAYLILY
	161	IRIS DOUGLASIANA / DOUGLAS IRIS
	46	LANTANA X 'NEW GOLD' / NEW GOLD LANTANA
	248	LAVANDULA ANGUSTIFOLIA 'HIDCOTE BLUE' / HIDCOTE BLUE LAVENDER
	162	MUHLENBERGIA DUBIA / PINE MUHLY
	134	NANDINA DOMESTICA 'LEMON LIME' / LEMON LIME NANDINA
	68	OLEA EUROPAEA 'LITTLE OLLIE' TM / LITTLE OLLIE OLIVE
	7	WESTRINGIA FRUTICOSA 'MORNING LIGHT' / MORNING LIGHT COAST ROSEMARY

VINES	QTY	BOTANICAL / COMMON NAME
	12	TRACHELOSPERMUM JASMINOIDES / STAR JASMINE TRELLIS

GROUND COVERS	QTY	BOTANICAL / COMMON NAME
	175	CAREX DIVULSA / BERKELEY SEDGE
	159	JUNIPERUS HORIZONTALIS 'BLUE CHIP' / BLUE CHIP CREEPING JUNIPER
	34	MYOPORUM X 'PUTAH CREEK' / PUTAH CREEK MYOPORUM
	17	ROSMARINUS OFFICINALIS 'IRENE' TM / IRENE TRAILING ROSEMARY
	186	SENECIO SERPENS / BLUE CHALKSTICKS

LANDSCAPE NOTE:

THE SELECTION OF PLANT MATERIAL IS BASED ON CULTURAL, AESTHETIC, AND MAINTENANCE CONSIDERATIONS. ALL PLANTING AREAS SHALL BE PREPARED WITH APPROPRIATE SOIL AMENDMENTS, FERTILIZERS AND APPROPRIATE SUPPLEMENTS BASED UPON A SOILS REPORT FROM AN AGRICULTURAL SUITABILITY SOIL SAMPLE TAKEN FROM THE SITE. DECOMPOSED GRANITE SHALL FILL IN BETWEEN SHRUBS TO SHIELD THE SOIL FROM THE SUN, EVAPOTRANSPIRATION, AND RUN-OFF. ALL SHRUB BEDS SHALL BE MULCHED TO A 3" DEPTH TO HELP CONSERVE WATER, LOWER SOIL TEMPERATURE, AND REDUCE WEED GROWTH. THE SHRUBS SHALL BE ALLOWED TO GROW IN THEIR NATURAL FORMS. ALL LANDSCAPE IMPROVEMENTS SHALL FOLLOW THE GUIDELINES SET FORTH BY THE CITY OF WEST COVINA MUNICIPAL CODE.

IRRIGATION NOTE:

AN AUTOMATIC IRRIGATION SYSTEM SHALL BE INSTALLED TO PROVIDE 100% COVERAGE FOR ALL PLANTING AREAS SHOWN ON THE PLAN. THE WATER SUPPLY FOR THIS SITE IS A POTABLE WATER CONNECTION AND A DEDICATED IRRIGATION METER WILL BE PROVIDED. LOW VOLUME EQUIPMENT SHALL PROVIDE SUFFICIENT WATER FOR PLANT GROWTH WITH NO WATER LOSS DUE TO WATER CONTROLLERS, AND OTHER NECESSARY IRRIGATION EQUIPMENT. ALL POINT SOURCE SYSTEM SHALL BE ADEQUATELY FILTERED AND REGULATED PER THE MANUFACTURER'S RECOMMENDED DESIGN PARAMETERS. ALL IRRIGATION IMPROVEMENTS SHALL FOLLOW THE GUIDELINES SET FORTH BY THE CITY OF WEST COVINA MUNICIPAL CODE.

I HAVE COMPLIED WITH THE CRITERIA OF THE WATER EFFICIENT LANDSCAPE ORDINANCE AND APPLIED THEM FOR THE EFFICIENT USE OF WATER IN THE LANDSCAPE AND IRRIGATION DESIGN PLAN.

MICHAEL P. MADSEN, LLA 5758

10. Surrounding Land Uses and Setting

The project site is in an urban area and is surrounded by residential, office, and commercial uses. Land uses surrounding the project site consist of an automotive dealership to the north, East Garvey Avenue North beyond which are commercial uses to the east, East Garvey Avenue North and I-10 to the south, and single-family residences and a preschool to the west. Figure 12 provides photos of a few surrounding land uses.

11. Required Approvals

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

- Precise Plan for site layout and architecture
- Administrative Use Permit (AUP) to allow the major tenant to sell alcohol for off-site consumption
- Conditional Use Permit for to allow for the construction of pylon signs with the freeway adjacent property sign area and height bonus
- Tentative Parcel Map to combine the two parcels that currently comprise the project site
- Tree Removal Permit to allow for the removal of significant trees on the site

12. Other Public Agencies Whose Approval is Required

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

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

Three tribes have requested notification of projects within the City of West Covina: the Soboba Band of Luiseño Indians, Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation), and Gabrielino/Tongva Nation. Per Public Resources Code (PRC)Section 21080.3.1, the City mailed consultation letters to these three tribes on August 13, 2020 and have since received a response from the Kizh Nation requesting consultation to discuss the proposed project in further detail. Following the request from the Kizh Nation, a consultation meeting between Kizh Nation representatives and City Staff occurred on September 3, 2020. The Kizh Nation representatives expressed concerns regarding the proposed project, stating that their tribe had villages near the project site and their former trade routes follow alongside I-10. They also requested information regarding on-site soils, asking if the soil proposed to be disturbed by grading is the original/native soil or fill that was brought in at some later date. For further discussion of tribal cultural resources in this IS-MND please refer to Section 18, *Tribal Cultural Resources* and Section 5, *Cultural Resources*, and for further discussion of on-site soils please refer to Section 7, *Geology and Soils* The City of West Covina will continue to comply with all applicable tribal consultation requirements of PRC Section 21080.3.1 and all other applicable regulations as the proposed project moves through the required review and approval process.

Figure 12 Photos of Surrounding Land Uses

View of northern boundary of project site and adjacent auto dealership located north of the site.

View of preschool located west of the project site and multi-family residences further west.

Environmental Factors Potentially Affected

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

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

Determination

Based on this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

10/19/2020

Date

Jo-Anne Burns

Printed Name

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in PRC Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	■	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	■
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	■	☐

For purposes of determining significance under CEQA, scenic resources are the visible natural and cultural features of the landscape that contribute to the public's enjoyment of the environment. A scenic vista is defined as a public viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Public views are those that are experienced from a publicly accessible vantage point, such as a roadway or public park. Scenic vistas can be officially designated by public agencies, or informally designated by tourist guides. The California Department of Transportation (Caltrans) manages the California State Scenic Highway Program, which designates state scenic highways. Scenic highways are highways located in areas of natural beauty. A scenic highway becomes officially designated when the local governing body applies to and is approved by Caltrans for scenic highway designation and adopts a Corridor Protection Program that preserves the scenic quality of the land that is visible from the highway right of way (Caltrans 2020a).

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

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

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

Scenic vistas are panoramic public views available from publicly accessible vantage points that are found to be locally or regionally attractive. According to the City's General Plan, the City of West Covina does not have any officially designated scenic vistas (West Covina 2016). However, the Angeles National Forest and San Gabriel Mountains lie approximately seven miles north of the City and are visible throughout West Covina. The proposed project would involve construction of three single-story commercial buildings on the project site, the tallest of which (the main tenant building) would be 36 feet, 8 inches. These buildings would be of similar height and massing to the buildings most recently on and near the site, which are mostly one story, with some exceptions such as the seven-story commercial building at 100 N. Citrus Street across Citrus Street from the project site.

Public views of the Angeles National Forest and San Gabriel Mountains from and through the project site and its vicinity are limited due to visual obstructions such as existing buildings on and around the project site, and other visual obstructions such as signs and trees. The San Jose Hills are visible to the south of the project site, across I-10. However, from the project site these views are distant, background views and partially obstructed by existing development within the City such as buildings and trees. The proposed project would not block existing public views of the San Jose Hills from East Garvey Avenue North or other nearby roadways. Therefore, the proposed project would not significantly obstruct or affect any publicly accessible scenic vistas in the City. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is in an urban area consisting of residential, office, and commercial uses. The project site does not contain any scenic resources such as natural habitats or rock outcroppings, nor is it in proximity to any such resources. The project site is not located on any National Register of Historic Places, California State Historical Landmarks, or California Historical Resources or Points of Interest (California State Parks 2017a). Furthermore, the City of West Covina does not contain any officially designated state scenic highways (West Covina 2016). State Route (SR) 57 between SR 91 and SR 60 and SR 39 between Route 2 and I-210, located 6.6 and 6.3 miles from the project site, respectively, are identified as Eligible for State Scenic Highway designation (Caltrans 2020b). However, the project site is not visible from SR 57 or SR 60, as it is located 6.0 and 3.5 miles away from these roadways, respectively. Therefore, the project would not substantially degrade views of mature trees, rock outcroppings, or any other scenic resources along or visible from a scenic highway. There would be no impact.

NO IMPACT

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

The project site was, until approximately July 2020, occupied by three single-story buildings and associated surface parking lots, with on-site vegetation limited to a few trees and hedges, ruderal

vegetation, and minimal ornamental landscaping. Two of the three on-site buildings were demolished in July 2020. The project involves construction of three single-story commercial structures, with an on-site surface parking lot and landscaping. The project is in an urban area of the City that is primarily developed with one- to seven-story commercial, office, and residential buildings.

Implementation of the project would add new retail and restaurant uses to the project site, which contained two auto dealerships. While development of the project would change the appearance and use of the project site relative to its last commercial use and existing conditions, it is not anticipated to degrade the existing visual character or quality of the site and its surroundings since it would be a compatible use with other commercial uses in the project area and would upgrade the existing landscaping and visual quality of the site compared to existing conditions. The project would, therefore, aesthetically enhance the project area.

The proposed project would also be subject to City design review, including review of building elevations, colors and materials, and compliance with the Precise Plan standards per Article VI, Division 2 of the West Covina Municipal Code (WCMC). In addition, the project design would be reviewed for approval by the Planning Commission as part of the Precise Plan application process. The City uses this regulatory procedure to verify that the design, colors, and finish materials of development projects comply with adopted design guidelines and achieve compatibility with the surrounding area. Although the project would not substantially degrade the visual character of the site and surroundings, this regulatory procedure provides the City with further assurances for aesthetic review and an opportunity to incorporate additional conditions to increase the aesthetic value of the project. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

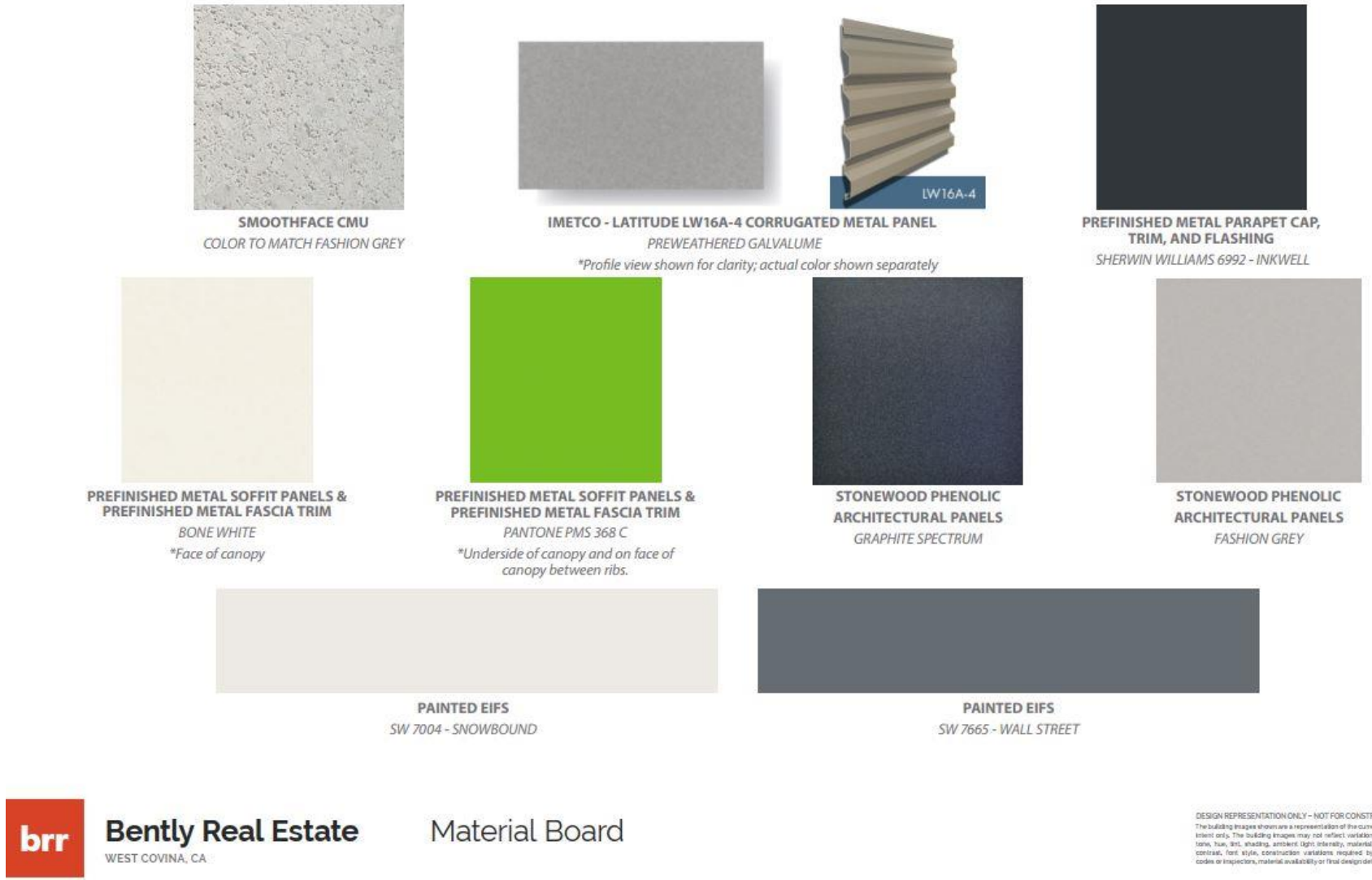
The project is in an urban area of the City that is primarily developed with commercial, office, and residential buildings. The main sources of light and glare in the project area are streetlights and exterior lighting associated with residential and commercial/retail structures and associated vehicles, including vehicles on nearby major roadways such as Citrus Street and I-10. Implementation of the project would replace existing lighting on the project site with new outdoor lighting for the proposed commercial buildings, parking lots, landscaping, and other safety-related lighting. New lighting that is proposed as part of the project would not substantially increase daytime and nighttime lighting at the project site relative to lighting associated with the current and most recent use of the project site as an auto dealership because auto dealerships have numerous outdoor lighting fixtures to illuminate and provide security for parked vehicles. Light sources associated with the proposed project would not substantially increase the overall levels of day or nighttime lighting in the area because they would be comparable to existing light levels on and around the project site and those of the surrounding commercial, office, and residential land uses. Furthermore, East Garvey Avenue is already illuminated by street lighting. For these reasons, the proposed project would not result in a substantial new source of light such that day or nighttime views in the area would be adversely affected. Rather, the proposed exterior lighting and building materials would be consistent with those of surrounding uses and would be an important aide to public safety.

In addition, as shown in **Error! Reference source not found.**, the project design does not propose any new highly reflective materials that could potentially cause significant glare during the day, such as stainless-steel panels or expansive glass windows. The design of this project, including its finish, colors, and materials, would be reviewed for approval through the City's design review process

described in impact discussion *1c*. This regulatory procedure provides the City with an additional layer of review for aesthetics including light and glare, and an opportunity to incorporate additional conditions to improve the project's building materials and lighting plans. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

Figure 13 Project Material Palette



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2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)); timberland (as defined by PRC Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

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

The project site is in an urban area of the City and currently consists of commercial and parking uses. According to the City's Zoning and Land Use Maps, the project site is zoned Medium Commercial (C-2) and designated Commercial (C). The California Department of Conservation's (DOC) California Important Farmland Finder shows that the project site is in an area that does not consist of Farmland (California DOC 2020a). Therefore, the project would not have an impact on designated Farmland.

NO IMPACT

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

As discussed under impact discussion *a.* of this section, the project site consists of commercial and parking uses and is not zoned or designated for agricultural use. In addition, the project site is not under a Williamson Act contract (California DOC 2015). The proposed project involves demolition of existing commercial buildings and construction of three new commercial buildings in an urban area. The project site does not include conversion of farmland to non-agricultural uses; therefore, the proposed project would not conflict with agricultural zoning or a Williamson Act contract. No impact would occur.

NO IMPACT

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)); timberland (as defined by PRC Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

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

As discussed under impact discussion *a.* of this section, the project site consists of commercial and parking uses and is not zoned or designated for forest land or timberland. Therefore, the project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

NO IMPACT

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

The proposed project involves demolition of three commercial buildings and construction of three new commercial buildings in an urban area. As discussed above, the proposed project does not include the conversion of farmland to non-agricultural uses, forest land to non-forest uses, nor any other change in the existing environment that could result in impacts to farmland or forest land. No impact would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	■	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	■	☐

Air Quality Standards and Attainment

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

Depending on whether the standards are met or exceeded, the Basin is classified as being in "attainment" or "nonattainment." Under State law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The SCAQMD is in non-attainment for the federal standards for ozone and $PM_{2.5}$ (particulate matter up to 2.5 microns in size) and the State standards for ozone, PM_{10} (particulate matter up to 10 microns in size), and $PM_{2.5}$. The Los Angeles County portion of the Basin is also designated non-attainment for lead (SCAQMD 2016). The Basin is designated unclassifiable or in attainment for all other federal and State standards. The health effects associated with criteria pollutants for which the Basin is in non-attainment are described in Table 2.

Table 2 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM_{10})	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).[a]
Suspended particulate matter ($PM_{2.5}$)	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.[a]
Lead	(1) Short-term overexposures: lead poisoning can cause (a) anemia, (b) weakness, (c) kidney damage, and (d) brain damage; (2) long-term exposures: long-term exposure to lead increases risk for (a) high blood pressure, (b) heart disease, (c) kidney failure, and (d) reduced fertility.

[a] More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: United States Environmental Protection Agency (USEPA), Air Quality Criteria for Particulate Matter, October 2004.

Sources: USEPA 2018a; Centers for Disease Control and Prevention (CDC) 2019

Air Quality Management

Under State law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which the District is in non-compliance. The SCAQMD administers the Air Quality Management Plan (AQMP) for the Basin, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board on March 3, 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017). The 2016 AQMP incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP, including the approval of the new federal 8-hour ozone standard of 0.070 ppm that was finalized in 2015.

The 2016 AQMP addresses several State and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality models. The Southern California Association of Governments' (SCAG) projections for socio-economic data (e.g., population, housing, employment by industry) and transportation activities from the 2016 Regional Transportation Plan/Sustainable

Communities Strategy (2016 RTP/SCS) are integrated into the 2016 AQMP. This Plan builds upon the approaches taken in the 2012 AQMP for the attainment of federal PM and ozone standards and highlights the significant amount of reductions to be achieved. It emphasizes the need for interagency planning to identify additional strategies to achieve reductions within the timeframes allowed under the federal Clean Air Act, especially in the area of mobile sources. The 2016 AQMP also includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The Plan also demonstrates strategies for attainment of the new federal eight-hour ozone standard and vehicle miles travelled (VMT) emissions offsets, pursuant to recent USEPA requirements (SCAQMD 2017).

Air Emission Thresholds

The CEQA Guidelines (Section 15064.7) provide that, when available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make determinations of significance. These thresholds are designed such that a project that would not exceed the adopted thresholds would not have an individually or cumulatively significant impact on the Basin's air quality. Therefore, a project that does not exceed these SCAQMD thresholds would have a less than significant impact. This Initial Study conforms to the methodologies recommended in the SCAQMD's *CEQA Air Quality Handbook* (1993) and supplemental guidance provided by the SCAQMD, including recommended thresholds for emissions associated with both construction and operation of the project (SCAQMD 2015).

Table 2 presents the significance thresholds for construction and operational-related criteria air pollutant and precursor emissions being used for the purposes of this analysis. These represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the Basin's existing air quality conditions. For the purposes of this analysis, the proposed project would result in a significant impact if construction or operational emissions would exceed any of the thresholds shown in Table 3.

Table 3 SCAQMD Regional Significance Thresholds

Construction Thresholds	Operational Thresholds
75 pounds per day of ROG	55 pounds per day of ROG
100 pounds per day of NO_X	55 pounds per day of NO_X
550 pounds per day of CO	550 pounds per day of CO
150 pounds per day of SO_X	150 pounds per day of SO_X
150 pounds per day of PM_{10}	150 pounds per day of PM_{10}
55 pounds per day of $PM_{2.5}$	55 pounds per day of $PM_{2.5}$

ROG: reactive Oorganic gases; NO_x: nitrogen oxides; CO: carbon monoxide; SO_x: sulfur oxides

Source: SCAQMD 2015

Localized Significance Thresholds

In addition to the above regional thresholds, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the *CEQA Air Quality Handbook* (1993). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and have been developed for NO_X, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a

project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), distance to the sensitive receptor, and project size. LSTs have been developed for emissions generated in construction areas up to five acres in size. However, LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008a). As such, LSTs are typically applied only to construction emissions because most operational emissions are associated with project-generated vehicle trips.

The project site is in Source Receptor Area 11 (SRA-11, South San Gabriel Valley) (SCAQMD 2008a). Sensitive receptors closest to the project site consist of single-family residences and a preschool approximately 25 feet to the west of the project site. The SCAQMD's publication *Final Localized Significant (LST) Thresholds Methodology* (2008) provides LSTs for receptors at a distance of 82 to 1,640 feet (25 to 500 meters) from the project site boundary. According to the SCAQMD, projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 feet. Therefore, Table 4 summarizes the LSTs for a 3.67-acre site in SRA-11 with sensitive receptors located at a distance of 82 feet.

Table 4 SCAQMD LSTs for Construction Emissions

Pollutant	Allowable Emissions from a 3.68-acre site in SRA-11 for a receptor 82 feet away
Gradual conversion of NO_X to NO_2	156
CO	1,469
PM_{10}	11
$PM_{2.5}$	7

NO_x: nitrogen oxides; NO_2: nitrogen dioxide; CO: carbon monoxide; PM_{10}: coarse particulate matter; $PM_{2.5}$: fine particulate matter
Source: SCAQMD 2009

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

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP relies on local general plans and the SCAG 2016 RTP/SCS forecasts of regional population, housing, and employment growth in its own projections for managing air quality in the Basin.

The growth projections used by the SCAQMD to develop the AQMP emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by SCAG in the development of the 2016 RTP/SCS. As such, projects that are consistent with the growth anticipated by SCAG's growth projections and/or the General Plan would not conflict with the AQMP. If a project is less dense than anticipated by the growth projections, the project would likewise be consistent with the AQMP.

The proposed project involves construction of three commercial buildings on a site that is currently designated Commercial (C). Therefore, the proposed project would be consistent with the site's current General Plan designation. As discussed in Section 14, *Population and Housing,* according to the California Department of Finance (DOF), the City has an estimated population of 105,999 (California DOF 2020). SCAG estimates that the City's population will increase to 116,700 by 2040, an increase of approximately 10.1 percent or 10,701 persons (SCAG 2016).

The proposed project would not include any residential development and would therefore not directly increase the City's population. The proposed project would replace the auto dealerships formerly operating on the project site with retail space for one major tenant, five smaller tenants, and one restaurant. Therefore, the proposed project would eliminate jobs associated with the former auto dealerships but also generate new employment within the City. The major tenant would employ approximately 150 people. According to the United States Green Building Council (USGBC), community retail land uses employ approximately one person per 383 sf, while fast food restaurants with a drive-thru have approximately one employee per 92 sf (USGBC 2008). Therefore, the five smaller tenants would employ approximately 20 individuals and the restaurant would employ approximately 49 individuals. Therefore, the proposed project would potentially generate approximately 219 jobs which could potentially lead to indirect population increase within West Covina if these jobs were filled by employees who became new residents of the City. If all new employees became residents of the City, this would increase the existing population by approximately 219 residents (approximately 0.2 percent) to 106,218, which would be within SCAG's 2040 population forecast of 116,700 residents.

Therefore, the project would not conflict with the SCAQMD's AQMP and the potential indirect population increase generated by the proposed project would not substantially alter air quality conditions in the Basin and would not generate emissions that would adversely affect regional air quality. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it is considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

As discussed under *Air Quality Standards and Attainment*, the Basin has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a State nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The Los Angeles County portion of the Basin is designated in nonattainment for lead, as well. The Basin is designated unclassifiable or in attainment for all other federal and State standards. The proposed project does not include any stationary sources of lead emissions. Therefore, implementation of the project would not result in substantial emissions of lead and this pollutant is not discussed further in this analysis.

The following analysis evaluates air pollutant emissions generated by project construction and operation compared to the regional significance thresholds established by the SCAQMD in the *CEQA Air Quality Handbook* (1993), as well as the SCAQMD LSTs. Construction and operational air pollutant emissions were modeled using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2.

Construction Emissions

Project construction would primarily generate temporary criteria pollutant and GHG emissions from construction equipment operation on-site, construction worker vehicle trips to and from the site, and from export of materials off-site. Construction input data for CalEEMod include, but are not limited to: (1) the anticipated start and finish dates of construction activity; (2) inventories of construction equipment to be used; (3) areas to be excavated and graded; and (4) volumes of materials to be exported from and imported to the project site. The analysis assessed maximum daily emissions from individual construction activities, including demolition, site preparation, grading, building construction, paving, and architectural coating. Grading, excavation, hauling, and site preparation would involve the greatest use of heavy equipment and generation of fugitive dust.

Table 5 summarizes the estimated maximum daily emissions of pollutants associated with construction of the proposed project. Emissions modelling accounts for compliance with the SCAQMD Rule 403, which regulates fugitive dust emissions during the project's demolition, grading, and construction activities to minimize emissions of PM_{10} and $PM_{2.5}$ and SCAQMD Rule 1113, which regulates the volatile organic compound (VOC) content of architectural coatings to minimize emissions of ROGs during construction activities.

Table 5 Estimated Construction Emissions

	Estimated Maximum Daily Emissions (lbs/day)					
Construction Year	**ROG**	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
2020 Maximum	4.2	38.2	31.4	0.1	4.8	3.0
2021 Maximum	7.0	35.2	30.8	0.1	2.8	1.8
Maximum Emissions	**7.0**	**38.2**	**31.4**	**0.1**	**4.8**	**3.0**
SCAQMD Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum On-site Emissions	6.7	34.3	28.1	0.1	4.6	2.9
Local Significance Thresholds (LSTs) (on-site emissions only)[1]	N/A	156	1,469	N/A	11	7
Threshold Exceeded?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

NO_x: nitrogen oxides; NO_2: nitrogen dioxide; CO: carbon monoxide; PM_{10}: coarse particulate matter; $PM_{2.5}$: fine particulate matter

[1] LSTs are for a 3.67-acre project site in SRA-11 within 82 feet from the site boundary.

Notes: All emissions modeling was completed using the CalEEMod. See Appendix A for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from CalEEMod's "mitigated" results, which is a term of art for the modeling output and is not equivalent to mitigation measures that may apply to the CEQA impact analysis. The CalEEMod "mitigated" results account for compliance with regulations and project design features. Emissions presented are the highest of the winter and summer modeled emissions.

As shown in Table 5, construction of the proposed project would not result in criteria pollutant emissions that would exceed the SCAQMD regional thresholds or LSTs. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for

which the project region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant.

Operational Emissions

Development of the project would result in long-term air pollutant emissions over the course of operations. Emissions include area sources, energy sources, and mobile emissions. Area sources include use of consumer products, use of gas-powered landscaping equipment, and re-application of architectural coating (re-painting). Energy sources include natural gas for uses such as heating/air conditioning, appliances, lighting, and water heating. Mobile emissions include vehicle trips (including employees, deliveries, and customers).

Table 6 summarizes the estimated maximum daily emissions of pollutants associated with operation of the proposed project, accounting for emissions generated by on-site development. Most project-related operational emissions would result from vehicle trips to and from the site. As shown in Table 6, both total project emissions and net new operational emissions would not exceed the SCAQMD regional thresholds for criteria air pollutants; therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant.

Table 6 Estimated Operational Emissions

Emission Source	Maximum Daily Emissions (lbs/day)					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	1.0	< 0.1	< 0.1	<0.1	<0.1	<0.1
Energy	< 0.1	0.3	0.3	<0.1	<0.1	<0.1
Mobile[1]	5.9	24.8	43.7	0.1	9.7	2.7
Total Project Emissions	**7.0**	**25.1**	**43.9**	**0.1**	**9.8**	**2.7**
Existing Emissions (Auto Dealerships)[2]	1.4	3.8	7.5	<0.1	1.9	0.5
Project Net Emissions (Project- Existing)	**5.6**	**21.3**	**36.4**	**0.1**	**7.9**	**2.2**
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

ROG: reactive organic gases; NO_x: nitrogen oxides; CO: carbon monoxide; SO_2: sulfur dioxide; PM_{10}: coarse particulate matter; $PM_{2.5}$: fine particulate matter

[1] To account for the effects of the Part One Rule, California Air Resources Board (CARB) released off-model adjustment factors on November 20, 2019 to adjust criteria air pollutant emissions outputs from the EMFAC model. These off-model adjustment factors are applied by multiplying the emissions calculated for light- and medium-duty vehicles by the adjustment factor. With the incorporation of these adjustment factors, operational emissions generated by light-duty automobiles, light-duty trucks, and medium-duty trucks associated with project-related vehicle trips at the year 2021 would be approximately 0.01 percent greater for ROG, 0.09 percent greater for particulate matter, 0.02 percent greater for NO_X, and 0.05 percent greater for CO. These increases would have a negligible impact on overall operational emissions generated by the project and would not alter the significance of the project's operational emissions.

[2] Emissions from the previously operational auto dealerships were subtracted from the project operational emissions to calculate net operational emissions on the project site. As of August 2020, these auto dealerships are vacant and/or demolished, but were included in the modeling as they were vacated as part of the proposed project.

Notes: All emissions modeling was completed using CalEEMod. See Appendix A for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from CalEEMod's "mitigated" results which is a term of art for the modeling output and is not equivalent to mitigation measures that may apply to the CEQA impact analysis. The CalEEMod "mitigated" results include compliance with regulations and project design features that will be included in the project. Emissions presented are the highest of the winter and summer modeled emissions.

LESS THAN SIGNIFICANT IMPACT

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

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The proposed project would not introduce new sensitive receptors to the project site. Off-site sensitive receptors nearest to the project site consist of single-family residences and a preschool located immediately west of the project site.

Local Carbon Monoxide (CO) Hotspots

A CO hotspot is a localized concentration of CO that exceeds the State one-hour or eight-hour CO ambient air standards (SCAQMD 2008a). Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 ppm or the federal and State eight-hour standard of 9.0 ppm (CARB 2016).

The SCAQMD conducted a detailed CO analysis for the Basin during the preparation of the 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the Basin, which would be expected to experience the highest CO concentrations. The highest CO concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of Los Angeles near Interstate-405, which has an ADT of approximately 100,000 vehicles per day. The concentration of CO at this intersection was 4.6 ppm, which is well below the 35-ppm 1-hour CO federal standard and the State standard of 20 ppm. Furthermore, the Basin has been in attainment of federal CO standards since 2007 (SCAQMD 2016). No stations in the vicinity of the project site have monitored CO in the last eight years. The highest 8-hour CO average recorded at the nearest monitoring, the Azusa monitoring station located approximately 4.6 miles northeast of the project site, was 1.13 ppm in 2012 (the most recent year for which data is available), which is well below the 8-hour CO federal and State standard of 9 ppm (CARB 2020).

As shown in Table 5, maximum daily CO construction emissions would be approximately 31.4 pounds and maximum on-site emissions would be approximately 28.1 pounds, which would not exceed the SCAQMD's regional threshold (550 lbs/day) or LST (664 lbs/day) for CO. Likewise, as shown in Table 6, net new operational emissions from area, energy, and mobile sources combined would be approximately 36.4 pounds of CO emissions per day, which is below the SCAQMD regional threshold of 550 pounds. Both the SCAQMD's regional thresholds and LSTs are designed to be protective of public health. Based on the low background level of CO in the project area, ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the project's low level of operational CO emissions, the project would not create new hotspots or contribute substantially to existing hotspots. Localized air quality impacts related to CO hot spots would be less than significant.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer, typically based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology (OEHHA 2015). In addition, some TACs have noncarcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) non-carcinogenic effects.

The greatest potential for TAC emissions associated with the proposed project would occur during construction and would be from diesel particulate emissions associated with heavy equipment operations. Diesel particulate matter emissions would be produced by heavy equipment operations

and heavy-duty trucks. Heavy-duty construction equipment is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. As shown in Table 5, total PM_{10} construction emissions, which includes exhaust PM_{10} (representative of diesel particulate matter) and fugitive dust PM_{10} (representative of airborne particulate matter), exposure would below SCAQMD thresholds.

According to the OEHHA, health risk assessments (HRA) that determine the exposure of sensitive receptors to toxic emissions should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should be limited to the period/duration of activities associated with the project. Therefore, the duration of the proposed construction activities would constitute a small percentage of the total 30-year exposure period. Due to this relatively short period of exposure and minimal emissions on site, TACs generated during construction would not result in concentrations causing significant health risks.

Furthermore, the project does not propose routine operational activities following completion of on-site construction that would generate TAC emissions. Operation of the proposed project would not result in any nonpermitted direct emissions (e.g., those from a point source such as diesel generators) or result in a substantial increase in diesel vehicles (i.e., delivery trucks) over baseline conditions. There would be no residual emissions or corresponding individual cancer risk after project construction is complete and on-site construction activities cease. As such, the project would not result in substantial TAC exposure to sensitive receptors in the vicinity of the proposed project and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of the receiving location, each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project, which would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, and architectural coatings. Such odors would disperse rapidly from the project site, generally occur at magnitudes that would not affect substantial numbers of people and would be limited to the construction period. Impacts associated with odors during construction would be temporary and less than significant.

With respect to operation, the SCAQMD's *CEQA Air Quality Handbook* (1993) identifies land uses associated with odor complaints as agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. The types of commercial uses included in the proposed project are not identified on this list. In addition, solid waste generated by the proposed on-site uses would be properly stored in lidded dumpsters and collected by a contracted waste hauler, ensuring that odors resulting from on-site waste would be managed and collected in a manner to prevent the proliferation of odors. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	■
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	■
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	■
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	■	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The project site encompasses 3.67 acres and is currently developed and mostly covered by building footprints and asphalt surfaces. The site is in a developed urban area and is approximately 2.2 miles from the nearest open space, Walnut Creek Community Regional Park. The nearest U.S. Fish and Wildlife Service (USFWS) designated Critical Habitat, located approximately 1.8 miles to the southeast, is habitat for the Coastal California gnatcatcher (*Polioptila californica californica*), a threatened bird species (USFWS 2020a). Project implementation would not affect or modify this protected habitat or wildlife habitats for this protected species within the City. The project site contains several ornamental trees (palms and ficus), shrubbery and grasses. Due to the fact that the project site consists solely of ornamental vegetation, and because of its isolation from any other natural area, it does not contain and is not suitable habitat for protected species.

Migratory or other common nesting birds, while not designated as special-status species, are protected by the California Fish and Game Code (CFGC) and Migratory Bird Treaty Act (MBTA) and may nest in ornamental trees on-site. Therefore, construction of the project has the potential to directly (by destroying a nest) or indirectly (by creating construction noise, dust, and other human disturbances that may cause a nest to fail) impact nesting birds protected under the CFGC and MBTA. Implementation of Mitigation Measure BIO-1 would ensure compliance with the CFGC Section 3503 and the MBTA with respect to nesting birds by reducing the impact through pre-construction nesting bird surveys and avoidance of active nests. Given the absence of special-status species and incorporation of mitigation for nesting birds, no impacts to special-status species or nesting birds would occur and impacts would be less than significant.

Mitigation Measure

BIO-1 Nesting Bird Avoidance

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

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

- A survey report by the qualified biologist documenting and verifying compliance with the mitigation and with applicable State and federal regulations protecting birds shall be submitted to the City. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

Implementation of Mitigation Measure BIO-1 would avoid permanent impacts to nesting birds. Furthermore, during operation of the project, the site would include trees as part of the project's landscaping and continue to provide nesting sites in an urban residential neighborhood, consistent with existing conditions.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

Plant communities are considered sensitive biological resources if they have limited distributions, have high wildlife value, including sensitive species, or are particularly susceptible to disturbance. CDFW ranks sensitive communities as "threatened" or "very threatened" and keeps records of their occurrences in the CNDDB. The project is in a developed urban area and is not located within a vegetated or open space area. The only vegetation present on site is landscaping, consisting of a few ornamental shrubs and trees. These existing trees and shrubs do not constitute a sensitive natural community. Additionally, there is no riparian habitat on or near the project site (USFWS 2020b). Therefore, the proposed project would not have a substantial adverse effect on riparian habitat or other sensitive natural communities as none exist on the site or in nearby areas. No impact would occur.

NO IMPACT

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

As discussed above, the project site is in an urban area and is entirely paved other than small landscaped areas near the existing buildings and the perimeter of the project site. No riparian habitats, wetlands, or other water features have been identified on or adjacent to the project site (USFWS 2020b). Further, the project site does not include any discernable drainage courses, inundated areas, wetland vegetation, or hydric soils (USDA 2020). As a result, no state or federally protected wetlands or other waters that may be considered jurisdictional by the CDFW, United State Army Corps of Engineers (USACE), or Regional Water Quality Control Board (RWQCB) occur on or adjacent to the project site. Therefore, the proposed project would not directly or indirectly have a substantial adverse effect on State or federally protected wetlands or other jurisdictional waters. No impact would occur.

NO IMPACT

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

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

As discussed above, the project site is developed with commercial and parking uses, some of which have now been demolished and/or vacated, in an urban area. The site is separated from any open space areas by existing development and roadways. The project site does not contain any natural communities or habitat areas that would be expected to support populations of native wildlife nurseries or movement. While the project site contains trees, these trees are ornamental and are not a part of larger habitat area; they are surrounded by development and do not form a natural community or constitute a habitat area.

Due to their fully developed nature as described above, the project site and surrounding area do not contain any natural or physical features that connect habitat areas and impacts to the movement of native or resident species or on the use of native wildlife nursery sites resulting from the proposed project are not expected. Therefore, no impact would occur.

NO IMPACT

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

Article VI, Division 9 of the West Covina Zoning Code regulates the preservation, protection, and removal of trees on public and private property in the City. According to the Zoning Code [Section 26-288(6) (a & b)], a heritage tree is any tree defined by the Planning Commission resolution as having historic or cultural value, representative of a significant period in the City's development, or designated for protection in a specific plan, and includes any of the Southern California black walnut tree species in the San Jose Hills.

The Zoning Code also defines a significant tree as a tree located on public or private property that meets one or more of the following requirements: (a) is located in the front yard of a lot or parcel and has a caliper of one foot or more; (b) is located in the street-side yard of a corner lot and has a caliper of one foot or more; (c) is located anywhere on a lot, has a caliper of six inches or more, and is one of the following species: any oak tree native to California, California Sycamore, or American Sycamore.

According to the Zoning Code, no tree permit shall be issued for the removal of any heritage tree or significant tree on any lot associated with a development application, unless all discretionary approvals have been obtained from the City. The Planning Director may approve, conditionally approve, or deny a tree removal application, subsequent to site investigation regarding specific trees, site conditions, and topographic considerations. The Planning Director may also place conditions on the tree removal permit, including replacement of removed trees with comparable size and species, or relocation of existing trees.

The project site contains eight palms and one ficus tree located along the eastern property line of the parcel located at 2505 East Garvey Avenue North, none of which are heritage tree species or protected tree species. Some of the ornamental trees located near the front of the Lotus Building parcel may qualify as Significant Trees due to their front yard location. All of the ornamental trees planted within the project site boundary will be impacted by the project and will be replaced according to the project landscape design as shown in Figure 11. Removal of any Significant Trees would require an approved permit from the City. Upon completion of the proposed project, the project site would contain 38 more trees than currently exist on the site. With approval of any required tree removal permits, loss of existing trees and vegetation would not conflict with any local policies or ordinances protecting biological resources, and existing trees would be replaced upon completion of the proposed landscaping plan. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There are no adopted Habitat Conservation or Natural Community Conservation Plans or other approved local, regional, or state habitat conservation plans in the City of West Covina (CDFW 2019). Therefore, no impacts would occur.

NO IMPACT

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5 Cultural Resources

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

CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources (PRC, Section 21084.1) and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). Tribal cultural resources are discussed in Section 18 of this IS-MND.

A historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CEQA Guidelines, Section 15064.5[a][1-3]).

A resource shall be considered historically significant if it:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
2. Is associated with the lives of persons important in our past
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history

In addition, if it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a], [b]).

PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;

2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

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

Until August of 2020, the project site contained three commercial buildings which were formerly used as auto dealerships. The two buildings located on 2539 East Garvey Avenue North were constructed in 1967 and remodeled in 1973 (Partner Engineering and Science, Inc. [Partner] 2013), but were demolished in preparation for implementation of the proposed project in August of 2020. According to the Los Angeles County Office of the Assessor, the building located on 2505 East Garvey Avenue North (a former Lotus dealership building which has not yet been demolished but which has been vacated) was constructed in 1979 (Los Angeles 2020). The City of West Covina has published two Historic Context Reports (HCSs) and Historic Resources Inventories (HRIs), which provide for the identification of buildings within the City that may be eligible for listing as a historic resource and evaluates them for their historic significance (West Covina 2006 and 2019). The project site was not identified in either the *Historic Resources Survey* (2006) or *Historic Context Statement, 1945-1978, & Historic Resource Inventory Update* (2019) as potentially eligible for listing as historic resources in the National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), and as local landmarks.

In addition, Rincon completed an Archaeological Resources Assessment for the proposed project (Appendix B) in September 2020. This assessment included a search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC) located at the California State University, Fullerton. The purpose of the records search was to identify previously conducted cultural resources studies within the project site and a 0.5-mile radius, and previously recorded cultural resources within the project site and a 0.5-mile radius. The CHRIS search included a review of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the Office of Historic Preservation Historic Properties Directory, the California Inventory of Historic Resources, and the Archaeological Determinations of Eligibility list.

The SCCIC records search identified ten previously conducted cultural resources studies performed within a 0.5-mile radius of the project site and eight previously recorded cultural resources within a 0.5-mile radius of the project site. The search results did not identify any historic resources on or within 0.5 miles of the project site. Therefore, none of the buildings that existed on the project site through July of 2020 are considered historic resources, and the proposed project would have a less than significant impact on historical resources.

LESS THAN SIGNIFICANT IMPACT

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

The project site is developed and does not contain undisturbed surficial soils. According to the Geotechnical Engineering Investigation (Appendix D), the project site is comprised of artificial fill consisting of loose to medium dense, slightly moist silty sand and firm sandy silt to depths of 5 to 7.5 feet below ground surface (bgs). If archaeological resources once existed within surficial soils on the site, it is likely that previous grading, construction, and modern use of the site have either removed or destroyed them. The proposed project would involve grading to a maximum depth of seven feet

below the existing ground surface or 4 feet below the bottom of the proposed footings, whichever is deeper, and would not substantially disturb soils beyond the footprint of existing soil disturbance from previous development.

In addition, the results of the Archaeological Resources Assessment indicate that no recorded archaeological resources have been identified on the project site or within its immediate vicinity (Appendix B). While it is unlikely that previously undiscovered archaeological resources exist on the site, if they did, grading and ground-disturbing activities during construction could significantly impact them. The Archaeological Resources Assessment recommends four mitigation measures to avoid impacts to archaeological and tribal cultural resources (Appendix B). In order to avoid potential impacts to archaeological resources in the unlikely event that such resources are discovered during construction, Mitigation Measures CR-1 and TCR-1 through TCR-3 would be required. These mitigation measures are listed below and in Section 18, *Tribal Cultural Resources*, of this IS-MND because they address potential discovery of tribal cultural resources, but they also contain provisions for discovery of non-tribal archaeological resources.

Mitigation Measures

CR-1 Worker's Environmental Awareness Program

A qualified archaeologist shall be retained to conduct a Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. The training shall be conducted by an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology (National Park Service [NPS] 1983). Archaeological sensitivity training shall include a description of the types of cultural material that may be encountered, cultural sensitivity issues, the regulatory environment, and the proper protocol for treatment of the materials in the event of a find.

Implementation of Mitigation Measures CR-1 and TCR-1 through TCR-3 would reduce impacts to significant archaeological resources, if any are discovered during project construction, to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The project site is not part of a formal cemetery and is not known to have been used for disposal of historic or prehistoric human remains. There are no known human remains on the site. Therefore, human remains are not expected to be encountered during construction of the proposed project. In the unlikely event that human remains are encountered during project construction, State Health and Safety Code Section 7050.5 requires the project to halt until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to PRC Section 5097.98. Compliance with these regulations would ensure the proposed project would not result in significant impacts due to disturbing human remains, and impacts would be less than significant. Analysis of potential discovery of Native American human remains is contained in Section 18, *Tribal Cultural Resources* of this IS-MND.

LESS THAN SIGNIFICANT IMPACT

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6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	■	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	■

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

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

Construction Energy Demand

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. The project would require demolition, site preparation and grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping. As shown in Table 7, project construction would require approximately 5,678 gallons of gasoline and approximately 31,511 gallons of diesel fuel. These construction energy estimates are conservative because they assume that the construction equipment used in each phase of construction is operating every day of construction.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, per applicable regulatory requirements such as 2019 CALGreen, the project would

comply with construction waste management practices to divert a minimum of 65 percent of construction and demolition debris. These practices would result in efficient use of energy necessary to construct the project. In the interest of cost-efficiency, construction contractors also would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Table 7 Estimated Fuel Consumption during Construction

	Fuel Consumption (gallons)	
Source	**Gasoline**	**Diesel**
Construction Equipment & Hauling Trips	–	31,511
Construction Worker Vehicle Trips	5,678	–

See Appendix C for energy calculation sheets.

Operational Energy Demand

Operation of the project would contribute to area energy demand by consuming electricity, natural gas, and gasoline and diesel fuel. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, water use, and the overall operation of the project. Gasoline and diesel consumption would be attributed to the trips generated by future employees, customers, and deliveries. Table 8 summarizes estimated operational energy consumption for the proposed project. As shown therein, project operation would require approximately 148,080 gallons of gasoline and 36,521 gallons of diesel fuel for transportation fuels, 0.74 GWh of electricity, and 1,108 million metric British thermal units (MMBtu) of natural gas. Transportation of workers, customers, and deliveries would represent the greatest operational use of energy associated with the proposed project.

Table 8 Estimated Project Annual Operational Energy Consumption

Source	Energy Consumption[1]	
Transportation Fuels		
Gasoline	148,080 gallons	16,257 MMBtu
Diesel	36,521 gallons	4,655 MMBtu
Electricity	0.74 GWh	2,517 MMBtu
Natural Gas Usage	11,917 U.S. therms	1,108 MMBtu

MMBtu: million metric British thermal units; GWh: Gigawatt hours

[1] Energy consumption is converted to MMBtu for each source

See Appendix C for transportation energy calculation sheets and Appendix A for CalEEMod output results for electricity and natural gas usage.

The project would be required to comply with all standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California's Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to

result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. Furthermore, the project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase to comply with State requirements through Senate Bill (SB) 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

To help achieve Title 24 reduction targets, the project applicant proposes to incorporate several energy efficient features into overall project design. Energy efficient design features include use of passive solar by including large windows, energy-efficient appliances and lighting, water-efficient indoor fixtures throughout the project site, and drought tolerant landscaping. Four parking spaces would be equipped with electric vehicle (EV) charging outlets, ten parking stalls would be designated for preferential parking for EVs, and six parking stalls would be designated for Clean Air Vehicles. In addition, the project would include six long-term bicycle parking lockers and ten short-term bicycle parking spaces. The project site is also within 0.25 mile of bus stops for three Foothill Transit bus routes, including routes that connect to the Covina Metrolink station location 1.3 miles north of the project site. These features would incentivize the use of public transit, active transportation, and fuel-efficient vehicles for accessing the new commercial development.

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

LESS THAN SIGNIFICANT IMPACT

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

The City adopted its Energy Action Plan (EAP) in 2011, which includes energy conservation goals and policies for municipal operations in the City, as well as outreach programs to encourage local businesses and residents to implement utility energy efficiency measures such as design features that achieve water and energy use reductions, including compliance with Title 24 (West Covina 2011). The goals and policies established by the EAP are geared towards municipal operations and the establishment of new local energy policies, and, therefore, have limited applicability to commercial projects within the city. However, the proposed project would be in accordance with the overall intent of the EAP. For example, the project would be designed to comply with the performance levels of the latest version of the California Green Building Standards Code, which would reduce energy consumption compared to standard building practices. The proposed project would be required to comply with the nonresidential mandatory measures in the 2019 California Green Building Standards Code, Title 24, Part 11. The proposed project would also be required to comply with the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24). Measures included in the proposed project to meet these energy standards include low-flow plumbing fixtures, water-efficient irrigation systems, and lighting conservation features. Compliance with these regulations would minimize potential conflicts with adopted energy conservation plans. There would be no impact.

NO IMPACT

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7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	■	☐
2. Strong seismic ground shaking?	☐	☐	■	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	■	☐
4. Landslides?	☐	☐	■	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	■	☐	☐
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	■	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	■
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	■	☐	☐

A Geotechnical Engineering Investigation by Leighton Consulting, Inc. was prepared for the project site in April 2020. It included 13 exploratory soil borings, infiltration testing within two soil borings, laboratory testing of soil samples, and engineering analysis. The report concluded that the proposed project is feasible from a geotechnical engineering standpoint, provided that the recommendations presented in the report are adhered to during planning and construction of the project, to the satisfaction of the City's Building Division (Leighton Consulting, Inc. [Leighton] 2020; see Appendix D). The following analysis is based on the information contained in this project-specific Geotechnical Engineering Investigation, as well as information and maps provided by the California Geological Survey (CGS).

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

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The project site is located in a seismically-active area of southern California; however, according to CGS, the project site is not located in an Alquist-Priolo Fault Zone (CGS 2020). There are no faults present on the project site, and the nearest fault to the project site is the Sierra Madre Fault Zone approximately four miles north of the site (CGS 2020). Implementation of the project would not exacerbate the existing risk of fault rupture, as the project would not include uses such as hydraulic fracturing or minerals extraction which can exacerbate earthquake risks. Though the project site is not located above an Alquist-Priolo Fault Zone, strong ground shaking at the site may occur in the event of a sufficiently large earthquake on this or other nearby faults.

To reduce geologic and seismic impacts, the City regulates development through the requirements of the CBC. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. The earthquake design requirements of the CBC consider the occupancy category of the structure, site class, soil classifications, and various seismic coefficients. The CBC provides standards for various aspects of construction, including but not limited to excavation, grading, earthwork, construction, preparation of the site prior to fill placement, specification of fill materials, fill compaction and field testing, retaining wall design and construction, foundation design and construction, and seismic requirements. It includes provisions to address issues such as (but not limited to) construction on expansive soils and soil strength loss. In accordance with California law, project design and construction would be required to comply with provisions of the CBC. Because the project would comply with the CBC and recommendations of the Geotechnical Engineering Investigation and because the project would not exacerbate existing ground shaking hazards, impacts related to seismically induced ground shaking would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

Liquefaction is a process whereby soil is temporarily transformed to fluid form during intense and prolonged ground shaking or because of a sudden shock or strain. Liquefaction typically occurs in areas where the groundwater is less than 30 feet from the surface and where the soils are composed of poorly consolidated fine to medium sand. According to the CGS, the project site is not located in a liquefaction zone (CGS 2020). Based on the findings in the geotechnical study, groundwater was not encountered during boring activities within the project site, which reached depths of up to 51.5 feet below ground surface, and the site soils are not susceptible to liquefaction (Leighton 2019; see Appendix D). Design and construction of the proposed project would conform to the current seismic design provisions of the CBC. The 2016 CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program, to mitigate losses from an earthquake and provide for the latest in earthquake safety. While the project would be susceptible to seismic activity given its location within a seismically-active area, the project site is not susceptible to liquefaction and would be required to minimize this risk, to the extent feasible, through the incorporation of applicable CBC standards. Therefore, the potential effects of differential settlement as a result of liquefaction would be less than significant.

In addition, the project site and surrounding areas are relatively flat and not located within an area of seismically-induced landslide risk according to CGS maps (CGS 2020). The proposed project would not involve changes to the site grading or terrain that would destabilize soils prone to landslide. Therefore, the project would not directly or indirectly cause potential adverse effects related to landslides. Potential impacts related to liquefaction and landslides would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The proposed project involves demolition of commercial buildings on the project site and development of three new commercial retail buildings and a surface parking lot. The project site is in an urban area and is currently developed and entirely paved. Fugitive dust caused by strong wind and/or earth-moving operations during construction would be minimized through compliance with SCAQMD Rule 403, which prohibits visual particulate matter from crossing property lines. Standard practices to control fugitive dust emissions include watering of active grading sites, covering soil stockpiles with plastic sheeting, and covering soils in haul trucks with secured tarps.

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

LESS THAN SIGNIFICANT IMPACT

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

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

As discussed above, although the proposed project is in a seismically active area, the project site is not located on unstable soils or a geologic unit at risk for liquefaction or landslides. The project site consists of compact, relatively flat land that is surrounded by developed land. According to the Geotechnical Engineering Investigation (Appendix D), onsite soils are anticipated to have a negligible collapse potential when inundated with water. Likewise, based on the absence of shallow groundwater, subsurface soils at the project site are not considered susceptible to liquefaction. However, artificial fill and the upper portion of native soils are considered slightly to moderately compressible. Therefore, Mitigation Measure GEO-1 would be implemented in order to reduce the potential for adverse total and differential settlement at the project site. Construction and operation of the proposed project would not involve activities known to cause or trigger subsidence and is not anticipated to adversely affect soil stability or increase the potential for local or regional landslides, subsidence, liquefaction, or collapse. Lastly, the project would comply with CBC requirements and recommendations of the Geotechnical Engineering Investigation. Because the project would not create or exacerbate conditions related to unstable soils and would implement mitigation to reduce potential risks related to compressible soils, impacts would be less than significant with mitigation.

Mitigation Measure

GEO-1 Overexcavation and Recompaction

To reduce the potential for adverse total and differential settlement of the proposed structures, the underlying subgrade soil shall be prepared in such a manner that a uniform response to the applied loads is achieved. For the proposed structures, onsite soils shall be overexcavated to a minimum depth of seven feet below the existing ground surface or four feet below the bottom of the proposed footings, whichever is deeper. In addition, all undocumented artificial fill should be removed. Deeper overexcavation may be recommended, depending on building loads. Where possible, the removal bottom should extend horizontally a minimum of five feet from the outside edges of the footings (including columns connected to the buildings), or a distance equal to the depth of over excavation below the footings, whichever is farther. During over excavation, the soil conditions should be observed by a qualified geotechnical engineer to further evaluate these recommendations based on actual field conditions encountered. A firm removal bottom should be established across the building footprint to provide uniform foundation support for the proposed structure. The removal bottom should be observed and tested prior to placing fill. Deeper over excavation and recompaction may be recommended locally until a firm removal bottom is achieved. Areas outside of the proposed structures planned for new asphalt or concrete pavement (such as drive aisles, parking areas or fire lanes), flatwork (such as sidewalks), site walls and low retaining walls (taller walls should be over excavated per the recommendations for buildings), areas to receive fill, and other improvements,

should be over excavated to a minimum depth of 24 inches below existing grade or 12 inches below proposed subgrade (including the footing subgrade for walls), whichever is deeper. After completion of the overexcavation, and prior to fill placement, the exposed surfaces should be scarified to a minimum depth of six inches, moisture conditioned to or slightly above optimum moisture content, and recompacted to a minimum 90 percent relative compaction, relative to the ASTM D1557 laboratory maximum density.

Implementation of Mitigation Measures GEO-1 would reduce the potential for adverse total and differential settlement at the project site, and compliance with this mitigation measure, applicable CBC requirements, and the recommendations of the Geotechnical Engineering Investigation would reduce impacts related to unstable soils to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils are highly compressible, clay-based soils that tend to expand as they absorb water and shrink as water is drawn away. According to the Geotechnical Engineering Investigation (Appendix D), the project site is comprised of artificial fill consisting of loose to medium dense, slightly moist silty sand and firm sandy silt to depths of 5 to 7.5 feet bgs. The artificial fill is underlain by younger alluvial soils. The presence of groundwater in the project site is reported to exceed 51.5 feet below ground surface (Leighton 2020). In addition, laboratory testing performed on representative samples of the near surface soils indicates that the soils possess a low to very low expansion range. Therefore, the proposed project would not create a substantial direct of undirect risk to life or property due to expansive soils and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

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

NO IMPACT

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

The project site is currently developed and in an urban region of the city. Due to the site being previously graded and developed, with previously placed artificial fill to a depth of 5 to 7.5 bgs, it is unlikely that unique paleontological resources exist on the project site. Although project implementation is not expected to uncover paleontological resources, a remote possibility for such resources to be uncovered during the over excavation and compaction process exists, and therefore the potential for impacts to previously undiscovered paleontological resources cannot be excluded. Mitigation Measure GEO-2 is therefore required to avoid impacts to paleontological resources in the case of unanticipated fossil discoveries.

Mitigation Measure

GEO-2 Unanticipated Discovery of Paleontological Resources

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

Mitigation Measure GEO-2, which would apply to all phases of project construction, would reduce the potential for impacts to fossils present on site by providing for the recovery, identification, and curation of paleontological resources, and would reduce potential impacts to paleontological resources to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	■

Overview of Climate Change and Greenhouse Gases

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons and perfluorocarbons, and sulfur hexafluoride. Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, and CH_4 results from off-gassing associated with agricultural practices and landfills. Different types of GHGs have varying global warming potentials (GWPs), which are the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the GHG emissions, referred to as carbon dioxide equivalent (CO_2e), and is the amount of a GHG emitted multiplied by its GWP. CO_2 has a 100-year GWP of one. By contrast, CH_4 has a GWP of 28, meaning its global warming effect is 28 times greater than that of CO_2 on a molecule per molecule basis (IPCC 2014a).[1]

The accumulation of GHGs in the atmosphere regulates Earth's temperature. Without the natural heat-trapping effect of GHGs, the Earth's surface would be about 33 degrees Celsius (°C) cooler (World Meteorological Organization 2020). However, emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of GHGs in the atmosphere beyond the level of naturally occurring concentrations.

[1] The IPCC's (2014a) *Fifth Assessment Report* determined that methane has a GWP of 28. However, modeling of GHG emissions was completed using the California Emissions Estimator Model version 2016.3.2, which uses a GWP of 25 for methane, consistent with the IPCC's (2007) *Fourth Assessment Report*.

Greenhouse Gas Emissions Inventory

Worldwide anthropogenic emissions of GHGs were approximately 46,000 million metric tons (MT) of CO_2e in 2010. CO_2 emissions from fossil fuel combustion and industrial processes contributed about 65 percent of total emissions in 2010 (IPCC 2014b).

Total United States GHG emissions were 6,676.6 MMT of CO_2e in 2018. Emissions increased by 2.9 percent from 2017 to 2018, and since 1990, total U.S. emissions have increased by an average annual rate of 0.13 percent for a total increase of 3.7 percent between 1990 and 2018. In 2018, the transportation and industrial end-use sectors accounted for 36 percent and 26 percent, respectively, of nationwide GHG emissions while the residential and commercial end-use sectors accounted for 20 percent and 17 percent of nationwide GHG emissions, respectively, with electricity emissions distributed among the various sectors (USEPA 2020).

Based on the CARB's California Greenhouse Gas Inventory for 2000-2017, California produced 424.1 MMT of CO_2e in 2017. The major source of GHG emissions in California is the transportation sector, which comprises 41 percent of the state's total GHG emissions. The industrial sector is the second largest source, comprising 24 percent of the state's GHG emissions while electric power accounts for approximately 15 percent (CARB 2019).

Regulatory Setting

California Regulations

The State of California considers GHG emissions and the impacts of climate change to be a serious threat to the public health, environment, economic well-being, and natural resources of California, and has taken an aggressive stance to mitigate its impact on climate change through the adoption of policies and legislation. CARB is responsible for the coordination and oversight of state and local air pollution control programs in the state. California has numerous regulations aimed at reducing the state's GHG emissions; some of the major initiatives are summarized below.

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

The "California Global Warming Solutions Act of 2006," (AB 32), outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO_2e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others (CARB 2008). Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since the Scoping Plan's approval.

The CARB approved the 2013 Scoping Plan update in May 2014. The update defined the CARB's climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the state's longer term GHG reduction strategies with other state policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 (discussed later). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with statewide per capita goals of six MT of CO_2e by 2030 and two MT of CO_2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the state (CARB 2017).

SENATE BILL 375

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles for 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. SCAG was assigned targets of an 8 percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

Regional Regulations

2020-2045 SCAG RTP/SCS

On May 7, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS (titled Connect SoCal) for federal transportation conformity purposes and will consider approval of the full plan and for all other purposes within 120 days of this date. The 2020-2045 RTP/SCS builds upon the progress made through implementation of the 2016-2040 RTP/SCS and includes ten goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The SCS establishes a land use vision of center-focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation (SCAG 2020).

Local Regulations

ENERGY ACTION PLAN

The City of West Covina has not adopted a Climate Action Plan or other GHG reduction plan to date, nor has the City adopted a GHG emissions significance threshold for the purposes of CEQA. As discussed in Section 6, *Energy*, the City adopted an EAP in 2011 that contains policies to reduce energy use within the City, which would also result in reduced GHG emissions. The project's consistency with the provisions and intent of the EAP is discussed in Section 6, *Energy*.

GENERAL PLAN

The City's General Plan contains a number of sustainability policies that relate to GHG emissions. Relevant policies include the following:

P1.1 Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular traffic.

P1.2 Promote the use of energy-efficient vehicles.

P1.11 Plant to maximize the social, economic, and environmental benefits of trees.

P4.5 Work to eliminate barriers to pedestrian and bicycle travel.

P4.8 Implement "green" streetscape elements for purposes of beautification, carbon reduction and stormwater runoff management.

P5.6 Continue existing beneficial energy conservation programs, including adhering to the California Energy Code in new construction & major renovations.

P5.9 Provide adequate facilities & services for the collection, transfer, recycling, & disposal of refuse.

P6.1 Promote and support transportation decisions that reduce driving and increase rates of transit use, walking, and biking.

Methodology

GHG emissions associated with the proposed project were calculated using CalEEMod version 2016.3.2 (see Appendix A for CalEEMod worksheets). The construction schedule and construction equipment list were based on project information provided by the applicant. It is assumed that all construction equipment used would be diesel-powered. In accordance with SCAQMD guidance, construction emissions were amortized over a period of 30 years (the assumed life of the project) and amortized construction emissions were added to operational emissions so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008b).

Because the project would be operational post-2020, project emissions were modeled for year 2030 in accordance with the State's next milestone GHG reduction target for 2030 per SB 32. CalEEMod calculates operational emissions of CO_2, CH_4, and N_2O associated with energy use, area sources, waste generation, water use and conveyance as well as CO_2 and CH_4 emissions associated with mobile sources. The default electricity consumption values in CalEEMod include the CEC-sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies. CalEEMod currently incorporates California's 2016 Title 24 building energy efficiency standards; however, the project would be subject to at least the 2019 Title 24 standards. According to the CEC, nonresidential buildings

built to the 2019 standards will use about 30 percent less energy than those built to the 2016 standards due to energy efficiency measures, particularly lighting upgrades (CEC 2018b). As a result, a 30 percent reduction was included in the model for the project's Title 24 energy use.

The project would be served by Southern California Edison (SCE). Therefore, SCE's energy intensity factors (i.e., the amount of CO_2, CH_4, and N_2O per kilowatt-hour) were used to calculate GHG emissions. The default SCE energy intensity factors included in CalEEMod are based on data from 2012. As of 2012, SCE procured 20.6 percent of its electricity from renewable sources (SCE 2012); however, per SB 100, the statewide RPS Program requires electricity providers to increase procurement from eligible renewable energy sources to 33 percent by 2020 and 60 percent by 2030. To account for the continuing effects of the RPS, the energy intensity factors included in CalEEMod were reduced based on the percentage of renewables reported by SCE. SCE energy intensity factors that include this reduction are shown in Table 9.

Table 9 SCE Energy Intensity Factors

	2012 (lbs/MWh)	2030 (lbs/MWh)[2]
Percent procurement	20.6%[1]	60%
Carbon dioxide (CO_2)	702.4	353.87
Methane (CH_4)	0.029	0.015
Nitrous oxide (N_2O)	0.006	0.003

[1] Source: SCE 2012

[2] RPS goal established by SB 100

GHG emissions from water and wastewater usage calculated in CalEEMod were based on the default electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for northern and southern California. A 20 percent reduction in indoor potable water use was incorporated in the model in accordance with CALGreen standards. In addition, the project would include water efficient landscape irrigation, which was included in the CalEEMod model.

Mobile source emissions are generated by the increase in vehicle trips to and from the project site associated with operation of on-site development. Ganddini Group, Inc. (Ganddini) prepared a TIA for the proposed project, which determined that the proposed project would result in a net increase of 2,563 daily trips (Ganddini 2020; Appendix I). The estimated trip generation and pass-by rates for the proposed project were included in CalEEMod. CalEEMod calculates emissions of CO_2 and CH_4 generated by project-generated vehicle trips (i.e., mobile sources). However, CalEEMod does not calculate N_2O emissions from mobile sources; therefore, N_2O emissions were quantified separately using guidance from CARB (see Appendix A for calculations).

Because existing uses on the project site would be or already have been demolished, existing operational emissions were subtracted from the proposed project's emissions to account for the net change in GHG emissions associated with the project. Existing emissions were calculated using CalEEMod defaults for the year 2030 and the latest Institute of Transportation Engineers trip generation rate for the used automobile sales land use (Land Use Code 841) (Institute of Transportation Engineers 2017).

Significance Thresholds

The majority of individual projects do not generate sufficient GHG emissions to create significant project-specific environmental effects. However, the environmental effects of a project's GHG emissions can contribute incrementally to cumulative environmental effects that are significant, contributing to climate change, even if an individual project's environmental effects are limited (CEQA Guidelines Section 15064[h][1]). The issue of a project's environmental effects and contribution towards climate change typically involves an analysis of whether or not a project's contribution towards climate change is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

In late 2015, the California Supreme Court's Newhall Ranch decision confirmed that there are multiple potential pathways for evaluating GHG emissions consistent with CEQA, depending on the circumstances of a given project (*Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal. 4th 204). Given the legislative attention and judicial action regarding post-2020 goals and the scientific evidence that additional GHG reductions are needed through the year 2050, the Association of Environmental Professionals' (AEP) Climate Change Committee published a white paper in October 2016 to provide guidance on defensible GHG thresholds for use in CEQA analyses and GHG reduction targets in climate action plans in light of the change in focus on the 2030 reduction target and questions raised in the Newhall Ranch case (AEP 2016).

The AEP Climate Change Committee white paper identified seven thresholds for operational emissions. The following four methods described are the most widely used evaluation criteria:

(1) **Consistency with a Qualified GHG Reduction Plan.** For a project located within a jurisdiction that has adopted a qualified GHG reduction plan (as defined by CEQA Guidelines Section 15183.5), GHG emissions would be less than significant if the project is anticipated by the plan and fully consistent with the plan. However, projects with a horizon year beyond 2020 should not tier from a plan that is qualified up to 2020.

(2) **Bright Line Thresholds.** There are two types of bright line thresholds:

   a. **Standalone Threshold.** Emissions exceeding standalone thresholds would be considered significant.

   b. **Screening Thresholds.** Emissions exceeding screening thresholds would require evaluation using a second-tier threshold, such as an efficiency threshold or other threshold concept, to determine whether project emissions would be considered significant.

      However, projects with a horizon year beyond 2020 should take into account the type and amount of land use projects and their expected emissions out to year 2030.

(3) **Efficiency Thresholds.** Most land use sector efficiency thresholds are currently based on AB 32 targets and should not be used for projects with a horizon year beyond 2020. Projects with a horizon year beyond 2020 should use efficiency metrics that are adjusted for 2030 and include applicable land uses.

(4) **Percent Below "Business as Usual" (BAU).** GHG emissions would be less than significant if the project reduces BAU emissions by the same amount as the statewide 2020 reductions. However, this method is no longer recommended following the Newhall Ranch ruling (AEP 2016).

The City does not have a climate action plan that can be used for project tiering for threshold method (1). Efficiency thresholds (threshold method [3]) are quantitative thresholds based on a measurement of GHG efficiency for a given project, regardless of the amount of mass emissions. These thresholds identify the emission level below which new development would not interfere with attainment of statewide GHG reduction targets. A project that attains such an efficiency target, with or without mitigation, would result in less than significant GHG emissions. This option cannot be utilized, however, because the City does not have an existing community-wide baseline inventory that can be used to calculate a project-specific efficiency threshold. Comparison of project emissions with BAU emissions (threshold method [4]) are no longer recommended following the Newhall Ranch ruling. Therefore, threshold methods (1), (3), and (4) are not appropriate for the proposed project. As such, consistent with a recent CEQA analysis published by the City, the most appropriate threshold for the project is the bright line threshold of 3,000 MT of CO_2e established by SCAQMD (West Covina 2020a). As such, the project would result in a significant impact if project-generated emissions exceed the bright line threshold provided by the SCAQMD's GHG CEQA Significance Threshold Working Group in September 2010 (SCAQMD 2010).

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

Project construction is assumed to occur over a period of approximately one year, and the project is assumed to become operational in 2022. Based on CalEEMod modeling results, construction activities for the project would generate an approximately 361 MT of CO_2e (Table 10). Amortized over a 30-year period (the assumed life of the project per SCAQMD guidance), project construction would generate about 12 MT of CO_2e per year.

Table 10 Estimated Construction GHG Emissions

Project Emissions (MT/yr CO_2e)	
2020	90.4
2021	270.3
Total	360.7
Total Amortized over 30 Years	12.0

See Appendix A for CalEEMod worksheets.

Table 11 summarizes the project's combined construction and operational GHG emissions. Existing uses on the project site include two automobile dealerships/repair center, which would be demolished under the proposed project. Therefore, these emissions were subtracted from those of the proposed project to obtain the overall net change in GHG emissions. Once construction activities are complete, the source of GHG emissions associated with the project would be mainly from energy consumption and mobile sources (i.e., vehicle trips). A breakdown of emissions by source type is available in the CalEEMod modeling worksheets in Appendix A of this IS-MND.

Table 11 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT of CO_2e)
Construction	12.0
Operation	
Area	<0.1
Energy	178.3
Solid Waste	48.5
Water	13.2
Mobile	
CO_2 and CH_4	1,338.0
N_2O	33.6
Project Annual Emissions	**1,623.5**
Existing Annual Emissions	471.1
Net Project Annual Emissions (Project-Existing)	**1,152.4**
SCAQMD Brightline Threshold	3,000
Exceeds Threshold?	**No**

See Appendix A for CalEEMod worksheets.

As shown in Table 11, the proposed project would result in net increase in GHG emissions of 1,152 MT of CO_2e per year, which would not exceed the SCAQMD threshold of 3,000 MT of CO_2e per year. Therefore, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

As discussed under *Regulatory Setting*, plans and policies have been adopted to reduce GHG emissions in the Southern California region, including the State's 2017 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and local policies contained in the City's General Plan and EAP. The proposed project's consistency with these plans is discussed in the following subsections. As discussed therein, the proposed project would not conflict with plans and policies aimed at reducing GHG emissions. No impact would occur.

2017 Scoping Plan

The principal state plan and policy is AB 32, the California Global Warming Solutions Act of 2006, and the follow up, SB 32. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020

and the goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. Pursuant to the SB 32 goal, the 2017 Scoping Plan was created to outline goals and measures for the state to achieve the reductions. The 2017 Scoping Plan's goals include reducing fossil fuel use and energy demand and maximizing recycling and diversion from landfills. The project would be consistent with these goals through project design, which includes complying with the latest Title 24 Green Building Code and Building Efficiency Energy Standards and installing energy-efficient LED lighting, water-efficient faucets and toilets, water efficient landscaping and irrigation, and EV charging parking spaces. Therefore, the project would be consistent with the 2017 Scoping Plan.

SCAG 2020-2045 RTP/SCS

The SCAG's 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by 8 percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. The 2016-2040 RTP/SCS includes ten goals with corresponding implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The project's consistency with the 2020-2045 RTP/SCS is discussed in Table 12. As shown therein, the proposed project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 12 Project Consistency with Applicable SCAG 2020-2045 RTP/SCS Strategies

Reduction Strategy	Project Consistency
Focus Growth Near Destinations & Mobility Options. ▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations ▪ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets ▪ Plan for growth near transit investments and support implementation of first/last mile strategies. ▪ Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses ▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods ▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) ▪ Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	**Consistent.** The proposed project is an infill development that would replace the underperforming auto dealership retail developments on the project site with new retail commercial uses in an urbanized area adjacent to existing regional-serving commercial retail development. Existing public transit facilities are located near the project site, including bus stops for Foothill Transit Routes 190, 281, and 480. Furthermore, Route 281 connects to the Covina Metrolink station located 1.3 miles north of the project site. The proposed project would also be within walking and biking distance of existing residential, commercial, and recreational uses and would provide bicycle parking options on the site. Therefore, the proposed project would focus growth near destinations and mobility options.

Reduction Strategy	Project Consistency
Leverage Technology Innovations. ▪ Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space ▪ Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments ▪ Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Consistent.** The project would include four EV charging spaces, ten designated EV parking spaces, and six Clean Air Vehicle stalls.
Support Implementation of Sustainability Policies. ▪ Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions ▪ Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations ▪ Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space ▪ Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies ▪ Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region ▪ Continue to support long range planning efforts by local jurisdictions ▪ Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Consistent.** The project would be consistent with the City of West Covina EAP (see discussion in Section 5, *Energy*), Title 24, and the latest CALGreen requirements. Therefore, the project would support implementation of sustainability policies.
Promote a Green Region. ▪ Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards ▪ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration ▪ Integrate local food production into the regional landscape ▪ Promote more resource efficient development focused on conservation, recycling and reclamation ▪ Preserve, enhance and restore regional wildlife connectivity	**Consistent.** The project is an infill development that would involve construction of commercial uses in an urbanized area and would therefore not interfere with regional wildlife connectivity or convert agricultural land. The project would comply with the applicable conservation policies such as the City's EAP (discussed in Section 5, *Energy*), Title 24, and CALGreen. Therefore, the project would support development of a green region.

Reduction Strategy	Project Consistency
▪ Reduce consumption of resource areas, including agricultural land ▪ Identify ways to improve access to public park space	

Source: SCAG 2020

Local Regulations

As further discussed in Section 6, *Energy*, the proposed project would be consistent with the provisions and intent of the City's EAP due to project design features that would conserve energy, such as the use of LED lighting. In addition, as illustrated in Table 13, the proposed project would be consistent with applicable policies associated with GHG emission reductions within the City's General Plan.

Table 13 West Covina General Plan Consistency Analysis

General Plan Policy	Project Consistency
P1.1. Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular traffic.	**Consistent.** The project site is within 0.25 mile of bus stops that serve Foothill Transit Routes 190, 281, and 480. Furthermore, Route 281 connects to the Covina Metrolink station located 1.3 miles north of the project site. The proposed project would also be within walking and biking distance of existing residential, commercial, and recreational uses and would provide short- and long-term bicycle parking options on the site. Therefore, the proposed project would be accessible by alternative transportation modes.
P1.2. Promote the use of energy-efficient vehicles.	**Consistent.** The proposed project would include four EV charging spaces, enabling customers with EVs to utilize the project site for charging, and it would also include ten designated EV/Clean Air Vehicle stalls.
P1.11. Plant to maximize the social, economic, and environmental benefits of trees.	**Consistent.** The project site almost entirely paved and contains only five ornamental trees. The proposed project would result in the net addition of 38 trees to the project site.
P4.5. Work to eliminate barriers to pedestrian and bicycle travel.	**Consistent.** The proposed project would add street trees to provide additional shading for sidewalks adjacent to the project site and would provide bicycle parking infrastructure.
P4.8. Implement "green" streetscape elements for purposes of beautification, carbon reduction and stormwater runoff management.	**Consistent.** The proposed project would add new trees throughout the project site and street trees along the border of East Garvey Avenue.
P5.6. Continue existing beneficial energy conservation programs, including adhering to the California Energy Code in new construction & major renovations.	**Consistent.** The proposed project would be required to comply with the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24). According to the applicant, the project would include energy efficient design features such as energy-efficient lighting, drought tolerant landscaping, and water-efficient indoor fixtures throughout the project site.
P5.9. Provide adequate facilities & services for the collection, transfer, recycling, & disposal of refuse.	**Consistent.** The proposed project would include trash enclosures that provide for separate waste disposal and recycling containers and would be served by Athens Services, the existing waste hauler for the City.

General Plan Policy	Project Consistency
P6.1. Promote and support transportation decisions that reduce driving and increase rates of transit use, walking, and biking.	**Consistent.** The project site is within 0.25 mile of bus stops that serve Foothill Transit Routes 190, 281, and 480. Furthermore, Route 281 connects to the Covina Metrolink station located 1.3 miles north of the project site. The proposed project would also be within walking and biking distance of existing residential, commercial, and recreational uses and would provide bicycle parking options on the site. Therefore, the proposed project would promote and support transportation decisions that reduce driving and increase rates of transit use, walking, and biking.

Source: West Covina 2016

As discussed above and illustrated in Table 12 and Table 13, the proposed project would be consistent with the 2017 Scoping Plan, 2020 RTP/SCS, and the City of West Covina General Plan. Therefore, the proposed project would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. There would be no impact.

NO IMPACT

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	■	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	■	☐
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	■
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	■

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

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

Operation of the proposed project would likely involve the use of common materials used in the regular maintenance of buildings and landscaping, such as cleaning and degreasing solvents, fertilizers, and pesticides. However, maintenance activities would only require minor quantities of these products and would not involve the use of extremely hazardous substances. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. The transport, use, and storage of hazardous materials during construction of the project would be subject to all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Therefore, the proposed project would not create a significant hazard to the public or the environmental through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

A Phase II Environmental Site Assessment (ESA) was conducted by Partner Engineering and Science, Inc. (Partner) in June 2013 for the proposed project (see Appendix E) to further assess recognized environmental conditions (RECs) and historic recognized environmental conditions (HRECs) that were identified by Partner in a previous Phase I ESA (see Appendix E). RECs on the project site include its former use for automotive repair, below-grade and aboveground hydraulic lifts, and a two-chambered clarifier used to treat wastewater streams. In addition, an HREC was found to exist on the project site; a 1,000-gallon underground storage tank (UST) containing waste oil and a 4,000-gallon UST containing unleaded gasoline were removed from the property in 1988. The closure letter from the Los Angeles County Department of Public Works indicates that the USTs were properly removed, and soil testing indicated that no soil contamination occurred, and no further action was required. In addition, the Phase I ESA noted that, due to the age of the buildings, there is the potential for the presence of asbestos-containing materials (ACMs) on the project site.

The Phase II ESA investigated the potential presence of total petroleum hydrocarbons as oil (TPH-o), carbon chain total petroleum hydrocarbons (TPH-cc), volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), and metals in the site soils due to the former use of the project site as an auto dealership and service center. None of the soil samples contained detectable concentrations of VOCs or PCBs and none exceeded the background concentrations for metals in typical California soils. One soil boring collected near the former car wash area detected TPH-o. The TPH-o concentration did not exceed the Maximum Soil Screening Levels (SSLs), which is the concentration of petroleum hydrocarbons allowed to remain in soil without potentially degrading the

quality of groundwater. Based on investigation and testing results, Partner determined that there is no evidence of a release on the project site and no further investigation was recommended.

Asbestos and Lead Surveys were conducted for the buildings on the project site in March 2020, prior to the commencement of demolition activities in July 2020. The Asbestos and Lead Surveys determined that ACMs and/or lead-containing paint (LCP) were found on the buildings formerly located at 2539 East Garvey Avenue North, but were not found on the building located at 2501 East Garvey Avenue North (Nick's Environmental Consulting 2020a, 2020b, and 2020c; Appendix F). In accordance with the recommendations of the Asbestos and Lead Surveys and all applicable local, state, and federal regulations, a California licensed abatement contractor was hired to properly remove and dispose of ACMs during demolition activities on 2539 East Garvey Avenue North (Nick's Environmental Consulting 2020b and 2020c; Appendix F). Likewise, demolition of the structure found to contain LCP was conducted in accordance with the recommendations of the Asbestos and Lead Survey recommendations, which included containment, air filtration, and disposal procedures for the handling of LCP (Nick's Environmental Consulting 2020c; Appendix F). Compliance with the recommendations of the Asbestos and Lead Surveys and the applicable local, state, and federal regulations during project demolition activities ensured that construction of the proposed project did not create a significant hazard to the public or environment. As discussed under *Impact a.*, operation of the project would not involve the regular use or storage of large quantities of hazardous materials that could pose a threat to the public. Therefore, construction and operational activities associated with the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The nearest school is the Discovery Montessori Preschool, located immediately adjacent to the southwest corner of the project site. During construction of the proposed project, hazardous and potentially hazardous materials would be utilized for the transport and operation of vehicles and machinery. As discussed above, the transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. As discussed under *Impact a*. of this section, the construction of the project, and associated air pollutant emissions, would be temporary and less than significant. Furthermore, operation and maintenance of the proposed project would likely involve the use of common cleaning and landscape maintenance materials comparable to those materials already in use in the project site vicinity. Therefore, emissions or hazardous materials releases near Discovery Montessori Preschool would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

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

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

The SEMS database search did not produce any results associated with the project site, indicating that the site is free of known hazards and contaminants (USEPA 2019b). A search of the DTSC Envirostor database did not identify any hazardous or known contamination sites within 0.25 mile of the site (DTSC 2020a). Furthermore, according to the DTSC Cortese list, the only hazardous materials release site in the City of West Covina is the BKK Sanitary Landfill located approximately 2.85 miles southwest of the project site (DTSC 2020b). According to GeoTracker, the project site does not contain any LUST or other cleanup sites (SWRCB 2020). There are four LUST cleanup sites within a 0.25-mile radius of the project site; however, all four have been completed and the cases are now closed (SWRCB 2020). Furthermore, as discussed under *Impact b.*, Partner determined that the former use of the project site as an automotive dealership and repair shop did not result in soil contamination exceeding SSLs (Partner 2013; Appendix E). Impacts related to hazardous material sites would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is not located within two miles of a public airport or within airport land use plan. The airports nearest to the project site are the Brackett Field Airport, located 6.25 miles to the northeast, and the San Gabriel Airport, located 8.11 miles west. Furthermore, there are no private airstrips in the vicinity of the project site. Therefore, the project would not result in safety hazards related to airports for people residing or working at the project site and its vicinity. No impact would occur.

NO IMPACT

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

The proposed project would involve the construction of three new commercial/retail buildings on the project site, including a drive-thru restaurant with dining room and patio. During construction, temporary and occasional lane closures may be required, however two-way traffic would still be maintained at construction entry points. Construction would not modify existing roadways in the vicinity. Vehicles would be able to access the project site via two entrances off East Garvey Avenue North. According to the Traffic Impact Analysis, the restaurant use would not result in long vehicle queues that could impact the flow of traffic on East Garvey Avenue North (Ganddini 2020; Appendix I). Implementation of the proposed project would not create new obstructions to an emergency response plan or evacuation plan. In addition, the project would not result in inadequate emergency

access because it would be subject to Fire Department review of site plans, site construction, and the actual structures prior to occupancy to ensure that required fire protection safety features, including building sprinklers and emergency access, are implemented. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. No impact would occur.

NO IMPACT

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

The project site is in an urban area of the City of West Covina. Undeveloped wildland areas are not located in proximity to the project site. As further discussed in Section 20, *Wildfire,* the project site is not located in a "Fire Hazard Severity Zone" or "Very High Hazard Severity Zone" for wildland fires (California State Geoportal 2020). The nearest Very High Hazard Severity Zone is located approximately one mile southeast of the project site (California State Geoportal 2020). Therefore, the project would not expose people or structures to a significant risk of loss injury or death involving wildland fires. No impact would occur.

NO IMPACT

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10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	■	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	■	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	■	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	■	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	■	☐
(iv) Impede or redirect flood flows?	☐	☐	■	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	■	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	■	☐

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

The project site is almost entirely developed and is surrounded by residential and commercial uses in an urban area. Prior to demolition of buildings on the project site as part of the proposed project, drainage was collected in existing paved parking lots and at downspouts on existing structures. This is still true for the one building currently remaining on the project site. Stormwater is then directed to the City's existing stormwater system via curb gutters along East Garvey Avenue North. Though construction of the proposed project would involve removal of nine ornamental trees, the project would add 48 new trees to the project site and incorporate approximately 19,200 sf of landscaped area, which would increase the permeable surface area of the project site by approximately three percent compared to existing conditions (MFKessler 2020a; Appendix G). A Hydrology Study was prepared for the proposed project which studied the existing stormwater run-off and the future stormwater run-off generated at the project site under two-year, ten-year, 25-year, and 50-year storm events (MFKessler 2020b; Appendix G). The Hydrology Study determined that the project site would experience a minimal decrease in stormwater run-off with implementation of the proposed project. Therefore, upon completion, the proposed project would not increase existing stormwater flows off the site and would not affect water quality.

In addition, the proposed project would be required to comply with all established regulations under the National Pollution Discharge Elimination System (NPDES) permitting program to control both construction and operation stormwater discharges. Under the permit, the project applicant would be required to eliminate or reduce non-stormwater discharges, develop and implement a Stormwater Pollution Prevention Program (SWPPP) for project construction activities (as discussed in Section 6, *Geology and Soils*), and perform inspections of the stormwater pollution prevention measures and control practices to ensure conformance with the SWPPP. Further, the applicant would be required to implement all applicable source control BMPs to reduce water-quality impacts as listed under the NPDES permit. The project would also be required to comply with WCMC water quality regulations. Chapter 9, Article III, Section 9-36, Control of pollutants from new developments/redevelopment projects, requires that the project implement a standard urban stormwater mitigation plan (SUSMP) that the City would review and approve prior to construction of the project.

As required by the WCMC and NPDES permit, construction activities on the project site would use a series of BMPs to reduce erosion and sedimentation and the construction contractor would be required to operate and maintain these controls throughout the duration of construction. Furthermore, the project applicant has developed a Low-Impact Development (LID) Plan for the project site detailing the BMPs that would be utilized in order to comply with NPDES stormwater requirements and County of Los Angeles LID requirements (MFKessler 2020a; Appendix G). BMPs planned for the proposed project include increasing permeable surface on the project site, directing flows to landscaping, and construction of three underground infiltration tanks to treat stormwater flows generated at the project site before discharging flows to the gutter system on East Garvey Avenue North (MFKessler 2020a; Appendix G). Because the proposed project includes additional permeable surface area and groundwater infiltration tanks that would improve infiltration and stormwater quality and would comply with all applicable local and federal stormwater drainage requirements, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site receives its water service from the City of Covina. The City of Covina is a shareholder in, and purchases the majority of its water from, Covina Irrigating Company (CIC). The City of Covina also receives about six percent of its water supply from Three Valleys Municipal Water District (TVMWD) (Covina 2017). CIC primarily sources groundwater from the Main San Gabriel Basin, which is an adjudicated basin subject to a groundwater management plan to ensure its sustainable management (Covina 2017).

As discussed in Section 19, *Utilities and Service Systems,* the proposed project's water demand would not substantially affect the City of Covina's ability to meet water demands. According to its 2015 Urban Water Management Plan (UWMP), the City of Covina would be able to provide reliable water supplies for an average year, single dry year, and multiple dry years for its existing and planned supplies through 2040 (Covina 2017). Furthermore, the majority of the project site is covered in hardscaping. The proposed project would increase permeable surfaces on-site by including 19,200 sf of landscaped area. Compared to existing conditions, the increase of landscaped area under the proposed project would facilitate infiltration and groundwater recharge and reduce the amount of surface runoff from the project site. Therefore, the proposed project would be served by available water supply and would not significantly deplete groundwater supplies or interfere with groundwater recharge. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is generally flat, with minimal elevation change across the site. The project site does not contain any streams, rivers, or other drainage features. The project site is developed with commercial buildings and surface parking lots and is almost entirely paved with impermeable surfaces. As previously discussed, the project would increase on-site permeable surfaces by including 19,200 sf of landscaped area and would include an LID Plan to treat stormwater generated at the project site and minimize the flow of stormwater from the project site to offsite locations. Therefore, runoff leaving the project site would be reduced when compared to existing conditions. Furthermore, as listed under *Impact a.* of this section, the proposed project would comply with the provisions of the NPDES General Construction Permit and the City's urban runoff requirements as stated in the WCMC, which would reduce the quantity and level of pollutants in runoff leaving the project site. Therefore, impacts related to erosion and siltation would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

The project site is developed and is almost entirely paved with impermeable surfaces. Under the proposed project, the project site would be redeveloped from its current condition by demolishing any remaining structures and building three new commercial structures. The project would include approximately 19,200 sf of landscaped area, which would increase pervious surfaces and reduce the volume of runoff from the site compared to existing conditions. In addition, any runoff from the site would be conveyed into the existing drainage system and the project would not substantially change the site's drainage patterns and would not alter a stream, river or other drainage course in a manner that would result in flooding or redirect flood flows. The proposed project would not increase runoff such that flooding would occur, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The project site is generally flat, with minimal elevation change across the site. The project site does not contain any streams, rivers, or other drainage features. The project site is almost entirely paved with impermeable surfaces. As previously discussed, the project would increase permeable surfaces on-site by including 19,200 sf of landscaped area. As detailed in the Hydrology Study and LID Plan, runoff leaving the project site would be reduced when compared to existing conditions and would be appropriately treated and managed through onsite BMPs (MFKessler 2020a and 2020b; Appendix G).

As discussed under *Impact a.* of this section, the proposed project would comply with the City's urban runoff requirements as stated in the WCMC and with the requirements of NPDES, which would reduce the quantity and level of pollutants in runoff leaving the project site. Therefore, the proposed project would not create runoff that would exceed the capacity of the storm drain system and would not provide a substantial additional source of polluted runoff. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is not located near any major bodies of water that could produce seiche impacts at the project site. In addition, the project site is located approximately 35 miles from the Pacific Ocean and, according to the California DOC, is not inside the boundaries of any regional tsunami impact areas (DOC 2020b). Furthermore, according to the Federal Emergency Management Agency (FEMA), the project site is located in Zone X and has a 0.2 percent Annual Chance Flood Hazard, indicating that the project site is in an area of minimal flood hazard (FEMA 2008). However, according to the City's Natural Hazard Mitigation Plan, the City could be impacted by flooding in the event of dam failure at the Puddingstone Dam or San Dimas Dam, located 4.6 and 8.8 miles from the project site, respectively (West Covina 2020a). The Puddingstone Dam failed once in 1926, when it overtopped due to construction on the dam, and there was no loss of life or significant damage. The San Dimas Dam has not experienced failure to date (West Covina 2020a). Dam failure at either of these dams is unlikely, and each dam has an Emergency Action Plan in place to guide emergency response in case of dam failure. Furthermore, the proposed project would not involve the regular use or storage of large quantities of hazardous materials. Therefore, the project would not pose a significant risk of release of pollutants due to inundation and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project would receive water service from the City of Covina, which maintains a UWMP (Covina 2017). The City of Covina purchases treated water from CIC and TVMWD, which is sourced from the Main Basin and imported water sources (Covina 2017). The commercial uses on the project site would not be point source generators of water pollutants and would not interfere with the ability of the City of Covina to maintain water quality standards per the UWMP. Furthermore, as discussed under *Impact a.*, the proposed project would increase permeable surfaces on the project site and would therefore increase infiltration on the site. Section 19, *Utilities and Service Systems*, provides additional details about project water demand. The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	■

a. Would the project physically divide an established community?

The proposed project involves demolition of commercial buildings and construction of three new commercial buildings in an urban area. Vehicular access to the project is and would continue to be provided via East Garvey Avenue North. The project does not include any new roads or infrastructure, such as fences, that have the potential to divide any established communities. No impact would occur.

NO IMPACT

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

The proposed project involves the construction of three commercial buildings and associated surface parking on a site that is currently zoned Medium Commercial (C-2) and has a land use designation of Commercial (C). The current zoning and land use designation permit the proposed use of the project site for commercial retail and a restaurant. Therefore, the project is consistent with the existing land use designation and there would be no impact.

NO IMPACT

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12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The California Surface Mining and Reclamation Act of 1975 (SMARA) was enacted to promote conservation and protection of significant mineral deposits. According to the California Department of Conservation Mineral Land Classification Maps, the project site is in an area with MRZ-3 designation, indicating that the area may contain mineral deposits; however, the significance cannot be evaluated using available data (DOC 1994). The proposed project involves demolition of commercial buildings and construction of new commercial buildings in their place, in an urban area not used for mineral deposit recovery. Given the existing conditions of the site and its surroundings and the nature of the project, the proposed project would not result in the loss of availability of a known mineral resource, and there would be no impact.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	■	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	■

Noise

The unit of measurement used to describe a noise level is the decibel (dB). However, the human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, a method called "A weighting" is used to adjust actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz, thus filtering out noise frequencies that are not audible to the human ear. A weighting approximates the frequency response of the average young ear when listening to most ordinary everyday sounds. When people make relative judgments of the loudness or annoyance of a sound, their judgments correlate well with the "A-weighted" levels of those sounds. Therefore, the A-weighted noise scale is used for measurements and standards involving the human perception of noise. In this analysis, all noise levels are A-weighted, and "dBA" is understood to identify the A-weighted decibel.

Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or

decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that an increase (or decrease) of 5 dBA (8 times [or one eighth] the sound energy) is readily perceptible; and that an increase (or decrease) of 10 dBA (10.5 times [or approximately one tenth] the sound energy) sounds twice (or half) as loud (Crocker 2007).

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been developed. The noise descriptors used for this analysis are the one-hour equivalent noise level (L_{eq}) and the community noise equivalent level (CNEL).

- The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period. Typically, L_{eq} is equivalent to a one-hour period, even when measured for shorter durations as the noise level of a 10- to 30-minute period would be the same as the hour if the noise source is relatively steady. L_{max} is the highest Root Mean Squared (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period (Crocker 2007).
- The CNEL is a 24-hour equivalent sound level with an additional 5 dBA penalty to noise occurring during evening hours, between 7:00 p.m. and 10:00 p.m., and an additional 10 dBA penalty to noise occurring during the night, between 10:00 p.m. and 7:00 a.m., to account for the added sensitivity of humans to noise during these hours (Caltrans 2013). Quiet suburban areas typically have a CNEL in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 70+ CNEL range.

Propagation

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in sound level as the distance from the source increases. The way sound reduces with distance depends on factors such as the type of source (e.g., point or line), the path the sound will travel, site conditions, and obstructions. Sound levels from a point source (e.g., construction, industrial machinery, ventilation units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Sound from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013).

Vibration

Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The vibration frequency of an object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body is from a low of less than 1 Hz up to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as

groundborne noise. Groundborne noise may result in adverse effects, such as building damage, when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz). Vibration may also damage infrastructure when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (Federal Transit Administration [FTA] 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Descriptors

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. The PPV and RMS velocity are normally described in inches per second (in./sec.). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020c).

Response to Vibration

Vibration associated with construction of the project has the potential to be an annoyance to nearby land uses. Caltrans has developed limits for the assessment of vibrations from transportation and construction sources. The Caltrans vibration limits are reflective of standard practice for analyzing vibration impacts on structures. The Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans 2020c) identifies impact criteria for buildings and criteria for human annoyances from transient and continuous/frequent sources: **Error! Reference source not found.**Table 14 presents the impact criteria for buildings, and Table 15 presents the criteria for humans.

Table 14 Vibration Damage Potential

Building Type	Maximum PPV (in./sec.)
Historic sites and other critical locations	0.1
Historic and some old buildings	0.5
Older residential structures	0.5
New residential structures	1.0
Modern industrial/commercial buildings	2.0

PPV = peak particle velocity; in./sec. = inches per second

Source: Caltrans 2020c

Table 15 Vibration Annoyance Potential

	Maximum PPV (in./sec.)	
Human Response	Transient Sources	Continuous/Frequent Intermittent Sources
Severe/Disturbing	2.00	0.70
Strongly perceptible	0.90	0.10
Distinctly perceptible	0.240	0.035
Barely perceptible	0.035	0.012

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls (i.e., a loose steel ball that is dropped onto structures or rock to reduce them to a manageable size). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV = peak particle velocity; in./sec. = inches per second

Source: Caltrans 2020c

Propagation

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Variability in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020c). When a building is exposed to vibration, a ground-to-foundation coupling loss (the loss that occurs when energy is transferred from one medium to another) will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Some land uses are considered more sensitive to ambient noise and ground-borne vibration levels than others. For example, residences, motels, hotels, schools, libraries, churches, nursing homes, auditoriums, museums, cultural facilities, parks, and outdoor recreation areas are more sensitive to noise than commercial and industrial land uses.

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

The sensitive receivers nearest to the site consist of single-family residences and the Discovery Montessori School/Preschool immediately to the west and multi-family residences approximately 150 feet to the west beyond the preschool. Additional single-family residences are located approximately 350 feet to the south across I-10 but are not considered sensitive receivers for the purpose of this analysis due to their distance from the site and location across I-10.

Project Noise Setting

The predominant noise source on and around the project site is vehicular traffic on I-10. Ambient noise levels are generally highest during the daytime and rush hour unless congestion substantially slows speeds. Four 15-minute noise level measurements were collected by Rincon on August 11, 2020

between 7:30 a.m. and 9:00 a.m. using an Extech (Model 407780A) ANSI Type 2 integrating sound level meter. Noise Measurement (NM) 1 was taken along the western boundary of the site adjacent to single-family residences, NM 2 was taken at the southeastern corner of the site, NM 3 was taken at the southwestern corner of the site adjacent to the preschool, and NM 4 was taken at the nearest residential cul-de-sac west of the site. Because of restrictions associated with COVID-19, which were in effect at the time on-site measurements were taken and are still ongoing, there is a decreased use of area roadways and on-site noise measurements cannot be considered fully representative of typical noise conditions. Nonetheless, on-site measurements were conducted for informational purposes.

Table 16 summarizes the noise measurement results and Figure 14 shows the noise measurement locations. Measured noise levels are provided in L_{eq} for the measurement period; L_{min} and L_{max} are also provided. These measurements are representative of existing ambient noise levels at these locations although, as described above, they may not be representative of typical conditions without COVID-19 restrictions. Detailed sound level measurement data are included in Appendix H.

Table 16 Project Vicinity Sound Level Monitoring Results

#	Measurement Location	Sample Times	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
1	Western boundary of site	7:27 a.m. – 7:42 a.m.	510 feet to centerline of I-10	55.9	53.4	65.3
2	Southeastern bend of site	7:47 a.m. – 8:02 a.m.	300 feet to centerline of I-10; 40 feet to centerline of East Garvey Avenue North	70.0	65.3	73.1
3	Southwestern corner of site adjacent to preschool	8:16 a.m. – 8:31 a.m.	210 feet to centerline of I-10; 20 feet to centerline of East Garvey Avenue North	70.0	67.4	79.7
4	West of site at residential cul-de-sac	8:40 a.m. – 8:55 a.m.	450 feet to centerline of I-10	54.9	53.3	62.4

See Appendix H for noise monitoring data.

Source: Rincon field visit on August 11, 2020.

Regulatory Setting

State of California

The 2019 California Green Building Standards Code (CALGreen), Title 24, Part 11, Section 5.507.4 (Acoustic Control) of the California Code of Regulations (CCR) requires the implementation of building assemblies and components with Sound Transmission Class (STC) values or Outdoor-Indoor Sound Transmission Class (OITC) for acoustical control in nonresidential buildings, using either the prescriptive or performance methods described in Sections 5.507.4.1 and 5.507.4.2. According to Section 5.507.4.1, acoustical control is required for nonresidential project construction located within the 65 CNEL or L_{dn}[2] contour of an airport , freeway, expressway, railroad, industrial noise source, or other fixed source. According to Section 5.507.4.1.1, where noise contours are not readily available, "buildings exposed to a noise level of 65 dB L_{eq}-1-hour during any hour of operation shall have building, addition or alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum STC of 40 (or OITC 30)." Otherwise, nonresidential projects may demonstrate compliance with Section

2 The day-night average sound level (Ldn) is the average noise level experienced within a 24-hour period.

5.507.4 through the prescriptive method (Section 5.507.4.1) or performance method (Section 5.507.4.2):

- If wall and roof-ceiling assemblies exposed to the noise source meet a composite STC rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30, through the prescriptive method; or
- If wall and roof-ceiling assemblies exposed to the noise are constructed to provide an interior noise environment that does not exceed 50 dB L_{eq}-1-hour in occupied areas during hours of operation through the performance method.

City of West Covina General Plan

The City of West Covina adopted the General Plan Update (PlanWC) in December 2016. The Our Healthy and Safe Community Chapter of PlanWC provides a description of existing noise levels and sources and incorporates comprehensive goals and policies, which focus on establishing and applying criteria for acceptable noise levels for different land uses in order to minimize the negative impacts of noise, especially at sensitive receivers. In support of these goals and policies, the City has adopted the State's noise and land use compatibility matrix into PlanWC, which determines the "normally acceptable,[3]" "conditionally acceptable,[4]" "normally unacceptable[5]", and "clearly unacceptable[6]" noise levels for various land uses. According to the City's noise compatibility matrix in PlanWC, ambient noise up to 70 CNEL is normally acceptable, ambient noise between 70 CNEL and 75 CNEL is conditionally acceptable, and ambient noise above 75 CNEL is normally unacceptable for office buildings and business commercial uses (West Covina 2016a).

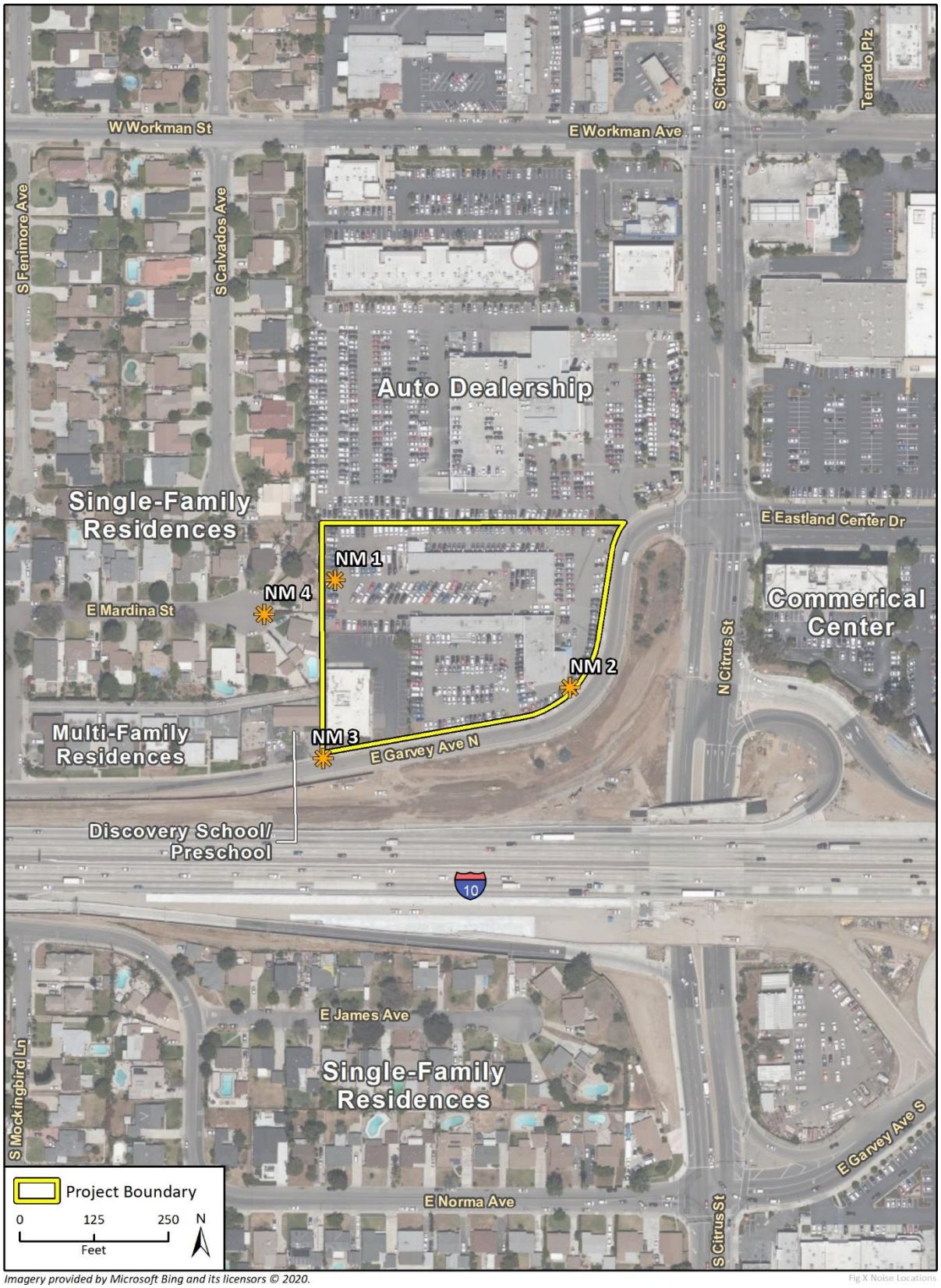
City of West Covina Municipal Code

West Covina's Noise Ordinance (Article IV of Chapter 15 of the WCMC) states that it is the City's policy to regulate and control annoying noise levels from all sources, and prohibits loud, unnecessary or unusual noise that unreasonably disturbs the peace and quiet of any residential neighborhood or that causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area.

Section 15-85 of the Noise Ordinance states that, if noise is plainly audible at 50 feet from the property line of any property, unit, building, structure or vehicle in which it is located, it shall be presumed that the noise being created is in violation. The Noise Ordinance also contains provisions regulating nuisance noise sources, such as repairing, rebuilding, or testing of any motor vehicles on private property, and the operation of two- and four-stroke engines. Any noise from these sources that exceed ambient noise levels by five decibels or more is considered a noise violation.

3 Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
4 Conditionally Acceptable. New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
5 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.
6 Clearly Unacceptable. New construction or development should generally not be undertaken.

Figure 14 Noise Measurement Locations



Section 15-95 of the Noise Ordinance prohibits any construction activities between the hours of 8:00 p.m. and 7:00 a.m. (or 6:00 a.m. for unloading and loading activities) within a residential zone, or within a radius of 500 feet therefrom, that causes the noise level at the property line to exceed the ambient noise level (defined as the all-encompassing noise associated with a given environment) by more than five decibels, unless a permit to do so has been obtained from the City, or in the case of emergency work as defined in the Noise Ordinance.

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

The proposed project involves the demolition of existing on-site commercial buildings and the construction of three new commercial buildings. Noise-sensitive receivers, consisting of residences and a preschool, may be subject to both temporary construction noise and long-term operational noise. The following discussions address construction and operational noise associated with the project.

Construction Noise

Construction activity would result in temporary increases in ambient noise in the project area on an intermittent basis and, as such, would expose surrounding noise-sensitive receivers to increased noise. The sensitive receivers consist of single-family residences and the Discovery Montessori School/Preschool immediately to the west and multi-family residences approximately 150 feet to the west beyond the preschool.

As discussed under *Regulatory Setting* of this section, WCMC Section 15-95 prohibits any construction activities between the hours of 8:00 p.m. and 7:00 a.m. (or 6:00 a.m. for unloading and loading activities) within a residential zone, or within a radius of 500 feet therefrom, that causes the noise level at the property line to exceed the ambient noise level by more than 5 dBA. While the City does not have specific noise level criteria for assessing daytime construction impacts, the FTA has developed criteria for determining whether construction of a project would result in a substantial temporary increase in noise levels. Based on FTA guidance, a significant impact would occur if project-generated construction noise exceeds a one-hour 90 dBA L_{eq} noise limit during the day at the nearest residences (FTA 2018). For the purpose of this analysis, the adjacent preschool is considered as noise sensitive as a residential use for comparison to FTA noise criteria.

Construction noise was estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) (2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at noise-sensitive receivers near the project site. RCNM provides reference noise levels for standard construction equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment.

Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some may have discontinuous high-impact noise levels. The maximum hourly L_{eq} of each phase is determined by combining the L_{eq} contributions from each piece of equipment used in that phase (FTA 2018). Project construction phases would include demolition, site preparation, grading, building construction, architectural coating, and paving of the project site. It is assumed that diesel engines would power all construction equipment. For assessment purposes, the loudest phases (i.e., grading, and building construction) have been used for this assessment and have

been modeled under the conservative assumption that a bulldozer, an excavator, and a jackhammer would be operating simultaneously.

Construction equipment would be continuously moving across the site, coming near and then moving further away from individual receivers. Therefore, due to the dynamic nature of construction, maximum hourly noise levels are calculated at various distances from the center of on-site construction activity to the nearest receivers. Based on the configuration of the project site and location of proposed major tenant and multi-tenant commercial buildings adjacent to single-family residences and preschool to the west, a significant portion of construction activities would occur as near at 50 feet from sensitive receivers. Therefore, using the FHWA RCNM, construction noise was modeled at various intervals between 50 feet and 200 feet from the adjacent single-family residences and preschool and multi-family residences to the west beyond the preschool. Construction noise levels and distances to the nearest receivers are shown in Table 17**Error! Reference source not found.**. RCNM calculations are included in Appendix H.

Table 17 Construction Noise Levels at Receivers

	Approximate L_{eq}, dBA			
Construction Equipment	**50 Feet**	**100 Feet**	**150 Feet**	**200 Feet**
Bulldozer, Excavator, Jackhammer	84	78	75	72

See Appendix H for RCNM results.

As shown in Table 17**Error! Reference source not found.**, maximum hourly noise levels during project construction, which would occur during the demolition, grading, and building phases of construction, were calculated at 84 dBA L_{eq} at the nearest noise-sensitive receivers, consisting of single-family residences and a preschool 50 feet from the project site boundary, and between 72 and 75 dBA L_{eq} at the multi-family residences further west 150-200 feet from the project site boundary. Therefore, construction noise levels would not exceed the FTA daytime noise criteria of 90 dBA L_{eq} for construction noise.

WCMC Section 15-95 also prohibits any construction activities between the hours of 8:00 p.m. and 7:00 a.m. (or 6:00 a.m. for unloading and loading activities) within a residential zone, or within a radius of 500 feet therefrom, that causes the noise level at the property line to exceed the ambient noise level by more than 5 dBA. As shown in Table 16, ambient noise adjacent to single-family residences west of the site (NM 1 and NM 4) was measured between 54.9 and 55.9 dBA L_{eq} and ambient noise adjacent to the preschool (NM 3) was measured at 70.0 dBA L_{eq}. NM 3 is also used to approximate ambient noise at multi-family residences further west due to their location along East Garvey Avenue North and exposure to noise from I-10 (see Figure 14). Compared to modeled construction noise levels shown in Table 17, construction noise would increase ambient noise levels at the nearest single-family residences and preschool by more than 5 dBA in the event that construction activities occur between the hours of 8:00 p.m. and 7:00 a.m. While construction of the project would occur during the day outside of nighttime hours and would not exceed the standard described by WCMC Section 15-95, the adjacent preschool would operate during daytime hours and its location adjacent to the project site would expose the school to higher construction noise. Mitigation Measure N-1 is therefore required to reduce noise from construction at adjacent sensitive receivers.

Mitigation Measure

N-1 Construction Noise Reduction

Noise barriers with a minimum height of ten feet shall be erected along the western boundary of the construction site when construction is performed within 50 feet of the adjacent single-family residences and Discovery Montessori School/Preschool at this boundary. The noise barriers shall be constructed of material with a minimum weight of two pounds per square foot with no gaps or perforations. Noise barriers may be constructed of, but not limited to, 5/8-inch plywood, 5/8-inch oriented strand board, and hay bales.

According to the Housing and Urban Development's Barrier Performance Module, a ten-foot barrier would result in a noise reduction of approximately 10 dBA. Noise barrier performance calculations are included in Appendix H. A 10 dBA reduction would reduce the maximum construction noise level at the nearest sensitive receptor shown in Table 17 from 84 dBA to 74 dBA, well below the FTA daytime noise criteria of 90 dBA L_{eq} for construction noise. Implementation of Mitigation Measure N-1 and compliance with the construction hours requirements of the WCMC would reduce construction noise impacts to a less than significant level.

Land Use Compatibility

As discussed under *Project Noise Setting* of this section, the predominant noise source on and around the project site is vehicular traffic on I-10. According to the City's noise compatibility matrix in PlanWC, ambient noise up to 70 CNEL is normally acceptable, ambient noise between 70 CNEL and 75 CNEL is conditionally acceptable, and ambient noise above 75 CNEL is normally unacceptable for office buildings and business commercial uses (West Covina 2016). Based on Caltrans' traffic volumes for I-10 and traffic volumes reported in the TIA conducted by Ganddini for the project, the segment of I-10 nearest to the site carries an estimated 200,000 ADT and has an estimated vehicle mix of 92.9 percent passenger vehicles, 2.6 percent medium-duty trucks, and 4.5 percent heavy-duty trucks (Caltrans 2018). Using a posted speed limit of 65 mph and the FHWA Traffic Noise Model (TNM) (see Appendix H) under the Existing Plus Project traffic volume scenario, the project's southern façade facing I-10 would be exposed to an ambient noise level of approximately 81 CNEL (see Appendix H). While this is higher than the observed existing noise level at the southern project site boundary facing I-10 of 70.0 dBA L_{eq} (see Table 16 and Figure 14), it may better represent noise levels that the project would eventually be exposed to under "post-pandemic" conditions. Based on the City's noise and land use compatibility matrix, if the project were exposed to this modeled noise level of approximately 81 CNEL, it would be exposed to noise levels within the "normally unacceptable" range for commercial uses. According to PlanWC, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design of new development exposed to "normally unacceptable" noise levels (West Covina 2016).

Title 24, Part 11, Section 5.507.4 (Acoustic Control) of the CCR requires interior acoustical control in nonresidential buildings located within the 65 CNEL of a freeway or other fixed source, using either the prescriptive or performance methods described in *Regulatory Setting* of this section. Specific building materials are not currently known at this time; therefore, this analysis uses the performance method to analyze the project for compliance with the CCR. A project can demonstrate compliance using the performance method if wall and roof-ceiling assemblies exposed to the noise are constructed to provide an interior noise environment that does not exceed 50 dB L_{eq}-1-hour in occupied areas during hours of operation. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (FHWA 2011). Structures can

substantially reduce occupants' exposure to noise as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows (FHWA 2011). Commercial buildings are typically constructed with thicker double-glazed windows, which provide an exterior-to-interior noise level reduction of at least 30 dBA. Using the same modeling assumptions previously described and the FHWA Traffic Noise Model under the Existing Plus project traffic volume scenario to obtain an hourly on-site noise level, the project's southern façade facing I-10 would be exposed to an ambient hourly noise level of approximately 81 dBA L_{eq}. Based on a noise exposure level of up to 81 dBA L_{eq} and a noise attenuation of 30 dBA, the interior noise level at the nearest on-site commercial building to I-10 would be approximately 51 dBA L_{eq} and, without additional sound insulation features, would not comply with the CCR performance method. Therefore, Mitigation Measure N-2 would be required to implement building materials capable of reducing exterior-to-interior noise levels or otherwise show that the project would be consistent with the prescriptive or performance methods described in Sections 5.507.4.1 and 5.507.4.2 of the CCR.

Mitigation Measure

N-2 Sound Insulation

The applicant shall submit a report and/or project plans proving compliance with either the prescriptive or performance methods described in Sections 5.507.4.1 and 5.507.4.2 of the CCR. To achieve compliance per the prescriptive method, wall and roof-ceiling assemblies with direct line-of-sight to I-10 shall meet a composite STC rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30, as described in Title 24, Part 11, Section 5.507.4.1 of the CCR. To achieve compliance with the performance method, wall and roof-ceiling assemblies exposed to the noise shall be constructed to provide an interior noise environment that does not exceed 50 dB L_{eq}-1-hour in occupied areas during hours of operation, as described in Title 24, Part 11, Section 5.507.4.2 of the CCR.

Implementation of Mitigation Measure N-2 would reduce interior noise levels to less than significant levels.

On-Site Operational Noise

The proposed project involves the construction of three new commercial buildings on a site that was previously occupied by operational commercial uses. The primary on-site noise sources associated with operation of the project would include those typical to a shopping center, such as noise from delivery trucks, trash hauling trucks, vehicle parking, and rooftop ventilation and heating systems. According to WCMC Section 15-85, any noise source that is plainly audible at 50 feet from the property line of the property in which it is located would be in violation of the Noise Ordinance. However, project noise sources are already a common occurrence in the project area due to existing residential, preschool, and commercial uses that occupy the surrounding urban development. In addition, as shown in Table 16, the primary noise source in the project vicinity would be vehicular traffic on major roads , primarily I-10, not on-site noise. Therefore, the project would not generate noise that is plainly audible at a distance of 50 feet from the site when compared to existing ambient noise levels in the urban area without the project. On-site operational noise generated by the project would not exceed the City's noise standards and impacts would be less than significant.

Off-Site Traffic Noise

The proposed project would generate new vehicle trips and incrementally increase traffic on area roadways, particularly on East Garvey Avenue North. Off-site project noise (i.e., roadway noise) would result in a significant impact if the project would cause the ambient noise level measured at the property line of affected uses to increase by 3 dBA, which would be a perceptible increase in traffic noise. Roadway noise impacts were assessed on East Garvey Avenue North because vehicle access to the project site would be provided be this roadway and it would therefore carry the highest volumes of traffic generated by the project.

As discussed in Section 17, *Transportation*, the project is forecast to generate approximately 2,563 daily trips, including 126 trips during the a.m. peak hour and 121 trips during the p.m. peak hour (Ganddini 2020). According to the TIA conducted by Ganddini (see Appendix I), the segment of East Garvey Avenue North adjacent to the site carries approximately 7,300 vehicles per day. Based on a total project-generated ADT of 2,563 vehicles, the project would increase traffic by an estimated 35 percent along East Garvey Avenue North, which would generate an estimated 1 CNEL increase in traffic noise.[7] Therefore, the project would not create a perceptible 3-dBA increase in traffic noise at surrounding roadways. Noise impacts associated with off-site traffic generated by the proposed project would be less than significant.

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

Operation of the project would not include stationary sources of significant vibration, such as heavy equipment operations. Rather, construction activities have the greatest potential to generate groundborne vibration affecting nearby receivers. Certain types of construction equipment can generate high levels of groundborne vibration. Construction of the project would potentially utilize loaded trucks, jackhammers, and/or bulldozers during most construction phases.

The City has not adopted specific standards for vibration impacts during construction. Therefore, the Caltrans *Transportation and Construction Vibration Guidance Manual* (2020) is used to evaluate potential construction vibration impacts related to both potential building damage and human annoyance. Based on the Caltrans criteria shown in Table 14**Error! Reference source not found.** and Table 15, construction vibration impacts would be significant if vibration levels exceed 0.5 in./sec. PPV for residential structures and 2.0 in./sec. PPV for commercial structures, which is the limit where minor cosmetic, i.e. non-structural, damage may occur to these buildings. In addition, construction vibration impacts would cause human annoyance at nearby receivers if vibration levels exceed 0.24 in./sec. PPV, which is the limit above which temporary vibration activities become distinctly perceptible.

Because groundborne vibration could cause physical damage to structures, vibration impacts were modeled based on the distance from the location of vibration-intensive construction activities, conservatively assumed to be at edge of the project site, to the edge of nearby off-site structures. Therefore, the analysis of groundborne vibrations differs from the analysis of construction noise levels in that modeled distances for vibration impacts are those distances between the project site to nearest off-site structures (regardless of sensitivity) whereas modeled distances for construction noise impacts are based on the property line of the nearest off-site sensitive receivers. Based on the

7 A doubling of traffic is required for an audible 3 dB increase in traffic noise levels. However, the increase in traffic generated by the proposed project would be at most 35 percent of the estimated ADT on East Garvey Avenue North.

distance from the project site to nearby structures, equipment was modeled at 15 feet from adjacent single-family residences and preschool to the west, 50 feet from the auto dealership to the north, and 150 feet from multi-family residences to the west beyond the preschool. Table 18**Error! Reference source not found.** shows estimated groundborne vibration levels from project equipment. Vibration calculations are included in Appendix H.

As shown in Table 18**Error! Reference source not found.**, construction activities would generate peak vibration levels of approximately 0.16 in./sec. PPV at the nearest off-site structures to the west. Therefore, according to the Caltrans vibration criteria, groundborne vibration from typical construction equipment would not exceed the applicable threshold of 0.5 in/sec. PPV for building damage at nearby residences nor would it exceed the applicable threshold of 2.0 in./sec. PPV for building damage at the nearby commercial buildings. Furthermore, groundborne vibration would not exceed the threshold of 0.24 in./sec. PPV for human annoyance at any of the modeled distances. Project construction would not result in groundborne vibration that would cause building damage or human annoyance. Vibration impacts would be less than significant.

Table 18 Vibration Levels at Receivers

	in./sec. PPV		
Equipment	**Single-Family Residences/ Preschool 15 Feet**	**Auto Dealership 50 Feet**	**Multi-Family Residences 150 Feet**
Large Bulldozer	0.156	0.042	0.012
Loaded Truck	0.133	0.036	0.011
Jack hammer	0.061	0.016	0.005
Small Bulldozer	0.005	0.001	<0.001
Threshold for Building Damage[1]	**0.5**	**0.5**	**0.5**
Threshold for Human Annoyance[2]	**0.24**	**0.24**	**0.24**
Thresholds Exceeded?	No	No	No

See Appendix H for vibration analysis worksheets.

[1] Caltrans 2020c. See Table 14**Error! Reference source not found.**.

[2] Caltrans 2020c. See Table 15.

LESS THAN SIGNIFICANT IMPACT

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

As discussed in Section 8, *Hazards and Hazardous Materials*, the project site is not located within two miles of a public airport. The airports nearest to the project site are the Brackett Field Airport, located 6.25 miles to the northeast, and the San Gabriel Airport, located 8.11 miles to the west. According to the Los Angeles Airport Land Use Commission (ALUC) Airport Land Use Plan, the site is not located in either of the airports' noise contours (Los Angeles County ALUC 2004). Furthermore, there are no private airstrips in the vicinity of the project site. Therefore, the proposed project would not expose people working in the project area to excessive noise levels associated with airports or airstrips and

the project would not exacerbate existing noise conditions related to airports or airstrips. No impact would occur.

NO IMPACT

14 Population and Housing

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

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

Until recently, development on the site included three commercial buildings associated with two former auto dealerships and several surface parking lots. Currently, two of the former auto dealership buildings have been demolished as of August 2020, leaving only the former Lotus dealership building in the southwest corner of the site. Therefore, for the purpose of this analysis and a conservative estimate of total employees generated by the project, employees associated with the former auto dealerships are not factored into the following analysis.

The project involves the construction of three new commercial buildings totaling 46,955 sf. Therefore, the project would generate new employees on the site. According to SCAG, the City's employment count is anticipated to increase from 31,700 in 2020 to 34,400 by 2040, a 2,700-employee increase (SCAG 2016). As discussed in Section 3, *Air Quality*, the project would generate approximately 219 new employees. Therefore, employment growth associated with the project would account for approximately 8.1 percent of SCAG's projected employment growth of 2,700 employees in West Covina between 2020 and 2040. Therefore, the employment growth associated with the project is within SCAG's long-term employment forecasts and would not exceed regional employment projections.

According to the California Department of Finance (DOF), the City has an estimated population of 105,999 (California DOF 2020). Without a residential component, the project would not generate a direct increase in the City's population, but the generation of approximately 219 jobs could result in an indirect population increase if these jobs were filled by employees who became new residents of the City. If all new employees became residents of the City, the project would increase the City's existing population of by approximately 0.2 percent to 106,218 residents, which would be within SCAG's 2040 population forecast of 116,700 residents. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

NO IMPACT

15 Public Services

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	1 Fire protection?	☐	☐	■	☐
	2 Police protection?	☐	☐	■	☐
	3 Schools?	☐	☐	■	☐
	4 Parks?	☐	☐	■	☐
	5 Other public facilities?	☐	☐	■	☐

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

The West Covina Fire Department (WCFD) provides fire protection and paramedic emergency services to residents and businesses within the City. The project site is in closest proximity to Fire Station No. 2, which is located at 2441 East Cortez Street approximately 0.5 mile south of the site. According to the City, the WCFD responds to the average emergency medical service (EMS) call with one fire engine and paramedic ambulance with a total of five personnel and the average fire emergency call with four fire engines, one fire ladder truck, two rescue ambulances, and one command units with a total of 22 personnel (West Covina 2020b).

The West Covina Fire Prevention Bureau of the WCFD provides technical review of all building construction plans within the City to ensure proposed buildings meet the City's adopted 2019 California Fire Code, 2019 California Building Code, California Health and Safety Code, and WCMC standards prior to construction. As such, the WCFD would review the site and building plans for the project as part of the City's review process. The project would increase the total commercial building area on the project site, which would incrementally increase demand for fire protection services. However, the project site is located in an urbanized area already served by the WCFD and the project would be required to adhere to all applicable Fire Code standards and requirements. Therefore, the

project would not have a significant impact on fire response times nor create a substantially greater need for additional fire protection services above current capacity. Furthermore, General Plan policy P6.13 aims to optimize firefighting and emergency response capabilities. Specifically, Action A6.13-a under Policy P3.11 states that an increase of public access to fire protection services would be enhanced by an increase in fire staffing and funding to coincide with increasing population, development, and call for public services. Consistent with the City's General Plan policies and actions, developers in the City are required to pay development impact fees that would go toward fire facilities, as per WCMC Section 17-204. Because it would not create a substantially greater need for additional fire protection services above current capacity, the project would not require new or expanded facilities to support fire protection and emergency response providers. Therefore, the project's potential impacts to fire services and facilities would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The West Covina Police Department (WCPD) provides police protection services to residents and businesses within the City. The WCPD consists of a full-time workforce of 97 sworn Officers and 66 civilians, where approximately 67 percent of all sworn Officers pertain to the Patrol Division. The Patrol Division focuses on patrolling city streets, answering calls for service, and identifying potential crime problems. In addition, there are approximately 55 part-time positions in the force, which include reserve Officers and clerical staff (WCPD 2020a; 2020b). Compared to a national average of 1.7 officers per 1,000 residents for police departments serving a population between 100,000 to 249,999, the WCPD currently operates with an 0.92 officers per 1,000 residents, which is below the national average. 2016b). The WCPD would need an additional estimated 80 officers in order to meet the national average.

The project site is located within WCPD Service Area 2 (East), and the police station is located at 1444 West Garvey Avenue, approximately 2.5 miles west of the project site. The project would incrementally increase demand for police protection services. However, the project site is in a highly urbanized area already served by the WCPD and the project would not have a significant impact on police response times nor create a substantially greater need for additional police services above current capacity. General Plan policy P6.11 aims to provide community safety through enhanced police services. Specifically, Action A6.11-a under Policy P6.11 states that an increase of public access to police services would be enhanced by an increase in police staffing and funding to coincide with increasing population, development, and call for public services. Consistent with the City's General Plan policies and actions, developers in the City are required to pay development impact fees that would go toward police facilities, as per WCMC Section 17-204. Because it would not create a substantially greater need for additional police services above current capacity, the project would not result in the need for new or physically altered police protection facilities that could have an environmental impact, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

West Covina is primarily served by the West Covina Unified School District (WCUSD), Covina-Valley Unified School District (CVUSD), and Rowland Unified School District (RUSD), as well as other districts at least partially within West Covina. Based on available enrollment data, the estimated number of students enrolled is 13,500 at WCUSD, 12,000 at CVUSD, and 14,000 at RUSD, which is a total estimated 39,500 students for the 2019-2020 academic school year (Ed-Data 2020). The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause new schools to be constructed. The proposed project involves replacing the previous on-site commercial uses with new commercial uses. As discussed in Section 14, *Population and Housing*, if all new employees became residents of the City, the project would increase the City's existing population of by 219 residents, which would be an increase of approximately 0.2 percent to 106,218 residents. Conservatively assuming that the project would generate 219 students, the project would increase the combined current enrollment of 39,500 students by approximately 0.6 percent.

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

LESS THAN SIGNIFICANT IMPACT

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

According to the California Department of Finance (DOF), the City has an existing population of 105,999 (California DOF 2020). West Covina has 501.5 acres of existing parks and open space, which results in an estimated service ratio of 4.7 acres per 1,000 residents (West Covina 2016b). The City is urbanized and nearly built out, with limited open space available to meet the needs of anticipated population growth or to increase the current level of service. However, public schools have 287 acres of additional open space, and provide potential recreational access for residents through joint use agreements between the City and school districts (West Covina 2016b). The additional 287 acres of open space added to the existing City park acreage totals approximately 789 acres of parks and open space within the City, which increases the service ratio to approximately 7.4 acres per 1,000 residents.

The nearest park to the project site is Cortez Park located approximately 0.4-mile south of the site, which includes sports fields and picnic areas. As discussed under Section 14, *Population and Housing*, the project would not generate residents that would result in a direct increase in the City's population. Rather, the project would generate an estimated 219 new employees on the site, which would not result in a direct increase to the City's population that would utilize recreational facilities. Nonetheless, assuming that project employees increase the City's population, the estimated increase in 219 employees would not substantially alter the existing service ratio of 7.4 acres of parkland per

1,000 residents. The proposed project would therefore not create the need for new or expanded park facilities and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

The project site in an urban area already served by other commonly used public facilities such as public libraries, including the West Covina Library, and medical facilities. As discussed in Section 14, *Population and Housing*, if all new employees became residents of the City, the project would increase the City's existing population of by 219 residents, which would be an increase of approximately 0.2 percent to 106,218 residents and would be within SCAG's 2040 population forecast of 116,700 residents. Therefore, the project would not generate an unforeseen population increase that would substantially affect existing public facilities or necessitate the provision of new public facilities. In addition, the West Covina Library is part of the County of Los Angeles Public Library system, which is financed by property taxes from the service area, general county funds, parcel tax, grants, feeds, and funds raised by the Library Foundation. As a result, the proposed project would contribute to the financing of library services through property taxes, which would mitigate the need for new or physically altered government facilities that support library use. Therefore, the project would not substantially affect existing governmental facilities or require the need for new or altered governmental facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	■	☐
h. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	■	☐

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

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

According to the California Department of Finance (DOF), the City has an existing population of 105,999 (California DOF 2020). West Covina has 501.5 acres of existing parks and open space, which results in an estimated service ratio of 4.7 acres per 1,000 residents (West Covina 2016b). The City is urbanized and nearly built out, with limited open space available to meet anticipated population growth or to increase the current level of service. However, public schools have 287 acres of additional open space, and provide potential recreational access for residents through joint use agreements between the City and school districts (West Covina 2016b). The additional 287 acres of open space added to the existing City park acreage totals approximately 789 acres of parks and open space within the City, which increases the service ratio to approximately 7.4 acres per 1,000 residents.

The nearest park to the project site is Cortez Park located approximately 0.4-mile south of the site, which includes sports fields and picnic areas. As discussed under Section 14, *Population and Housing*, the project would not generate residents that would result in a direct increase in the City's population. Rather, the project would generate an estimated 219 new employees on the site, which would not result in a direct increase to the City's population that would utilize recreational facilities. Nonetheless, assuming that project employees increase the City's population, the estimated increase in 219 employees would not substantially alter the existing service ratio of 7.4 acres of parkland per 1,000 residents. The project does not contain any elements for construction or expansion beyond the project site, construction of on-site commercial uses would have no physical environmental impacts on existing recreational facilities beyond the project site, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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17 Transportation

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

Ganddini Group, Inc. (Ganddini) prepared a Traffic Impact Analysis (TIA) in October 2020 to assess traffic impacts resulting from development of the proposed project. The following analysis is based on the findings of the TIA, which is included as Appendix I.

Existing Circulation System

Regional access to the project site is provided by I-10, while local access to the site is provided by Citrus Street and Garvey Avenue. No bicycle facilities are currently provided in the project area, but sidewalks are provided on both sides of Citrus Street and on the north side of Garvey Avenue. Transit bus routes are provided in the project area and serviced by Foothill Transit and Go West Shuttle. Routes 281 and 480 of Foothill Transit and the Red Route of Go West Shuttle provide bus transit service along Citrus Street adjacent to the project site. In addition, the Los Angeles County Metropolitan Transit Authority has Routes 190/194 along Workman Avenue, with bus stops located at the intersection of Citrus Street and Workman Avenue approximately 600 feet north of the site (Ganddini 2020). Foothill Transit bus routes include routes that connect to the Covina Metrolink station location 1.3 miles north of the project site.

Study Area and Analysis Scenarios

The TIA analyzed the Citrus Street (North-South) at Garvey Avenue (East-West) intersection in the City's jurisdiction under the following analysis scenarios:

- Existing Conditions
- Existing Plus Project
- Opening Year (2021) Without Project
- Opening Year (2021) With Project

Analysis Methodology

Intersection Capacity Utilization

In accordance with the City's requirements, analysis of signalized intersections is based on the Intersection Capacity Utilization (ICU) methodology. The ICU methodology compares the volume of traffic using the intersection to the capacity of the intersection. The resulting volume-to-capacity (V/C) ratio represents that portion of the hour required to provide sufficient capacity to accommodate all intersection traffic if all approaches operate at capacity. The V/C ratio is then correlated to a performance measure known as Level of Service (LOS) based on the following thresholds shown in Table 19:

Table 19 Level of Service to Volume/Capacity Ratio

Level of Service (LOS)	Volume/Capacity (V/C) Ratio
A	≤0.600
B	0.601 to 0.700
C	0.701 to 0.800
D	0.801 to 0.900
E	0.901 to 1.000
F	>1.000

Source: Traffic Impact Analysis, Ganddini 2020 (Appendix I)

LOS is used to qualitatively describe the performance of a roadway facility, ranging from LOS A (free-flow conditions) to Level of Service F (extreme congestion and system failure). The ICU analysis was conducted for the project using the Vistro software. Consistent with County of Los Angeles guidelines, this analysis uses the following lane capacity value input parameters for the ICU analysis: 1,600 vehicles per hour per lane for through and turn lanes, 2,880 vehicles per hour for dual left-turn lanes, and a total clearance time of ten percent.

The City has not established minimum acceptable LOS standards during peak hour conditions but has typically used LOS E as the threshold in assessing projects in the past. Therefore, for the purpose of this analysis, LOS E or better is considered acceptable and LOS F is considered unacceptable.

Need for Improvements

To address operational impacts associated with a project at signalized study intersections within the City, a project is required to provide improvements if the addition of project generated trips is forecast to cause an increase in V/C of 0.02 or greater when the intersection is operating at LOS D, E, or F in the baseline condition.

Congestion Management Program Criteria

The Los Angeles County 2010 Congestion Management Program (CMP) provides the following thresholds for requiring a CMP-compliant traffic impact analysis:

- All CMP arterial monitoring intersections, including monitored freeway on or off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hours (of adjacent street traffic)

- If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions).
- Mainline freeway monitoring locations were the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hours.

Vehicle Miles Travelled (VMT)

In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines package. The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of VMT as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. All agencies and projects State-wide are required to utilize the updated CEQA guidelines recommending use of VMT for evaluating transportation impacts as of July 1, 2020.

The updated CEQA Guidelines allow for lead agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the intended goals of the legislation. Where quantitative models or methods are unavailable, Section 15064.3 allows agencies to assess VMT qualitatively using factors such as availability of transit and proximity to other destinations. The Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA provides technical considerations regarding methodologies and thresholds with a focus on office, residential, and retail developments as these projects tend to have the greatest influence on VMT (Ganddini 2020).

The City of West Covina adopted its VMT guidelines in June 2020. Therefore, the project VMT impact has been assessed in accordance with the City of West Covina VMT guidelines and guidance from City staff.

Project Trip Generation

Project trip generation is based upon standard rates obtained from the Institute of Transportation Engineers (ITE), Trip Generation Manual, 10th Edition, 2017. Trip generation rates for Commercial Retail (ITE Land Use Code 820) and Fast-Food Restaurant with Drive-Thru (ITE Land Use Code 934) were used. According to the TIA, the project is forecast to generate approximately 2,563 daily trips, including 126 trips during the a.m. peak hour and 121 trips during the p.m. peak hour (Ganddini 2020). Detailed tip generation calculations are included in the TIA in Appendix I.

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

Existing Plus Project traffic conditions and Opening Year (2021) With Project traffic conditions were evaluated for the study area intersection. The intersection analysis results for both traffic conditions are summarized in Table 20 and Table 21, respectively. As shown in these tables, the study intersection is forecast to operate at LOS D or better during the peak hours under both the Existing Plus Project and Opening Year (2021) With Project traffic conditions. No off-site operational improvements were identified by the TIA since the project would not result in operational traffic impacts at the study intersection under these traffic conditions.

Table 20 Existing Plus Project Conditions

	AM Peak Hour						PM Peak Hour					
	Existing		Plus Project		Project Change	Impact?	Existing		Plus Project		Project Change	Impact?
Intersection	ICU	LOS	ICU	LOS			ICU	LOS	ICU	LOS		
Citrus St at Garvey Ave	0.434	A	0.516	A	+0.082	No	0.755	C	0.837	D	+0.082	No

Note: In the City of West Covina, an operational impact occurs if the project-related increase in ICU equals or exceeds 0.02 when an intersection is operating at LOS D, E, or F in the baseline.

ICU = Intersection Capacity Utilization

LOS = Level of Service

Source: Traffic Impact Analysis, Ganddini 2020 (Appendix I)

Table 21 Opening Year (2021) With Project Conditions

	AM Peak Hour						PM Peak Hour					
	Opening Year (2021)		With Project		Project Change	Impact?	Opening Year (2021)		With Project		Project Change	Impact?
Intersection	ICU	LOS	ICU	LOS			ICU	LOS	ICU	LOS		
Citrus St at Garvey Ave	0.439	A	0.521	A	+0.082	No	0.764	C	0.846	D	+0.082	No

Note: In the City of West Covina, an operational impact occurs if the project-related increase in ICU equals or exceeds 0.02 when an intersection is operating at LOS D, E, or F in the baseline.

ICU = Intersection Capacity Utilization

LOS = Level of Service

Source: Traffic Impact Analysis, Ganddini 2020 (Appendix I)

The proposed project would not contribute traffic volumes to any intersection that would exceed applicable thresholds of significance for impacts to the performance of the circulation system. In addition, the project would continue to be served by, and would not interfere with, existing transportation facilities currently available to the project site. Therefore, the proposed project's impacts under Existing Plus Project and Opening Year (2022) With Project traffic conditions would be less than significant.

As discussed under *Project Trip Generation*, the project is forecast to generate approximately 126 a.m. peak hour trips and 121 p.m. peak hour trips, which would be distributed from the project site. The intersection of Citrus Street at Garvey Avenue is not a CMP intersection. The project will not add 150 or more peak hour trips to I-10 since the project generates less than this threshold in total during each peak hour. Therefore, the proposed project would not result in a CMP impact because it does not meet the thresholds requiring a traffic impact analysis for CMP purposes and no further CMP traffic analysis is warranted. Furthermore, according to the TIA, the project is also forecast to generate approximately six transit trips during the a.m. and p.m. peak hours (Ganddini 2020). Based on the existing transit services available in the project vicinity and the relatively low transit trip generation, the proposed project is forecast to have a less than significant impact on transit service.

LESS THAN SIGNIFICANT IMPACT

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

As discussed in *Analysis Methodology* under this section, the City adopted its VMT guidelines in June 2020. Consistent with recommendations in the OPR Technical Advisory, the City has established screening criteria for certain projects that may be presumed to have a less than significant VMT impact, including local-serving retail uses less than 50,000 sf. The project involves construction of a retail development totaling approximately 46,955 sf. Therefore, the project satisfies the screening criteria for local-serving retail and may be presumed to result in a less than significant VMT impact in accordance with City's VMT guidelines.

LESS THAN SIGNIFICANT IMPACT

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

The following analysis includes a description of project improvements necessary to provide safe and compatible site access and circulation.

Project Design Features

The proposed project would construct the following improvements as project design features to provide project site access:

- Construct the Project Driveway (North-South) at East Garvey Avenue (East-West) (located on the southwest portion of the project site) to provide one inbound lane and one outbound lane with southbound stop-control and the following lane configurations:
  - Northbound – Not applicable
  - Southbound – One shared left/right turn lane
  - Eastbound – One shared left/through lane
  - Westbound – One shared through/right turn lane
- Construct the East Garvey Avenue (North-South) at Project Driveway (East-West) (located on the northeast portion of the project site) to provide one inbound lane and one outbound lane with eastbound stop-control and the following lane configurations:
  - Northbound – One through lane
  - Southbound – One shared through/right turn lane
  - Eastbound – One shared left/right turn lane
  - Westbound – Not applicable

This analysis also assumes the project would comply with the following conditions as part of the City's standard development review process:

- A construction work site traffic control plan shall comply with State standards set forth in the California Manual of Uniform Traffic Control Devices and shall be submitted to the City for review and approval prior to the issuance of a grading permit or start of construction. The plan shall identify any roadway, sidewalk, bike route, or bus stop closures and detours as well as haul routes and hours of operation. All construction related trips shall be restricted to off-peak hours to the extent possible.

- All on-site and off-site roadway design, traffic signing and striping, and traffic control improvements relating to the proposed project shall be constructed in accordance with applicable State/Federal engineering standards and to the satisfaction of the City.
- Site-adjacent roadways shall be constructed or repaired at their ultimate half-section width, including landscaping and parkway improvements in conjunction with development, or as otherwise required by the City.
- Adequate off-street parking shall be provided to the satisfaction of the City.
- Adequate emergency vehicle access shall be provided to the satisfaction of the WCFD.
- The final grading, landscaping, and street improvement plans shall demonstrate that sight distance requirements are met in accordance with applicable City of West Covina/California Department of Transportation sight distance standards.

Queuing Analysis

According to the TIA, a queuing analysis was performed for Opening Year (2021) With Project conditions for the eastbound left turn movement at the intersection of Citrus Street at Garvey Avenue since it is a key movement for outbound project access. Based on the queuing analysis in the TIA, the existing storage length for the eastbound left turn movements at the intersection of Citrus Street at Garvey Avenue is forecast to not provide adequate queueing capacity with the addition of project trips. This queuing analysis also incorporates the striping and installment of a dedicated eastbound left turn lane at this intersection.

The TIA-recommended improvement to alleviate this operational queuing impact is to stripe “Do Not Block Intersection”, “Keep Clear”, or equivalent striping/signage at the intersection of Garvey Avenue and Project Driveway (located near the northeast portion of the project site), so that the eastbound queue from Garvey Avenue at Citrus Street does not block this intersection, thus allowing for motorists making an eastbound left turn from the project driveway to head east on Garvey Avenue to clear the project driveway. Section 15064.3 of the updated CEQA Guidelines recommends the use of VMT as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects under CEQA. The queuing impacts discussed above therefore do not constitute a significant environmental impact under CEQA and the striping/signing improvements discussed above are therefore not required as mitigation measures to address any significant environmental impact. The City can, however, at its discretion, incorporate this identified and recommended improvement into the project through conditions of approval.

It should be noted that outbound motorists at this driveway would queue internally and not affect operations on Garvey Avenue. Since the driveway is restricting inbound northbound left turns, there would also not be any conflicts with inbound turning vehicles from Garvey Avenue. Therefore, the aforementioned striping combined with internal site queuing and striping of a dedicated eastbound left turn lane is determined by the TIA to be sufficient to alleviate existing and future eastbound queuing issues at the intersection of Citrus Street at Garvey Avenue and impacts would be less than significant.

Restaurant Drive-Thru Queuing Analysis

Drive through queues were measured as part of the TIA based on data provided from 14 studies at six fast-food restaurant locations. The 85th percentile maximum number of vehicles queued in the drive through lanes was measured at 12 vehicles, which would require 240 feet of vehicle stacking (Ganddini 2020).

The distance from the approximation of the pay window to the entrance of the drive through lane is approximately 130 feet, which would provide for stacking of six vehicles. The project site plan provides an additional 85 feet westbound from the extension of the drive through lane to the western extension of the drive aisle that services the restaurant from the project driveway from Garvey Avenue. This provides queuing for an additional four vehicles, which would provide a total queueing capacity for ten vehicles. Furthermore, although it is not anticipated to be necessary, the TIA determined that the drive through queue could be directed along the north-south drive aisle adjacent to the west façade of the restaurant to provide an additional approximately 60 feet, or approximately three vehicles, of queueing capacity. The summation of the queuing ability for the drive-thru lane (six vehicles), east-west drive aisle (four vehicles), and north-south drive aisle (three vehicles) equates to a total queuing capacity of 13 vehicles. This queuing capacity of 13 vehicles exceeds the 85th percentile maximum queue of 12 vehicles. Therefore, adequate queuing capacity is forecast to be provided to accommodate the expected 85th percentile queue volume of 12 vehicles and impacts would be less than significant.

Sight Distance Analysis

The unposted speed limit on East Garvey Avenue North adjacent to the project site is 40 mph. However, according to the TIA, a more realistic travel speed for this roadway is 25 mph based on the curvature of the road. Therefore, a stopping sight distance of 25 mph was used by the TIA to reflect more realistic travel speeds along this stretch of roadway. This stopping sight distance requires 150 feet of unobstructed line of sight for a 25-mph design speed. The driver's eye for a vehicle located at a project driveway intending to head either eastbound or westbound on Garvey Avenue is situated 42 inches above the pavement and 15 feet back from the edge of the travel way. The driver must have a minimum unobstructed sight line of 150 feet looking westbound at an object 42 inches above the pavement situated in the center of the eastbound travel lane, and must have a minimum unobstructed sight line of 150 feet looking eastbound at an object 42 inches above the pavement situated in the center of the westbound travel lane. As determined by the TIA, adequate stopping sight distance is currently provided and would also be confirmed in the final grading, landscaping, and street improvement plans. Furthermore, Garvey Avenue and the surrounding terrain at and adjacent to the project site is relatively flat with minimal changes in gradient (Ganddini 2020). Therefore, vertical sight distance concerns are not prevalent. Potential hazard impacts associated with sight distance would be less than significant.

Truck Access, Turning, and Deliveries

The applicant has provided truck turning templates for both inbound and outbound truck turning movements on Garvey Avenue. Inbound trucks servicing the retail (major pad) would enter the project driveway at the southwest portion of the project site heading westbound on Garvey Avenue. According to the TIA, on-site trucks would be provided with sufficient area to safely navigate through the site into loading areas and subsequently exit the site to Garvey Avenue, where they would proceed northbound/eastbound to the signalized intersection at Citrus Street. Furthermore, truck deliveries would occur only during off-peak hours so that any potential conflict between trucks and consumers on-site would be less than significant (Ganddini 2020).

LESS THAN SIGNIFICANT IMPACT

d. Would the project result in inadequate emergency access?

During construction, temporary and occasional lane closures may be required, however two-way traffic would still be maintained at construction entry points. Implementation of the project would not create new obstructions to emergency access in the project area. In addition, the project would not result in inadequate emergency access because it would be subject to WCFD review of site plans, site construction, and the actual structures prior to occupancy to ensure that required fire protection safety features, including building sprinklers and emergency access, are implemented. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
m. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or	☐	■	☐	☐
n. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	■	☐	☐

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

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

4. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
5. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52,

lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k)?

As discussed in Section 3, *Cultural Resources*, the project site is currently developed with commercial uses and is surrounded by residential and commercial uses. The developed site has been disturbed, has been previously graded, and is almost entirely paved. Due to this previous ground disturbance, there is low probability of encountering on-site tribal cultural resources throughout project construction. The results of the Archaeological Resources Assessment discussed further in Section 3, *Cultural Resources*, indicate that no archaeological or tribal cultural resources have been identified on the project site or in its immediate vicinity (Appendix B). For further discussion of on-site soils please refer to Section 7, *Geology and Soils*.

Three tribes have requested notification of projects within the City of West Covina: the Soboba Band of Luiseño Indians, Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation), and Gabrielino/Tongva Nation. Per PRC Section 21080.3.1, the City mailed consultation letters to these three tribes on August 13, 2020 (see Appendix J) and subsequently received a response from the Kizh Nation requesting consultation to discuss the proposed project in further detail. Following the request from the Kizh Nation, a consultation meeting between Kizh Nation representatives and City Staff occurred on September 3, 2020. The Kizh Nation representatives expressed concerns regarding the proposed project, stating that their tribe had villages near the project site and their former trade routes follow alongside I-10. They also requested information regarding on-site soils, asking if the soil proposed to be disturbed by grading is the original/native soil or fill that was brought in at some later date. Subsequent to this consultation meeting in September 2020, the Kizh Nation sent various written correspondence to the City providing the City with documentation supporting the information they provided in the consultation meeting, including suggested mitigation measures to avoid potential impacts to tribal cultural resources.

The City of West Covina will continue to comply with all applicable tribal consultation requirements of PRC Section 21080.3.1 and all other applicable regulations as the proposed project moves through the required review and approval process.

Given the developed nature of the site, excavation and grading activities required for project construction are not expected to uncover tribal cultural resources. However, it is possible that intact and previously undiscovered tribal cultural resources are present at subsurface levels and could be uncovered during ground-disturbing activities. In the event such previously unknown tribal cultural resources are found, significant effects may occur to that resource if the resource is disturbed, destroyed, or otherwise improperly treated. The Archaeological Resources Assessment included four suggested mitigation measure to avoid potential impacts to previously undiscovered archaeological and tribal cultural resources. Mitigation Measure CR-1, provided in Section 5, *Cultural Resources*, would require the project to provide training to construction workers on the identification and proper handling of archaeological resources that could be encountered during ground disturbing activities. In addition, Mitigation Measures TCR-1 through TCR-3 are required in the event such tribal cultural resources are uncovered during construction. These mitigation measures are consistent with those

recommended in the Archaeological Resources Assessment but expand upon them in order to address comments and recommendations from the Kizh Nation.

Mitigation Measures

TCR-1 Retain a Native American Monitor

The project applicant shall obtain the services of a qualified Native American Monitor(s) during construction-related ground disturbance activities. Ground disturbance is defined as activities that include, but are not limited to, pavement removal, potholing or auguring, grubbing, weed abatement, boring, grading, excavation, drilling, and trenching, within the project area. The monitor(s) shall be present on-site during the construction phases that involve any ground disturbing activities. The Native American Monitor(s) shall complete monitoring logs on a daily basis that provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the construction-related ground disturbance activities are completed, or when the monitor has indicated that the site has a low potential for archeological resources.

TCR-2 Unanticipated Discovery of Tribal Cultural Resources

A qualified archaeologist and Native American Monitor shall be present during construction-related ground disturbance activities in order to identify any unanticipated discovery of tribal cultural resources. The qualified archaeologist and Native American Monitor may be separate individuals or the same individual if the City determines that individual qualifies as both a qualified archaeologist and Native American Monitor. All archaeological resources unearthed by construction activities shall be evaluated by the qualified archaeologist and Native American Monitor. If the resources are determined to be human remains (see also Mitigation Measure TCR-3) the coroner shall be notified, and if the human remains are Native American in origin, the coroner shall notify the NAHC as mandated by state law, who will then appoint a Most Likely Descendent (MLD). The MLD shall then coordinate with the landowner regarding treatment and curation of these resources. Typically, the MLD will request reburial or preservation for educational purposes. If a resource is determined by the qualified archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to PRC Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.

TCR-3 Unanticipated Discovery of Human Remains and Associated Funerary Objects

The term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of associated cultural resources (Funerary objects) with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. The Native American Graves Protection and Repatriation Act (NAGPRA) guidance specifically states that the federal agencies will consult with organizations on whose aboriginal lands the remains and cultural items might be discovered, who are reasonably known to have a cultural relationship to the human remains and other cultural items. Therefore, for this project site, it is appropriate to consult with local Native American groups as recommended by the NAHC.

Any discoveries of human skeletal material shall be immediately reported to the County Coroner. The monitor shall immediately divert work at a minimum of 50 feet and place an exclusion zone around the burial. The monitor shall then notify the Qualified Archaeologist and the construction manager who shall call the coroner. Work shall continue to be diverted while the coroner determines whether the remains are Native American. The discovery shall be kept confidential and secure to prevent any further disturbance. If Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent. The Most Likely Descendant shall provide recommendations as to the treatment and disposition of the human remains within 48 hours MLD designation. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with a protective casing to prevent further damage or looting.

If the coroner determines the remains represent a historic non-Native American burial, the burial shall be treated in the same manner of respect with agreement of the coroner. Reburial will be in an appropriate setting. If the coroner determines the remains to be modern, the coroner will take custody of the remains. Each occurrence of human remains and associated funerary objects shall be stored in accordance with methods agreed upon between the MLD and the landowner.

Implementation of Mitigation Measures TCR-1 through TCR-3 would reduce potential impacts to tribal cultural resources to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1?

There are no known tribal cultural resources at the project site. However, as described under impact discussion *a.* of this section, the potential for previously undiscovered cultural resources to be uncovered during ground-disturbing activities, while unlikely, cannot be completely ruled out. If such resources are found and are determined to be significant under PRC Section 5024.1, the project could result in significant impacts to such resources if they are disturbed, destroyed, or otherwise improperly treated. Mitigation Measures TCR-1 through TCR-3 would ensure that any subterranean tribal cultural resources encountered during construction activities for the proposed project are

properly handled and treated. With implementation of Mitigation Measures TCR-1 through TCR-3, impacts to tribal cultural resources would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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19 Utilities and Service Systems

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

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

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

The project site is in an urbanized area and is well-served by existing utilities infrastructure. Wastewater service in West Covina is provided by the City's Public Works Department. Wastewater from the City's system is treated and disposed of by the San Jose Creek Water Reclamation Plant

(SJCWRP) and/or the Whittier Narrows Reclamation Plant (WNRP), operated by the Los Angeles County Sanitation District (LACSD). The SJCWRP and WNRP have a design capacity of 100 million gallons per day (mgd) and 15 mgd, respectively, for a combined design capacity of 115 mgd (LACSD 2020). The project site is located in the SJCWRP tributary area. The average daily flow to the SJCWRP is approximately 66 mgd, leaving approximately 34 mgd in available capacity (West Covina 2016b).

CalEEMod is a statewide emissions computer model and comprehensive tool for quantifying emissions associated with both construction and operations from a variety of land use projects, including project water demand. Conservatively assuming that wastewater generation would be approximately 100 percent of water demand[8], which is based on CalEEMod results (see Appendix A), the proposed project would generate approximately 5,059,722 gallons of wastewater per year, or 13,862 gallons of wastewater per day. By comparison, the most recent uses on the site demanded approximately 3,740,480 gallons of wastewater per year, or 10,248 gallons of wastewater per day. Therefore, the project would demand a net increase of 3,614 gallons of wastewater per day. The project's estimated daily wastewater generation accounts for approximately 0.01 percent of the SJCWRP's available daily capacity of approximately 34 mgd. Therefore, the SJCWRP would have sufficient capacity to accommodate additional wastewater flows generated by the proposed project, the proposed project would not require the construction of new or expanded treatment facilities.

The project site would continue to connect to the existing storm drain system operated and maintained by the City. As discussed in Section 10, *Hydrology and Water Quality*, project implementation would result in similar drainage patterns as existing conditions. Furthermore, the project would increase permeable surfaces on-site by including 19,200 sf of landscaped area. As detailed in the Hydrology Study and LID Plan, runoff leaving the project site would be reduced when compared to existing conditions and would be appropriately treated and managed through onsite BMPs (MFKessler 2020a; 2020b; Appendix G). Therefore, upon completion, the proposed project would decrease existing stormwater flows off the site and impacts to storm water quality by increasing drainage. Therefore, the project would not necessitate the construction of new stormwater drainage facilities or expansion of existing facilities.

Furthermore, as discussed in Section 6, *Energy*, the project would not result in the wasteful, inefficient or unnecessary consumption of energy. Project operation would consume approximately 0.74 GWh of electricity per year. The project's electricity demand would be served by Southern California Edison (SCE), which supplied 85,275 GWh of electricity to its service area in 2018 (California Energy Commission [CEC] 2018a). The project's electricity demand would represent less than 0.01 percent of electricity provided by SCE. Therefore, SCE would have sufficient supplies for the project. Estimated natural gas consumption for the project would be 0.01 MMthm per year (Appendix A). The project's natural gas demand would be served by the Sothern California Gas Company (SoCal Gas), which provided 5,156 MMthm per year in 2018 (CEC 2018b). The project's natural gas consumption would represent less than 0.01 percent of natural gas provided by SoCal Gas; which would therefore have adequate supply to serve the project. Therefore, the project would not require the construction of new electric power or natural gas facilities. Likewise, the project site is an infill project served by existing telecommunications facilities within the City and would not require the expansion or construction of new telecommunications infrastructure.

8 This analysis conservatively assumes that wastewater generation would be approximately 100 percent of the project's water demand, whereas a more likely scenario is that the project's water demand includes landscape irrigation which does not result in wastewater.

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

LESS THAN SIGNIFICANT IMPACT

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

As discussed in Section 9, *Hydrology and Water Quality*, the project site receives its water service from the City of Covina (Covina), which is a retail water supplier that serves customers in Covina and portions of West Covina, as well as an unincorporated portion of Los Angeles County. According to the 2015 UWMP, the City of Covina would have an adequate supply of water, with normal conservation efforts, to meet projected demand through 2040 in average year, single dry year, and multiple dry year scenarios (Covina 2017). Table 22 shows projected water supply and demand in the District through 2040 according to the 2015 UWMP.

Table 22 Normal Year Water Supply and Demand Comparison

	2015	2020	2025	2030	2035	2040
Water Supply Totals	5,396	5,705	5,762	5,821	5,880	5,940
Water Demand Totals	5,396	5,705	5,762	5,821	5,880	5,940
5-year Demand Increase	–	309	57	59	59	60

[1] Water supply and demand totals are reported in acre-feet per year (AFY).

Source: Covina 2015 Urban Water Management Plan, 2017

According to CalEEMod results (see Appendix A), the project would demand a net increase of 3,614 gallons of water per day, or approximately four acre-feet per year (AFY) of water. This increase is within the forecasted increase in water demand for the City shown in Table 22.

The project would be required to be constructed in accordance with all applicable CBC standards, including those that mandate water-efficient fixtures and features, and would also be mandated to adhere to applicable water conservation measures for landscaping. Existing water infrastructure and supplies would be adequate to serve the anticipated residents and other users of the proposed project, and the project's impact on water supply would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

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

The City contracts with Athens Services to provide trash, recycling, and special pickup services for residents. After collection, waste is conveyed to the Athens Services Materials Recovery Facility (MRF) in Industry, which can process 5,000 tons of mixed material each day. Diversion of solid waste from the project site into the recycling stream would substantially reduce the project's impact on landfill capacity. Waste goes to Athens' MRF for separation of recyclable materials from disposable materials. This process has increased the City's diversion rate to 58 percent, higher than the State-mandated 50

percent. After waste is sorted, material that cannot be recycled is sent to Victorville Sanitary Landfill. This landfill has a permitted maximum capacity of 3,000 tons per day, a daily throughput of approximately 1,125 tons, and a current estimated remaining daily capacity of 1,875 tons (CalRecycle 2020; West Covina 2016b).

According to the CalEEMod results (see Appendix A), existing uses on the project site generated approximately 94 tons of solid waste per year while operation of the proposed project would generate approximately 96 tons of solid waste per year. Therefore, the project would generate a net increase of two tons of solid waste per year, which would not exceed the current estimated remaining daily capacity of 1,875 tons at Victorville Sanitary Landfill. Therefore, the project's impacts on solid waste would be less than significant.

LESS THAN SIGNIFICANT IMPACT

20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
t. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
u. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	■
v. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	■
w. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	■

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

A Fire Hazard Severity Zone (FHSZ) is a mapped area that designates zones (based on factors such as fuel, slope, and fire weather) with varying degrees of fire hazard (i.e., moderate, high, and very high). While FHSZs do not predict when or where a wildfire will occur, they do identify areas where wildfire hazards could be more severe and therefore are of greater concern. FHSZs are meant to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements that reduce risk. The FHSZs serve several purposes: they are used to designate areas where California's wildland urban interface building codes apply to new buildings; they can be a factor in real estate disclosure; and they can help local governments consider fire hazard severity in the safety elements of their general plans. The California Fire Hazard Severity Zone Viewer is an online application tool that includes proposed FHSZs for State Responsibility Area (SRA) lands and separate Very High FHSZs for Local Responsibility Area (LRA) lands (California State Geoportal 2020).

The project site is in an urban area of West Covina surrounded by roads, including I-10, and structures (i.e., residential, office, and commercial buildings). Undeveloped wildland areas are not located near the project site. According to the California Fire Hazard Severity Zone Viewer, the project site is not located in a FHSZ or Very High FHSZ for wildland fires. The nearest Very High FHSZ is located approximately one mile east of the site (California State Geoportal 2020). Therefore, the project site would not be subject to severe wildfires or wildfires of greater concern.

As discussed in Section 15, *Public Services*, the project site is in closest proximity to Fire Station No. 2, which is located at 2441 East Cortez Street approximately 0.5 mile south of the site. The WCFD provides technical review of building construction plans to ensure proposed buildings meet the City's adopted 2019 California Fire Code prior to construction. As such, the WCFD would review the site and building plans for the project as part of the City's review process. The project would increase the total commercial building area on the project site, which would incrementally increase demand for fire protection services. However, the project site is located in an urbanized area already served by the WCFD and would not have a significant impact on fire response times nor create a substantially greater need for additional fire protection services above current capacity. Construction of the proposed project would maintain emergency access to the site and on area roadways and would not interfere with an emergency response plan or evacuation route. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

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

As discussed under impact discussion *a.* of this section, the project site is not located in a FHSZ or Very High FHSZ for wildland fires. The nearest Very High FHSZ is located approximately one mile east of the site (California State Geoportal 2020). There are no streams or rivers located on or adjacent to the project site, and the project site and surrounding areas are not at high risk of downslope or downstream flooding or landslides. Therefore, the project would not exacerbate wildfire risks, and risks to people or structures due to runoff, post-fire slope instability, or drainage changes would not occur. Employees and customers at the project site would not be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur.

NO IMPACT

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

As discussed under impact discussion *a.* of this section, the project site is not located in a FHSZ or Very High FHSZ for wildland fires. The nearest Very High FHSZ is located approximately one mile east of the site (California State Geoportal 2020). The proposed project is an infill development in an urbanized area involving the demolition of existing on-site commercial buildings and the

construction of three new commercial buildings. The project site would be adequately served by existing facilities and utilities. Therefore, the proposed project would not require additional infrastructure such as roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk and no temporary or ongoing impacts to the environment would occur.

NO IMPACT

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21 Mandatory Findings of Significance

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

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

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

season to avoid potential impacts to on-site nesting birds. Furthermore, as discussed in Section 5, *Cultural Resources*, Section 7, *Geology and Soils*, Section 9, *Hazards and Hazardous Materials,* and Section 18, *Tribal Cultural Resources*, the proposed project would have a less than significant impact on unanticipated cultural resources, paleontological resources, and tribal cultural resources with implementation of Mitigation Measures CR-1, GEO-2, and TCR-1 through TCR-3. Implementation of these mitigation measures, as well as adherence to existing local, State and federal regulations and specific monitoring procedures related to the discovery of any unanticipated cultural resources, hazardous materials, paleontological resources, tribal cultural resources, and human remains during construction activity, would reduce these potential impacts to a less than significant level.

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

As concluded in Sections 1 through 20, the project would have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated, with respect to all environmental issues considered in this document. As indicated in Table 3 of the TIA prepared for the project (see Appendix I), other pending or approved future development in the project site vicinity predominantly consists of mixed-use developments, including residential, retail, and office uses. As shown on Figure 18 of the TIA, the nearest off-site development is located approximately 0.7 mile north of the site and would consist of three condominium homes. Given the distance to the nearest project, impacts associated with implementation of these condominium homes would not be cumulatively considerable to those of the proposed project.

Cumulative impacts related to several other resource areas have been addressed in the individual resource sections of this IS-MND, including air quality, GHGs, noise, and transportation (see CEQA Guidelines Section 15064(h)(3)). As discussed in Section 1, *Air Quality*, and Section 7, *Greenhouse Gas Emissions*, the proposed project would result in less than significant impacts associated with air quality and GHG emissions. The impact analyses in these sections use thresholds that already account for cumulative (regional) impacts, except for cumulative localized impacts of construction emissions. However, most of the demolition at the project site has already occurred, and the grading phase accounts for most of the emissions with localized impacts and for which LST impact thresholds exist, including NO_X, CO, PM_{10}, and $PM_{2.5}$. Additionally, as explained above, the nearest the nearest pending or approved future development project is 0.7 miles from the project site. As concluded in Sections 1 and 7, air quality and GHG emissions associated with operation and construction would be less than significant and not be cumulatively considerable.

As discussed in Section 13, *Noise*, the proposed project would not generate significant construction noise impacts as construction would occur during hours between 7:00 a.m. and 8:00 p.m. consistent with WCMC Section 15-95. Due to the 0.7-mile distance of the nearest pending or approved future development, impacts associated with implementation of this development in conjunction with those of the project would not be cumulatively considerable. The noise and traffic analyses in this IS-MND both considered increases in traffic and traffic noise under Existing plus Project conditions and concluded that impacts would be less than significant.

This IS-MND determined that, for some of the other resource areas (e.g. agricultural and mineral), the proposed project would have no impact in comparison to existing conditions. Therefore, the project would not contribute to cumulative impacts related to these issues. Other issues (e.g., biological

resources, cultural resources, geology, hazards, hazardous materials, and tribal cultural resources) are by their nature project specific and impacts at one location do not add to impacts at other locations or create additive impacts. As such, cumulative impacts would be less than significant (not cumulatively considerable).

LESS THAN SIGNIFICANT IMPACT

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed in analyses for air quality, hazards and hazardous materials, and noise, the proposed project would not result, either directly or indirectly, in adverse hazards related to air quality, hazardous materials or noise. Compliance with applicable rules, regulations, and mitigation measures included in this IS-MND (including Mitigation Measure N-1, which would require a construction noise barrier at the western boundary along adjacent sensitive receivers, and Mitigation Measure N-2, which would require implementation of building materials capable of reducing exterior-to-interior noise levels consistent with Sections 5.507.4.1 and 5.507.4.2 of the CCR) would reduce potential impacts on human beings to a less than significant level.

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List of Preparers

Rincon Consultants, Inc. prepared this IS-MND under contract to Bently Real Estate. Persons involved in data gathering analysis, project management, and quality control are listed below.

RINCON CONSULTANTS, INC.

Deanna Hansen, Principal
Greg Martin, Senior Environmental Planner, Project Manager
Vanessa Villanueva, Associate Environmental Planner
Emily Marino, Associate Environmental Planner