Draft Initial Study and Mitigated Negative Declaration

Walnut Grove Residential Project

Prepared for

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November 19, 2020

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ACRONYM LIST

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ac	acre
ACM	asbestos-containing materials
af	Acre-feet
AFY	acre-feet per year
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
bgs	below the existing ground surface
BMP	Best Management Practice
CAAQS	California Ambient Air Quality Standards
CalARPP	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalFire	California Department of Forestry and Fire Prevention
CALGreen Code	California Green Building Standards Code
CalOSHA	State Occupational Safety and Health Regulations
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CH_4	methane
City	City of West Covina
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
Cortese List	Hazardous Waste and Substances Site List
CPUC	California Public Utilities Commission
CWA	Clean Water Act
cy	cubic yards
dBA	A-weighted decibel scale
DIFs	Development Impact Fees
DOC	Department of Conservation
DOGGR	California Division of Oil, Gas, and Geothermal Resources
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
DTSC-SLs	Department of Toxic Substance Control Screening Levels
du	dwelling units
EAP	Energy Action Plan
EIR	Environmental Impact Report
EMFAC	EMissions FACtor
EO	Executive Order
ESA	Environmental Site Assessment

FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
ft	feet
FTA	Federal Transportation Administration
GHG	greenhouse gas
GP	General Plan
gpcd	gallons per capita per day
HCP	Habitat Conservation Plan
HFC	hydrofluorocarbons
HOA	Homeowners Association
HVAC	heating, ventilation, and air conditioning
HWCA	California Hazardous Waste Control Act
I	Interstate
in/sec	inches per second
IRPs	integrated resources plans
IS/MND	Initial Study/Mitigated Negative Declaration
ISSD	Investigative & Support Services Division
ITE	Institute of Transportation Engineers
km	kilometer
LACSD	Los Angeles County Sanitation District
LBP	lead-based paint
L_{eq}	energy average
L_{eq} dBA	Equivalent Continuous Noise Level in A-weighted decibels
L_{max}	maximum noise level
L_{min}	minimum noise level
LOS	Level of Service
LST	localized significance threshold
MBTA	Migratory Bird Treaty Act
MEI	maximally exposed individual
mg	Million Gallons
mgd	million gallons of wastewater per day
mg/m^3	milligrams per cubic meter
mph	miles per hour
MPO	metropolitan planning organization
MRF	Materials Recovery Facility
MRZs	Mineral Resources Zones
MRZ-1	Mineral Resource Zone-1 (an area with no significant mineral deposits)
MRZ-2	Mineral Resource Zone-2 (an area with significant mineral deposits)
MRZ-3	Mineral Resource Zone-3 (an area containing known mineral resources of undetermined significance)
MTdba ldn	metric tons of carbon dioxide equivalent
$MTCO_2e$	metric tons of CO_2 equivalent
$MTCO_2e/yr$	metric tons of CO_2 equivalent per year
NAAQS	National Ambient Air Quality Standards
N-C	Neighborhood Commercial
NCCP	Natural Community Conservation Plan
NHMP	Natural Hazard Mitigation Plan

NPDES	National Pollutant Discharge Elimination System
N_2O	nitrous oxide
NO	nitric oxide
NO_2	nitrogen dioxide
NOI	Notice of Intent
NOx	nitrogen oxide
O_3	ozone
OCPs	organochlorine pesticides
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Governor's Office of Planning and Research
OSHA	Federal Occupational Safety and Health Regulations
PFC	perfluorocarbons
PlanWC	City of West Covina General Plan
PM2.5	fine particulate matter with a diameter of 2.5 microns or less
PM10	respirable particulate matter with a diameter of 10 microns or less
ppm	parts per million
ppv	peak particle velocity
PRD	Permit Registration Document
pvc	polyvinyl chloride
R-1	Residential Single-Family
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RHNA	Regional Housing Needs Assessment
RPS	Renewable Portfolio Standard
RSLs	Residential Regional Screening Levels
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
S-C	Service Commercial
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCGC	Southern California Gas Company
SCS	sustainable communities strategy
sf	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SJCWRP	San Jose Creek Water Reclamation Plant
SO_2	sulfur dioxide
SoCAB	South Coast Air Basin
S-P	Specific Plan
SR	State Route
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	toxic air contaminates

TPA	Transit Priority Area
µg/m^3	micrograms per cubic meter
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VdB	vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOCs	volatile organic compounds
WCFD	West Covina Fire Department
WCPD	West Covina Police Department
WCUSD	West Covina Unified School District
WNRP	Whittier Narrows Reclamation Plant

1.0 INTRODUCTION

1.1 PURPOSE OF THE INITIAL STUDY

The purpose of this Initial Study (IS) is to (1) describe the proposed Walnut Grove Residential Project (hereinafter referred to as the "Project"), which would be constructed in the City of West Covina and (2) provide an evaluation of potential environmental impacts associated with the Project's construction and operation. The Project involves development of a 158-unit attached and detached residential development on an approximately 9.14-acre site. This IS has been prepared pursuant to the California Environmental Quality Act (CEQA), as amended (Section 21000 et. seq. of the *Public Resources Code*) and in accordance with the State CEQA Guidelines (Section 15000 et. seq. of the *California Code of Regulations*).

Pursuant to Section 15367 of the State CEQA Guidelines, the City of West Covina (hereinafter referred to as the "City") is the lead agency for the Project. The lead agency is the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment. The City of West Covina, as the lead agency, has the authority for Project approval and certification of the accompanying environmental documentation.

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT COMPLIANCE

In accordance with CEQA and the State CEQA Guidelines, an Initial Study (IS) has been prepared for the proposed Project and its associated discretionary approvals. The IS indicates that the potentially significant impacts of the Project can be reduced to less than significant levels with implementation of mitigation measures, and therefore, the Project requires preparation of an Initial Study/Mitigated Negative Declaration (IS/MND).

This IS/MND serves as the environmental document that presents the analysis of Project impacts on each of the environmental issue areas in the CEQA Environmental Checklist provided in Section 4.0. This document will serve to inform City decision makers, representatives of affected trustee and responsible agencies, and other interested parties of the potential environmental effects that may occur with approval and implementation of the proposed Project.

1.3 PROJECT SUMMARY

1.3.1 LOCATION

The approximate 9.14-acre Project site is in the City of West Covina, in Los Angeles County, California. The site is located at 1651 East Rowland Avenue, north of East Rowland Avenue and west of North Azusa Avenue. The site is approximately 0.47 mile north of Interstate (I) 10 Freeway and located within the northern portion of the City. Local and regional access to the site is provided by Rowland Avenue and I-10, respectively. North Eileen Street ends in a cul-de-sac within the site along the northwestern boundary of the Project. See Exhibit 1-1, Regional Location and Local Vicinity.

Aerial Source: Maxar 2019

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Regional Location and Local Vicinity

Exhibit 1-1

Walnut Grove Residential Project

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The site is currently developed with the former Tri-Community Adult School-Pioneer Center, which moved to a new location in Covina, California. All existing structures have been closed and will be demolished to accommodate the proposed development.

1.3.2 PROJECT PROPONENT

Glen Crosby
Lewis Management Corporation
1156 North Mountain Avenue,
Upland, CA 91786
(909) 579-5193

1.3.3 EXISTING GENERAL PLAN AND ZONING

Land Use Designation: Civic: Schools (S)

Zoning Classification: RS-1 Residential Single Family

1.3.4 EXISTING SETTING

Project Site

The Project site is currently developed with a school campus (former Pioneer School), which is not in use and slated for demolition. The existing use is comprised of nine administrate buildings and classrooms in the southern portion; surface parking lots in the southeastern and in northeastern portions; three storage sheds, a paved play area, and an athletic field in the western and northwestern portions of the Project site. Access to the site is primarily from East Rowland Avenue, and existing North Eileen Street terminates in a cul-de-sac within the property along the northern boundary of the site.

Surrounding Land Uses

The Project site is surrounded by single family residential uses to the north and west. Commercial, retail, restaurant, and office uses are located to the east, and immediately to the north is a shopping center. To the south and across Rowland Avenue, is a large commercial retail shopping center, and beyond that is single-family residential neighborhood.

1.3.5 PROPOSED DEVELOPMENT

The proposed Walnut Grove Residential Project would involve construction of a 158-unit attached and detached residential development on an approximately 9.14-acre site with a density of 16.7 dwelling units per acre (du/ac). The existing school uses, including administrative buildings and surface parking lot, would be demolished to accommodate the proposed Project.

The proposed Project would consist of two different types of residences, including: 66 units of detached single-family in a cluster configuration and 92 attached multi-family units. The proposed detached single-family units would have a minimum of three floor plan types, with

units ranging in size from 1,471 to 1,798 square feet (sf). The proposed townhomes would have a minimum of three floor plans, ranging in size from 1,310 to 1,721 sf. Furthermore, the Project would include 2 covered garage parking spaces per dwelling unit (for a total of 316 indoor garage spaces), 99 uncovered guest surface parking spaces throughout the Project site, and approximately 0.27 acre of common open space. Additional details on the Project are provided in Section 3.0 of this IS/MND.

1.4 SUMMARY OF FINDINGS

Based on the environmental checklist form prepared for the Project and supporting environmental analysis (Section 4.0), the proposed Project would have no impact or less than significant impacts in the following environmental areas: aesthetics, agriculture and forest resources, air quality, energy, greenhouse gas (GHG) emissions, hazards and hazardous materials, land use and planning, mineral resources, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire. The Project has the potential to have significant impacts on the following topics unless the recommended mitigation measures described herein are incorporated into the Project: biological resources, cultural resources, geology and soils, hydrology and water quality, noise, and tribal cultural resources.

According to the State CEQA Guidelines, it is appropriate to prepare an IS/MND for the proposed Project because, after incorporation of the recommended mitigation measures, potentially significant environmental impacts would be reduced to a level considered less than significant.

1.5 PROJECT APPROVAL

This IS/MND has been submitted to potentially affected agencies and individuals. The Notice of Intent (NOI) to adopt the IS/MND, as well as the environmental documentation are also available on the City of West Covina's website (https://www.westcovina.org/departments/community-development/planning-division/projects-and-environmental-documents) for review. Additionally, the NOI was published in the San Gabriel Valley Tribune.

A 30-day public review period has been established for the IS/MND beginning on November 19, 2020 and ending on December 21, 2020. The review period has been established in accordance with Section 15073 of the State CEQA Guidelines. During review of the IS/MND, affected public agencies and the interested public should focus on the document's adequacy in identifying and analyzing the potential environmental impacts and the ways in which the potentially significant effects of the Project can be avoided or mitigated. Comments on the IS/MND and the analysis contained herein must be received by 5:00 PM on December 21, 2020, and should be addressed to:

City of West Covina
Planning Division
Attention: Jo-Anne Burns
Planning Manager
1444 West Garvey Avenue South, 2nd Floor, Room 208
West Covina, CA 91790
JBurns@westcovina.org

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation—such as an Environmental Impact Report (EIR) or an expanded IS/MND—may be required. If not, the Project and the environmental documentation are tentatively scheduled to be submitted to the West Covina Planning Commission and City Council for consideration.

1.6 ORGANIZATION OF THE INITIAL STUDY

The IS/MND is organized into sections, as described below.

- **Section 1.0: Introduction.** This section provides an introduction, Project summary, and overview of the conclusions in the IS/MND.
- **Section 2.0: Project Location and Environmental Setting.** This section provides a brief description of the Project location, relevant background information, and a description of the existing conditions of the Project site and vicinity.
- **Section 3.0: Project Description.** This section provides a description of the proposed Project, a statement of purpose and need, and necessary discretionary approvals.
- **Section 4.0: Environmental Checklist.** The completed Environmental Checklist Form from the State CEQA Guidelines provides an overview of the potential impacts that may or may not result from Project implementation. The Environmental Checklist Form also includes "mandatory findings of significance", as required by CEQA.
- **Section 5.0: References.** This section identifies the references used to prepare the IS/MND.

2.0 PROJECT LOCATION AND ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION

The approximate 9.14-acre Project site is located at 1651 East Rowland, in the City of West Covina. The Project site is located north of East Rowland Avenue and west of North Azusa Avenue. The Project site is surrounded by single family residential uses to the north and west of the Project site. Existing commercial uses are located immediately to the north, east, and south of the Project site across Rowland Avenue.

A 4-foot and a 6-foot wide easement from the southern boundary of the Project site has been granted to Southern California Edison Company (SCE), where overhead power lines on wooden poles are present on the northern and western Project boundaries.

2.2 EXISTING SITE AND AREA CHARACTERISTICS

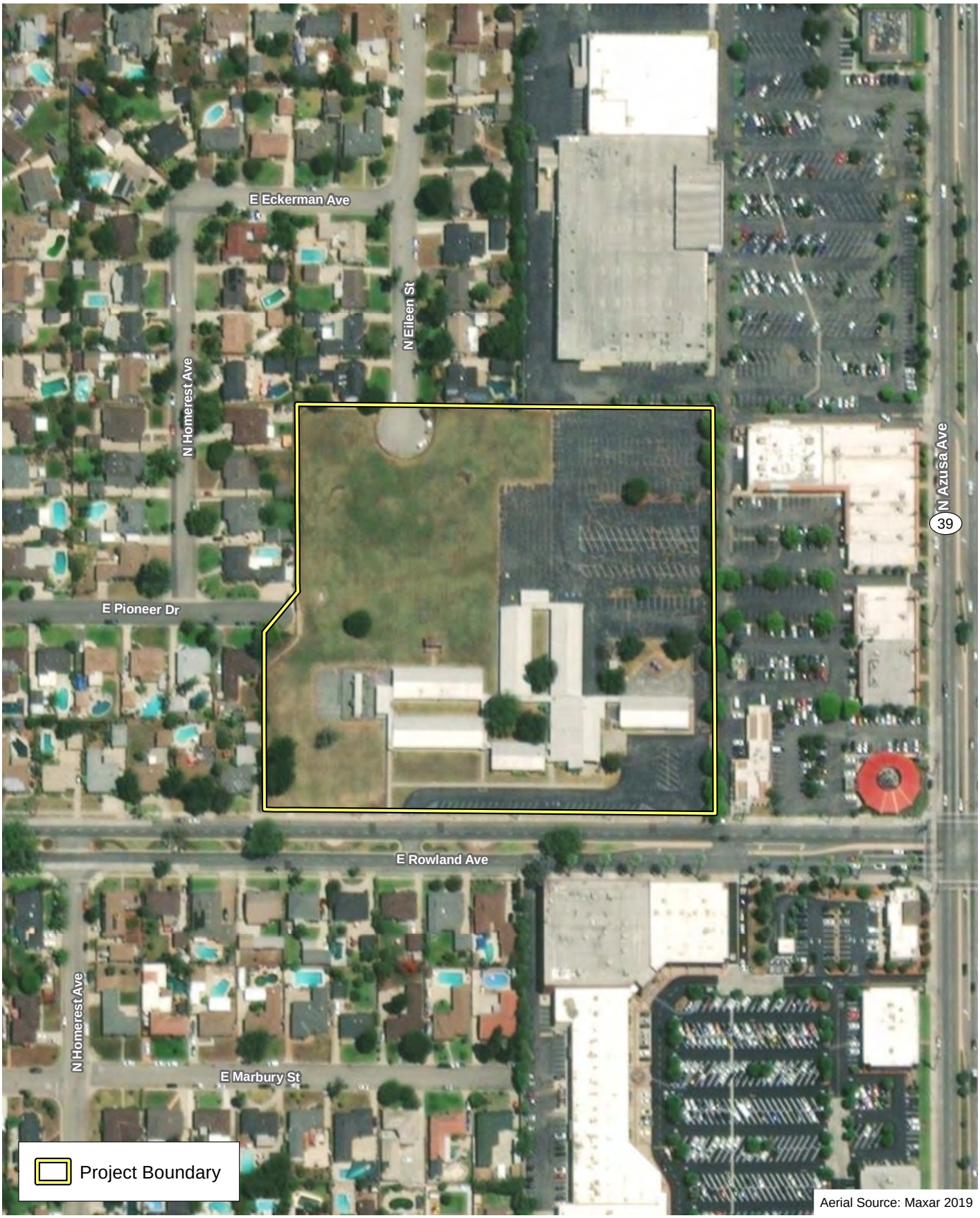
2.2.1 SITE ACCESS

Vehicular access to the Project site is provided by two primary ingress and egress points, located on East Rowland Avenue, on the southern boundary of the Project site. A fire access point is provided through an existing cul-de-sac, North at Eileen Street, terminating within the northwestern portion of the Project site. Rowland Avenue is a four-lane divided road that extends westerly from North Sunset Avenue (on the west) to South Grand Avenue (on the east) for approximately 3.6 miles. I-10 is located approximately 0.47 mile south of the Project site.

2.2.2 EXISTING SITE CONDITIONS

The Project site is developed with an adult school use (former Pioneer School), which is not currently in use. The southern portion of the site has nine one-story administrative buildings and classrooms, and three storage sheds. These nine buildings include: five permanent classroom buildings, a cafeteria, an administration building, and two temporary classroom structures. Recreational uses, such as fields and a paved playground are located throughout the site. Asphalt-paved surface parking lots are located adjacent to most of East Rowland Avenue, and a surface parking lot is also located in the northeastern portion of the Project site. The terminus of a cul-de-sac (North Eileen Street) is located within the northwestern Project boundary.

The site contains ornamental trees and shrubs scattered throughout the Project site. In areas not paved with asphalt, grass is present throughout the site, especially on the western half of the Project site. Chain-link fence borders portions of the southern Project boundary and surrounds recreational uses within the Project site. Block walls line the eastern perimeter of the site, with a chain-link fence lining the perimeter of the northern, western, and portions of the southern boundary. See Exhibit 2-1, Aerial Photograph.



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Aerial Photograph

Exhibit 2-1

Walnut Grove Residential Project

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2.2.3 SURROUNDING LAND USES AND DEVELOPMENT

The Project site is located within a highly urbanized portion of the City of West Covina that includes a mix of residential and commercial land uses. As shown in Exhibit 2-1, the Project site is bordered by single-family residential and commercial uses to the north; commercial uses to the east; East Rowland Avenue, single-family residential, and commercial uses on the south across from East Rowland Avenue; and single-family residential uses to the west. A residential community exists to the south beyond the commercial uses. Commercial uses surrounding the site include grocery stores, restaurants; small retail establishments; and medical offices, among others.

2.3 PLANNING CONTEXT

2.3.1 GENERAL PLAN DESIGNATION

The Project site currently has a General Plan land use designation of Civic: Schools. The land use designations in the vicinity of the Project site includes Neighborhood—Low Density Residential and Neighborhood—Medium Density Residential to the north, Neighborhood—Medium Density Residential and Commercial to the east; Commercial and Neighborhood—Low Density Residential to the south; and Neighborhood Low Density Residential to the west.

2.3.2 ZONING DESIGNATION

In the City's Zoning Map, the site is zoned as R-1, Residential Single-Family (Limited Business). Adjacent zoning designations include R-1 and Neighborhood Commercial (N-C) to the north; Service Commercial (S-C) to the east; S-C and R-1 to the south; and R-1 to the west.

3.0 PROJECT DESCRIPTION

3.1 RESIDENTIAL LAND USE

The Project involves demolition and removal of the existing school uses and associated parking areas; preparation of the site for redevelopment (e.g., clearing and grading); and construction of 158 attached and detached residential development units, internal drive aisles, and common open space areas on the 9.14-acre site. The Project consists of two different housing types: 66 "Liberty Deluxe" detached single-family units in clusters with six or eight individual units (hereinafter referred to as "single-family units") and 92 "Bedford" attached row townhomes with five or six individual units (hereinafter referred to as "multi-family units"). The proposed dwelling units would feature three minimum floor plans for the single-family units, and a minimum of two floor plans for the multi-family units. Table 3-1 provides the breakdown of the proposed dwelling units. With adoption of the Walnut Grove Specific Plan, the Project would have a development density of 16.7 dwelling units per acre (du/ac), which would require a zone change to allow for a density between 15 and 18 single family du/ac.

TABLE 3-1
RESIDENTIAL UNITS

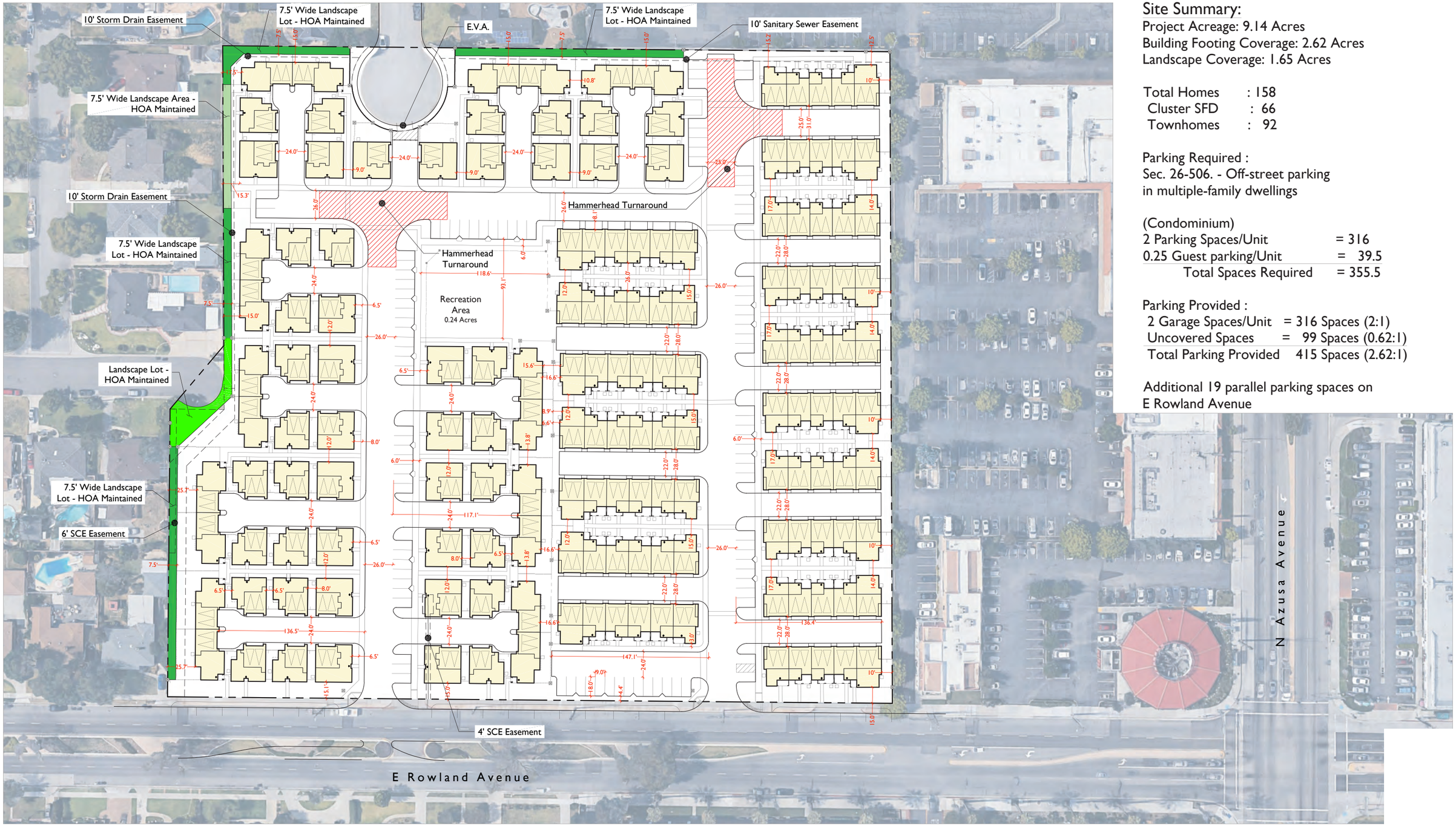
Floor Plan	Number of Units	Floor Area (sf)
Liberty Deluxe Detached Single-Family Residences	66	1,471 to 1,798
Bedford Townhomes	92	1,310 to 1,721
Total	***158***	**—**

sf – square feet

Source: Lewis Management Corp. 2020.

The single-family units would be arranged in clusters around a private drive alley, as depicted on Exhibit 3-1, Site Plan. The individual clusters of the single-family units would contain either six or eight units each. These dwelling units would be generally located on the western half of the Project site. As shown in Table 3-1, the typical floor plans would range from 1,471 sf to 1,798 sf within 2-story residences. Plan 1A would be 1,471 sf with 3 bedrooms, 2.5 baths, a 2-car garage, and a private outdoor yard. Plan 2A would be 1,663 sf with 3 bedrooms, 2.5 baths, a 2-car garage, and a private outdoor yard. Plan 3A would be 1,798 sf, with 4 bedrooms, 3 baths, a loft, a 2-car garage, and would include a private outdoor yard.

The multi-family units would be grouped in rows of five to six dwelling units and would be generally located on the eastern half of the Project site. The multi-family units would be three stories in height, with a minimum of three floor plans for these units. Typical floor plans would range from 1,310 to 1,721 sf for the multi-family units. For example, Plan 1 would be 1,310 sf, with 2 bedrooms, 2.5 baths, a 2-car garage, a porch, and a deck. Plan 2 would be 1,495 sf, with 2 bedrooms, 3 baths, a den, a 2-car garage, and a porch and deck. Plan 3 would be 1,721 sf with 3 bedrooms, 3.5 baths, a 2-car garage, and a porch.



Site Summary:

Project Acreage: 9.14 Acres
Building Footing Coverage: 2.62 Acres
Landscape Coverage: 1.65 Acres

Total Homes	: 158
Cluster SFD	: 66
Townhomes	: 92

Parking Required :
Sec. 26-506. - Off-street parking in multiple-family dwellings

(Condominium)

2 Parking Spaces/Unit	= 316
0.25 Guest parking/Unit	= 39.5
Total Spaces Required	= 355.5

Parking Provided :

2 Garage Spaces/Unit	= 316 Spaces (2:1)
Uncovered Spaces	= 99 Spaces (0.62:1)
Total Parking Provided	415 Spaces (2.62:1)

Additional 19 parallel parking spaces on E Rowland Avenue

Source: Lewis Group Of Companies, October 2020

Site Plan

Exhibit 3-1

Walnut Grove Residential Project

N W E S

Map not to scale

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The single-family dwelling units and townhomes located adjacent to East Rowland Avenue would face the street frontage. Exhibit 3-1 shows the location of the proposed dwelling units, open space areas, access driveway, and drive aisles.

A common open space area would be provided on-site at one central location at the Project site, and private open spaces would be available for each single-family unit. The Project would have 100 sf of common open space per unit (including walking paseos and the neighborhood park use). The single-family units would have a minimum of 150 sf of private open space per unit, and the multi-family units would have a minimum of 100 sf of private open space per unit. The common open space area of the Project would consist of 0.27 acre of neighborhood park use, hereinafter referred to as the ("Community Open Space Area"). The Community Open Space Area would have a private park that is publicly accessible for use. Open space amenities would include bench seating areas and trash receptacles; picnic areas; children's tot-lot area; open turf area; connecting walkways; and mailboxes.

3.2 PROJECT ACCESS/PARKING

Two primary ingress and egress points are proposed on East Rowland Avenue, along the southern boundary of the Project site. The west driveway would be a full access driveway, and the east driveway would be a right-in right-out only driveway. The median on East Rowland Avenue in front of the west driveway would be reconstructed, as the existing median opening is slightly east of the proposed west driveway location. The median reconstruction would also include a left turn cutout to allow left turns directly into the site. All units would be accessible from either driveway. An additional fire access point is provided from north of the Project site, via the existing cul-de-sac at North Eileen Street. A series of 24-foot-wide private drive aisles would provide direct access to all units from the primary on-site 25-foot loop road within the Project site.

Because this is a Specific Plan project, the parking requirements are specified separately from the typical City standards. Per the Specific Plan, the Project is required to provide 2 parking spaces per unit and 0.5 guest parking spaces per unit. This would result in required 316 parking spaces for residents and 79 spaces for guests. The Project would provide 316 garage spaces and 99 uncovered guest spaces (20 spaces in excess of the requirement) at various locations throughout the Project.

In light of the access discussion, the following measures/features (i.e., project design features—PDFs) would be implemented by the development to self-mitigate the issues discussed above:

PDF TRA-1 The Project Applicant shall implement a left-in turn-pocket for eastbound traffic on East Rowland Avenue and left-out turn movements from the Project entrance. The new turn pocket will require modifications to the existing median to align the new turn-pocket with the Project entrance. Final engineering will determine the precise dimensions and details of the proposed turn-pocket and the required median modifications.

PDF TRA-2 The Project Applicant shall implement red curbing along the Project frontage on East Rowland based on line of site distance determined during final engineering to identify the limits of guest parking along the frontage.

The above PDFs are included in 4.17, Transportation, of this IS/MND.

3.3 ARCHITECTURAL DESIGN

The proposed single-family units would be 2 stories and a maximum of 27'-6" tall. Each single-family unit may have the following architectural styles, including, but not limited to: Cottage, Farmhouse, and Spanish Colonial styles, as shown on Exhibit 3-2, Front Elevations—Single Family Units. All multi-family units would be 3 stories and a maximum of 40'-4" tall. The architectural styles of the multi-family units may include, but not be limited to, Farmhouse or Spanish Colonial styles, as shown on Exhibit 3-3, Front Elevations—Multi-Family Units.

Each dwelling unit would feature variations in buildings and roof planes and combinations of roof forms, heights, and direction of the gables, depending on the architectural style established. Window shapes and details, including header, sill, and trim elements would be consistent with the architectural style of each building.

The Project site would include a new boundary or fence along the northern, eastern, and western perimeters of the site. The southern perimeter would include a combination of privacy fencing for individual homes and homes that front directly onto East Rowland Avenue. There would be no fencing at ingress/egress points or along the street-adjacent parking area at the southern perimeter. At the western and northern Project site boundaries, there would be a combination of 6-foot-tall precision block perimeter walls with a 4-inch cap, and a 6-foot tall enhanced split-face block perimeter wall with an enhanced beveled cap. The eastern and southern Project site boundaries would have a 6-foot tall enhanced split-face block perimeter wall with an enhanced beveled cap. Between private yards within the single-family dwelling units, there would be internal fencing with 6-foot tall vinyl privacy fences. In areas with private yards that abut common areas, there would be a 6-foot-tall single-sided split-face interior walls with 4-inch caps. Details on wall and fence locations and materials are shown on Exhibit 3-4, Conceptual Wall and Fence Plan.

3.4 CONCEPTUAL LANDSCAPE PLAN

The proposed conceptual landscape plan would include a hierarchy of plant materials including trees, vines, shrubs, and groundcover along the front yards of each unit, throughout the Project site, and in open space areas.

The centrally-located park would include landscape berm; 42-inch tall two rail fencing; trellis entry, trash receptable; bench seating; concrete path; children's tot lot with play equipment; picnic table and seating; and open turf play area.

A 7'-6" wide minimum homeowners association (HOA) maintained landscape area would be along the northern and western perimeter of the site. The boundary to the south would include trees and a parkway along East Rowland Avenue. The site entries on East Rowland Avenue would include monumentations comprised of stucco finish wall and pilaster with brick cap, precast concrete signage, and decorative planter pots. Refer to Exhibit 3-5, Conceptual Landscape Master Plan, for the proposed locations of landscaped and open space areas and Exhibit 3-6, Conceptual Park Enlargement Plan.

The landscape plan would also comply with Chapter 26, Article XIV, Division 1, Water Efficient Landscaping.

COTTAGE

FARMHOUSE

SPANISH COLONIAL

FARMHOUSE

SPANISH COLONIAL

Source: Lewis Group Of Companies, April/May 2020

Front Elevations—Single-Family Units

Exhibit 3-2

Walnut Grove Residential Project

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FARMHOUSE

SPANISH COLONIAL

5-Plex 3-story Townhomes

FARMHOUSE

SPANISH COLONIAL

6-Plex 3-story Townhomes

Source: Lewis Group Of Companies, May 2020

Front Elevations—Multi-Family Units

Exhibit 3-3

Walnut Grove Residential Project

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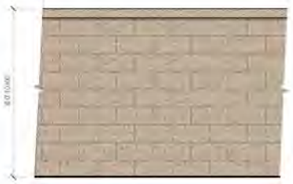
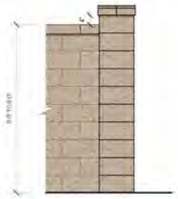
WALL AND FENCE LEGEND:

1. 6'-0" TALL SPLIT-FACE BLOCK PERIMETER WALL WITH 4" CAP.
2. 6'-0" TALL ENHANCED SPLIT-FACE BLOCK PERIMETER WALL WITH ENHANCED BEVELED CAP.
3. 6'-0" TALL PRECISION BLOCK PERIMETER WALL WITH 4" CAP.
4. 6'-0" TALL SINGLE SIDED SPLIT-FACE RETURN WALLS.
5. 6'-0" TALL VINYL PRIVACY FENCE.
6. 3'-0" WIDE VINYL ACCESS GATE.
7. 6'-8" TALL SPLIT-FACE PERIMETER PILASTER WITH 4" ENHANCED BEVELED CAP.
8. 3'-6" TALL 2-RAIL VINYL PVC COMMUNITY PARK FENCE.
9. 4'-0" TALL SPLIT FACE PERIMETER PILASTER AT COMMUNITY PARK.
10. REMOVABLE VEHICULAR BOLLARDS.
11. PROPOSED MONUMENT LOCATION.

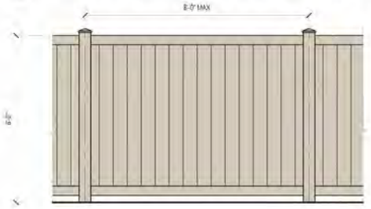


A 6' TO 8' TALL SPLITFACE BLOCK PERIMETER WALL W/ 4" CAP

B 6' TALL SPLITFACE BLOCK PERIMETER WALL w/ ENHANCED 4" BEVELED CAP

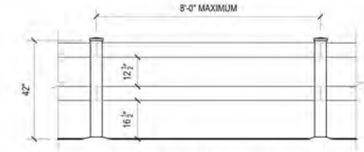


C 6'-8" TO 8'-8" TALL SPLITFACE BLOCK PERIMETER PILASTER w/ ENHANCED 4" BEVELED CAP

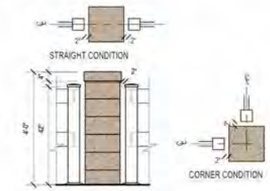


D 6' TALL PVC RETURN WALL, SIDE AND REAR YARD PRIVACY FENCE

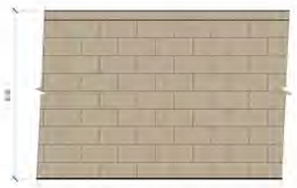
E 3' WIDE VINYL SIDE YARD GATE AT VINYL RETURN WALL



F 2 RAIL PVC FENCE AT COMMUNITY PARK



G PILASTER CONDITION AT 2 RAIL PVC FENCE



H 6' TALL PRECISION BLOCK PERIMETER WALL

Source: Architerra Gesign Group, July 2020

Conceptual Wall and Fence Plan

Exhibit 3-4

Walnut Grove Residential Project

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Map not to scale

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PLANT PALETTE:

TREES & VINES

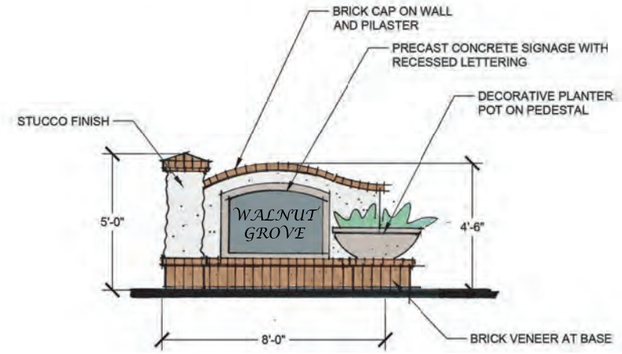
BOTANICAL NAME	COMMON NAME	SIZE
INTERIOR STREET TREE		
Tristania conferta	Brisbane Box	24" Box
UPRIGHT RESIDENTIAL CORRIDOR CANOPY TREE		
Hymenosporum flavum	Sweetshade Tree	24" Box
ALLEY AND CORRIDOR TERMINUS FOCAL TREE		
Melaleuca quinquenervia	Paperbark Tree	24" Box
LARGE MULTI-TRUNK SPECIMEN TREE		
Arbutus 'Marina'	Strawberry Tree	36" Box
FLOWERING ACCENT TREE		
Lagerstroemia indica x fauriei 'Arapaho'	Arapaho Crape Myrtle	24" Box
MOTORCOURT UPRIGHT ACCENT TREE		
Cupressus sempervirens 'Monshel'	Tiny Tower Italian Cypress	15 Gal.
SMALL FLOWERING ACCENT TREE		
Handroanthus chrysotrichus	Golden Trumpet Tree	24" Box
FLOWERING SHADE TREE		
Bauhinia x. blakeana	Hong Kong Orchid Tree	24" Box
ROWLAND AVENUE PARKWAY TREE		
Jacaranda mimosifolia	Jacaranda	24" Box
EVERGREEN SCREENING TREE MASS		
Podocarpus gracilior	Fern Pine	15 Gal.
VINES		
Parthenocissus tricuspidata	Boston Ivy	15 Gal.

SHRUBS AND GROUNDCOVER

BACKGROUND		
Arbutus unedo 'Compacta'	-	Dwarf Strawberry Tree
Arctostaphylos d. 'Howard McMinn'	-	Manzanita
Callistemon v. 'Little John'	-	Dwarf Bottlebrush
Cistus species	-	Rockrose
Echium fastuosum	-	Pride of Madeira
Frangula c. 'Eve Case'	-	Coffeeberry
Rosmarinus o. 'Tuscan Blue'	-	Rosemary
MIDGROUND		
Lavandula species	-	Lavender
Hesperaloe parvifolora 'Break Lights'	-	Red Yucca
Nandina domestica 'Fire Power'	-	Heavenly Bamboo
Muhlenbergia rigens	-	Deer Grass
Romneya coulteri	-	Matilija Poppy
Salvia clevelandii 'Pozo Blue'	-	Cleveland Sage
Salvia leucantha 'Santa Barbara'	-	Mexican Sage
FOREGROUND		
Anigozanthos 'Bush Baby'	-	Kangaroo Paw
Carex divulsa	-	Berkeley Sedge
Festuca o. 'Glauca'	-	Blue Fescue
Rosmarinus o. 'Huntington Carpet'	-	Rosemary
Senecio serpens	-	Blue Chalksticks
Trachelospermum jasminoides	-	Star Jasmine

FEATURE LEGEND:

1. 5' Wide, Medium Broom, Natural Color Concrete Interior Walkways.
2. 4' Wide, Medium Broom, Natural Concrete Residential Corridor Walkways.
3. A.C. Units Per Architects Plans.
4. 6' Wide Medium Broom, Natural Concrete Sidewalk at Head-In-Parking Stalls.
5. H.O.A. Landsacpe Areas.
6. Removable Bollards.
7. Enhanced Crosswalks.
8. Enhanced Paving at Main Entry Drive.
9. Proposed Monument Locations. (See Monument Elevation, This Sheet)
10. Parking Stalls Per Civil Engineer's Plans.
11. Existing Easements.
12. Existing Curb.
13. Proposed Parkway Along Rowland Avenue.
14. 7'-6" Wide Min. H.O.A. Maintained Landscape Lot.
15. Maintenance Access Gate.
16. Gang Mailbox Location with Trash Receptacle.
17. Proposed New Rowland Avenue, Median Alignment Per Civil Engineers Plans.
18. Curb Ramp with Truncated Domes Per Civil Engineer's Plans.
19. Minimum 3' Wide Utility Closet Access Concrete Pad
20. 4' Wide Medium Broom Natural Concrete Sideyard Access Path (w/ Utility Closet Access Pad).
21. 3' Wide Medium Broom Natural Concrete Private Residential Unit Entry Walkway.
22. Diamond Tree Planter.
23. 6' Tall EVA Double Swing Gate.



Source: Architerra Gesign Group, July 2020

Conceptual Landscape Master Plan

Exhibit 3-5

Walnut Grove Residential Project

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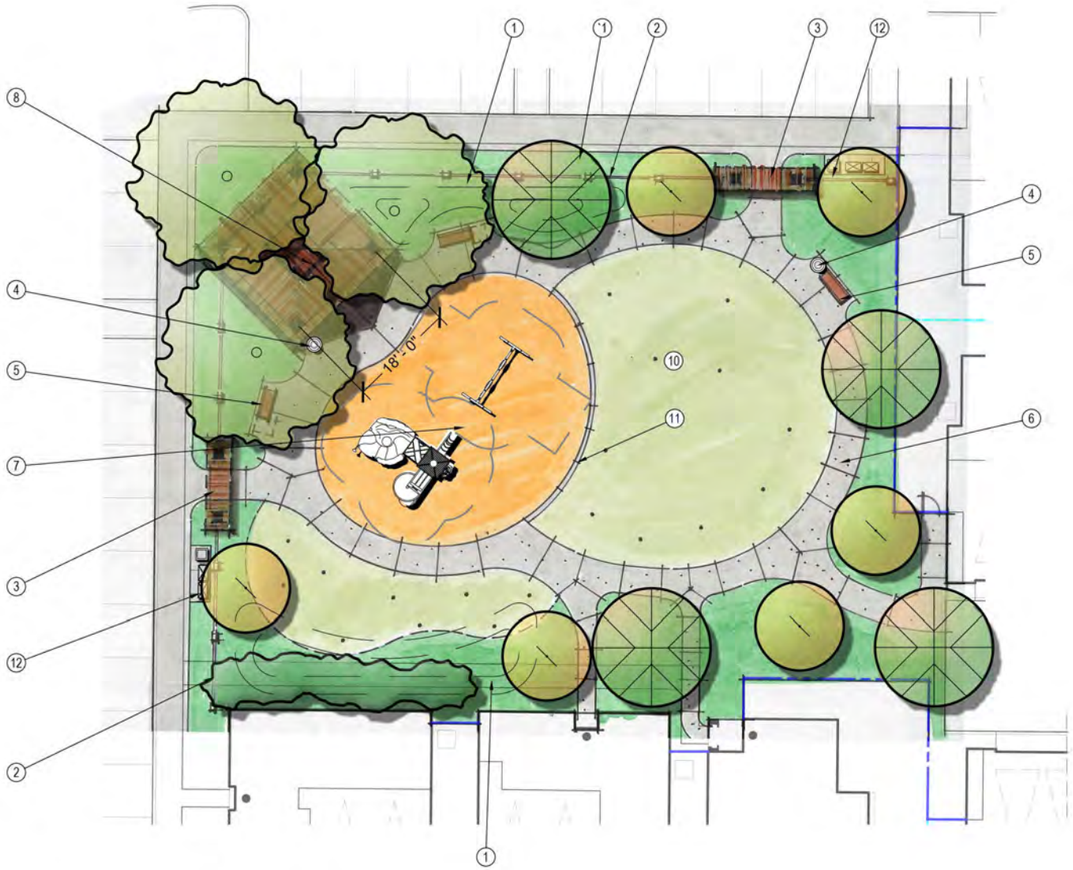
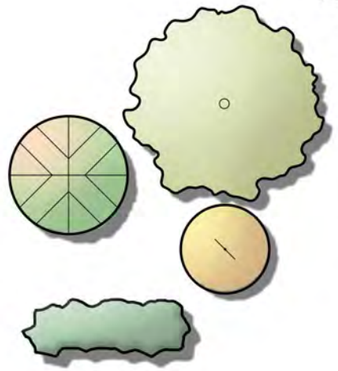


PLANT PALETTE:

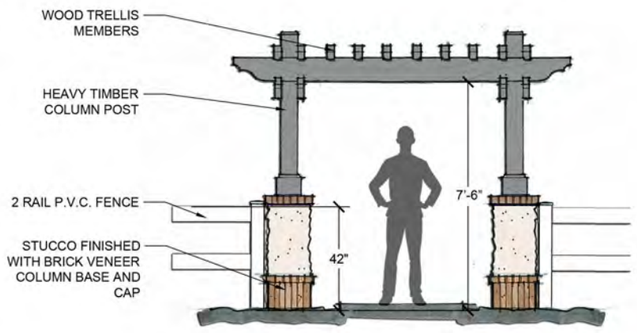


TREES & VINES

LARGE MULTI-TRUNK SPECIMEN TREE			
Arbutus 'Marina'	•	Strawberry Tree	36" Box
FLOWERING SHADE TREE			
Bauhinia x. blakeana	•	Hong Kong Orchid Tree	24" Box
SMALL FLOWERING ACCENT TREE			
Handroanthus chrysotrichus	•	Golden Trumpet Tree	24" Box
EVERGREEN SCREENING TREE MASS			
Prunus caroliniana 'Bright and Tight'	•	Carolina Laurel Cherry	

FEATURE LEGEND:

1. Landscape Berming.
2. 42" Tall 2 Rail P.V.C. Fencing.
3. Wood Arbor Trellis Entry.
4. Trash Receptacle.
5. Bench Seating.
6. 5' Wide Medium Broom Natural Concrete Path.
7. Children's Tot-Lot with Play Equipment, Swing Set and Rubber Surfacing.
8. Pre-Fabricated Covered Structure with Decorative Column Post and Picnic Table Seating.
10. Open Turf Play Area.
11. Concrete Header.
12. Gang Mailbox Location.



WOOD ARBOR ENTRY TRELLIS
SCALE : 1/2" = 1'-0"

CONCEPT IMAGES

BENCH SEATING

PICNIC TABLE

TRASH RECEPTACLE

2 RAIL PVC FENCE

MAILBOX

COVERED SHADE STRUCTURE

Source: Lewis Group Of Companies, April 2020

Conceptual Park Enlargement Plan

Exhibit 3-6

Walnut Grove Residential Project

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Map not to scale

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3.5 CONSTRUCTION ACTIVITIES

Construction activities are anticipated to begin in March 2021 and occur in a single phase, through December 2021, for a total of 10 months. Construction activity would occur for 8 hours per day, and 6 days per week, in accordance with the City's permitted hours of construction.

3.5.1 DEMOLITION

Implementation of the Project would include demolition of the existing buildings and site improvements, which would result in 100 truckloads exported from the Project site. A portion of the demolition and construction debris (65 percent) would be recycled, reused, and/or salvaged in compliance with the California Green Building Standards Code (CALGreen Code). Materials that cannot be recycled, reused, or salvaged would be transported to a local landfill. Any hazardous materials (e.g., asbestos-containing materials and lead-based paint) encountered during demolition would be handled and disposed of in accordance with South Coast Air Quality Management District (SCAQMD) rules and other pertinent regulations.

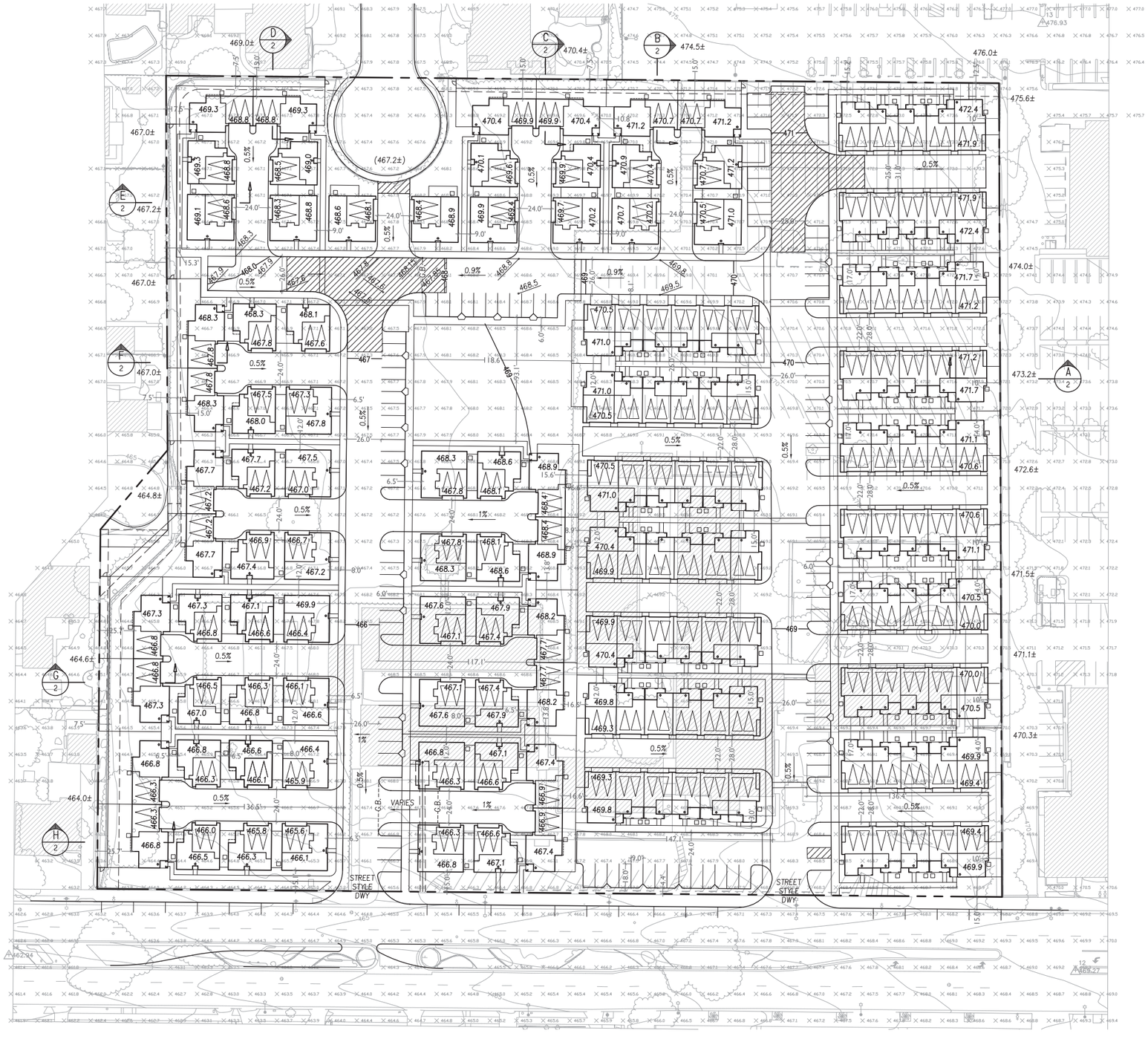
3.5.2 GRADING/CONSTRUCTION

The proposed grading of the site would retain the relatively flat topography. Total earthwork proposed is approximately 9,740 cubic yards (cy) of import, with 86,150 cy of cut, and 95,900 cy of fill. Due to grade differences from offsite adjacent properties, a combination of retaining and freestanding walls would be required, with a combined height between 9 to 10 feet. All retaining walls would comply with the City of West Covina requirements. The Conceptual Grading Plan is depicted on Exhibit 3-7, Conceptual Grading Plan.

Construction activities would utilize standard construction equipment, including earth-moving equipment, trucks, cranes, and forklifts. Construction activities and construction staging would mainly occur within the Project site boundaries. Implementation of traffic control measures during demolition and construction activities would minimize obstruction of vehicular traffic on public roadways in the vicinity of the Project site.

3.5.3 OFF-SITE IMPROVEMENTS

Off-site improvements would include storm drain improvements, parkway improvements, and utility connections (water, sewer, electricity, natural gas, and telecommunication lines). Exhibit 3-8 shows the Conceptual Utility Plan. A private storm drain system, which would be located within the main drive aisles would convey the site's stormwater runoff to an underground detention system in the guest parking lot adjacent to East Rowland Avenue. Stormwater would infiltrate, be detained, and meter the runoff onto East Rowland Avenue to match historical drainage patterns and volumes at the Project site. In addition, stormwater from North Eileen Avenue would be intercepted and re-routed through the onsite storm drain system. This would allow for abandonment of the existing storm drain swale and easement along the westerly boundary of the site and improved drainage for the area. These encroachments would occur in compliance with City regulations. Any right-of-way dedication and public infrastructure improvements would also be conducted in accordance with the City's municipal code.



EARTHWORK

	CUT (C.Y.)	FILL (r.)
RAW EXCAVATIONS	6150	6450
OVER-EXCAVATION & RE-COMPACTION (3' SITE)	80,000	80,0C
SUBSIDENCE (0.2' SITE)	–	1,450
LOSS (10%)	–	8,00C
TOTAL	86,150	95,9C
IMPORT		9,750 Y.

* ASSUMES 8" THICKNESS ROADWAY/PARKING BASE AND PAVEMENT.

NOTES:

1. HOUSE/UNIT ELEVATIONS ARE PAD GRADE
2. STREET CONTOUR ARE FINISH PAVEMENT

Source: Lewis Group Of Companies, July 2020

Grading Plan

Exhibit 3-7

Walnut Grove Residential Project

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Map not to scale

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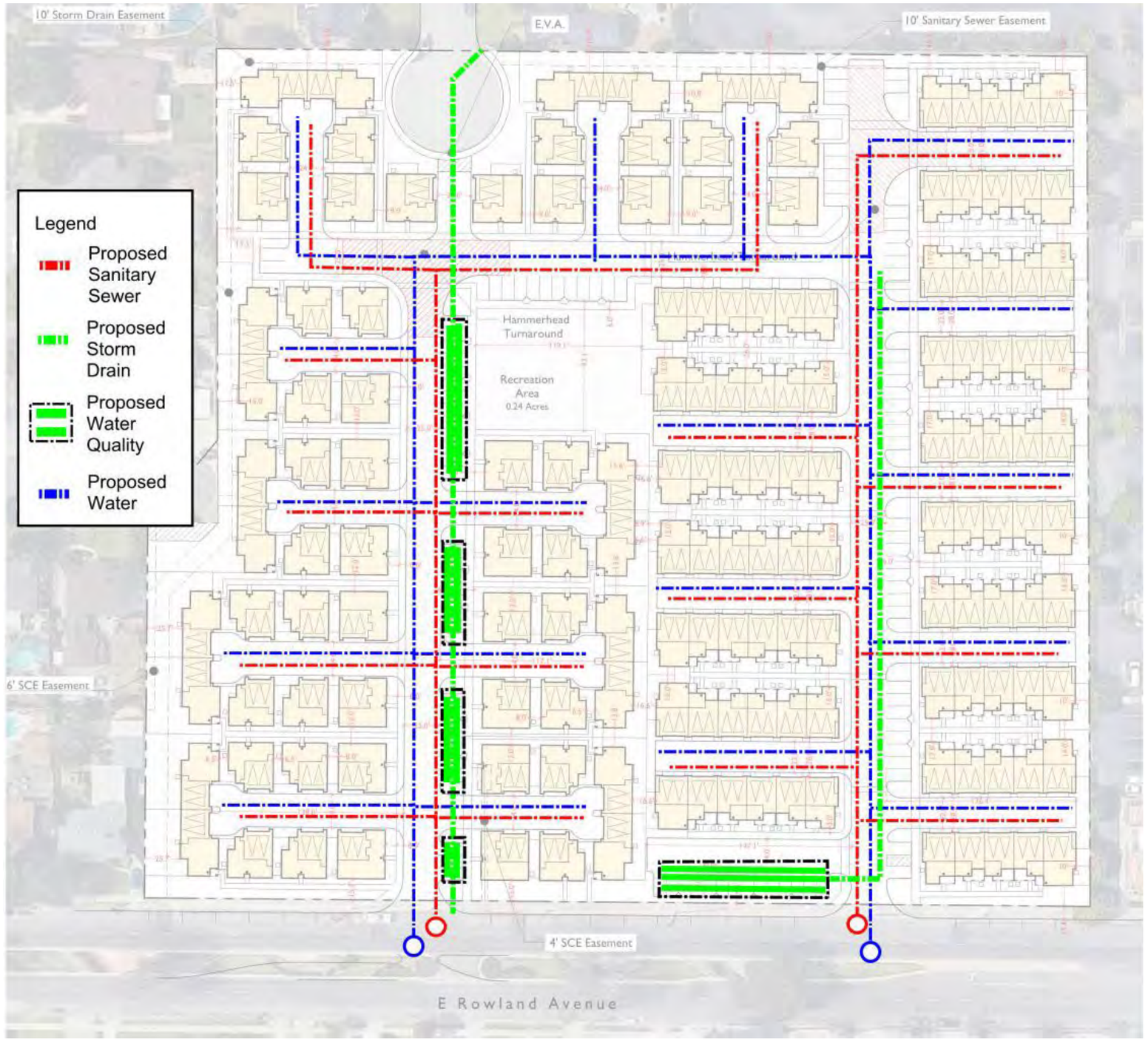

Source: City Of West Covina, July 2020

Conceptual Utility Plan

Exhibit 3-8

Walnut Grove Residential Project

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3.6 DISCRETIONARY APPROVALS

This IS/MND is intended to serve as the primary CEQA environmental document for all actions associated with the proposed Project, including all other approvals beyond the City's authority needed to implement the Project. The following discretionary approvals are required for Project approval.

3.6.1 GENERAL PLAN LAND USE AMENDMENT

The Project site has an existing General Plan Land Use designation of Civic: Schools. Approval of the Project and adoption of the Walnut Grove Specific Plan requires a concurrent adoption of a General Plan Land Use Amendment to the "Neighborhood Medium" land use designation, which allows densities between 9 and 20 dwelling units. The Walnut Grove Specific Plan seeks a density of 16.7 dwelling units per acre with an overall plan area size of 9.14 acres. Upon the General Plan Amendment, the Specific Plan would be consistent with the General Plan.

3.6.2 ZONE CHANGE AND SPECIFIC PLAN ADOPTION

The Project site is currently zoned as Residential Single-Family (R-1).The R-1 zoning of the site is not consistent with its General Plan land use designation and requires a Zone Change to Specific Plan. Upon adoption by ordinance of the Walnut Grove Specific Plan, it would constitute as the zoning for the Project site, and therefore, the Project would be consistent with the Zoning Code.

The Walnut Grove Specific Plan is established through the authority granted to the City of West Covina by California Government Code, Title 7, Division 1, Chapter 3, Article 8, Sections 65450 and 65457 (Specific Plans). This Government Code establishes the minimum requirements and review procedures for specific plans, requiring that a specific plan include text and diagrams that specify all of the following:

- The distribution, location, and extent of land uses, including open space, within the area covered by the plan.
- The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan.
- Standards and criteria by which development will be provided, and standards for the conservation, development, and utilization of natural resources, where applicable.
- A program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out the project.

A specific plan is a legislative planning tool that serves as the zoning for the property involved. Development plans, site plans, and tentative tract/parcel maps must be consistent with both the Specific Plan and the City's General Plan. The Walnut Grove Specific Plan must be adopted for Project approval.

3.6.3 PRECISE PLAN

A Precise Plan must be approved for the site layout and architecture of the Project.

3.6.4 TREE REMOVAL

A Tree Removal Permit must be approved for the removal of significant trees on site.

Per Section 26-289 of the West Covina Municipal Code, a significant tree is a tree located on private and/or public 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 (1) foot or more;

b. is located in the street-side yard of a corner lot and has a caliper of one (1) foot or more; and

c. is located anywhere on a lot, has a caliper of six (6) inches, or more, and is one of the following species:

Common Name	Genus/Species
Oak (any oak tree native to California, including, but not limited to:	
Valley Oak	*Quercus lobata*
California Live Oak	*Quercus agrifolia*
Canyon Oak	*Quercus chrysolepis*
Scrub Oak	*Quercus dumoso*
Mesa Oak	*Quercus engelmanii*
Interior Live Oak	*Quercus wislezenii*
California Sycamore	*Platanus racemosa*
American Sycamore	*Platanus occidentalis*

3.6.5 MITIGATED NEGATIVE DECLARATION

In compliance with CEQA, the State CEQA Guidelines, the City of West Covina would adopt Mitigated Negative Declaration, prior to approval of the Project. The MND serves as a finding that the Project would not have a significant effect on the environment, with the incorporation of mitigation measures, as appropriate.

3.6.6 TENTATIVE TRACT MAP

The Tentative Tract Map must be approved for the "condominium" map to create an "air space" subdivision of units and for shared ownership of the common lot.

3.7 MINISTERIAL APPROVALS

In addition, the following ministerial permits would be sought from the City of West Covina:

- Demolition Permit for existing buildings and site improvements

- Grading Permit
- Building Permits
- Occupancy Permits
- Encroachment Permit for driveway, sidewalk, and utility connections on adjacent streets

The Project would require coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the State Water Resources Control Board (SWRCB). The Project would also require a demolition permit from the SCAQMD.

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4.0 ENVIRONMENTAL CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

DETERMINATION: (To be completed by the Lead Agency.)

On the basis of this initial evaluation:

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

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

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

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

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

Signature	Date: 11/17/2020
Printed Name: Jo-Anne Burns	For: City of West Covina

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

4.1 AESTHETICS

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

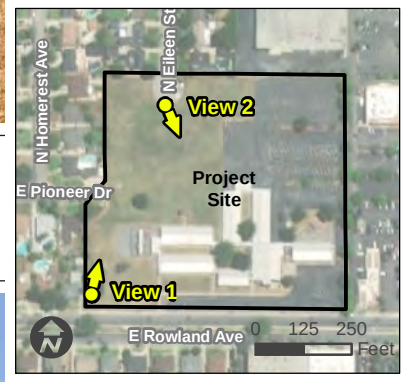
Impact Analysis

Existing Views and Visual Character

The Project site is currently developed with surface parking lots at the southeastern and northeastern portions, nine administrative buildings and classrooms at the southern portion, three storage sheds, a paved play area, and an athletic field in the west and northwestern portions of the Project site. Access to the site is primarily from East Rowland Avenue. Existing North Eileen Street terminates in a cul-de-sac within the property. Exhibits 4-1a through 4-1c, Existing Site Views, include photographs that depict the existing visual character of the Project site. More specifically, Views 1 through 6 on Exhibit 4-1a through Exhibit 4-1c are views of the on-site buildings and site improvements.

- **View 1**, looking north from the Project's southern boundary, shows a view of the existing vegetation lining the Project's western boundary along a chain-link fence with dry grasses dispersed throughout this view. Existing chain-link fence surrounding the onsite buildings are visible. Distant partial views of the San Gabriel and San Bernardino Mountains can be seen from this location.
- **View 2**, looking south from the northwestern portion of the Project site, shows dry grasses in the foreground, with existing one-story administrative buildings. A surface parking lot with a dumpster and some landscaping and mature trees are also depicted in this view.
- **View 3**, looking northeast from the sidewalk along East Rowland Avenue shows the façade of the Pioneer School building, which is painted shades of blue and beige, with graffiti visible on the front of the building. Dispersed vegetation and mature trees are visible from this location. Parking spaces are in the foreground. Commercial uses are in the background, as well as a portion of East Rowland Avenue.

View 1



View 2

D:\Projects\LewisOp\3LEW001200\GRAPHICS\MND\ex_Site_Views_A.ai

Existing Site Views

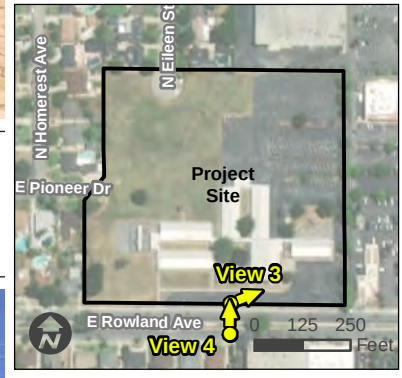
Exhibit 4-1a

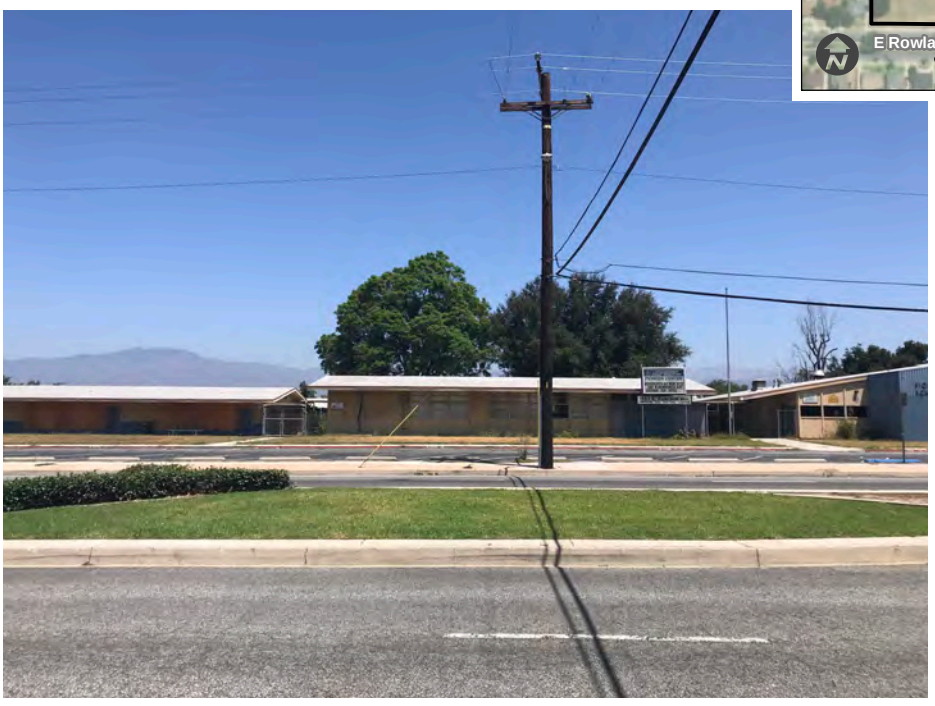
Walnut Grove Residential Project

PSOMAS

(08/03/2020 MMD) R:\Projects\LEW\3LEW001200\Graphics\MND\ex_Site_Views.pdf

View 3





View 4

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Existing Site Views

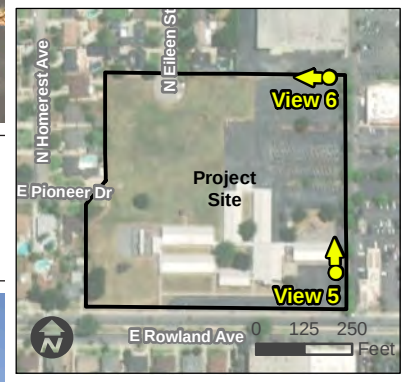
Exhibit 4-1b

Walnut Grove Residential Project

PSOMAS

(08/03/2020 MMD) R:\Projects\LEW\3LEW001200\Graphics\MND\ex_Site_Views.pdf

View 5



View 6

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Existing Site Views

Exhibit 4-1c

Walnut Grove Residential Project

PSOMAS

(08/03/2020 MMD) R:\Projects\LEW\3LEW001200\Graphics\MND\ex_Site_Views.pdf

- **View 4**, looking north from across East Rowland Avenue, across the street from the Project site depicts the various onsite administrative buildings and mature trees on the site. An electrical pole is in the foreground. Distant views of the San Gabriel and San Bernardino Mountains are visible from this location.
- **View 5**, looking north from the southwestern portion of the Project site shows cracked asphalt in the foreground with the property's concrete block walls at the edge of the site. An onsite one-story administrative building is visible from this location, with chain-link fence connecting the existing building and property wall. An access gate with a "no trespassing" light is visible. Some mature trees are visible on the Project site. Outside of the Project site boundary, views of existing mature trees, a cell phone tower (with a pine-tree disguise), electrical poles, and roofs of existing commercial uses are visible. Distant partial views of the San Gabriel Mountains are also visible from this location.
- **View 6**, looking west from the northeastern corner of the Project site, shows the existing broken asphalt with dispersed vegetation, a multi-color concrete block wall separating the Project site from commercial uses. Distant views of single-family residences are visible from this location.

Would the Project:

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

Less than Significant Impact. The Our Natural Community Element of the City's General Plan identifies the San Jose Hills, located at the southeasterly boundary of the City, as the scenic vista (City of West Covina 2016a). The San Jose Hills are located 3.6 miles southeast of the Project site. The City is located within the San Gabriel Valley, with the San Gabriel Mountains and San Bernardino Mountains located approximately 5 miles north and northeast of the Project site. The Los Angeles National Forest and San Gabriel Mountains are visible in the background throughout West Covina; however, their views are dependent on the viewer's vantage point and orientation and are not designated as scenic vistas by the City.

Under the Our Natural Community Element, Access to Nature, Policy 1.9, encourages minimization of view obstruction by requiring analysis of potential impacts to views of natural areas from public streets, parks, trails, and community facilities, during review of public and private development projects. East Rowland Avenue is a public street adjacent to the Project site; views from East Rowland Avenue are shown on Views 3 and 4 of Exhibit 4-1b. As shown in Views 3 and 4, views of the San Gabriel and San Bernardino Mountains are visible and provide a scenic backdrop from certain vantage points; however, these views are partially obstructed by existing development and mature trees and are limited due to the topography of the area. Additionally, View 2, on Exhibit 4-1a, shows distant partial views of the tops of the San Jose Hills from the Project site.

The Project site is currently developed with single-story administrative buildings and associated uses, including surface parking and scattered landscaping. However, implementation of the Project would include construction of new structures and buildings and result in denser development than the existing Project site. The single-family units would be 2 stories and at a maximum height of 27'-6" tall. The multi-family units would be 3 stories tall and at a maximum height of 40'-4" feet. Overall, the proposed building heights would be taller than existing uses. Due to the proposed Project's location in the central area of the City and the lack of scenic

resources in the immediate area, the Project would not have a substantial adverse effect on a scenic resource. Views of the San Jose Hills with Project implementation would be consistent with existing views; partial views may be offered at certain vantage points, but intervening structures and trees would continue to block most views of the San Jose Hills. Similarly, with implementation of the Project, the San Gabriel and San Bernardino Mountains would continue to offer partial views at certain vantage points on East Rowland Avenue, but intervening structures and trees would continue to block most views of the San Gabriel and San Bernardino Mountains. Implementation of the Project would not further exacerbate obstruction of existing views, which are currently mostly blocked by existing development and mature trees. Therefore, impacts related to scenic vistas would be less than significant, and no mitigation is required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no officially designated scenic highways within West Covina (City of West Covina 2016a). The nearest Officially Designated Highway is portions of the Angeles Crest Highway, located approximately 20 miles north of the Project site, (Caltrans 2011). Views of the Project site from this Officially Designated Highway are completely obstructed by distance and intervening topography, and there is no direct line-of-sight to the Project area such that short-term construction activities and long-term operation would affect public views from the Angeles Crest Highway. State Route (SR) 57 between SR 91 and SR 60, located approximately 2 miles east of the southeastern tip of the City, is identified as Eligible for State Scenic Highway designation (City of West Covina 2016b). There are no scenic resources, including trees, rock outcroppings, and historic buildings in the vicinity of the Project site. Views of the Project site from the portion of SR-57, which is an Eligible State Scenic Highway, are completely obstructed by intervening topography, and there is no direct line-of-sight to the Project area such that short-term construction activities and long-term operation would affect public views from SR 57. Therefore, implementation of the Project would not damage scenic resources within a State scenic highway. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. The aerial photograph (Exhibit 2-1) previously presented, shows the Project site's relationship to the surrounding land uses. Single family residences are located adjacent to the Project's western and northern boundaries. East Rowland Avenue is adjacent to the Project's southern boundary, with residential and commercial uses south of East Rowland Avenue. The Project's northeastern and eastern boundaries abut surface parking lots and commercial uses. Due to the developed nature and flat topography of the Project area, the presence of mature trees and existing walls, views of the Project site are limited to immediately adjacent vantage points, as further described below. However, given the views to be analyzed are from public and not private vantage points, only views from East Rowland Avenue experienced by transient users (i.e., passengers in vehicles and pedestrians) on East Rowland Avenue would be considered. There are no other public vantage points such as from public parks and trails that would have views of the Project site.

Visual Changes

During demolition and construction activities on the Project site, views of construction equipment; ongoing demolition and construction activities; short-term stockpiles of building materials and debris; and haul trucks delivering building materials and removing debris would be visible from surrounding area. These views would be typical of construction sites in an urban environment and temporary in nature. Project construction is anticipated to occur in a single phase, for a total of 10 months. Additionally, construction staging would occur within the Project's boundaries. Therefore, the impacts would be less than significant, and no mitigation is required.

Once construction is completed, the proposed Project would alter views of the Project site by replacing the existing school uses with attached and detached residential units. The 66 detached single-family units would be oriented in a cluster configuration, centered around private alleys, in groups of 6 or 8 units. The single-family units would be 2 stories and a maximum of 27'-6" feet tall. The 92 attached multi-family units (townhomes) would be grouped in 5 or 6 units. All multi-family units would be 3 stories and a maximum of 40'-4" feet tall. Each residential unit may have unique architectural style for visual interest.

Two access points would be located on East Rowland Avenue. The west driveway would be a full access driveway, and the east driveway would be a right-in right-out only driveway. A common open space area would be provided on-site at one location, located centrally at the Project site, and private open spaces would be available for each single-family unit. Given the quality of the design and architecture, the Project would be an improvement over the existing condition of the site. The common open space area of the Project would consist of 0.27 acre of neighborhood park use. The Community Open Space Area would have a private park that is publicly accessible for use.

The proposed Project would replace on-site landscaping with trees, shrubs, and groundcover along the front yards of each unit, throughout the Project site, and in open space areas. The Project would also comply with the sign regulations in the City's Zoning Code, as needed. Considering this, view of the site from a public vantage point (East Rowland Avenue) would be of a high-quality development with landscaping visible from adjacent roadways.

While the proposed Project would alter the existing visual character of the Project site from a school use to a residential development and would change views from the surrounding public vantage point (i.e., East Rowland Avenue), this change would not be considered a degradation of the Project site or its surroundings. The new development would replace older structures and increase visual interest and character of the site with quality design and landscaping. The Project would be required to comply with Section 26-547, Specific Plan (S-P) zone, which has requirements for design elements, such as orientation of buildings and uses, building bulk and scale, building height and setback, parking, traffic generation, noise and landscaping (RR AES-1). Therefore, this would ensure that the design of the Project uses would be compatible with the surrounding uses and the General Plan requirements. The introduction of 158 residences and associated site improvements would also be compatible the existing residential uses north, south, and west of the proposed Project. In light of visual improvement over the existing condition and the quality of design, the Project would not substantially degrade the visual character or quality of the site for public viewers Therefore, no impacts would occur, and no mitigation is required.

In the absence of scenic resources in the vicinity of the site, the Project would not conflict with applicable zoning and other regulations governing scenic quality and resources. The Project would comply with City regulations, through RR AES-1 and RR BIO-1. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. The Project site is in an area that is already subject to ambient lighting from the existing residential and commercial/retain uses surrounding the site. Streetlights are also present on East Rowland Avenue. The existing light sources include exterior building lights, parking lot pole lights, and interior building lights.

With the demolition of the existing development and construction of the proposed Project, new light sources would be provided with the proposed dwelling units, along the internal drive aisles, and in the common open space area. This would change lighting levels at the Project site but would be consistent with the ambient and night-time lighting at the residential uses surrounding the site.

However, to avoid potential impact and light trespass onto the surrounding uses, the Walnut Grove Specific Plan includes provisions to address the potential lighting issues. In compliance with the Specific Plan, fixtures would have devices to aim light downward with a minimum 70 percent cut off. Additionally, the City's Municipal Code regulates lighting to ensure that sensitive land uses are not affected by lighting associated with new developments. Section 26-519 of the City's Municipal Code requires that "all lighting of the building, landscape, parking area, or similar facilities shall be hooded and directed to reflect away from adjoining properties" for multiple-family residential zones. This is generally accomplished with shielding and directional lighting methods. Furthermore, the proposed perimeter block walls would provide screening of on-site lighting onto adjacent residential uses. Due to the urban nature of the Project site and existing lighting near the Project site, impacts associated with new lighting from the proposed Project would be less than significant, and no mitigation is required.

Glare is a common daytime phenomenon and is due mainly to the occurrence of a high number of days per year with direct sunlight and the presence of large reflective surfaces. Excessive glare not only restricts visibility but also increases the ambient heat reflectivity in a given area. Glare is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on intensity and direction of sunlight. Glare can create hazards to motorists and nuisances for pedestrians and other viewers. The proposed dwelling units would be constructed with primarily non-reflective materials such as stucco on the exterior facades and concrete or clay tile roofing*. The use of glass would be confined to windows and* is not such that would generate substantial glare affecting surrounding uses. Additionally, during nighttime, the proposed lighting would not be more intense than the surrounding uses, and no lighting that is considered of high intensity such as high wattage security lighting is proposed that would cause substantial nighttime glare. Per the Walnut Grove Specific Plan, lighting fixtures would be selected and located appropriately to avoid unwanted glare. Signs would be lit at night to aid with wayfinding and identification. Signage lighting would be aimed directly at the designated signage and designed such that would not negatively impact pedestrian or vehicle line-of-sight with unwanted glare. The Project would

also comply with City regulations (RR AES-2). Impacts would be less than significant, and no mitigation is required.

Regulatory Requirements

RR AES-1 Project design would be required to comply with Section 26-547, Specific Plan (S-P) Zone, of the West Covina Specific Plan. The City shall review and approve the Specific Plan, with consideration to elements including, but not limited to, orientation of buildings and uses, building bulk and scale, building height and setback, and landscaping.

RR AES-2 Exterior lighting for the Project shall be designed and constructed in compliance with Section 26.519, Lighting, of the West Covina Municipal Code.

Mitigation Measures

Project implementation would not result in significant impacts related to aesthetics; therefore, no mitigation measures are required.

4.2 AGRICULTURE AND FOREST RESOURCES

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

Impact Analysis

Would the Project:

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

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

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?

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

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

No Impact. The Project site is in an urbanized area and would not convert farmland to a non-agricultural use. Based on review of the Los Angeles Important Farmland 2016, prepared by the California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP),

there are no lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on or near the Project site (FMMP 2020). The Project site is in "unclassified/out of survey area". The Project site is not being used, nor anticipated to be used or zoned for agricultural purposes. The site is not subject to a Williamson Act contract, and it does not contain Prime Farmland or Farmland of Statewide Importance. Additionally, no forest land occurs on the Project site or in the surrounding area. Therefore, the proposed Project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. In addition, the Project site does not contain designated forest land or timberland, as defined in the California Public Resources Code (§§12220[g] and 4526, respectively) (OLC 2020). Therefore, no impacts to agricultural resources, forest land, or timberland would result from Project implementation, and no mitigation is required.

Regulatory Requirements

None required.

Mitigation Measures

Project implementation would not result in significant impacts related to agriculture and forest resources; therefore, no mitigation is required.

4.3 AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Impact Analysis

The South Coast Air Quality Management District (SCAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the following criteria pollutants: ozone, carbon monoxide, nitrogen oxides, sulfur dioxide, and particulate matter 10 and 2.5 microns. The characteristics and health effects of these criteria pollutants are described below:

- Ozone (O_3) is a nearly colorless gas that is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight). Ground-level O_3 exposure can cause a variety of health problems, including lung irritation, wheezing, coughing, pain when taking a deep breath, and breathing difficulties during exercise or outdoor activities; permanent lung damage; aggravated asthma; and increased susceptibility to respiratory illnesses.
- Carbon monoxide (CO) is a colorless and odorless toxic gas which, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. CO combines with hemoglobin in the bloodstream and reduces the amount of oxygen that can be circulated through the body. High CO concentrations can lead to headaches, aggravation of cardiovascular disease, and impairment of central nervous system functions.
- Nitrogen oxides (NOx) are yellowish-brown gases, which at high levels can cause breathing difficulties. NOx are formed when nitric oxide (a pollutant from internal combustion processes) combines with oxygen.
- Sulfur dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.
- Particulate Matter 10 (PM10) and Particulate Matter 2.5 (PM2.5) refer to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. Particulate matter includes both aerosols and

solid particles. An example of particulate matter is fugitive dust. Short-term exposure to high PM2.5 levels is associated with premature mortality and increased hospital admissions and emergency room visits. Long-term exposure to high PM2.5 levels is associated with premature mortality and development of chronic respiratory disease. Short-term exposure to high PM10 levels is associated with hospital admissions for cardiopulmonary diseases, increased respiratory symptoms, and possible premature mortality.

The SCAQMD regulates air quality in the Los Angeles County and is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin (SoCAB). The SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary. The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a sequence of Air Quality Management Plans (AQMPs).

The SCAQMD adopted the 2016 AQMP on March 3, 2017 (SCAQMD 2017). The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including Southern California Association of Government's (SCAG's) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts.

The two principal criteria for conformance to an AQMP are:

1. Whether a project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emissions reductions in the AQMP.
2. Whether a project will exceed the assumptions in the AQMP based on the year of Project buildout.

To estimate if a project may adversely affect the air quality in the region, the SCAQMD has prepared the *Air Quality Analysis Guidance Handbook* (SCAQMD CEQA Handbook) to provide guidance to those who analyze the air quality impacts of projects (SCAQMD 1993). The SCAQMD CEQA Handbook provides significance thresholds for both construction and operation of projects within the SCAQMD's jurisdictional boundaries. The SCAQMD recommends that projects be evaluated in terms of the quantitative thresholds established to assess both the regional and localized impacts of project-related air pollutant emissions. The SCAQMD CEQA Handbook states that any project in the SoCAB with daily emissions that exceed any of the identified significance thresholds may have an individually and cumulatively significant air quality impact. The City of West Covina uses the current SCAQMD thresholds to determine whether a project would have a significant impact (SCAQMD 2019). These SCAQMD thresholds are identified in Table 4-1, *South Coast Air Quality Management District Air Quality Significance Thresholds*.

TABLE 4-1
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds (lbs/day)		
Pollutant	**Construction**	**Operation**
VOC	75	55
NOx	100	55
CO	550	550
PM10	150	150
PM2.5	55	55
SOx	150	150
Lead	3	3

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SOx: sulfur oxides.

Source: SCAQMD 2019.

Existing Air Quality Conditions

The monitoring data presented in Table 4-2, Air Quality Measurements at the Azusa Monitoring Station, were obtained from the SCAQMD and CARB (SCAQMD 2020, CARB 2020). Pollutants measured at this monitoring station include O_3, PM10, PM2.5, NO_2, CO. Federal and State air quality standards are presented with the number of times those standards were exceeded.

TABLE 4-2
AIR QUALITY MEASUREMENTS AT THE AZUSA MONITORING STATION

Pollutant	California Standard	National Standard	Year	Max. Level[a]	State Standard Days Exceeded[b]	National Standard Days Exceeded[b, c]
O_3 (1 hour)	0.09 ppm	None	2016	0.146	30	4
			2017	0.152	38	7
			2018	0.139	24	3
O_3 (8 hour)	0.070 ppm	0.070 ppm	2016	0.107	40	39
			2017	0.114	64	62
			2018	0.100	43	42
PM10 (24 hour)	50 µg/m^3	150 µg/m^3	2016	74.6	12/-	0/0
			2017	83.9	7/-	0/0
			2018	78.3	10/59.2	0/0
PM10 (AAM)	20 µg/m^3	None	2016	33.7	N/A	N/A
			2017	31.4	N/A	N/A
			2018	32.2	N/A	N/A
NO_2 (1 Hour)	0.18 ppm	0.100 ppm	2016	0.074	0	0
			2017	0.065	0	0
			2018	0.070	0	0
NO_2 (AAM)	0.030 ppm	0.053 ppm	2016	0.017	–	–
			2017	0.016	–	–
			2018	0.015	–	–
CO (8 hour)	9.0 ppm	9.0 ppm	2016	1.2	–	–
			2017	0.9	–	–
			2018	1.0	–	–
PM2.5 (24 Hour)	None	35 µg/m^3	2016	32.1	N/A	0/0
			2017	24.9	N/A	0/0
			2018	41.8	N/A	1/3
PM2.5 (AAM)	12 µg/m^3	15 µg/m^3	2016	10.15	N/A	N/A
			2017	10.42	N/A	N/A
			2018	10.35	N/A	N/A

O_3: ozone; ppm: parts per million; PM10: respirable particulate matter with a diameter of 10 microns or less; µg/m^3: micrograms per cubic meter; AAM: annual arithmetic mean; NO_2: nitrogen dioxide; CO: carbon monoxide; PM2.5: fine particulate matter with a diameter of 2.5 microns or less

"–" indicates that the data are not reported or there is insufficient data available to determine the value. N/A indicates that there is no applicable standard.

[a] California maximum levels were used.
[b] For annual averaging times, a "Yes" or "No" response is given if the annual average concentration exceeded the applicable standard.
[c] PM is measured once every 6 days. Where 2 values are shown for PM10 and PM2.5, the first is for the measured value, and the second is the estimated value if monitored every day.

Source: SCAQMD 2020, CARB 2020.

Regulatory Background

The U.S. Environmental Protection Agency (USEPA) defines seven "criteria" air pollutants, as described above. These pollutants are called criteria pollutants because the USEPA has established National Ambient Air Quality Standards (NAAQS) for the concentrations of these pollutants (USEPA 2014). The California Air Resources Board (CARB) has also established

standards for the criteria pollutants, known as California Ambient Air Quality Standards (CAAQS), and the State standards are generally more restrictive than the NAAQS. When a region has air quality that fails to meet the standards, the USEPA and the CARB designate the region as "nonattainment" and the regional air quality agency must develop plans to attain the standards.

Based on monitored air pollutant concentrations, the USEPA and the CARB designate an area's status in attaining the NAAQS and the CAAQS, respectively, for selected criteria pollutants. These attainment designations are shown in Table 4-3. As identified in Table 4-3, Los Angeles County is a nonattainment area for O3, PM10, and PM2.5 for the State standards and a nonattainment area for O3, and PM2.5 for the State standards.

TABLE 4-3
ATTAINMENT STATUS OF CRITERIA POLLUTANTS
IN THE SOUTH COAST AIR BASIN

Pollutant	State	Federal
O_3 (1 hour)	Nonattainment	No standards
O_3 (8 hour)	Nonattainment	Nonattainment
PM10	Nonattainment	Attainment/Maintenance
PM2.5	Nonattainment	Nonattainment
CO	Attainment	Unclassified/Attainment
NO_2	Attainment	Unclassified/Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Attainment/Nonattainment*
All others	Attainment/Unclassified	No standards

O_3: ozone; PM2.5: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; NO_2: nitrogen dioxide; SO_2: sulfur dioxide; SoCAB: South Coast Air Basin.

* Los Angeles County is classified nonattainment for lead; the remainder of the SoCAB is in attainment of the State and federal standards.

Source: CARB 2018

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for coordinating and administering both the federal and State air pollution control programs in California. In this capacity, CARB conducts research, sets the CAAQS (as shown in Table 4-4), compiles emission inventories, develops suggested control measures, oversees local programs, and prepares the State Implementation Plan (SIP). For regions that do not attain the CAAQS, CARB requires the air districts to prepare plans for attaining the standards. These plans are then integrated into the SIP. CARB establishes emissions standards for (1) motor vehicles sold in California, (2) consumer products (e.g., hair spray, aerosol paints, barbecue lighter fluid), and (3) various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

Ozone (O3) is a secondary pollutant and is created when nitrogen oxides (NOx) and volatile organic compounds (VOCs) react in the presence of sunlight. The predominant source of air emissions generated by Project development would be from vehicle emissions. Motor vehicles primarily emit CO, NOx, and VOCs. The NAAQS and CAAQS are designed to protect the health and welfare of the populace within a reasonable margin of safety. The NAAQS and CAAQS for O3, CO, NO2, SO2, PM10, PM2.5, and lead are shown in Table 4-4.

TABLE 4-4
CALIFORNIA AND FEDERAL AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	Federal Standards	
			Primary[a]	Secondary[b]
O_3	1 Hour	0.09 ppm (180 µg/m³)	–	–
	8 Hour	0.070 ppm (137 µg/m³)	0.070 ppm (137 µg/m³)	Same as Primary
PM10	24 Hour	50 µg/m³	150 µg/m³	Same as Primary
	AAM	20 µg/m³	–	Same as Primary
PM2.5	24 Hour	–	35 µg/m³	Same as Primary
	AAM	12 µg/m³	12.0 µg/m³	15.0 µg/m³
CO	1 Hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	–
	8 Hour	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m³)	–	–
NO_2	AAM	0.030 ppm (57 µg/m³)	0.053 ppm (100 µg/m³)	Same as Primary
	1 Hour	0.18 ppm (339 µg/m³)	0.100 ppm (188 µg/m³)	–
SO_2	24 Hour	0.04 ppm (105 µg/m³)	–	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m³)
	1 Hour	0.25 ppm (655 µg/m³)	0.075 ppm (196 µg/m³)	–
Lead	30-day Avg.	1.5 µg/m³	–	–
	Calendar Quarter	–	1.5 µg/m³	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m³	
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	**No Federal Standards**	
Sulfates	24 Hour	25 µg/m³		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m³)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m³)		

O_3: ozone; ppm: parts per million; µg/m³: micrograms per cubic meter; PM10: respirable particulate matter 10 microns or less in diameter; AAM: Annual Arithmetic Mean; –: No Standard; $_{PM2.5}$: fine particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; mg/m³: milligrams per cubic meter; NO_2: nitrogen dioxide; SO_2: sulfur dioxide; km: kilometer.

[a] *National Primary Standards:* The levels of air quality necessary, within an adequate margin of safety, to protect the public health.
[b] *National Secondary Standards:* The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

Note: More detailed information in the data presented in this table can be found at the CARB website (www.arb.ca.gov).

Source: SCAQMD 2016

Would the Project:

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

Less than Significant Impact. CEQA requires a discussion of any inconsistencies between a project and applicable General Plans (GPs) and regional plans (CEQA Guidelines Section 15125). The regional plan that applies to the Proposed Project includes the SCAQMD's AQMP, as discussed above.

The SCAQMD CEQA Handbook states that "New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP". Strict consistency with all aspects of the plan is usually not required. A project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency, as discussed above:

> (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
>
> (2) Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both criteria are evaluated for the Project, as shown below.

With respect to the first criterion, based on the air quality modeling analysis conducted for the proposed Project [thresholds 4.3(b) and 4.3(c), below)], construction and operation of the Project would not exceed the SCAQMD's CEQA thresholds of significance and consequently would not result in an increase in the frequency or severity of existing air quality violations nor cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emissions reductions in the AQMP. Therefore, the Project is consistent with the first criterion.

With respect to the second criterion, the proposed Project was assessed as to whether it would exceed the assumptions in the AQMP. The SCAQMD's current air quality planning document is the 2016 Air Quality Management Plan (2016 AQMP). The 2016 AQMP is a regional and multi-agency effort among the SCAQMD, CARB, SCAG, and USEPA. The 2016 AQMP includes an analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures. The purpose of the 2016 AQMP is to set forth a comprehensive program that would promote reductions in criteria pollutants, greenhouse gases, and toxic risk and efficiencies in energy use, transportation, and goods movement. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's 2016-2040 RTP/SCS; updated emission inventory methods for various source categories; and SCAG's latest growth forecasts (SCAQMD 2017). The 2016 AQMP includes strategies and measures necessary to meet the NAAQS. The AQMP is based on projections of energy usage and vehicle trips from land uses within the SoCAB.

The Project site is designated by the General Plan for civic (schools) land use designation. As part of the Project, adoption of the Walnut Grove Specific Plan requires a General Plan land use Amendment to the "Neighborhood Medium" Land use designation. Upon amendment, the

Specific Plan (i.e., Project) would be consistent with the General Plan, its land use designation, and its relevant goals and objectives. Because the Project would require that its existing land use be re-designated, the Project would not be consistent with the assumptions in the 2016 AQMP. However, implementation of the Project results in emissions, which are less than the significance thresholds adopted by the SCAQMD (as detailed in the following emissions analyses). In addition, the proposed residential uses provide housing near commercial uses and within a Transit Priority Area (TPA), and this would minimize travel to and from this destination, which would reduce transportation-related emissions and be consistent with the goals of the AQMP. As such, the proposed Project is not anticipated to exceed the AQMP assumptions for the Project site and is found to be consistent with the AQMP for the second criterion. Therefore, the Project would not result in an inconsistency with the SCAQMD's 2016 AQMP. Less than significant impacts would occur, and no mitigation is required.

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

Less than Significant Impact. Los Angeles County is a nonattainment area for O3, PM10, and PM2.5, as shown in Table 4-3, Attainment Status of Criteria Pollutants in the South Coast Air Basin. The Project would generate PM10, PM2.5, NO2, and O3 precursors (NOx and VOC) during short-term construction and long-term operations.

Construction Impacts

Construction-Related Regional Impacts

A project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation.

A project with daily emission rates below the SCAQMD's established air quality significance thresholds (shown in Table 4-1) would have a less than significant impact on regional air quality. Project emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 computer program (CAPCOA 2016). CalEEMod is designed to model construction and operational emissions for land development projects and allows for the input of project- and County-specific information. The CalEEMod input for construction emissions was based on the Project's construction assumptions (as detailed in Section 3.5, Construction Activities) and default assumptions derived from CalEEMod. Demolition of the on-site buildings and asphalt was estimated to generate demolition debris of approximately 100 truckloads to be exported from the Project site.

Table 4-5, Estimated Maximum Daily Construction Emissions, presents the estimated maximum daily emissions during construction of the proposed Project and compares the estimated emissions with the SCAQMD's daily regional emission thresholds. As shown in Table 4-5, all criteria pollutants are below the SCAQMD's respective thresholds.

TABLE 4-5
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS

Year	Emissions (lbs/day)					
	VOC	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
2021	15	67	37	<1	7	4
Maximum Emissions	**15**	**67**	**37**	**<1**	**7**	**4**
SCAQMD Thresholds (Table 4-1)	*75*	*100*	*550*	*150*	*150*	*55*
Exceeds SCAQMD Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

Source: SCAQMD 2019 (thresholds); see Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data, for CalEEMod model outputs.

Cumulative Construction Impacts

Construction activities associated with the proposed Project would result in less than significant construction-related regional and localized air quality impacts, as quantified above in Table 4-5, Estimated Maximum Daily Construction Emissions, and Table 4-7, Localized Significance Threshold Construction Emissions (discussed under Threshold 4.3c), respectively. Short-term cumulative impacts related to air quality could occur if construction of the Project and other projects in the surrounding area were to occur simultaneously. In particular, with respect to local impacts, the consideration of cumulative construction particulate (PM10 and PM2.5) impacts is limited to cases when projects constructed simultaneously are within a few hundred yards of each other because of: (1) the combination of the short range (distance) of particulate dispersion (especially when compared to gaseous pollutants), and (2) the SCAQMD's required dust-control measures, which further limit particulate dispersion from the Project site.

SCAQMD's policy with respect to cumulative impacts associated with the above-referenced pollutants and their precursors is that impacts that would be directly less than significant on a project level would also be cumulatively less than significant (SCAQMD 2003a). Because the Project's construction emissions are below the SCAQMD's regional and local significance thresholds, local construction emissions would not be cumulatively considerable, and the impact would be less than significant. No mitigation is required.

Operational Impacts

The following section provides an analysis of potential long-term air quality impacts to regional air quality with the long-term operation of the proposed Project. The potential operations-related air emissions have been analyzed below for the regional and local criteria pollutant emissions and cumulative impacts.

Operations-Related Regional Impacts

Operational emissions associated with the Project are comprised of area, energy, and mobile source emissions. The principal source of VOC emissions associated with the Project would result from vehicle trips. Area and energy source emissions are based on CalEEMod assumptions for the specific land uses and size. Mobile source emissions are based on estimated Project-

related trip generation forecasts, as contained in the Project traffic impact analysis. The Project would generate 1,124 daily trips (Psomas 2020). The peak day operational emissions for VOC, NOx, CO, SOx, PM10, and PM2.5 daily emissions that would be created from the Project's long-term operation have been calculated and are summarized below in Table 4-6, Peak Daily Operational Emissions.

TABLE 4-6
PEAK DAILY OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)*					
	VOC	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Area sources	8	2	14	<1	<1	<1
Energy sources	<1	1	<1	<1	<1	<1
Mobile sources	2	8	28	<1	8	2
Total Operational Emissions*	**10**	**11**	**42**	**<1**	**9**	**3**
SCAQMD Significance Thresholds (Table 2)	*55*	*55*	*550*	*150*	*150*	*55*
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

* Some totals do not add due to rounding.

Source: SCAQMD 2019 (thresholds); see Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data, for CalEEMod model outputs.

The data provided in Table 4-6 shows that none of the analyzed criteria pollutants would exceed the regional emissions operational thresholds. Therefore, a less than significant regional air quality impact would occur from operation of the Project. No mitigation is required.

Cumulative Operational Impacts

As shown in Table 4-6, Peak Daily Operational Emissions, and Table 4-8, Localized Significance Thresholds Operational Emissions (under Threshold 4.3c, below) operational emissions of VOC, NOx, CO, SOx, PM10, and PM2.5 would be below the SCAQMD CEQA significance thresholds. Consistent with the approach described above (under Cumulative Construction Impacts), SCAQMD's policy with respect to cumulative impacts associated with the above-referenced pollutants and their precursors is that impacts that would be directly less than significant on a project level would also be cumulatively less than significant. Therefore, because the Project's operational emissions are less than the respective SCAQMD daily operational thresholds, the Project's operations phase activities would not contribute to a cumulatively considerable net increase of a pollutant for which the SoCAB is in nonattainment. Emissions of nonattainment pollutants or their precursors would not be cumulatively considerable and would be less than significant. No mitigation is required.

Cumulative Health Impacts

The SoCAB is designated as nonattainment for O3, PM10, and PM2.5, which means that the background levels of those pollutants are, at times, higher than the ambient air quality standards. The air quality standards were set to protect public health, including the health of sensitive individuals (the elderly, children, and the sick). Therefore, when the concentrations of those

pollutants exceed the standard, it is likely that some sensitive individuals in the population would experience health effects. These health effects are not identified for specific individual receptors nor does the analysis identify the magnitude of health effects. The regional analysis detailed above found that the Project would not exceed the SCAQMD regional significance thresholds for VOC and NOx (ozone precursors), PM10, and PM2.5. As such, the Project would result in a less than significant cumulative health impact. No mitigation is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. A significant impact may occur when a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large. Exposure of sensitive receptors is addressed for emissions from construction and operation of the proposed Project. To address construction activities, the analysis below includes the following analyses: localized air quality impacts from construction and toxic air contaminants (TACs), specifically diesel particulate matter (DPM) from on-site construction, and asbestos and exposure to lead-based paint during demolition activities. To address operational emissions exposure to sensitive receptors, the analysis below discusses local air quality impacts from on-site operations and CO hotspots. Operational, long-term TACs may be generated by some industrial land uses; commercial land uses (e.g., gas stations and dry cleaners); and diesel trucks on freeways. Residential uses do not generate substantial quantities of TACs and are therefore not addressed in this analysis.

Construction

Localized Criteria Pollutants from On-Site Construction

In addition to the mass daily emissions thresholds established by the SCAQMD, short-term local impacts to nearby sensitive receptors from on-site emissions of NOx, CO, PM10, and PM2.5 are examined based on SCAQMD localized significance threshold (LST) methodology. To assess local air quality impacts for development projects without complex dispersion modeling, the SCAQMD developed screening (lookup) tables to assist lead agencies in evaluating impacts.

The LST method is recommended to be limited to projects that are five acres or less. For the purposes of an LST analysis, the SCAQMD considers receptors where it is possible that an individual could remain for 1 hour for NO2 and CO exposure and 24 hours for PM10 and PM2.5 exposure. The emissions limits in the lookup tables are based on the SCAQMD's Ambient Air Quality Standards (SCAQMD 2016). The closest receptors to the Project site are single family uses adjacent to the Project's northern and western boundaries. Individuals at these residences were evaluated for exposure for 1 hour and 24 hours. The emissions thresholds are for receptors within 25 meters (82 feet) of the Project site; the thresholds for receptors farther away would be higher, and the Project emissions would be a smaller fraction of the thresholds.

Table 4-7, Localized Significance Threshold Construction Emissions, shows the maximum daily on-site emissions for construction activities compared with the SCAQMD LSTs with receptors within 25 meters for a Project site area of 4.5 acres. The Project's maximum daily on-site emissions would occur during the grading phase. As shown in Table 4-7, the localized emissions from the Project would be below the thresholds, and no significant impacts would result to sensitive receptors. No mitigation is required.

TABLE 4-7
LOCALIZED SIGNIFICANCE THRESHOLD CONSTRUCTION EMISSIONS

	Emissions (lbs/day)			
Emissions and Thresholds	**NOx**	**CO**	**PM10**	**PM2.5**
Project maximum daily on-site emissions	56	34	6	4
SCAQMD Localized Significance Threshold[a]	**173**	**1,684**	**13**	**8**
Exceed threshold?	**No**	**No**	**No**	**No**

lbs/day: pounds per day; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter.

[a] Data is for SCAQMD Source Receptor Area 11, South San Gabriel Valley, 25-meter distance, 4.5 acres.

Source: SCAQMD 2009 (thresholds); see Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data, for CalEEMod outputs.

Toxic Air Contaminant Emissions from On-Site Construction

Construction activities would result in short-term, project-generated emissions of DPM from the exhaust of off-road, heavy-duty diesel equipment used for site preparation (e.g., demolition, excavation, and grading); paving; building construction; and other miscellaneous activities. CARB identified DPM as a TAC in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual (MEI) are higher if a fixed exposure occurs over a longer time period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments—which determine the exposure of sensitive receptors to TAC emissions—should be based on a 40-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the Project.

There would be relatively few pieces of off-road, heavy-duty diesel equipment in operation, and the total construction period would be relatively short when compared to a 40-year exposure period. Combined with the highly dispersive properties of DPM and additional reductions in particulate emissions from newer construction equipment, as required by USEPA and CARB regulations, construction emissions of TACs would not expose sensitive receptors to substantial emissions of TACs. The impact would be less than significant, and no mitigation is required.

Exposure to Asbestos and Lead Paint During Demolition

Exposure of persons to asbestos-containing materials (ACM) and lead-based paint (LBP) during demolition is addressed in Section 4.9, Hazards and Hazardous Materials, of this IS/MND. The buildings onsite contain ACM and LPB, per the Limited Asbestos Inspection Report and Lead-Based Paint/Ceramic Tile Inspection Reports, included as appendices to this IS/MND (Appendices E2 and E3, respectively). The demolition of these materials would then be handled in accordance with applicable regulations (RR HAZ-1 through RR HAZ-3). The impacts would be less than significant, and no mitigation is required.

Operational

Localized Criteria Pollutants from On-site Operations

Project-related air emissions may have the potential to exceed the State and federal air quality standards in the vicinity of the Project even though these pollutant emissions may not be significant enough to create a regional impact to the SoCAB. Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, and on-site usage of natural gas appliances may have the potential to generate emissions that exceed the State and federal air quality standards in the vicinity of the Project even though these pollutant emissions may not be significant enough to create a regional impact to the SoCAB.

The local air quality emissions from on-site operations were analyzed using the SCAQMD's Mass Rate LST Look-up Tables and the LST Methodology. Table 4-8, Localized Significance Threshold Operational Emissions, shows the on-site operational emissions from area sources, energy usage, vehicles operating on-site, and the calculated emissions thresholds.

TABLE 4-8
LOCALIZED SIGNIFICANCE THRESHOLD OPERATIONAL EMISSIONS

On-Site Emission Source	Pollutant Emissions (pounds/day)			
	NOx	**CO**	**PM10**	**PM2.5**
Area Sources	2	14	<1	<1
Energy Sources	1	<1	<1	<1
Mobile Sources[a]	<1	1	<1	<1
Project's total maximum daily on-site emissions	**4**	**16**	**1**	**<1**
SCAQMD Localized Significance Threshold[b]	**183**	**1,814**	**4**	**2**
Exceeds Threshold?	**No**	**No**	**No**	**No**

lbs/day: pounds per day; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter.

[a] Onsite vehicle emissions based on 5% of the gross vehicular emissions, which is the estimated portion of vehicle emissions occurring within a quarter mile of the Project site.

[b] Data is for SCAQMD Source Receptor Area 11, San Gabriel Valley, with a source receptor distance of 25-meters, 9 acres.

Source: SCAQMD 2009 (thresholds); see Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data, for CalEEMod outputs.

The data provided in Table 4-8 shows that the ongoing operations of the Project would not exceed the local NOx, CO, PM10, and PM2.5 thresholds of significance. Therefore, operation of the Project would create a less than significant impact to sensitive receptors, and no mitigation is required.

Carbon Monoxide Hotspot

In an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations generally are found close to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as the distance from the emissions source (e.g., congested intersection) increases. Therefore, for purposes of providing a

conservative worst-case impact analysis, CO concentrations typically are analyzed at congested intersection locations. If impacts are less than significant close to congested intersections, impacts also would be less than significant at more distant sensitive-receptor and other locations. Per the Focused Traffic Study prepared for the proposed Project, implementation of the Project would result in 82 trips in the AM peak hour and 106 trips in the PM peak hour with a total of 1,124 trips per day. Existing traffic volumes along East Rowland Avenue is approximately 12,000 trips per day and over 40,000 trips per day along North Azusa Avenue. The 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (SCAQMD 2003b) evaluated numerous intersections for the potential to result in CO hotspots and found that the 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. Because the roadways proximate to the Project site have substantially less traffic than 400,000 trips per day, CO concentrations at nearby roadway intersections are anticipated to be substantially less than the CO ambient air quality standards. Moreover, vehicle standards have become increasingly more stringent since 1992 and background CO concentrations are less than in 1992. As such, existing CO concentrations would be less than the ambient air quality concentration standards and the small contribution of Project-related traffic would likewise not result in CO concentrations that would exceed either the State or federal ambient air quality standards. The Project would result in less than significant impacts related to CO hotspots, and no mitigation is required.

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

Less than Significant Impact. Project construction would use equipment and activities that could result in other emissions (such as those leading to odors). However, these odors would be typical during construction and not extraordinarily objectionable. Potential construction odors include on-site construction equipment's diesel exhaust emissions as well as roofing, painting, and paving operations. There may be situations where construction activity odors could be noticed. However, these odors would be temporary and would dissipate rapidly from the source with an increase in distance. These odors would not be of such magnitude to cause a public nuisance. Therefore, the impacts would be short-term; would not affect a substantial number of people; and would be less than significant.

According to the SCAQMD CEQA Handbook, land uses associated with odor complaints typically include agricultural uses, sewer treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The Project does not include any uses identified by the SCAQMD as being associated with odors, and therefore, would not likely produce objectionable odors. In addition, the Project uses are regulated from nuisance odors or other objectionable emissions by SCAQMD Rule 402, Nuisance. Rule 402 prohibits discharge from any source of air contaminants or other material which would cause injury, detriment, nuisance, or annoyance to people or the public. Overall, there would be a less than significant impact, and no mitigation is required.

Regulatory Requirements

RR AQ-1 All construction activities shall be conducted in compliance with South Coast Air Quality Management District's Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. Contractor compliance with Rule 403 requirements shall be mandated in the contractor's specifications.

RR AQ-2 All construction activities shall be conducted in compliance with South Coast Air Quality Management District Rule 402, Nuisance, which states that a project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property".

Mitigation Measures

Project implementation would not result in significant impacts related to air quality; therefore, no mitigation measures are required.

4.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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, 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?	☐	☐	☐	☒

Impact Analysis

A Habitat Assessment has been prepared by ELMT Consulting (November 2018) for the proposed Project to document baseline conditions and assess the potential for special-status plant and wildlife species to occur within the Project site that could pose a constraint to implementation of the proposed Project. The findings of the Habitat Assessment are summarized below, and the report is included as Appendix B to this IS/MND.

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?

No Impact. The Project site is located within an urban area and surrounded by commercial and residential uses. As a result of urbanization of the land, the entire Project site and immediate surrounding areas are developed and no longer support undeveloped land. Native plant

communities were removed from the site several decades ago from development of the property. The vegetation on the Project site consists of ornamental plant species. However, several native oak trees are located at the Project site, as depicted on Exhibit 4-2, Existing Tree Inventory Plan.

No fish, amphibian, or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for fish or amphibians were observed on or within the vicinity of the Project site. Therefore, no fish are expected to occur and are presumed absent from the Project site (ELMT Consulting 2018). Great Basin fence lizard (Sceloporus occidentalis longipes) was the only reptilian species observed on-site. Common reptilian species adapted to a high degree of anthropogenic disturbances that have the potential to occur on-site include western side-blotched lizard (Uta stansburiana elegans) and alligator lizard (Elgaria multicarinata) (ELMT Consulting 2018). Due to the high level of anthropogenic disturbances on-site, and surrounding development, no special-status reptilian species are expected to occur within the Project site. The Project site provides minimal foraging habitat for bird or mammal species that have adapted to human disturbance. The existing landscaping provides potential habitats for common animal species that are typically found in urban areas, such as small mammals, birds, small reptiles, and insects. However, the site does not provide natural habitats for sensitive plant and animal species.

Review of the USFWS' Critical Habitat for Threatened and Endangered Species shows there are no designated critical habitat areas on or near the site. The nearest critical habitat is located in Galster Park, approximately 2.3 miles to the south.

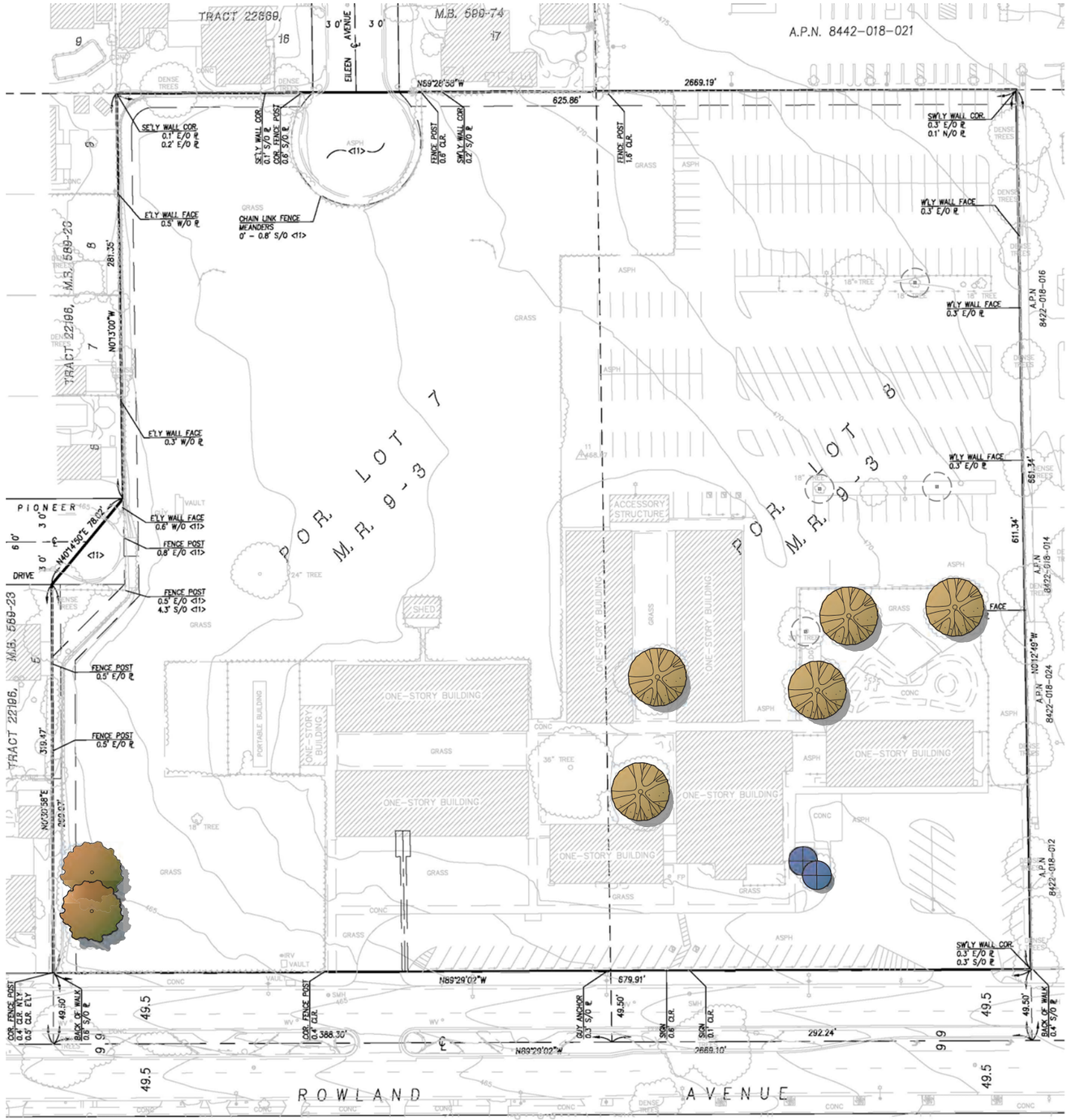
Since there are no natural or sensitive biological resources on the Project site, the proposed Project would not impact any candidate, sensitive, or special status species, as identified in the local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). There would be no impact on sensitive species, and no mitigation is required.

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

No Impact. The Project site is currently developed, and stormwater sheet flows across the asphalt pavement, ribbon gutters, and catch basins toward abutting streets. The site supports ornamental landscaping at scattered locations but does not contain riparian habitat or sensitive natural vegetation communities identified by CDFW and USFWS. There would be no impact to riparian habitats or sensitive natural vegetation communities, and no mitigation is required.

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

No Impact. The Project site is largely paved and does not support State or federally protected wetlands, or other areas under the jurisdiction of the CDFW, the Regional Water Quality Control Board (RWQCB), or U.S. Army Corps of Engineers (USACE). Per the Habitat Assessment performed for the Project site, there are no jurisdictional drainage, wetland, or riparian habitats at the Project site. However, it should be noted that a concrete-lined storm drain was observed along the western boundary of the Project site. This storm drain was constructed in the uplands



TREE INVENTORY LEGEND:

SIGNIFICANT TREES
(OAK TREES 6" DIA. OR GREATER & (FRONT YARD) PROJECT SITE TREES 10" DIA. OR GREATER):

- QUERCUS AGRIFOLIA - COAST LIVE OAK, 5 TREES TOTAL
- ACER SPP. - MAPLE TREE
- CALLISTEMON VIMINALIS - BOTTLE BRUSH TREE
- DEAD TREE (12" OR GREATER IN SIZE)

TREE INVENTORY NOTES:

- **THIS SITE DOES NOT HAVE ANY HERITAGE TREES.**
- **SIGNIFICANT TREES FOR THIS SITE ARE:**
  - **A. OAK TREES 6" OR GREATER IN DIAMETER;**
  - **B. ANY TREE LOCATED IN THE (FRONT YARD) PROJECT SITE GREATER IN DIAMETER.**

Source: Lewis Group Of Companies, March 2020

Existing Tree Inventory Plan

Walnut Grove Residential Project

Exhibit 4-2

N W E S

0 30 60 120 Feet

PSOMAS

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and does not have a surface hydrologic connection to downstream "waters of the United States." Therefore, regulatory approvals from the CDFW, RWQCB, or USACE would not be required for implementation of the Project (ELMT Consulting 2018). There would be no impact, and no mitigation is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact with Mitigation. The Project site is developed and is surrounded by residential uses on two sides, a roadway on one side, and commercial uses on the other side. The Project site is isolated from regional wildlife corridors and linkages, and there are no riparian corridors, creeks, or useful patches of stepping stone habitat (natural areas) within or connecting the Project site to any identified wildlife corridors or linkages. As a result, implementation of the proposed Project would not disrupt or have any adverse effects on any migratory corridors or linkages in the surrounding area (ELMT Consulting 2018). The Project would not affect the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, as the Project is part of none. Also, there are no native wildlife nursery sites on or near the site.

Due to the presence of trees and vegetation on the Project site, there is the potential for birds protected by the Federal Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code to nest at the site. The MBTA protects common and special status migratory birds and their nests and eggs. Bird species protected under the provisions of the MBTA are identified by the List of Migratory Birds (50 Code of Federal Regulations [CFR] Section 10.13, as amended). Since the 1970s, the MBTA has been interpreted to prohibit the accidental or "incidental" take of migratory birds. However, in December 2017, the acting Solicitor of the Department of the Interior issued a new memorandum disclaiming the interpretation of the MBTA as prohibiting incidental take of migratory birds (DOI 2017). In response to the federal changes in interpretation of the MBTA, the CDFW and the California Attorney General have issued an advisory affirming California's protection for migratory birds (CDFW and Attorney General 2018).

Multiple sections of California Fish and Game Code provide protection for nesting birds and raptors. Section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 specifically addresses raptors (i.e., birds of prey in the orders Falconiformes and Strigiformes) and makes it unlawful to take, possess, or destroy these birds or their nest or eggs. Section 3513 prohibits the take or possession of migratory non-game birds or any part of such bird, as designated by the MBTA.

If demolition and site clearing activities occur during the nesting season, active bird nests on the site may be disturbed or destroyed by the proposed Project, resulting in a significant impact. Therefore, MM BIO-1 is recommended to avoid impacts to nesting birds and their fledglings.

Upon completion of construction and landscaping activities on the site, newly planted trees and landscaping would provide nesting habitat for migratory birds. Therefore, impacts to migratory birds may occur during the construction phase but would be less than significant with implementation of MM BIO-1.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. On-site trees and vegetation would be removed and replaced by a variety of trees, vines, shrubs and groundcovers. The landscape plan would comply with Chapter 26, Article XIV, Division 1, Water Efficient Landscaping, of the West Covina Municipal Code, as reviewed and approved by the City of West Covina. As shown on Exhibit 4-2, Existing Tree Inventory Plan, the Project site has five heritage trees and 13 significant trees, as defined by the City. The heritage trees onsite consist of five coast live oaks (*Querus Agrifolia*) that are 6 inches or greater in diameter. The significant trees onsite consist of trees 12 inches or greater in diameter, including: one mulberry tree (*Morus Spp.*), two maple trees (Acer Spp.), one carrotwood tree (*Cupaniopsis Anacardioides*), two bottle brush trees (Callistemon Viminalis), one (sick) California ash tree (*Fraxinus Dipetala*), one jacaranda tree (*Jacaranda Mimosifolia*), and 4 dead trees. These trees would be removed as part of the Project. The removal of these trees would require a permit to remove trees, as oak trees are native to California and are considered heritage trees. Therefore, the Project would be subject to Chapter 26, Article VI, Division 9, Preservation, Protection, and Removal of Trees, of the West Covina Municipal Code (RR BIO-1). The Project would not conflict with City regulations in this regard. Impacts would be less than significant and, no mitigation is required.

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

No Impact. The proposed Project site is in a highly urbanized region and not within any established Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved type of habitat conservation plan. In addition, there are no HCP or NCCP areas within two miles of the Project site. Therefore, the proposed Project would not have any significant impacts in this regard, and no mitigation is required.

Regulatory Requirements

RR BIO-1 The proposed on-site and off-site trees shall be planted, preserved, removed, replaced and/or maintained in accordance with Chapter 26, Article XIV, Division 1, Water Efficient Landscaping, and Chapter 26, Article VI, Division 9, Preservation, Protection and Removal of Trees, of the West Covina Municipal Code.

Mitigation Measures

MM BIO-1 Prior to the issuance of any grading permits, the Community Development Director or designee shall verify that the following requirements for nesting birds and preconstruction survey are completed by the Project Applicant:

- The start of demolition and site-preparation activities shall be scheduled outside of the bird nesting and breeding season (typically March 1 through August 15). If demolition or site-preparation activities start during the nesting season, a qualified Biologist shall conduct a nesting bird survey in

potential bird nesting areas within 200 feet of any proposed disturbance. The survey shall be conducted no more than three days prior to the start of ground disturbance activities (i.e., grubbing or grading).

- If active nests of bird species protected by the Migratory Bird Treaty Act (MBTA) and/or the California Fish and Game Code (which, together, apply to all native nesting bird species) are present in the impact area or within 200 feet of the impact area, a temporary buffer fence shall be erected a minimum of 200 feet around the nest site. This temporary buffer may be greater or lesser depending on the bird species and type of disturbance, as determined by the Biologist.
- Clearing and/or construction within temporarily fenced areas shall be postponed or halted until juveniles have fledged from the nest and there is no evidence of a second nesting attempt. The Biologist shall serve as a construction monitor during those periods when disturbance activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

4.5 CULTURAL RESOURCES

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

This analysis used the results of the West Covina General Plan EIR (Rincon Consultants, Inc 2016) and a historic and archaeological record search conducted by Psomas on August 25, 2020 at the South Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton. The SCCIC houses records of the California Historical Resources Information System (CHRIS) for Los Angeles, Orange, Ventura, and San Bernardino Counties. The records search included a 0.8-kilometer (0.5-mile) radius around the Project site.

Existing Setting

The site is located at 1651 East Rowland Avenue, north of East Rowland Avenue and west of North Azusa Avenue. The site is currently developed with the former Tri-Community Adult School-Pioneer Center, which moved to a new location in Covina, California.

Access to the site is primarily from East Rowland Avenue, and existing North Eileen Street terminates in a cul-de-sac within the property along the northern boundary of the site. All existing structures have been closed and will be demolished to accommodate the proposed development. The existing structures located on the campus are comprised of nine administrate buildings and classrooms in the southern portion; surface parking lots in the southeastern and in northeastern portions; three storage sheds, a paved play area, and an athletic field in the western and northwestern portions of the Project site. Based on a review of historic aerials (1948-2016) (NetrOnline 2020), the campus was constructed in the early 1960s. Prior to the 1960s, the site was used for agricultural uses.

The SCCIC, located on the campus of California State University, Fullerton, houses records of the California Historical Resources Information System (CHRIS) for Orange, Los Angeles, San Bernardino, and Ventura Counties. On August 25, 2020, Psomas completed a record search for the Project site, which included a 0.8-kilometer (½-mile) radius around the site. The purpose of the literature search was to identify prehistoric or historic archaeological sites or historic buildings and structures, previously recorded within and around the Project site.

The SCCIC record search identified four prior cultural resources studies within the ½-mile search radius that were initiated due to planned urban and residential developments, utilities projects, and academic pursuits. One study, LA-07097, contained a portion of the Project site as part of a survey to assess the area as a potential cellular site. A second cellular site study, LA-03441, was

conducted 600 feet east of the Project site. Additionally, an archaeological survey, LA-02872, and a historic property survey, LA-10190, were conducted 0.45 miles south of the Project site.

The records search also identified three previously recorded cultural resources within the ½ -mile search radius of the Project site. The recorded resources include two historic districts and one historic structure. The record search did not identify any prehistoric sites within a ½-mile from the Project site.

The Mojave Road (P-19-187085) is located 0.45 miles north of the Project site and consists of a historic road that connected the U.S. Army Headquarters for Southern California and Arizona Territory at Wilmington, California with Fort Mojave, Arizona. The historic road was registered as a Historical Landmark and deemed significant based on its continued use throughout prehistoric and historic periods. The road was used by Native Americans as a trade route; the federal government as a supply and mail route, freight, and emigrant wagon route; and more recently as a recreational trail.

The two historic districts are located 0.3 miles south of the Project site. Tract #16472 (P-19-188957) consists of 286 single story, single family dwellings built on average sized lots in a simple grid pattern. The tract is bounded by Workman Avenue to the north, Lark Ellen Avenue to the west, Azusa Avenue to the east, and Interstate 10 (I-10) to the south. There are four streets within the tract, Fleetwell Avenue, Mardina Street, Shamwood Street, and Idahome Street. However, the majority of the houses within the district have had alterations that range from window replacement and altered fenestration, room additions, patio enclosures, and some alterations to the primary elevations by way of exterior siding changes, and entry reconfigurations. Thus, Tract #16472 retains only a moderate degree of integrity. Due to the lack of architectural or historical distinction, the properties do not appear to be eligible for listing in the National Register of Historic Places or considered significant in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines.

Tract #17547 (P-19-188965) consists of 147 parcels made up mostly of single-story single-family dwellings built on average sized lots. The tract is a modified grid plan bounded by Garvey Avenue to the south, Workman Avenue to the north, Hollenbeck Avenue to the east, and Baymar Avenue to the west. However, the majority of the houses within the district have had significant alterations that range from window replacement and altered fenestration, room additions, patio enclosures, and some alterations to the primary elevations by way of exterior siding changes, and entry reconfigurations. Thus, Tract #17547 does not retain its original integrity. Due to the lack of architectural or historical distinction, the properties do not appear to be eligible for listing in the National Register of Historic Places or considered significant in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines.

Impact Analysis

Would the Project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less than Significant Impact. The SCCIC records searches identified three previously recorded cultural resources within the ½ -mile search radius of the Project site. No Historical resources

were identified on the Project site. The recorded resources include two historic districts and one historic road. The Mojave Road (P-19-187085) is located 0.45 miles north of the Project site and consists of a historic road that connected the U.S. Army Headquarters for Southern California and Arizona Territory at Wilmington, California with Fort Mojave, Arizona. Tract #16472 (P-19-188957) is located 0.3 miles south of the Project site and consists of 286 single story, single family dwellings built on average sized lots in a simple grid pattern. Tract #17547 (P-19-188965) is located 0.3 miles south of the Project site and consists of 147 parcels made up mostly of single-story single-family dwellings built on average sized lots. Of these three resources, only Mojave Road (P-19-187085) is considered significant. However, due to the distance between the Project site and Mojave Road, the Project would not have any direct or indirect impacts to Mojave Road. Thus, the Project's impacts are considered less than significant, and no mitigation is required.

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

Less than Significant Impact with Mitigation. Based on the searches conducted, no archaeological resources were discovered on the Project site or within the ½ -mile search radius of the site. However, there is a possibility that buried historical and/or archaeological materials would be uncovered during necessary subsurface excavations for the construction of the Project. To make sure no significant impacts would result, MM CUL-1 is proposed and calls for a qualified Archaeologist to monitor earth-moving activities during construction and sets procedures to follow in the event of the discovery of archaeological resources. Implementation of MM CUL-1 would reduce the potential for the destruction of any significant archaeological resources. Therefore, potential impacts pertaining to adverse change in the significant of an archaeological resource would be less than significant with implementation of mitigation.

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

Less than Significant Impact. There is no indication that human remains are present within the Project site, and the SCCIC records search does not indicate evidence of human remains within the ½ -mile search radius of the site. However, construction activities may unearth previously undiscovered human remains.

In compliance with State and federal regulations, if human remains are encountered during excavation activities, all work shall halt at the site and or any nearby areas reasonably suspected to overlie adjacent remains, and the County Coroner shall be notified (RR CUL-1). The Coroner shall determine whether the remains are of forensic interest within two working days of receiving notification. If the Coroner, with the aid of the qualified archaeologist, determines that the remains are prehistoric, the Coroner shall contact the NAHC within 24 hours of the determination. The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the California Public Resources Code. Compliance with RR CUL-1 would ensure that impacts on human remains would be less than significant. No mitigation is required.

Regulatory Requirements

RR CUL-1 If human remains are encountered during any Project-related ground-disturbing activities, Section 7050.5 of the *California Health and Safety Code* states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition of the materials pursuant to Section 5097.98 of the *California Public Resources Code.* The provisions of Section 15064.5 of the California Environmental Quality Act Guidelines shall also be followed. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner shall notify the Native American Heritage Commission (NAHC). The NAHC will determine and notify a Most Likely Descendent (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The descendent must complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. These requirements shall be included as notes on the contractor specification and verified by the Community Development Department, prior to issuance of grading permits. This measure shall be implemented to the satisfaction of the City in consultation with the County Coroner.

Mitigation Measures

MM CUL-1 A qualified archaeologist (the "Project Archaeologist") shall be retained prior to the start of grading for Project-related construction. The Project Archaeologist shall monitor all ground-disturbing activities within the areas of native soil (i.e., below existing areas of artificial fill from previous construction). If archaeological or historical resources are encountered during implementation of any phase of the Project, the Project Archaeologist will be allowed to temporarily divert or redirect grading or excavation activities in the vicinity of the find in order to make an evaluation of the find.

4.6 ENERGY

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

Impact Analysis

Would the Project:

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

Less than Significant Impact. Section 21100(b)(3) of the *California Public Resources Code* and Appendix F to the State CEQA Guidelines require a discussion of potential energy impacts of proposed projects. Appendix F states:

> The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:
>
> (1) Decreasing overall per capita energy consumption,
>
> (2) Decreasing reliance on fossil fuels such as coal, natural gas and oil, and
>
> (3) Increasing reliance on renewable energy sources.

Southern California Edison (SCE) and the Southern California Gas Company (SCGC) are utility companies that currently provide and would continue to provide electrical and natural gas services to the Project site. Compliance with energy efficiency and conservation policies and regulations is discussed in this section.

The City of West Covina has adopted an Energy Action Plan (EAP) to address environmental and fiscal impacts associated with energy consumption. The EAP was developed to guide the City toward attainable conservation goals that would reduce the impact of GHG emissions within the community. These conservation goals include:

- Educating the public about energy saving techniques and programs.
- Promoting and creating energy conservation opportunities and programs.
- Installing environmentally benign, renewable and reliable energy facilities.
- Participating in alliances with local businesses and with other agencies.

- Pursuing and performing local and higher funding opportunities.
- Coordinating other City policies, programs and ordinances to become compatible with Sustainable Community goals.

The State of California has also adopted efficiency design standards within the Title 24 Building Standards and CALGreen requirements (RR ENE-1). Title 24 of the California Code of Regulations (CCR, specifically, Part 6) is California's Energy Efficiency Standards for Residential and Non-residential Buildings. Title 24 was established by the California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and to provide energy efficiency standards for residential and non-residential buildings. The 2019 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen Code, contains mandatory requirements for new residential and nonresidential buildings throughout California. The development of the CALGreen Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the Code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction. The regulation of energy efficiency for residential and non-residential structures is established by the CEC and its California Energy Code. Starting on January 1, 2020, all new single-family residential uses are required to offset their annual electrical demand through the use of energy efficiency and solar photovoltaic panels. These new homes are expected to reduce energy use by more than 50 percent. The proposed Project would be consistent with RR ENE-1.

Construction

Project construction would require the use of construction equipment for grading and building activities. All off-road construction equipment is assumed to use diesel fuel. Construction also includes the vehicles of construction workers and vendors traveling to and from the Project site.

Off-road construction equipment use was calculated from the equipment data (mix, hours per day, horsepower, load factor, and days per phase) provided in the CalEEMod construction output files included in Appendix C of this IS/MND. The total horsepower hours for the Project was then multiplied by fuel usage estimates per hours of construction activities included in the Off-Road Model.

Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total vehicle miles traveled (VMT) was then calculated for each type of construction-related trip and divided by the corresponding miles per gallon factor using CARB's EMissions FACtor (EMFAC) 2017 model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. Construction vendor and delivery/haul trucks were assumed to be heavy-duty diesel trucks.

As shown in Table 4-9, a total of 16,570 gallons of gasoline and 15,739 gallons of diesel fuel is estimated to be consumed during Project construction.

TABLE 4-9
ENERGY USE DURING CONSTRUCTION

Source	Gasoline - gallons	Diesel Fuel - gallons
Off-road Construction Equipment	0	11,344
Worker commute	15,054	60
Vendors	1,511	21
On-road haul	5	4,314
Totals	**16,570**	**15,739**
Sources: Psomas 2020 based on data from CalEEMod, OffRoad and EMFAC2017. Energy data can be found in Appendix C of this IS/MND.		

Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. The Project would also implement best management practices such as requiring equipment to be properly maintained and minimize idling and where feasible, use electric or clean alternative fuel equipment. Furthermore, there are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the State. Energy used in the construction of the Project would enable the development of buildings that meet the latest energy efficiency standards as detailed in California's Title 24 building standards. Therefore, the proposed construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption.

Operations

The proposed Project would promote building energy efficiency through compliance with energy efficiency standards (Title 24 and CALGreen). The Project site is currently developed with school uses that complied with older less stringent building energy efficiency standards. The development of the Project is required to comply with the latest (2019) building energy efficiency standards adopted by the State of California. The estimated energy consumption attributable to the Project is shown in Table 4-10 below.

TABLE 4-10
ENERGY USE DURING OPERATIONS

Land Use	Gasoline	Diesel	Natural Gas (kBTU/yr)	Electricity (kWh/yr)
Project Land Uses	134,907	22,288	3,393,560	1,019,281
Sources: Psomas 2020. Energy data can be found in Appendix C of this IS/MND.				

The CEC anticipates the new 2019 Building Energy Efficiency Standards would result in a reduction of energy use by more than 50 percent as compared to previous energy standards (CEC 2018). Therefore, the new buildings would be more energy efficient than the existing buildings to be demolished. In terms of whether the operations phase would result in a wasteful, inefficient, or unnecessary consumption of energy resources, during Project operation, the Project would add new energy efficient units to the housing inventory within Los Angeles County. Therefore, the proposed Project would not result in an inefficient, wasteful, or

unnecessary consumption of energy. There would be a less than significant impact, and no mitigation is required.

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

No Impact. The Project would be required to comply with the State of California's Title 24 Building Standards and Title 24 Energy Efficiency Standards (RR ENE-1). As discussed previously, the latest building standards would incorporate the CEC's building energy efficiency standards, which would reduce energy consumption through the incorporation of solar photovoltaic panels for the proposed single-family residential units as well as other energy efficiency requirements. Because the Project complies with the latest energy efficiency standards; provides additional housing capacity within the City; and incorporates renewable energy, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Regulatory Requirements

RR ENE-1 The Project must be designed in accordance with the applicable Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR], Title 24, Part 6) and the Title 24 Green Building Standards Code (CALGreen), (CCR, Title 24, Part 11). These standards are updated, nominally every three years, to incorporate improved energy efficiency technologies and methods.

Mitigation Measures

Project implementation would not result in significant impacts related to energy; therefore, no mitigation measures are required.

4.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☐	☒
ii) Strong seismic groundshaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative 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?	☐	☒	☐	☐

Impact Analysis

A Report of Geotechnical Investigation (Geotechnical Report) has been prepared by Leighton and Associates, Inc (April 2020) for the proposed Project to assess the geotechnical conditions on the site and provide structural design recommendations for the construction of the Project. The findings of the Geotechnical Report are summarized below, and the report is included as Appendix D to this IS/MND.

Would the Project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

No Impact. Ground rupture occurs when movement on a fault breaks through the surface. The State of California has established Earthquake Fault Zones for the purpose of mitigating the hazard of fault rupture by prohibiting the location of most human occupancy structures across the traces of active faults. The Project site is outside of an Earthquake Fault Zone and Alquist-Priolo Earthquake Fault Zoning Map. Therefore, per the Geotechnical Report, the potential for surface rupture onsite is low. Therefore, there is no impact associated with surface rupture from an Alquist-Priolo Fault Zone.

ii) Strong seismic groundshaking?

Less than Significant Impact with Mitigation. The City of West Covina and the rest of California are located within a seismically active region. There are no known active or potentially active faults on the Project site. However, the Project site is located within the northeastern portion of the Los Angeles Basin within the Peninsular Ranges geomorphic province of California. Several faults have been mapped in the region, including the Indian Hills fault (approximately 1 mile east of the site), the Walnut Creek fault (approximately 1.6 miles southeast of the site), and the Sierra Madre Fault Zone (approximately 3.4 miles north of the site). It is anticipated that because the Project site is located within a seismically active region, the Project site would experience ground shaking during the life of the Project.

In order to reduce the effects of ground shaking, the Project should be designed in accordance with all applicable current codes and standards utilizing the appropriate seismic design parameters to reduce seismic risk as defined by California Geological Survey (CGS) Chapter 2 of Special Publication 117a and the 2019 California Building Code (RR GEO-1). All buildings and other structures constructed as part of the proposed Project would be designed in accordance with applicable requirements of the CBC in effect at the time of grading plan submittal, and any applicable building and seismic codes in effect at the time the grading plans are submitted. The Geotechnical Report includes 2019 CBC Seismic Design Parameters in its evaluation (MM GEO-1) and concludes that the proposed Project is feasible from a geotechnical standpoint, with incorporation of the Geotechnical Report recommendations into the design and construction of the Project and compliance with applicable building and seismic codes. Therefore, there would be a less than significant impact from strong seismic groundshaking with incorporation of MM GEO-1.

iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction of soils may be caused by cyclic loading such as that imposed by ground shaking during earthquakes. The increase in pore pressure results in a loss of strength, and the soil then can undergo both horizontal and vertical movements, depending on the site conditions. Liquefaction is generally known to occur in loose (low-density), saturated, relatively clean, fine- to medium-grained cohesionless soils. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations.

As indicated in the Geotechnical Report (Appendix D), based on a review of the State of California Official Map of Earthquake Zones of Required Investigation for the Baldwin Park Quadrangle, the site is not located within a Zone of Required Investigation for Liquefaction. Additionally, with the absence of shallow groundwater, the potential for liquefaction to occur onsite is low. Therefore, the Project would not result in a substantial adverse effect, including the risk of loss, injury, or

death, due to seismic-related ground failure, including liquefaction. No impact would occur, and no mitigation is required.

iv) Landslides?

No Impact. The Project site and surrounding area are located in a generally flat, urbanized portion of the City, with the ground elevations on the Project site at approximately 450 feet above mean sea level (msl) (USGS 2020). The California Department of Conservation (DOC) does not designate the site and the surrounding area as Earthquake-Induced Landslide Zones, which include areas where historical occurrence of landslide movement has occurred or where local topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacement (DOC 2020). Therefore, the Project would not result in a substantial adverse effect, including the risk of loss, injury, or death, due to landslides. No impact would occur, and no mitigation is required.

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

Less than Significant Impact. The Project site is fully developed with administrative building, school uses, surface parking lots, and associated site improvements and has a relatively flat topography. During demolition and construction activities, temporary soil erosion may occur due to soil disturbance and the removal of buildings and paved surfaces. In addition, soil erosion due to rainfall and wind may occur if unprotected soils are exposed during construction. The Phase I Environmental Site Assessment (ESA) for the site states that the underlying soils consists of alluvial soil consisting of unconsolidated gravel, sand, and silt.

As the Project site has over one acre of land area, it would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities or coverage under the NPDES Construction General Permit. The Construction General Permit requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of erosion control, sediment control, tracking, waste management, and construction site maintenance best management practices (BMPs) to reduce the potential for soil and wind erosion during construction activities (see RR HYD-1, in Section 4.10). Further, the proposed Project must comply with the City's grading ordinance, which requires preparation of an erosion control plan for City approval prior to issuance of a grading permit (see RR GEO-2). With compliance with these regulations, construction-related soil erosion would be less than significant, and no mitigation is required.

As indicated in the Preliminary Hydrology Study (Appendix F), the Project site is currently 53 percent impervious. Following construction of the proposed Project, the site would be 80 percent impervious (DKP Engineering 2020). There would be minimal areas of exposed soils following completion of the proposed Project where erosion could occur. Site improvements and landscaping would also prevent long-term erosion (RR HYD-2). Therefore, operation-related soil erosion would be less than significant, and no mitigation is required.

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?

Less than Significant Impact with Mitigation. As discussed above, the Project site is not located in a potential landslide or a potential liquefaction area. Based on the Geotechnical Report (Appendix D), groundwater was not encountered in the exploratory borings placed on the site during the geotechnical investigation, which drilled to a maximum depth of 51.5 feet below the existing ground surface (bgs). The historical high depth to groundwater is reportedly at approximately 100 to 150 feet bgs at the Project site. In light of the depth of water and low potential for liquefaction as discussed under item (iii), above, lateral spreading also has a low potential of occurrence.

As indicated in the Geotechnical Report, during a strong seismic event, seismically induced settlement (dry dynamic settlement above groundwater) can occur within loose to moderately dense sandy soil due to reduction in volume during or shortly after an earthquake event. The Geotechnical Report performed analyses to estimate the potential for seismically induced settlement and determined that the proposed buildings would not be subject to collapse, nor would they be subject to special design considerations.

As indicated in the Geotechnical Report, the soil expansion is classified as very low to low (Appendix D). Based on the Geotechnical Report, one- to three- story structures proposed for the development may be supported on shallow foundation systems. However, in order to reduce the potential for adverse differential settlement, the underlying subgrade soil must be prepared in such a manner that a uniform response to the applied loads is achieved. Therefore, all artificial fill should be removed to firm native soil. The onsite alluvial soil should be over-excavated a minimum of 6.5 feet bgs or 3 feet bgs, whichever is deeper. This, along with the remaining recommendations, as outlined in the Geotechnical Report (MM GEO-1) and adherence to the City's grading code (RR GEO-1) would reduce the potential for expansion and collapse. The Geotechnical Report concludes that the proposed Project is feasible from a geotechnical standpoint, provided the recommendations in the Geotechnical Report are incorporated into the design and construction of the proposed Project, in its entirety, as required by MM GEO-1. Therefore, potential impacts would be less than significant with mitigation.

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

Less than Significant Impact with Mitigation. Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from rainfall, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors, and may cause unacceptable settlement or heave of structures, concrete slabs supported on-grade, or pavements supported over these materials. Depending on the extent and location below finished subgrade, these soils could have a detrimental effect on the proposed construction.

As indicated above, based on the field soil classification, as stated in the Geotechnical Report, while the expansion index classified as "low to very low" expansion potential, with recommendations included in the Geotechnical Report (MM GEO-1), impacts would be less than significant.

Additionally, Project construction would be required to comply with 2019 California Building Code (RR GEO-1). Also, the Geotechnical Report concludes that the proposed Project is feasible from a geotechnical standpoint, provided the recommendations in the Geotechnical Report are incorporated into the design and construction of the proposed Project, in its entirety, as required by MM GEO-1. Therefore, Project impacts related to expansive soils would be less than significant with compliance with RR GEO-1 and MM GEO-1.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. There is no evidence of septic tanks or systems, wastewater, drains, sumps, or cisterns at the Project site (Leighton and Associates, Inc. 2020b). The Project would convey sewage through an onsite 8-inch polyvinyl chloride (PVC) sewer line and 4-inch PVC laterals, which would tie into the existing sewer main in East Rowland Avenue. The use of septic tanks or alternative wastewater disposal systems is not proposed by the Project. Therefore, no impact would result, and no mitigation is required.

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

Less than Significant Impact with Mitigation. The site is located in the northeastern portion of the Los Angeles Basin within the Peninsular Ranges geomorphic province of California. The Peninsular Ranges are characterized by elongate structural blocks bounded by northwest to west-northwest trending fault zones. Several of these faults terminate at or merge with the east-west trending thrust faults at the southern edge of the Traverse Ranges geomorphic province to the north of the site. The site is underlain by alluvial soil deposits eroded from surrounding mountains and deposited in the site vicinity. However, previous grading to accommodate the former school has resulted in the placement of artificial fill in the first five feet of soil underlying the current Project site.

This analysis is based on the results of a literature review and records check conducted through the Natural History Museum (LACM) of Los Angeles County, an online search of localities listed on the Paleobiology Database (paleobiodb.org), and a review of geologic maps and aerials of the Project site. The paleontological records search was completed on August 28, 2020. The record search included a thorough search of the LACM paleontology collection records for the locality and specimen data for the Project site and surrounding area. The record search did not identify any fossil localities within the site. However, five localities were located nearby from the same sedimentary deposits that occurs in the Project site, either at the surface or at depth. The Project site is underlain by Holocene-age older alluvial soil deposits, which could contain significant fossils. However, earthmoving activities for the proposed Project would be isolated within the first five feet of soil. The site history and geotechnical analysis indicates these earthmoving activities would take place in previously disturbed soils, which consist of re-deposited alluvial soil and artificial fill. Additionally, based on the PlanWC's Resource Conservation Element, soils and geologic formations within the City have a low potential to contain significant paleontological resources.

Nevertheless, while paleontological resources are not anticipated to be discovered during excavations, if grading activities encounter unknown paleontological resources, implementation

of MM GEO-2 would reduce this potential impact to a less than significant level. Therefore, this impact would be less than significant with mitigation.

Regulatory Requirements

RR GEO-1 The Project shall be designed and constructed in compliance with the 2019 California Building Code (CBC) Design Parameters or the most current CBC adopted in the City's Municipal Code.

RR GEO-2 Prior to issuance of a grading permit, the Project Applicant shall prepare an erosion control plan in compliance with City's Grading Ordinance, as approved by the City.

Mitigation Measures

MM GEO-1 Prior to issuance of a grading permit, site preparation and building design specifications shall follow the recommendations in the *Report of Geotechnical Investigation, Former Pioneer Elementary School, 1651 East Rowland Avenue, City of West Covina, California,* prepared by Leighton and Associates, Inc (dated April 17, 2020) and additional future site-specific, design-level geotechnical investigations of the Project. Based on the Geotechnical Report, recommendations to be included in the Project specifications pertain to General Earthwork and Grading, Foundations, Slabs-On-Grade, Seismic Design Parameters, Lateral Earth Pressures, Cement Type and Corrosion Protection, Pavement Design, Infiltration, Temporary Excavations, Surface Drainage, and Additional Geotechnical Services.

MM GEO-2 In the event paleontological resources are encountered during construction, ground-disturbing activity shall cease. It is recommended that a Qualified Paleontologist be retained by the Applicant to examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered. Criteria for discard of specific fossil specimens shall be made explicit. If a Qualified Paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by Project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material prior to construction; monitoring work and halting construction if an important fossil needs to be recovered; and/or cleaning, identifying, and cataloging specimens for curation and research purposes. The cost associated with recovery, salvage, and treatment shall be borne by the Applicant. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the Qualified Professional. Resources shall be identified and curated into an established accredited professional repository. The Qualified Professional shall have a repository agreement in hand prior to initiating recovery of the resource.

4.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Impact Analysis

Climate change refers to any significant change in measures of climate (e.g., average temperature, precipitation, or wind patterns) over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have recently been associated with global warming, which is an average increase in the temperature of the atmosphere near the Earth's surface; this is attributed to an accumulation of greenhouse gas (GHG) emissions in the atmosphere. GHGs trap heat in the atmosphere which, in turn, increases the Earth's surface temperature. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The emission of GHGs through fossil fuel combustion in conjunction with other human activities are associated with global warming.

GHGs, as defined under California's Assembly Bill (AB) 32, include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). General discussions on climate change often include water vapor, atmospheric ozone, and aerosols in the GHG category. Water vapor and atmospheric ozone are not gases that are formed directly in the construction or operation of development projects, nor can they be controlled in these projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by either regulatory bodies, such as CARB, or climate change groups, such as the California Climate Action Registry, as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, atmospheric ozone, or aerosols is provided.

Regulatory Background

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order (EO) S-3-05, which calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

The principal overall State plan and policy adopted for the purpose of reducing GHG emissions is Assembly Bill (AB) 32 (California Global Warming Solutions Act of 2006). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 recognizes that California is the source of substantial amounts of GHG emissions. The statute states the following:

> Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.

In order to avert these consequences, AB 32 establishes a State goal of reducing GHG emissions to 1990 levels by the year 2020, codifying the goal of EO S-3-05.

CARB approved a Climate Change Scoping Plan as required by AB 32 in 2008; this plan is required to be updated every five years. The Climate Change Scoping Plan proposes a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health" (CARB 2008). The Climate Change Scoping Plan has a range of GHG-reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation regulation to fund the program. On February 10, 2014, CARB released the Draft Proposed First Update to the Climate Change Scoping Plan (CARB 2014). The board approved the final First Update to the Climate Change Scoping Plan on May 22, 2014. The first update describes California's progress towards AB 32 goals, stating that "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). The latest update occurred in January 2017 and incorporates the 40 percent reduction to 1990 emissions levels by 2030.

The Sustainable Communities and Climate Protection Act of 2008, Senate Bill (SB) 375, established a process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 required SCAG to incorporate a "sustainable communities strategy" (SCS) into its regional transportation plans (RTPs) that will achieve GHG emission reduction targets though several measures, including land use decisions. SCAG's SCS is included in the SCAG 2016–2040 RTP/SCS (SCAG 2016). The goals and policies of the RTP/SCS that reduce vehicle miles traveled (VMT) focus on transportation and land use planning that include building infill projects; locating residents closer to where they work and play; and designing communities so there is access to high quality transit service.

On April 29, 2015, Governor Brown signed EO B-30-15, which ordered an interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050. Five key goals for reducing GHG emissions through 2030 include (1) increasing renewable electricity to 50 percent; (2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; (3) reducing petroleum use in cars and trucks by up to 50 percent; (4) reducing emissions of short-lived climate pollutants; and (5) managing farms, rangelands, forests and wetlands to increasingly store carbon. EO B-30-15 also directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

On September 8, 2016, the Governor signed Senate Bill 32 (SB 32) to codify the GHG reduction goals of EO B-30-15, requiring the State to reduce GHG emissions by 40 percent below 1990 levels by 2030 (Health and Safety Code Section 38566). As stated above, this goal is expected to keep the State on track to meeting the goal set by EO S-3-05 of reducing GHG emissions by 80 percent below 1990 levels by 2050.

AB 197 was signed at the same time to ensure that the SB 32 goals are met by requiring CARB to provide annual reports of GHGs, criteria pollutants, and TACs by facility, City and sub-county level, and sector for stationary sources and at the County level for mobile sources. It also requires the CARB to prioritize specified emission reduction rules and regulations and to identify specified information for emission reduction measures (e.g., alternative compliance mechanism, market-based compliance mechanism, and potential monetary and nonmonetary incentive) when updating the Scoping Plan.

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of EO B-30-15. The objectives of SB 350 are as follows:

1. To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources
2. To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation

The text of SB 350 sets a December 31, 2030, target for 50 percent of electricity to be generated from renewable sources. SB 350 also requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. Additionally, SB 350 sets requirements for large utilities to develop and submit integrated resources plans (IRPs), which detail how utilities would meet their customers' resource needs, reduce GHG emissions, and integrate clean energy resources (CEC 2020a).

On September 10, 2018, Governor Brown signed SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 requires renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers and 100 percent of electricity procured to serve state agencies by December 31, 2045. This policy requires the transition to zero-carbon electric systems that do not cause contributions to increase of GHG emissions elsewhere in the western electricity grid (CEC 2020b). SB 100 also creates new standards for the Renewable Portfolio Standard (RPS) goals established by SB 350 in 2015. Specifically, the bill increases required energy from renewable sources for both investor-owned utilities and publicly owned utilities from 50 percent to 60 percent by 2030.

Further, on September 10, 2018, Governor Brown also signed California EO B-55-18, which sets a new statewide goal of carbon neutrality as soon as possible, and no later than 2045 and achieve net negative emissions thereafter. EO B-55-18 was added to the existing Statewide targets of reducing GHG emissions, including the targets previously established by Governor Brown of reducing emissions to 40 percent below 1990 levels by 2030 (EO B-30-15 and SB 32), and by Governor Schwarzenegger of reducing emissions to 80 percent below 1990 levels by 2040 (EO S-3-05).

The City of West Covina does not currently have a Climate Action Plan; however, the City has adopted an Energy Action Plan (EAP). Therefore, the Project is evaluated against the City's EAP.

The purpose of the EAP is to "guide the City of West Covina toward attainable conservation goals that may also significantly reduce the impact of greenhouse gas emissions within the community" (City of West Covina 2011). The goals of the City's EAP include: educating the public about energy-saving techniques and programs; promoting and creating energy conservation opportunities and programs; installing environmentally benign, renewable, and reliable energy facilities; participating in alliances with local businesses and with other agencies; pursuing and performing local and higher funding opportunities; and coordinating other City policies, programs, and ordinances to become compatible with Sustainable Community goals.

SCAQMD Significance Criteria

On December 5, 2008, the SCAQMD Governing Board presented the staff proposal for a tiered threshold approach wherein Tier 1 determines if a project qualifies for an applicable CEQA exemption, Tier 2 determines consistency with GHG reduction plans, and Tier 3 proposes a numerical screening value as a threshold. At their September 28, 2010, meeting, the Working Group suggested a Tier 3 threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO2e) per year for all land use types (SCAQMD 2010). Tier 4 determines if the project meets performance standards. Tier 4 has three options: Option 1—percent emission reduction target; Option 2—early implementation of applicable measures, and Option 3—sector-based standard. Tier 5 determines mitigation for CEQA offsets.

In the absence of adopted thresholds, the Tier 3 standard is used for this analysis (SCAQMD 2008). The development of project-level thresholds in accordance with CEQA is an ongoing effort at the State, Regional, and County levels, and significance thresholds may differ for future projects based on new or additional data and information that may be available at that time for consideration. The City of West Covina has not officially adopted any GHG CEQA significance threshold. The City defers to assessment methods and significance thresholds developed by the SCAQMD. This impact analysis evaluates consistency with regulatory programs designed to reduce GHG emissions and that contribute to the achievement of AB 32's and SB 32's goals as the primary significance criterion. In addition, this impact analysis also evaluates the Project's estimated emissions compared to the Tier 3 threshold (as discussed above) for impacts related to GHG emissions proposed by staff of the SCAQMD, but not adopted by the SCAQMD Board.

Would the Project:

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

Less than Significant Impact. In developing methods for GHG impact analyses, there have been suggestions from local air pollution control districts of quantitative thresholds, often referred to as screening levels, which define an emissions level below which it may be presumed that climate change impacts would be less than significant. Neither the SCAQMD, the City of West Covina, nor the County of Los Angeles has adopted a significance threshold for GHG emissions from non-industrial development projects. Consequently, pursuant to the discretion afforded by Sections 15064.4(a) and 15064.4(b) of the State CEQA Guidelines, the impact of the Project's GHG emissions are assessed based on the methodologies proposed by SCAQMD's GHG CEQA Significance Threshold Working Group, as described above.

Based on the proposed construction activities described above, the principal source of construction related GHG emissions would be from internal combustion engines of construction equipment, on-road construction vehicles, and workers' commuting vehicles. GHG emissions from construction activities were obtained from the CalEEMod model, described above. The estimated construction GHG emissions for the proposed Project would be 549 MTCO2e, as shown in Table 4-11, Estimated Greenhouse Gas Emissions from Construction.

TABLE 4-11
ESTIMATED GREENHOUSE GAS EMISSIONS FROM CONSTRUCTION

Year	Emissions ($MTCO_2e$)
2021	549
Total	**549**

$MTCO_2e$: metric tons of carbon dioxide equivalent

Notes:
- Totals may not add due to rounding variances.
- Detailed calculations in Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data.

Operational GHG emissions would come primarily from vehicle trips; other sources include electricity and water consumption; natural gas for space and water heating; and gasoline-powered landscaping and maintenance equipment. Table 4-12, Estimated Annual Greenhouse Gas Emissions from Project Operation, shows the annual GHG emissions from proposed Project's operations.

TABLE 4-12
ESTIMATED ANNUAL GREENHOUSE GAS EMISSIONS FROM PROJECT OPERATION

Source	Emissions ($MTCO_2e$/yr)
Area	35
Energy	508
Mobile	1,497
Waste	30
Water	81
Total Operational Emissions	**2,151**

$MTCO_2e$/yr: metric tons of carbon dioxide equivalent per year

Notes:
- Totals may not add due to rounding variances.
- Detailed calculations in Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data.

Because impacts from construction activities occur over a relatively short period of time, they contribute a relatively small portion of the overall lifetime project GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. The SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG reduction measures address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008). Therefore, construction and operational emissions

are combined by amortizing the construction and operations over an assumed 30-year project lifetime. This combination is shown in Table 4-13, Estimated Total Project Annual Greenhouse Gas Emissions, using the proposed Project's amortized construction and operational emissions.

TABLE 4-13
ESTIMATED TOTAL PROJECT ANNUAL
GREENHOUSE GAS EMISSIONS

Source	Emissions ($MTCO_2e/yr^a$)
Construction (Amortized)	18[a]
Operations (Table 14)	2,151
Total[b]	**2,170**
SCAQMD-Recommended Threshold (Tier 3)	**3,000**
Exceeds Threshold?	**No**

$MTCO_2e/yr$: metric tons of carbon dioxide equivalent per year

[a] Total derived by dividing construction emissions (see Table 4-11) by 30.
[b] Total annual emissions are the sum of amortized construction emissions and operational emissions.

It is noted that there are no established applicable quantitative federal, State, regional, or local CEQA significance criteria for GHG emissions for non-industrial projects in the SoCAB. The SCAQMD has proposed, but not adopted, a threshold of 3,000 MTCO2e per year for non-industrial land use projects. As shown, the estimated GHG emissions from the Project would be less than this suggested threshold. The impact would be less than significant, and no mitigation is required.

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

Less than Significant Impact. As discussed previously, the City of West Covina has adopted standards for the purpose of reducing energy consumption, which would result in a reduction in GHG emissions. The State policy and standards adopted for the purpose of reducing GHG emissions that are applicable to the proposed Project are EO S-3-05, AB 32, the California Global Warming Solutions Act of 2006, and SB 32. The quantitative goal of these regulations is to reduce GHG emissions to 1990 levels by 2020 to 80 percent below 1990 levels by 2050, and for SB 32, to 40 percent below 1990 levels by 2030. Statewide plans and regulations (such as GHG emissions standards for vehicles, the Low Carbon Fuel Standard, Cap-and-Trade, and renewable energy) are being implemented at the statewide level, and compliance at a project level is not addressed.

As stated above, the City adopted the Energy Action Plan (EAP) to identify the City's long-term strategies and commitment to achieve energy efficiency in the community and in City operations. However, the EAP does not include requirements or standards for implementation of energy reduction to development projects. Table 4-14, below, shows the applicable EAP policies applicable to the Project and the Project's consistency with these policies.

TABLE 4-14
ENERGY ACTION PLAN CONSISTENCY

Energy Action Plan Policy	Project Consistency Analysis
Provide on-line (Internet accessible) guidance and assistance to Homeowners and Builders to make compliance with new Title 24 energy requirements as effective and efficient as possible.	**Consistent**. The Project site would be equipped with internet accessibility, which would provide builders with the ability to effectively and efficiently meet Title 24 energy requirements.
Modify the City's lighting standards to encourage the application of "Dark Skies" goals (discourage excessive and spill-over lighting).	**Consistent**. The Project would comply with the City's lighting ordinance (Section 26-570) for non-residential buildings.
Promote energy and water conservation design features in all major renovation and development projects.	**Consistent**. The Project is designed to meet current Title 24 Standards at the time of Building Permit Review. The regulation of energy efficiency for residential and non-residential structures is established by the CEC and its California Energy Code. Starting on January 1, 2020, all new single-family residential uses will be required to offset their annual electrical demand through the use of energy efficiency and solar photovoltaic panels. These new homes are expected to reduce energy use by more than 50 percent. The proposed Project would be consistent with these objective and policies.
Encourage the efficient use of water and reduce urban runoff through the use of natural drainage, drought tolerant landscaping, and efficient irrigation systems in major renovation and new development projects. Recommend the incorporation of these practices within the approval processes of other local and regional departments and jurisdictions.	**Consistent.** The Project would meet current California Green Building Standards Code (CALGreen Code) for indoor water use.
Source: City of West Covina 2011.	

As shown in Table 4-14, the Project is consistent with applicable EAP policies. The Project would be built to meet the current applicable Title 24 Energy Efficiency Standards for Nonresidential Buildings (California Code of Regulations [CCR], Title 24, Part 6) and the applicable CALGreen Code (24 CCR 11). The proposed Project would be developed in compliance with the requirements of these regulations.

The regulations, plans, and polices adopted for the purpose of reducing GHG emissions that are directly applicable to the Project include the 2019 Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings and the Title 24 California Green Building Standards Code (CALGreen) (RR ENE-1). The 2019 Title 24 Energy Efficiency Standards for residential buildings include requirements such as installation of solar photovoltaic systems, including smart inverters with optional battery storage. Additionally, residential uses are required to have updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); ventilation requirements; and lighting requirements. Under the 2019 Standards, once factoring in rooftop solar electricity generation, single family units built with the 2019 standards would use about 53 percent less energy than those built under the 2016 Title 24 standards (CEC 2018). Single family homes per CALGreen requirements include reductions in indoor and outdoor water use, diversion of construction and demolition waste, inclusion of electric vehicle charging spaces or designated spaces capable of supporting future charging stations. These codes are enforced by the City, and adherence to standard requirements for construction and operations would ensure that the Project would comply with both regulations.

Therefore, through implementation of the State regulations mentioned above, the Project would be consistent with the City's Energy Action Plan.

Overall, the Project is an infill development project. The Project's uses would result in trip reductions due to the Project site's proximity to nearby commercial uses, which are within walking distance of the Project site. Therefore, the Project would promote pedestrian activity in an area with complementary uses, which would reduce reliance on single-passenger vehicles. The proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. The impact would be less than significant, and no mitigation is required.

Regulatory Requirements

RR ENE-1, in Section 4.6, Energy, would be applicable to this topic.

Mitigation Measures

Project implementation would not result in significant impacts related to GHG emissions; therefore, no mitigation measures are required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

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

Impact Analysis

A Phase I and Limited Phase II Environmental Site Assessment (ESA) was prepared by Leighton and Associates, Inc. in 2020 and is summarized below; the report is included as Appendix E1 to this IS/MND. Additionally, a Limited Asbestos Inspection Report and Lead-Based Paint/Ceramic Tile Inspection Report was prepared for buildings at the Project site by Executive Environmental in 2018. The results of these report are summarized below. The Limited Asbestos Inspection Report and Lead-Based Paint/Ceramic Tile Inspection Report are included as appendices to this IS/MND (Appendices E2 and E3, respectively).

Would the Project:

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

Less than Significant Impact. Demolition and construction activities for the proposed Project would involve the use of chemical substances such as solvents, paints, fuel for equipment, and other potentially hazardous materials. Hazards to the environment or the public would typically occur with the transport, use, storage, or disposal of hazardous materials. Demolition and

construction activities would be relatively short-term and the transport, use, and disposal of hazardous materials as part of these activities would be temporary. The contractor would be required to comply with existing regulations for the transport, use, storage and disposal of hazardous materials to prevent public safety hazards. These regulations include the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act (RCRA), California Hazardous Waste Control Act (HWCA), and California Accidental Release Prevention Program (CalARPP), among others.

Once constructed, the proposed dwelling units would use hazardous materials (e.g., paint, pesticides, cleansers, and solvents) for maintenance activities but any use would be in limited household quantities. The dwelling units would not utilize, store, or generate hazardous materials or wastes in quantities that would pose a significant hazard to the public. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. Review of historical aerial photographs indicate the site was used as an orchard from approximately 1927 to 1960, with a road adjacent to the south of the Project site. From 1960 to the present day, the Project site has been occupied by school uses. Prior to 1927, the Project site was vacant.

The Phase I ESA did not identify the presence of previous or current hazardous materials or wastes on the site. No underground or aboveground storage tanks were observed, and no stains, corrosion, drains, sumps, pits, or wells are present on the site. The existing school uses are not occupied. Miscellaneous trash, consisting of abandoned school and office supplies and equipment, was observed in the classroom buildings, the administration building, and the cafeteria. Minor amounts of trash were observed on the exterior of the Project site. According to the Phase I ESA, this debris is not considered a recognized environmental condition (REC) associated with the Project site. Commercial and residential uses near the site do not represent a significant environmental concern due to their distances or case status. No evidence of RECs (either historical or controlled) was found on the site, and no additional assessment was recommended. The Project site is not listed as a facility that handled hazardous materials or generated hazardous wastes.

Adjacent to the site are residential land uses to the north, south, and west, and commercial uses to the north and east. Historically, the adjacent properties were agricultural land. In the mid-1950s, the adjacent properties to the northwest, west, and south were developed for residential use. In the early 1960s, the surrounding properties to the northeast, east, and southeast were developed for commercial use. These uses do not store, use, or dispose of hazardous materials in quantities that may pose hazards to the public. Surrounding properties with environmental concern were not identified in the Phase I ESA.

According to the Limited Phase II ESA, the Project site did not detect concentrations of arsenic, lead, or organochlorine pesticides (OCPs) in excess of the U.S. Environmental Protection Agency (USEPA) Residential Regional Screening Levels (RSLs) or Department of Toxic Substance Control Screening Levels (DTSC-SLs).

Because of the age of the existing uses, asbestos is likely to have been used for construction. As part of the demolition activities, asbestos-containing materials (ACM) would be disturbed and contact with these materials would pose hazards to the construction crew and other persons near the construction site. According to the Limited Asbestos Inspections Report prepared for buildings at the Project site, there are ACM within buildings at the Project site. Additionally, lead-based paint (LBP) was determined to be present within buildings at the Project site. If LBP is encountered, it may also pose hazardous to the construction crew and other persons near the construction site. Demolition, removal, and disposal of ACM and LBP are required to comply with existing regulatory requirements, including the Federal and State Occupational Safety and Health Regulations (OSHA and CalOSHA); SCAQMD Regulation X, Subpart M – National Emission Standards For Asbestos and Rule 1403 – Asbestos Emissions (see RR HAZ-2); and California Code of Regulations Title 8, Section 1532.1 – Lead and Section 1529 – Asbestos (see RR HAZ-1 and RR HAZ-3). Compliance with these regulations would be included on the contractor specifications and verified by the City's Community Development Director, or designee in conjunction with the issuance of the Demolition Permit. Compliance with RR HAZ-1 through RR HAZ-3 would ensure that no impacts pertaining to demolition would occur. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. Existing schools located within a 0.25-mile radius of the Project site include Global Academy Development (0.09 mile to the east), Traweek Middle School (0.21 mile to the west), and Workman Avenue Elementary School (0.24 mile to the southeast). Other nearby schools, further than a 0.25-mile radius, include: Rowland Avenue Elementary School (0.31 mile to the west), Covina High School (0.33 mile to the west), Grovecenter Elementary School (0.44 mile to the northwest), and Acacia Montessori School (0.59 mile to the west).

There is a potential to expose children at these nearby schools to hazardous substances through accidental releases during demolition and construction activities. However, during demolition, existing hazardous materials and wastes would be removed and disposed in accordance with pertinent regulations, including RR HAZ-1 through RR HAZ-3, as discussed above. During construction, a potential exists for the accidental release or spill of hazardous substances such as gasoline, oil, hydraulic fluid, diesel fuel, or other liquids associated with construction equipment operation and maintenance. However, use of these materials would be in limited quantities as typical during the operation and maintenance of construction equipment and would be conducted in compliance with applicable federal, State, and local regulations. Additionally, the contractor would be required to use standard construction controls and safety procedures, which would avoid and minimize the potential for accidental release or spill of such substances into the environment. With compliance with pertinent regulations (RR HAZ-1 through RR HAZ-3), the level of risk associated with the accidental release of hazardous substances during demolition and construction would be less than significant, and no mitigation is required.

Residential activities associated with occupancy of the proposed dwelling units would be similar to other residential uses surrounding the site and would not generate hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste in quantities that may impact students at schools within 0.25 mile of the site. There would be a less than significant impact, and no mitigation is required.

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

No Impact. According to the Phase I and Limited Phase II ESA and review of the California Department of Toxic Substances Control (DTSC) Hazardous Waste and Substances Site List – Site Cleanup (Cortese List) (DTSC 2020), the Project site is not included on a list of hazardous material sites compiled pursuant to California Government Code Section 65962.5. Therefore, the Project does not have the potential to create a significant hazard to the public or the environment due to presence of an existing hazardous materials site identified on the Cortese List. No impact would occur, and no mitigation is required.

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?

No Impact. The Project site is not located within two miles of an airport. The nearest public airports are the San Gabriel Valley Airport (formerly El Monte Airport), located 6.87 miles west of the Project site, and the Brackett Field Airport, located 7.26 miles east of the Project site.

West Covina is not within the San Gabriel Valley Airport Influence Area, as defined by the Los Angeles County Airport Land Use Plan (Los Angeles County ALUC 1991). Similarly, West Covina is not within the Brackett Field Airport Influence Area, as defined by the Brackett Field Airport Land Use Compatibility Plan (Los Angeles County ALUC 2015). Thus, the Project would not result in a safety hazard or excessive noise for people residing on the site, as it relates to exposure to airport or aircraft hazards in areas within an airport land use plan or within two miles of a public airport. No impact would occur, and no mitigation is required.

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

Less than Significant Impact. The City of West Covina has a Natural Hazard Mitigation Plan (NHMP) which addresses natural hazards, risks, and mitigation actions for the City. It establishes a framework for proactive local planning for natural hazard mitigation, per the federal Disaster Mitigation Act of 2000. The nearest designated disaster route to the Project site is Azusa Boulevard, which is approximately 340 feet east of the site (City of West Covina 2008). The nearest designated freeway disaster route is I-10 freeway, located 0.47-mile south of the Project site. Temporary lane closures on adjacent streets (East Rowland Avenue, East Pioneer Drive, and/or North Eileen Street) may be required during the short-term construction period in order to connect the proposed Project to the existing utility infrastructure within these roadways. However, Project construction would not involve full closure of any public roadway during construction. Implementation of traffic control measures during construction in accordance with Chapter 19, Article X, Section 19-302, Standard Specifications for Public Works Construction, of the Municipal Code, which adopts the Greenbook by reference (see RR HAZ-4), would further reduce the potential for traffic hazards and the obstruction of access to adjacent parcels.

In the long-term, the Project would provide an access driveway off North Eileen Street that would be used for emergency response to the site and for emergency evacuation of the site, in addition

to two primary ingress and egress points, located on East Rowland Avenue, on the southern boundary of the Project site. The Project would not affect emergency response or emergency evacuation of adjacent land uses. Additionally, East Rowland Avenue, East Pioneer Drive, and/or North Eileen Street are not designated evacuation corridors at the City. There would be less than significant impacts, and no mitigation is required.

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

No Impact. The Project site is located in a highly urbanized area of the City, and there are no large, undeveloped areas and/or steep slopes on or near the site that may pose wildfire hazards. The site and the surrounding areas are not located in designated Very High Fire Hazard Severity Zones (VHFHSZ), as identified by the California Department of Forestry and Fire Prevention (CalFire). Rather, the site is within a Non-VHFHSZ area. Implementation of the proposed Project would not expose people or structures directly or indirectly to a significant risk of loss or death associated wildland fires. No impact would occur, and no mitigation is required.

Regulatory Requirements

RR HAZ-1 The demolition contractor shall comply with the requirements of Title 8 of the *California Code of Regulations* (Section 1532.1-Lead) regarding the removal of lead-based paint or other materials containing lead. The regulations set exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to lead. Lead-contaminated debris and other wastes shall be removed and monitored by contractors with appropriate certifications from the California Department of Health Services and disposed of in accordance with the applicable provisions of the *California Health and Safety Code*.

RR HAZ-2 The demolition contractor shall comply with the South Coast Air Quality Management District's (SCAQMD's) Rule 1403, which provides guidelines for the proper removal and disposal of asbestos-containing materials. In accordance with Rule 1403, prior to the demolition, renovation, rehabilitation or alteration of structures that may contain asbestos, an asbestos survey shall be performed by a Certified Asbestos Consultant (certified by the California Occupational Safety and Health Administration [CalOSHA]) to identify building materials that contain asbestos. Removal of the asbestos shall then include prior notification of the SCAQMD and compliance with removal procedures and time schedules; asbestos handling and clean-up procedures; and storage, disposal, and landfilling requirements under Rule 1403.

RR HAZ-3 The demolition contractor shall comply with the *California Health and Safety Code* (Section 39650 et seq.) and the *California Code of Regulations* (Title 8, Section 1529), which prohibit emissions of asbestos from asbestos-related demolition or construction activities; require medical examinations and monitoring of employees engaged in activities that could disturb asbestos; specify precautions and safe work practices that must be followed to minimize the potential for the release of asbestos fibers; and require notice to federal and local government agencies prior to beginning renovation or demolition that could disturb asbestos.

RR HAZ-4 All construction on public rights-of-way shall include the implementation of traffic control measures in accordance with the West Covina Municipal Code Chapter 12.20, Street Excavation, and Chapter 19, Article X, Section 19-302, Standard Specifications for Public Works Construction, which adopts the Greenbook by reference.

Mitigation Measures

Project implementation would not result in significant impacts related to hazards and hazardous materials; therefore, no mitigation measures are required.

4.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Impact Analysis

A Preliminary Hydrology Study (Hydrology Study) was prepared by DKP Engineering, Inc. in May 2020 for the Project. The Hydrology Study is summarized below, and the report is included as Appendix F to this IS/MND.

The City of West Covina is underlain by the San Gabriel Valley Groundwater Basin, which consists of water-bearing sediments that underlie most of the San Gabriel Valley and a portion of the upper Santa Ana Valley. Concerns about the sustainability of groundwater supply in the basin led to the adjudication of water rights and the establishment of a Main San Gabriel Basin Watermaster in 1973. The Basin Watermaster currently estimates the amount of water in storage at 7.45 million acre-feet and has attributed recent declines compared to historic levels to the effects of the current drought. Approximately 80 percent of West Covina's potable water is from the local groundwater basin, which is supplied by several water agencies. The basin contains several contaminant plumes including nitrates, volatile organic compounds, and perchlorate from past industrial processes. Cleanup of these contaminants continues today. Despite their presence, the overall groundwater quality of the basin for potable use is high (City of West Covina 2016b).

Would the Project:

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

Less than Significant Impact. Implementation of the Project would involve demolition of the existing school and administrative buildings, surface parking lots, and associated site improvements, in addition to construction of the proposed dwelling units and site improvements. Therefore, the Project has the potential to result in short-term construction impacts to surface water quality from demolition, grading, and construction-related activities. Storm water runoff from the construction site would contain loose soils, organic matter, and sediments. Spills or leaks from heavy equipment and machinery, such as fuel, oil and grease, and heavy metals, could also enter the runoff. Building construction would involve the use of hazardous materials (e.g., paints, solvents, cleansers) that, if not properly handled, may enter the stormwater runoff.

The Clean Water Act (CWA) establishes a framework for regulating potential water quality impacts from construction activities, as well as new development and major redevelopment, through the National Pollutant Discharge Elimination System (NPDES) program. Construction activities that disturb one acre or more of land are required to obtain an NPDES permit or coverage under the NPDES Construction General Permit. This is accomplished by completing and filing Permit Registration Documents (PRD) (including a Notice of Intent, a Storm Water Pollution Prevention Plan [SWPPP], an annual fee, and a signed certification) with the State Water Resources Control Board (SWRCB) prior to start of construction activities. The Best Management Programs (BMPs) in the SWPPP are implemented during construction to reduce storm water pollutants to the maximum extent practicable. Coverage under the NPDES Construction General Permit and implementation of the Project's SWPPP (see RR HYD-1) would ensure that short-term, construction-related water quality impacts would be less than significant. No mitigation is required.

Stormwater pollutants that would be generated by the Project in the long-term include sediment, trash and debris, oil and grease, bacterial indicators, nutrients, and pesticides that would come from landscaped areas, drive aisles, parking areas, and outdoor residential activities. In accordance with the NPDES program and Section 9.36, Control of Pollutants from New Developments/Redevelopment Projects, of the West Covina Municipal Code, the Project Applicant would be required to prepare and implement a standard urban stormwater mitigation plan (SUSMP) (RR HYD-2). The City would review and approve the SUSMP prior to construction and operation of the Project. The SUSMP would include low impact development, structural and non-structural BMPs and source control BMPs. Compliance with RR HYD-1 and RR HYD-2 would reduce the risk of water degradation from soil erosion and other pollutants related to construction activities, and potential violations of water quality standards would be minimized through required BMPs. Therefore, the Project would not violate water quality standards or waste discharge requirements. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. The Project would not involve direct or indirect withdrawals of groundwater. Domestic water service would be provided by the Suburban Water Systems, as described in Section 4.19, Utilities and Service Systems. Also, the Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Most of the Project site is currently covered in impervious surfaces (53 percent), and Project implementation would also result in an increase of impervious surfaces, to 80 percent coverage. Therefore, there would be minimal change in groundwater recharge, impacts would be less than significant, and no mitigation is required.

c) Substantially alter the existing drainage pattern of the site or area, including 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;

Less than Significant Impact. As indicated in Response 4.7b, Geology and Soils, the Project would be required to obtain a NPDES permit for construction activities or coverage under the NPDES Construction General Permit. The Construction General Permit requires preparation of a SWPPP and implementation of erosion control, sediment control, tracking, waste management, and construction site maintenance BMPs to reduce the potential for soil and wind erosion during construction activities (see RR HYD-1). Further, the proposed Project must comply with the City's grading ordinance, which requires preparation of an erosion and sediment control plan for City approval prior to issuance of a grading permit (see RR GEO-2). With compliance with these regulations, construction-related erosion would be less than significant, and no mitigation is required.

There would be minimal areas of exposed soils following completion of the proposed Project where erosion could occur. Site improvements and landscaping would also prevent long-term erosion (RR HYD-2). Therefore, operation-related erosion would be less than significant, and no mitigation is required.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less than Significant Impact. Currently, 53 percent of the Project site is covered with impervious surfaces, which would increase to 80 percent with implementation of the proposed Project. Off-site improvements would include storm drain improvements, parkway improvements, and utility connections (water, sewer, electricity, natural gas, and telecommunication lines). Exhibit 3-8 shows the Conceptual Utility Plan. A private storm drain system, which would be located within the main drive aisles would convey the sites stormwater runoff to an underground detention system in the guest parking lot adjacent to East Rowland

Avenue. Stormwater would infiltrate, be detained, and meter the runoff onto East Rowland Avenue to match historical drainage patterns and volumes at the Project site. In addition, stormwater from North Eileen Avenue would be intercepted and re-routed through the onsite storm drain system. This would allow for abandonment of the existing storm drain swale and easement along the westerly boundary of the site, and improved drainage for the area. These encroachments would occur in compliance with City regulations. Any right-of-way dedication and public infrastructure improvements would also be done in accordance with the City's municipal code. The proposed changes resulting from the Project site would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or offsite. Impacts would be less than significant, and no mitigation is required.

iv) impede or redirect flood flows?

Less than Significant Impact. FEMA designates most of West Covina as Zone X, which is an area subject to flooding from the 500-year flood (0.2 percent annual chance of flooding) (FEMA 2020). Off-site improvements would include storm drain improvements, parkway improvements, and utility connections (water, sewer, electricity, natural gas, and telecommunication lines). A private storm drain system, which would be located within the main drive aisles would convey the site's stormwater runoff to an underground detention system in the guest parking lot adjacent to East Rowland Avenue. Stormwater would infiltrate, be detained, and meter the runoff onto East Rowland Avenue to match historical drainage patterns and volumes at the Project site. In addition, stormwater from North Eileen Avenue would be intercepted and re-routed through the onsite storm drain system.

Implementation of temporary and permanent erosion control BMPs in the Project's SWPPP and SUSMP (see RR HYD-1 and RR HYD-2) would ensure that substantial erosion or siltation would not occur on- or off-site during short-term construction and long-term occupancy of the dwelling units. Thus, the Project would not result in erosion or siltation that would alter the drainage pattern of the area. Project impacts would be less than significant, and no mitigation is required.

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

No Impact. A seiche is the resonant oscillation of a body of water caused by earthquake shaking (waves). Seiche hazards exist where groundshaking causes water to splash out of the body of water and inundate nearby areas and structures. The site is not located near a large body of water that may be subject to seiche. Additionally, tsunamis are seismic sea waves generated by undersea earthquakes or landslides. The City of West Covina is not located along the coast, and the Project site is approximately 26.2 miles from the Pacific Ocean. Further, the Project site is relatively flat. There are no hillside areas on site or in the surrounding area that could generate mudflow. As a result, no impacts related to seiche, tsunami, or mudflow would occur, and no mitigation is required.

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

Less than Significant Impact. As discussed above in Response 4.10a, the Project would comply with applicable water quality regulations for short-term and long-term impacts. Specifically, the Project would have coverage under the NPDES Construction General Permit and implementation

of the Project's SWPPP (see RR HYD-1) would ensure that short-term, construction-related water quality impacts would be less than significant. For long-term water quality impacts, in accordance with the NPDES program and Section 9.36, Control of Pollutants from New Developments/Redevelopment Projects, of the West Covina Municipal Code, the Project would be constructed and operated in accordance with the standard urban stormwater mitigation plan (SUSMP), prepared for the Project and approved by the City (see RR HYD-2). Thus, with implementation of permanent BMPs in the SUSMP, the Project site would generate less stormwater pollutants than under existing conditions.

As indicated above in response to Threshold 4.10a, there are no groundwater wells on the Project site and no wells are proposed as part of the Project. The proposed Project would not involve direct withdrawals of groundwater, nor would it interfere with groundwater recharge such that it would result in a net deficit in aquifer volume or lowering of the local groundwater table levels. Excavation activities would not extend into the underlying groundwater, which has a historical high depth to groundwater at approximately 100 to 150 feet bgs at the Project site (Leighton and Associates 2020a). Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts are less than significant, and no mitigation is required.

Regulatory Requirements

RR HYD-1 Prior to demolition and construction activities on the site, the Contractor shall prepare and file a Permit Registration Document (PRD) with the State Water Resources Control Board in order to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002) or the latest approved Construction General Permit. The PRD shall consist of a Notice of Intent (NOI); a Risk Assessment; a Site Map; a Storm Water Pollution Prevention Plan (SWPPP); an annual fee; and a signed certification statement. Pursuant to permit requirements, the Project Applicant/Developer shall implement the Best Management Practices (BMPs) in the SWPPP to reduce or eliminate construction-related pollutants in site runoff. The BMPs shall be implemented during all demolition and construction activities on the site.

RR HYD-2 In accordance with Section 9.36, Control of Pollutants from New Developments/Redevelopment Projects, of the West Covina Municipal Code, the Project shall be constructed and operated in accordance with the standard urban stormwater mitigation plan (SUSMP) prepared for the Project and approved by the City.

Mitigation Measures

Project implementation would not result in significant impacts related to hydrology and water quality; therefore, no mitigation measures are required.

4.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Impact Analysis

Would the Project:

a) Physically divide an established community?

No Impact. The Project site is currently developed with a school use that consists of administrative buildings, recreational areas, and associated surface parking areas and site improvements. No residential uses currently occur on the site that would be impacted or divided by development of the proposed Project.

The Project site is surrounded by single family residential uses to the north and west and existing commercial uses are located immediately to the north, east, and south of the Project site. The proposed Project would be compatible with the adjacent residential communities. Therefore, the Project would not divide or disrupt the physical arrangement of the existing adjacent residential neighborhoods and would serve as an extension of existing residential area. No impact would on occur on an established community, and no mitigation is required.

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

Less than Significant Impact. With respect to regional planning, SCAG is the metropolitan planning organization (MPO) for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial counties. As the designated MPO, the federal government mandates SCAG to prepare plans for growth management, transportation, air quality, and hazardous waste management. In addition, SCAG reviews projects of regional significance for consistency with the existing regional plans. SCAG's regional planning programs, including the Regional Comprehensive Plan (RCP), Regional Housing Needs Assessment (RHNA), and RTP/SCS, are not directly applicable to the proposed Project because the Project is not of Statewide, regional or area-wide significance, as defined by Section 15206 of the CEQA Guidelines. However, the Project would contribute to new housing development in the City of West Covina, and thus contributes to the City's RHNA housing goal of 831 new dwelling units between 2014 and 2021 (SCAG 2012). Local plans and programs relevant to the Project and the consistency of the proposed Project with these plans and programs are discussed below.

Walnut Grove Specific Plan

The site is currently zoned Residential Single-Family (R-1) and would require a zone change to Specific Plan. The Walnut Grove Specific Plan has been developed as both a regulatory and a land use policy document, which, upon adoption by ordinance, would constitute the zoning for the Project site. The proposed Zone Change would make the Project consistent with the Zoning Code.

The Project would require a Zone Change and Specific Plan Adoption to include the parcel that comprises the 9.14-acre Project site, as described in Section 3.0, Project Description. Per California Government Code Section 65454, Specific Plans, the proposed Walnut Grove Specific Plan must be consistent with the City of West Covina's General Plan. The Governor's Office of Planning and Research (OPR) defines consistency with a General Plan as "a program or project that will further the objective and policies of the General Plan." The Walnut Grove Specific Plan area has an existing General Plan Land Use designation of Civic: Schools. Adoption of the Zone Change and Specific Plan would require a concurrent adoption of a General Plan Land Use Amendment to a "Neighborhood Medium" land use designation, which would allow densities between 9 and 20 dwelling units per acre. The Specific Plan would have a density of 16.7 dwelling units per acre. Upon this land use amendment, the Specific Plan would be consistent with the General Plan and its relevant goals and objectives.

City of West Covina General Plan

The City of West Covina General Plan, PlanWC, was adopted by City Council in December 2016 (City of West Covina 2016a). PlanWC is organized into the following elements: (1) Our Natural Community (Conservation/Open Space), (2) Our Prosperous Community (Economic Development), (3) Our Well Planned Community (Land Use/Design, Housing, Parks and Recreation), (4) Our Accessible Community (Circulation), (5) Our Resilient Community (Land Use), (6) Our Healthy and Safe Community (Public Health, Safety, Noise, and Land Use), (7) Our Active Community (Land Use, Open Space, Parks and Recreation), and (8) Our Creative Community (Culture). The housing element (2014-2021 Housing Element) was adopted under a separate cover on October 1, 2013 and was amended on December 20, 2016 (City of West Covina 2016c). Each element contains the City's goals and policies related to that element. An analysis of how the Project is applicable to each element is described below. Additionally, an evaluation of the Project's consistency with applicable goals and policies is provided in Table 4-15, Proposed Project General Plan Consistency Analysis.

TABLE 4-15
PROPOSED PROJECT GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goal/Policy/Action		Consistency Analysis
Goal—Our Natural Community		
Air—Policy 1.3	Minimize the adverse impacts of growth and development on air quality and climate.	**Consistent**. As discussed in Section 4.3, Air Quality, and 4.8, Greenhouse Gas Emissions, the Project's emissions would be less than the SCAQMD's thresholds for air quality and GHG emissions. Through compliance with RR AQ-1, for fugitive dust control, RR AQ-2, for nuisance emissions, and RR ENE-1, Title 24 Energy Efficiency Standards, the Project would minimize adverse impacts of the Project on air quality and climate.
Water—Policy 1.5	Where appropriate, new development shall minimize impervious area, minimize runoff and pollution, and incorporate best management practices.	**Consistent**. As discussed in Section 4.10, Hydrology and Water Quality, the Project would minimize runoff and pollution of water through the preparation of a SWPPP and implementation of erosion control, sediment control, tracking, waste management, and construction site maintenance BMPs to reduce the potential for soil and wind erosion during construction activities (see RR HYD-1, in Section 4.10). Therefore, the Project would be consistent with this Policy.
Access to Nature—Policy 1.9	During the review of public and private development projects, analyze potential impacts to views of natural areas from public streets, parks, trails, and community facilities.	**Consistent**. As discussed in Section 4.1, Aesthetics, of this IS/MND, potential impacts to natural views, including views of the Los Angeles National Forest and San Gabriel Mountains are analyzed from public areas surrounding the Project site. Impacts to public views would be less than significant.
Goal—Our Prosperous Community		
Policy 2.6	Create a diversity of housing options.	**Consistent**. The Project would provide a diversity of housing options, including single family detached units and multi-family attached townhome units.
Goal—Our Well Planned Community		
Policy 3.3	New growth will complete, enhance, and reinforce the form and character of the unique West Covina neighborhoods, districts, and corridors.	**Consistent**. The Project would provide new residential development to complete, enhance, and reinforce the surrounding neighborhood residential community adjacent to the Project site. The residences would be compatible with the surrounding neighborhood.
Policy 3.6	Reduce West Covina's production of greenhouse gas emissions and contribution to climate change, and adapt to the effects of climate change.	**Consistent**. As discussed in Section 4.8, Greenhouse Gas Emissions, the Project's emissions would be less than the SCAQMD's recommended thresholds GHG emissions. Through compliance with RR ENE-1, Title 24 Energy Efficiency Standards, the Project would minimize GHG emissions. The Project's proposed single-family uses are required to offset annual electrical demand through the use of energy efficiency and solar photovoltaic panels. These single-family units are expected to reduce energy use by more than 50 percent. This reduction of energy use would consequently reduce GHG emissions, thereby reducing West Covina's contribution to climate change. Additionally, the Project would reduce vehicle miles traveled (VMT) by providing residential uses adjacent to commercial uses, thereby reducing GHG emissions from mobile emissions.
Action 3.6	Key land use adaptation strategies to reduce greenhouse gas emissions are: Promoting transit-oriented infill development and Providing incentives for high-performance buildings and infrastructure.	
Goal—Our Accessible Community		
Policy 4.8	Implement "green" streetscape elements for purposes of beautification, carbon reduction and stormwater runoff management.	**Consistent**. The Project would implement landscaping along the streetscape of East Rowland Avenue. Tree and shrub planting would be designed to complement and blend the Walnut Grove frontage with adjacent properties.

TABLE 4-15
PROPOSED PROJECT GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goal/Policy/Action		Consistency Analysis
Goal—Our Resilient Community		
Energy—Policy 5.6	Continue existing beneficial energy conservation programs, including adhering to the California Energy Code in new construction & major renovations.	**Consistent**. The Project would comply with RR ENE-1, which is Title 24 of the California Energy Commission (CEC) code. The 2019 Title 24 Energy Efficiency Standards for residential buildings include requirements such as installation of solar photovoltaic systems, including smart inverters with optional battery storage. Additionally, residential uses are required to have updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); ventilation requirements; and lighting requirements.
Goal—Our Healthy and Safe Community		
Active Living—Policy 6.2	New and renovated buildings should be designed and constructed to improve the health of the residents, workers, and visitors.	**Consistent**. As stated above, the Project would comply with RR ENE-1. Under the 2019 Title 24 Energy Efficiency Standards, residential uses are required to have updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); ventilation requirements; and lighting requirements. Adherence with RR ENE-1 would ensure consistency with this policy.
Active Living—Policy 6.5	Seek to increase its amounts of parks and trails to support physical activity and reduce the incidence of chronic illness.	**Consistent**. The Project would establish a primary recreation area within the Project site as well as several internal paseo walkways, creating equal access to open space for residents.
Natural Hazard—Action 6.15a	Require all development to comply with the provisions of the latest California Building Code, including provisions related to design and engineering to mitigate potential impacts from seismic events, fires, and other hazards.	**Consistent**. The Project would comply with the provisions of the latest adopted California Building Code. Impacts from seismic fires, and other hazards are analyzed within this IS/MND. All impacts would be less than significant for the Project.
Noise—Policy 6.23	Ensure that new development is not exposed to excessive noise.	**Consistent**. The Project would have less than significant impacts associated with noise, as detailed in Section 4.13, Noise. Exterior noise levels would be reduced to the "normally acceptable" range in the City's land use/noise compatibility matrix, as demonstrated in Table 4-17 of Section 4.13.
Noise—Action 6.23a!	Require new developments to reduce exterior noise levels for any usable outdoor area to the "normally acceptable" range in the City's land use/noise compatibility matrix, shown in Table 6.4 of this Noise Element.	
Noise—Action 6.23c	Require any residential component of all new buildings to comply with the requirements of the residential noise insulations standards of the most recent edition of California's building code.	**Consistent**. The Project would be required to comply with residential noise insulation standards of the California Building Code (RR NOI-1).
Noise—Policy 6.24	Ensure that new development does not expose surrounding land uses to excessive noise.	**Consistent**. As detailed in Section 4.13, the Project would not subject surrounding land uses to excessive noise. Construction and operational noise was analyzed for the Project. Generation of

TABLE 4-15
PROPOSED PROJECT GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goal/Policy/Action		Consistency Analysis
Noise—Action 6.24	Through the environmental review process, require applicants for new development proposals to analyze potential noise impacts on nearby noise-sensitive receivers before project approval. As feasible, require appropriate noise mitigation to address any identified significant noise impacts.	temporary or permanent increases in ambient noise levels would be less than significant with implementation of MM NOI-1. MM NOI-2 would reduce vibration impacts to less than significant.
Noise—Policy 6.25	Minimize noise conflicts between local noise generators and sensitive receivers.	**Consistent**. As described in Section 4.13, Noise, the Project would have less than significant impacts for generation of noise in excess of noise standards. Sensitive receptors to the north and west of the site would not be subject to significant noise or vibration impacts. Additionally, the Project is subject to the City's noise ordinance, and would be comply with its requirements, per RR NOI-2.
Noise—Action 6.25a	Continue to enforce the City's existing Noise Ordinance.	
Goal—Our Creative Community		
Celebrate and Promote West Covina's Cultural Assets—Policy 7.7	Assess, avoid, and mitigate potential impacts to archeological, paleontological, and tribal resources through the CEQA review process for development projects carried out within the City. Comply with existing regulations relating to Native American resources, including California Environmental Quality Act Section 15064.5(d) and (e) and Public Resources Code §5097.98 concerning burial grounds, and Assembly Bill 52 and Senate Bill 18 for consultation with Native American tribes for development projects carried out within the City.	**Consistent**. The Project is subject to the CEQA process. Through this IS/MND, potential impacts to archeological, paleontological, and tribal resources are mitigated to less than significant impacts, as described in Sections 4.5, 4.7, and 4.18, respectively. The Project would be subject to existing regulations, including CEQA Section 15064.5(d) and (e) and Public Resources Code §5097.98 concerning burial grounds, and Assembly Bill 52 and Senate Bill 18 for consultation with Native American tribes for development projects carried out within the City. The Project's impacts to these resources would be less than significant with implementation of MM CUL-1, MM GEO-2, and MM TCR-1.
Celebrate and Promote West Covina's Cultural Assets—Action 7.7	Require development to avoid archaeological and paleontological resources, whenever possible. If complete avoidance is not possible, require development to minimize and fully mitigate the impacts to the resources. Notify California Native American tribes and organizations of proposed projects that have the potential to adversely impact cultural resources.	
Goals—Our Active Community		
Walk or Bike to Parks—Policy 8.4	Small and frequent open spaces should be dispersed throughout the neighborhood.	**Consistent**. The Project would establish a primary recreation area within the Project site as well as several internal paseo walkways, creating equal access to open space for residents.
Walk or Bike to Parks—Action 8.4	Develop new neighborhood parks, pocket parks, and community gardens as feasible and appropriate to meet citizen needs and require them in new development.	

TABLE 4-15
PROPOSED PROJECT GENERAL PLAN CONSISTENCY ANALYSIS

General Plan Goal/Policy/Action		Consistency Analysis
Housing Element		
Goal 2	Provide a variety of housing types to accommodate all economic segments of the City	**Consistent**. The intent of this goal is to assist in the provision of adequate housing to meet the needs of the community, including the needs of both renter and owner households. The Project implements this goal by providing a mixture of single family detached and attached homes in a well-designed community. Development is compatible with the surrounding neighborhoods and provides housing opportunities at different income levels.
Goal 4	Promote equal housing opportunity for all residents	**Consistent**. The Project would be consistent with this goal by allowing anyone, regardless of sex, age, race, marital status, ethnic background, handicap, source of income, or any other characteristic to live within the community.
Policy 4.1	Continue to enforce fair housing laws prohibiting discrimination in the building, financing, selling, or renting of housing on the basis of race, ethnicity, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.	
Goal 5	Identify adequate sites to achieve housing variety	**Consistent**. The Project would be consistent with this goal by creating detached single family residential and attached townhouse housing options through infill development on an underutilized parcel.
Policy 5.1	Provide for a range of residential development types in West Covina, including low density single-family homes, moderate density townhomes, higher density multi-family units, and residential/commercial mixed use in order to address the City's share of regional housing needs.	
Source: City of West Covina 2016a, City of West Covina 2016c.		

As demonstrated in Table 4-15, the Project would be consistent with the General Plan's applicable goals, policies, and actions. Adoption of the Walnut Grove Specific Plan, as part of the Project, would require a concurrent adoption of a General Plan Land Use Amendment to a "Neighborhood Medium" land use designation. This would allow between 9 and 20 dwelling units per acre. Upon amendment, the Project would be consistent with the General Plan. The Project would provide residential uses adjacent to the existing single-family residences and provides an infill development that would revitalize the underutilized site. Therefore, in light of the above, there would be no conflict with the goals and policies of the General Plan or the land use designation for the site.

West Covina Zoning Code

The West Covina Zoning Code is the primary tool for implementing the General Plan. The Zoning Code provides development standards (i.e., setbacks, building height, site coverage, parking, and sign requirements) for development in all areas of the City. In addition, the Zoning Code includes a Zoning Map that identifies the zoning of individual parcels, with corresponding permitted, conditionally permitted, and prohibited land uses.

The Project site is currently zoned Residential Single-Family (R-1). Thus, as part of the Project, a Zone Change is needed from R-1 to Specific Plan (SP). With the Zone Change, the site zoning would be consistent with the zoning of the site.

The Walnut Grove Specific Plan has been developed as both a regulatory and land use policy document. Upon adoption by ordinance, the Walnut Grove Specific Plan would constitute the zoning for the Project site. As part of the approval and adoption of the Walnut Grove Specific Plan, development plans or agreements, tract or parcel maps, site plans, and any other actions requiring ministerial or discretionary approval of the Project site must be consistent with the Specific Plan. With the proposed Zone Change, the Project would not conflict with any local land use plan, policy, or regulation.

In light of the above analysis, the Project would not cause a significant environmental impact, as the Project would not conflict with any land use plan, policy, or regulation, including the City's General Plan and Zoning. Impacts would be less than significant, and no mitigation is required.

Regulatory Requirements

None required.

Mitigation Measures

Project implementation would not result in significant impacts related to land use and planning; therefore, no mitigation measures are required.

4.12 MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Impact Analysis

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?

No Impact. The California Geological Survey (CGS) designates Mineral Resources Zones (MRZs) according to the presence of or potential for underlying mineral resources. MRZ-1 is an area with no significant mineral deposits; MRZ-2 is an area with significant mineral deposits; and MRZ-3 is an area containing known mineral resources of undetermined significance. The Project site is not located within an MRZ (DOC 2010). There are no areas within the City of West Covina containing known mineral resources appropriate for mineral extraction. Thus, there would be no loss of availability of known mineral resources or of locally important mineral resource recovery sites (City of West Covina 2016a).

There are no past or ongoing oil or gas drilling activities on or near the site. Review of the California Division of Oil, Gas, and Geothermal Resources' (DOGGR's) Well Finder shows no oil or gas wells are located on the Project site or in the vicinity of the site. The nearest well is a dry, plugged hole approximately 2.6 miles south of the site (DOGGR 2020). Therefore, redevelopment of the site with residential uses would not result in the loss or availability of regional mineral resources. In addition, there are no mining activities on or near the site. Thus, the Project would not result in the loss or availability of locally-important mineral resources. No impacts would occur, and no mitigation is required.

Regulatory Requirements

None required.

Mitigation Measures

Project implementation would not result in significant impacts related to mineral resources; therefore, no mitigation is required.

4.13 NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Impact Analysis

Several rating scales (or noise "metrics") are used to analyze the effects of noise on a community. These scales include the equivalent noise level (Leq) and the community noise equivalent level (CNEL). Average noise levels over a period of minutes or hours are usually expressed as A-weighted decibels (dBA) Leq, which is the equivalent noise level for that period of time. The period of time averaging may be specified where Leq(3) would be a 3-hour average. When no period is specified, a 1-hour average is assumed. Noise of short duration (i.e., substantially less than the averaging period) is averaged into ambient noise during the period of interest. Thus, a loud noise lasting several seconds or a few minutes may have minimal effect on the measured sound level averaged over a one-hour period.

To evaluate community noise impacts, CNEL was developed to account for human sensitivity to evening and nighttime noise. CNEL separates a 24-hour day into three periods: daytime (7:00 AM to 7:00 PM), evening (7:00 PM to 10:00 PM), and nighttime (10:00 PM to 7:00 AM). The evening sound levels are assigned a 5-dBA penalty, and the nighttime sound levels are assigned a 10-dBA penalty prior to averaging them with daytime hourly sound levels.

Several statistical descriptors are also often used to describe noise, including Lmax and Lmin, which are the highest and lowest A-weighted sound levels that occur during a noise event, respectively.

Vibration amplitudes are commonly expressed in peak particle velocity (ppv) or root-mean square (RMS) vibration velocity. Ppv is defined as the maximum instantaneous positive or negative peak of a vibration signal. Ppv and RMS vibration velocity are normally described in inches per second. Similar to airborne sound, vibration velocity can be expressed in decibel notation as vibration decibels (VdB).

Existing Conditions

To evaluate the existing noise environment, noise level measurements were collected at 4 locations on July 27th and 28th of 2020. Long-term measurements were collected for 24-hours along the eastern Project boundary (North Azusa Avenue and parking lot) and southern Project boundary (East Rowland Avenue), as well as 20-minute short-term measurements for the western and northern Project boundaries where noise levels are not substantial. The energy average (L_{eq}), maximum noise level (L_{max}), and minimum noise level (L_{min}) values were taken at each ambient noise measurement location, as shown in Table 4-16, below. The complete noise monitoring results are included in Appendix G.

TABLE 4-16
SUMMARY OF SHORT-TERM AMBIENT NOISE LEVEL MEASUREMENTS

Measurement Number	Location	Time	Noise Levels (dBA)			Primary Noise Source
			L_{eq}	L_{max}	L_{min}	
1	Northern Project Boundary	12:56 – 1:17 pm	50.5	61.3	46.7	Background traffic and parking lot activities
2	Western Project Boundary	1:23 – 1:46 pm	45.7	53.2	42.4	Background traffic

dBA: A-weighted decibels; L_{eq}: equivalent noise level; L_{max}: maximum noise level; L_{min}: minimum noise level.
See Appendix G for Noise data.

As shown in Table 4-16, the average daytime noise levels near the site range from approximately 46 to 51 dBA L_{eq}. Noise levels are considered low at these measurement locations and primarily attributable to distant traffic noise. Noise levels at the northern and western property boundaries are substantially below the noise compatibility standards for residential uses.

Noise monitoring locations along the southern and eastern Project boundary lines were measured for 24-hours due to the higher noise exposure caused by North Azusa Avenue and East Rowland Avenue. As shown on Exhibit 4-3, Hourly Noise Levels at Southern Project Boundary, average noise levels in the study area range from 53 to 70 dBA L_{eq}. The 24-hour weighted noise level at this location is 70 dBA CNEL. The measured noise levels are considered by the City as "Conditionally Acceptable" which requires that "new construction or development should be undertaken after an 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" (City of West Covina 2016a).

EXHIBIT 4-3
HOURLY NOISE LEVELS AT THE SOUTHERN PROJECT BOUNDARY ALONG EAST ROWLAND AVENUE

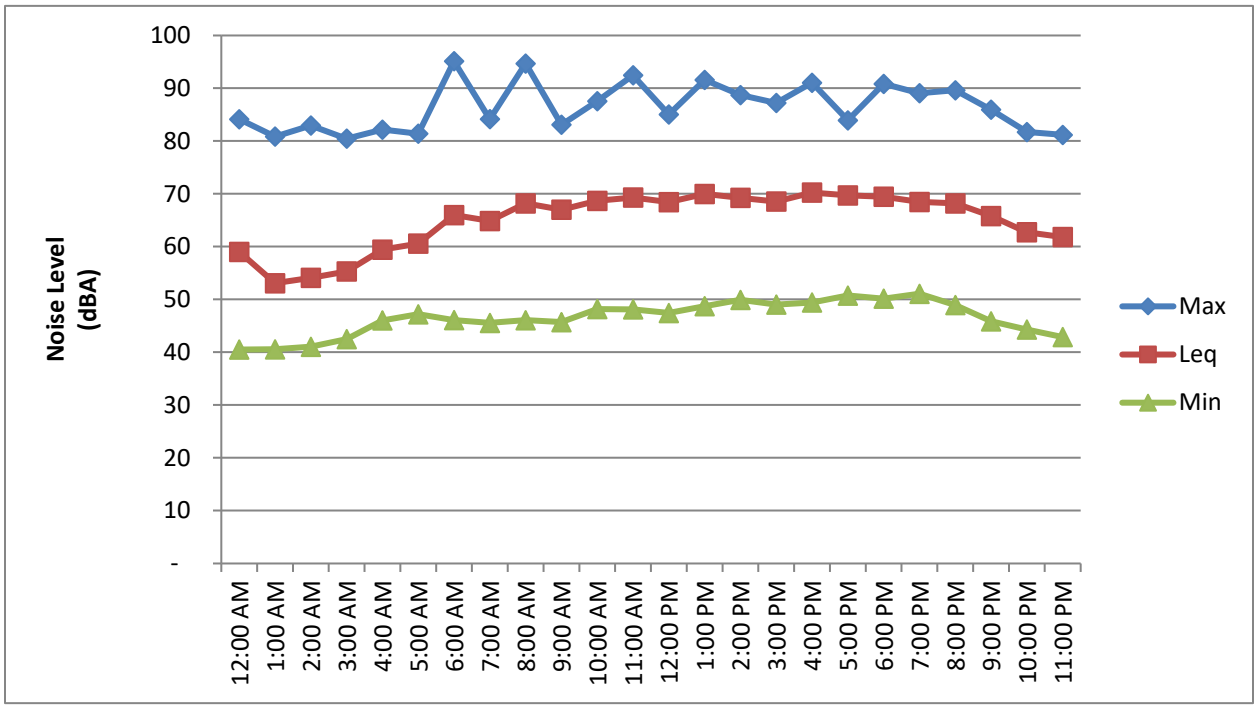
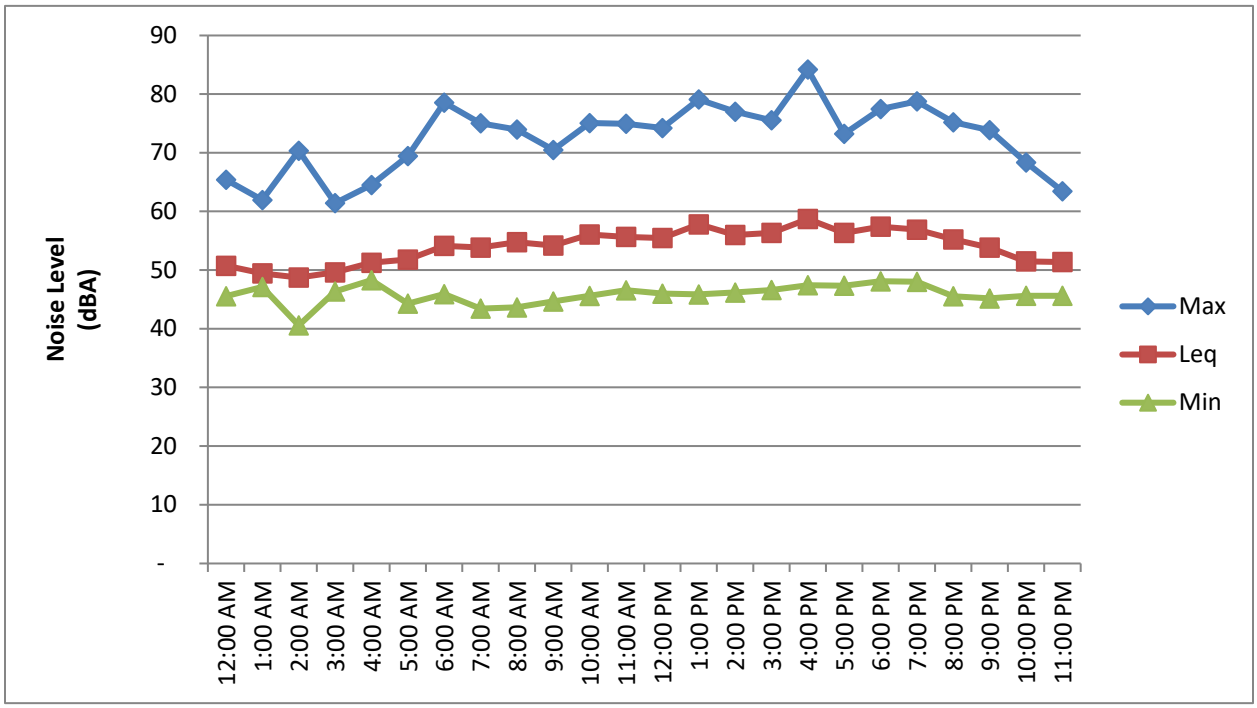


Exhibit 4-4, shown below, provides the 24-hour measurements conducted at the eastern Project property line adjacent to existing parking lot uses. Hourly Noise Levels at Noise Monitoring along East Grove Avenue had average daytime noise levels, which range from 49 to 59 dBA L_{eq}. The 24-hour weighted noise level at this location is 59 dBA CNEL. Noise levels at this location are within the City's noise exposure criteria of "Normally Acceptable" for residential uses (City of West Covina 2016a).

EXHIBIT 4-4
HOURLY NOISE LEVELS AT THE EASTERN PROJECT BOUNDARY
PROXIMATE TO PARKING LOT ACTIVITIES



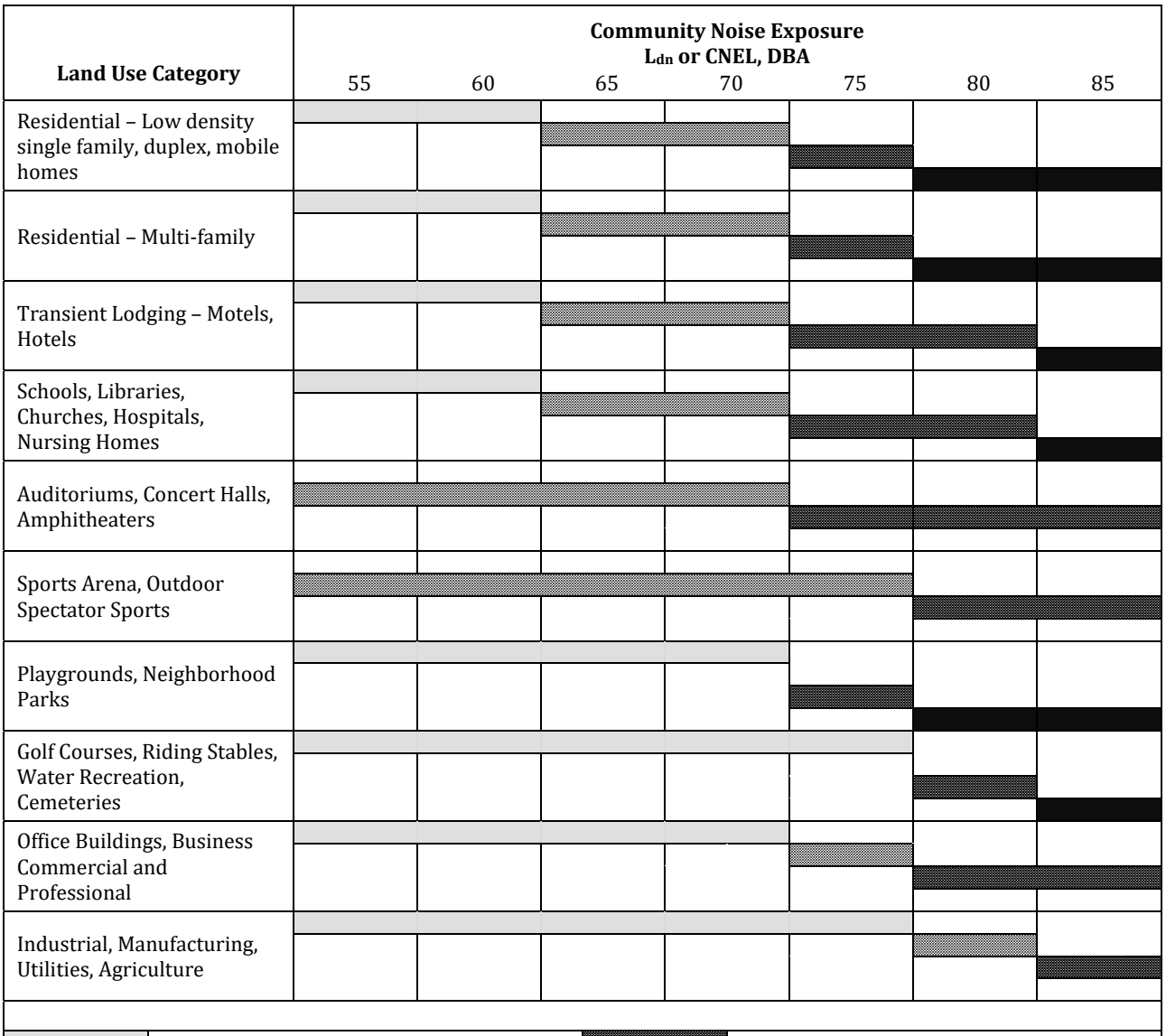
Sensitive Receptors

Noise-sensitive receptors are generally considered to be humans who are engaged in activities that may be subject to the stress of significant interference from noise. These would include residents within the Project site that may be sleeping, resting, or involved in other activities that are not conducive to loud noise.

City of West Covina General Plan

The City of West Covina is affected by several different sources of noise, including automobile traffic, commercial activity, and periodic nuisances such as construction, loud parties, and other events. The Noise Element of the City's General Plan (PlanWC) is intended to identify these sources and provide objectives and policies that ensure that noise from these sources does not create an unacceptable noise environment (City of West Covina 2016a). Consistency with the applicable noise-related Policies and Actions of the General Plan are demonstrated in Table 4-15 of Section 4.11, Land Use and Planning. The section of the PlanWC entitled "Our Healthy and Safe Community", Sub-Section E, comprises the City's "Noise Element" and contains guidelines for noise compatible land uses for long-term operations as shown in Table 4-17, General Plan Land Use/Noise Computability Matrix.

TABLE 4-17
GENERAL PLAN LAND USE/NOISE COMPATIBILITY MATRIX



Source: City of West Covina 2016a.

City of West Covina Development Code

The City Municipal Code (Chapter 15, Article IV, Noise Regulations) is the City's Noise Ordinance. It is the City's policy "…in the exercise of its police power, to regulate and control annoying noise levels from all sources. At certain levels noises are detrimental to the health and welfare of the citizenry and in the public interest shall be systematically proscribed." The following sections of the Noise Ordinance are applicable to the proposed Project:

Sec. 15-85 – Loud, unnecessary noise prohibited generally.

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

Sec. 15-94 – Radios, television sets, and similar devices.

Between the hours of 10:00 p.m. on one day and 7:00 a.m. of the following day, it shall be unlawful for any person within any residential zone of the city to use or operate any radio receiving set, musical instrument, phonograph, television set, or other machine or device for the producing or reproducing of sound or any device by which voice, music, or any other sound is amplified, in such a manner as to create any noise which causes the noise level at the property line of any property (or if a condominium or apartment house, within any adjoining unit or apartment), building, structure or vehicle to be plainly audible at a distance of fifty (50) feet therefrom.

Sec. 15-95 – Construction and building projects.

(a) Regulation. Between the hours of 8:00 p.m. of one day and 7:00 a.m. of the next day, it shall be unlawful for any person within a residential zone, or within a radius of five hundred (500) feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, steam shovel, pneumatic hammer, derrick, steam or electric hoist, or other construction type device in such manner as to create any noise which causes the noise level at the property line to exceed the ambient noise level by more than five (5) decibels unless a permit therefore has been duly obtained in accordance with paragraph (b) of this section. No permit shall be required to perform emergency work as defined in section 15-83 of this article.

(b) Permit procedure. A permit may be issued authorizing noises prohibited by this section whenever it is found that the public interest will be served thereby. Applications for permits shall be in writing, shall be accompanied by an application fee in the amount of five dollars ($5.00), and shall set forth in detail facts showing that the public interest will be served by the issuance of such permit. Applications shall be made to the building

director; provided, however, that, with respect to work upon or involving the use of a public street, alley, building, or other public place under the jurisdiction of the engineering department, applications shall be made to the city engineer. Anyone dissatisfied with the denial of a permit may appeal to the council.

(c) Unloading and Loading. Between the hours of 8:00 p.m. of one day and 6:00 a.m. of the next day, it shall be unlawful for any person within the radius of five hundred (500) feet of generally occupied residences to unload, load or otherwise perform duties preparatory to the commencement of construction or repair work on buildings or structures. Generally occupied residences shall include, but not be limited to, areas in which there is a reasonable probability of occupancy within the area.

Sec. 15-97. - Restrictions on the operation of two- and four-stroke engines.

(a) Regulation. Between the hours of 8:00 p.m. and 8:00 a.m. of the next day, it shall be unlawful for any person within a residential zone to operate any gasoline-powered two- or four-stroke engine such as a leaf blower, lawn mower, edger, chain saw, roto-tiller, and other such devices for the purpose of maintaining a lawn or property.

Would the Project:

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?

Less than Significant Impact with Mitigation.

Project-Related Temporary Noise Increases

Construction activities are anticipated to involve demolition of existing structures and pavement, grading and excavation for utilities and building foundations, and building construction. Construction activities are anticipated to occur in 2021. All construction activities would occur within the hours specified by the Noise Ordinance. It is estimated that a total of approximately 2,000 tons of demolition debris would be exported off site during demolition. During the demolition and grading activities, trucks are expected to enter and leave the Project site on a regular basis during working hours. Demolition debris removal from the Project site would generate an estimated 198 round trips over a 53-day demolition phase. On average, it is anticipated that there would be 4 truck hauls per day. The addition of 4 round haul truck trips per day would increase traffic noise levels by less than 3 dBA, which would not result in a substantial change in noise levels. The grading phase of the Project is estimated to result in 1,219 truck trips over a 31-day construction period. This would result in an average of 39 truck trips per day which would also not contribute a substantial number of trips along East Rowland Avenue with approximately 12,000 trips per day. Thus, this impact would be less than significant.

In typical construction projects (such as the proposed Project), demolition and grading activities generate the highest noise levels since they involve the use of the largest equipment. During demolition and grading, persons in the immediate vicinity of the construction site would experience short-term noise impacts related to the operation of heavy construction equipment such as bulldozers, hoe-rams, excavators, and dump trucks. Noise levels would fluctuate

depending on equipment type, duration of use, and distance between noise source and receiver. The operation of heavy equipment may occur as close as 10 feet to the residences to the north and west of the Project site. Noise from localized point sources, such as construction equipment, decreases by approximately 6 dBA with each doubling of distance from the source to receptor.

Local residents would be subject to elevated noise levels due to the operation of Project-related construction equipment. Construction activities are carried out in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise levels surrounding the construction site as work progresses. Construction noise levels reported in the USEPA's *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances* were used to estimate future construction noise levels for the Project (USEPA 1971). Typically, the estimated construction noise levels are governed primarily by equipment that produces the highest noise levels. Construction noise levels for each generalized construction phase (ground-clearing/demolition, excavation, foundation construction, building construction, paving, and site cleanup) are based on a typical construction equipment mix for an industrial project and do not include use of atypical, very loud, and vibration-intensive equipment (e.g., pile drivers).

The degree to which noise-sensitive receptors are affected by construction activities depends heavily on their proximity. Estimated noise levels attributable to the development of the proposed Project are shown in Table 4-18, Unmitigated Construction Noise Levels at Noise-Sensitive Uses, and calculations are included in Appendix G, Noise Calculations. Noise levels are evaluated at noise sensitive uses based on an 80 dBA noise threshold established by the City of West Covina (Burns 2020).

TABLE 4-18
UNMITIGATED CONSTRUCTION NOISE LEVELS AT NOISE-SENSITIVE USES

	Noise Levels (L_{eq} dBA)							
	Residential Uses to the North of the Project Site		Residential Uses to the West of the Project Site		Residential Uses to the South of the Project Site		Commercial Uses to the East of the Project Site	
Construction Phase	**Max (20 ft)**	**Avg (310 ft)**	**Max (20 ft)**	**Avg (305 ft)**	**Max (110 ft)**	**Avg (400 ft)**	**Max (20 ft)**	**Avg (305 ft)**
Ground Clearing/ Demolition	91	67	91	67	76	65	91	67
Excavation	96	72	96	72	81	70	96	72
Foundation Construction	89	65	89	65	74	63	89	65
Building Construction	89	65	89	65	74	63	89	65
Paving and Site Cleanup	96	72	96	72	81	70	96	72
Noise Threshold	**80**	**80**	**80**	**80**	**80**	**80**	**NA**	**NA**
Exceeds Threshold?	**Yes**	**No**	**Yes**	**No**	**Yes**	**No**	**NA**	**NA**

L_{eq} dBA: Average noise energy level; Max: maximum; avg: average; ft: feet, NA: Not Applicable

Note: Noise levels from construction activities do not take into account attenuation provided by intervening structures.

Source: USEPA 1971. Noise calculations included in Appendix G.

Table 4-18 shows both the maximum and average noise levels for construction equipment. Maximum noise levels represent the noise levels from construction equipment occurring nearest to the noise sensitive use/receptor. Average noise levels represent the noise exposure to sensitive uses based on the distance to the center of the Project site. Noise levels from general

Project-related construction activities would range from 74 to 96 dBA L_{eq} for the maximum noise levels and 63 to 72 dBA L_{eq} for average noise levels. Noise levels would not exceed the residential noise threshold of 80 dBA Leq for average noise levels but would exceed this noise threshold for maximum noise levels when construction equipment are working within 20 feet of a residential receiver. As the Project is anticipated to generate construction noise in excess of 80 dBA at the closest residences, a mitigation measure (MM NOI-1) pertaining to noise barriers is proposed to reduce the potential impact to less than significant levels. MM NOI-1 requires that noise barriers with a minimum height of 12 feet shall be erected along the northern and western boundaries of the construction site which abut residential uses. Mitigated construction noise from the Project is shown in Table 4-19, Mitigated Construction Noise Levels at Noise-Sensitive Uses, and calculations are included in Appendix G, Noise Calculations.

TABLE 4-19
MITIGATED CONSTRUCTION NOISE LEVELS AT NOISE-SENSITIVE USES

	Noise Levels (L_{eq} dBA)							
	Residential Uses to the North of the Project Site		Residential Uses to the West of the Project Site		Residential Uses to the South of the Project Site		Commercial Uses to the East of the Project Site	
Construction Phase	Max (20 ft)	Avg (310 ft)	Max (20 ft)	Avg (305 ft)	Max (110 ft)	Avg (400 ft)	Max (20 ft)	Avg (305 ft)
Ground Clearing/ Demolition	75	52	75	52	61	49	75	52
Excavation	80	57	80	57	66	54	80	57
Foundation Construction	73	50	73	50	59	47	73	50
Building Construction	73	50	73	50	59	47	73	50
Paving and Site Cleanup	80	57	80	57	66	54	80	57
Noise Threshold	**80**	**80**	**80**	**80**	**80**	**80**	**NA**	**NA**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**	**NA**	**NA**

L_{eq} dBA: Average noise energy level; Max: maximum; avg: average; ft: feet

Note: Noise levels from construction activities do not take into account attenuation provided by intervening structures.

Source: USEPA 1971. Noise calculations included in Appendix G.

Table 4-19 shows both the mitigated maximum and average noise levels for construction equipment. With the implementation of mitigation measure (MM NOI-1), construction noise levels would not exceed the noise threshold. The development of the proposed Project would comply with West Covina Municipal Code Section 15-95, which establishes restrictions for when construction activities are allowed to occur (RR NOI-2). In addition, the Project's construction activities would not result in unusually noisy activities such as impact pile driving. With the incorporation of the restrictions in West Covina Municipal Code Section 15-95 to limit noise levels to the least noise sensitive portions of the day and implementation of MM NOI-1, impacts would be less than significant.

Permanent Project Related Noise Increases

Permanent sources of noise associated with the Project involves vehicle trips traveling to and from the Project site, property maintenance activities (landscaping) as well as mechanical sources of noise.

Noise Generated by Project Traffic

Operation of the proposed Project would generate traffic along roadways in the Project vicinity. The Project is anticipated to generate an additional 1,124 trips per day with 82 AM peak-hour trips and 106 PM peak-hour trips (Psomas 2020). Existing traffic volumes along East Rowland Avenue is approximately 12,000 trips per day and over 40,000 trips per day along North Azusa Avenue. Table 4-20, Project-Related Offsite Traffic Noise Increases, shows that the corresponding increase in offsite traffic noise would range from 0.0 to 0.2 dBA for the analyzed roadway segments. Due to the small contribution of Project-related traffic along local roadways, traffic noise increases from the Project would not be perceptible or substantial. The impact on traffic noise levels would therefore be less than significant, and no mitigation is required.

TABLE 4-20
PROJECT-RELATED OFFSITE TRAFFIC NOISE INCREASES

Intersection	Segment	CNEL at 100 feet from roadway centerline (dBA)			
		No Project	With Project	Project Contribution	Potential Impact?
East Rowland Avenue	West of Project Site	71.2	71.3	0.2	No
	East of Project Site	71.2	71.4	0.2	No
North Azusa Avenue	North of East Rowland Avenue	72.0	72.0	0.0	No
	South of East Rowland Avenue	76.9	76.9	0.0	No

CNEL: community noise equivalency level; dBA: A-weighted decibels.
Source: Psomas 2020.

Noise Generated by On-Site Sources

The primary noise sources generated by operation of the proposed Project would be heating, ventilation, and air conditioning (HVAC) equipment, landscape maintenance, and trash collection. The Project would comply with the applicable Title 24 interior noise standards, which require that residential structures have interior noise levels that do not exceed 45 dBA CNEL in any habitable room (RR NOI-1). Noise generated by HVAC equipment and trash collection is not regulated by the Municipal Code. These sources of noise are common with land use development. Noise generated by landscaping activities is regulated by Section 15-97, which prohibits these activities between the hours of 8:00 PM and 8:00 AM within residential areas (RR NOI-2). These sources of noise are typical and not of sufficient magnitude and frequency of occurrence to be considered by the City to result in a significant noise impact. Impacts would be less than significant, and no mitigation is required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact with Mitigation. There are no applicable City standards for structural damage from vibration. The California Department of Transportation (Caltrans) vibration damage potential guideline thresholds are shown in Table 4-21.

TABLE 4-21
VIBRATION DAMAGE THRESHOLD CRITERIA

Structure and Condition	Maximum ppv (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.20	0.10
Historic and some old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

ppv: peak particle velocity; in/sec: inch(es) per second.

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans 2013.

The nearest structures to the Project site are the residences located within 10 feet from the Project's northern and western property lines. In terms of classifications in Table 4-21, the structures to the west, south and north are considered "older residential structures" for purposes of this analysis. Therefore, the criterion for a significant impact for continuous/frequency intermittent sources is 0.30 ppv in/sec. Commercial buildings located to the east of the Project site are assessed under "modern industrial/commercial buildings" with the criterion of 0.50 in/sec.

Similar to structural damage from vibration, there are no applicable standards in the City's Municipal Code for human annoyance from construction vibration. The Caltrans vibration annoyance potential guideline thresholds are shown in Table 4-22. Based on the guidance in Table 4-22, the "strongly perceptible" vibration level of 0.9 ppv in/sec is used in this analysis as the threshold for a potentially significant vibration impact for human annoyance.

TABLE 4-22
VIBRATION ANNOYANCE CRITERIA

Average Human Response	ppv (in/sec)
Severe	2.000
Strongly perceptible	0.900
Distinctly perceptible	0.240
Barely perceptible	0.035

ppv: peak particle velocity; in/sec: inch(es) per second.

Source: Caltrans 2013.

Conventional construction equipment would be used for demolition and grading activities, with no pile driving or blasting equipment. Table 4-23 summarizes typical vibration levels measured during construction activities for various vibration-inducing equipment at a distance of 25 feet.

TABLE 4-23
VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	ppv at 25 ft (in/sec)
Vibratory roller	0.210
Large bulldozer	0.089
Caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003
ppv: peak particle velocity; ft: feet; in/sec: inches per second. Source: Caltrans 2013; Federal Transit Administration 2006.	

Demolition, grading, and construction would occur up to the property lines and, as noted above, off-site land uses are relatively close to the property lines. Table 4-24, Unmitigated Project Vibration Impacts, shows the vibration annoyance criteria from construction-generated vibration activities proposed at the Project site. Table 4-24 shows the ppv relative to uses proximate to the Project site.

TABLE 4-24
UNMITIGATED PROJECT VIBRATION IMPACTS

	Vibration Levels (ppv)			
	Residential Uses to the North of the Project Site	**Industrial Uses to the West of the Project Site**	**Residential Uses to the South of the Project Site**	**Commercial Uses to the East of the Project Site**
Equipment	(ppv @ 5 ft)	(ppv @ 5 ft)	(ppv @ 125 ft)	(ppv @ 25 ft)
Vibratory roller	**2.35**	**2.35**	0.02	0.21
Caisson Drill	**1.00**	**1.00**	0.01	0.09
Large bulldozer	**1.00**	**1.00**	0.01	0.09
Small bulldozer	0.03	0.03	0.00	0.00
Jackhammer	0.39	0.39	0.00	0.04
Loaded trucks	0.85	0.85	0.01	0.08
Annoyance Criteria	**0.9**	**0.9**	**0.9**	**0.9**
Exceeds Annoyance Criteria?	**Yes**	**Yes**	**No**	**No**
Building Damage Criteria	**0.3**	**0.3**	**0.3**	**0.5**
Exceeds Building Damage Criteria?	**Yes**	**Yes**	**No**	**No**
ppv: peak particle velocity; Max: maximum; avg: average; ft: feet Note: Calculations can be found in Appendix G. Source: FTA 2006				

As shown in Table 4-24, ppv would exceed the criteria thresholds for annoyance and building damage for existing residential uses located to the north and west of the Project site when construction activities occur under maximum (i.e., closest to the receptor) exposure conditions. These vibration levels represent conditions when construction activities occur closest to receptor locations. Construction-related vibration would be substantially less under average

conditions when construction activities are located further away. Because vibration levels would be above the significance thresholds, vibration generated by the Project's construction equipment would be expected to generate strongly perceptible levels of vibration at the nearest uses and would result in significant vibration impacts related to vibration annoyance. In addition, the Project's construction activities may also result in cosmetic building damage at the nearest offsite residential uses located to the north and west of the Project site prior to the implementation of mitigation measures.

MM NOI-2 would reduce vibration generated by construction equipment to levels that would avoid vibration induced annoyance and cosmetic building damage to offsite buildings. MM NOI-2 requires that construction activities using vibratory rollers, caisson augers, and large bulldozers restrict the operation of equipment by at least 25 feet from off-site buildings, and that loaded trucks and other large equipment restrict the operation of equipment by at least 15 feet from off-site buildings. Table 4-25, Mitigated Project Vibration Impacts, shows the ppv levels relative to mitigated vibration generating construction activities.

TABLE 4-25
MITIGATED PROJECT VIBRATION IMPACTS

	Vibration Levels (ppv)			
	Residential Uses to the North of the Project Site	**Industrial Uses to the West of the Project Site**	**Residential Uses to the South of the Project Site**	**Commercial Uses to the East of the Project Site**
Equipment	(ppv @ 25 ft)	(ppv @ 25 ft)	(ppv @ 125 ft)	(ppv @ 25 ft)
Vibratory roller	0.21	0.21	0.02	0.21
Caisson Drill	0.09	0.09	0.01	0.09
Large bulldozer	0.09	0.09	0.01	0.09
Small bulldozer	0.00	0.00	0.00	0.00
Jackhammer	0.04	0.04	0.00	0.04
Loaded trucks	0.08	0.08	0.01	0.08
Annoyance Criteria	**0.9**	**0.9**	**0.9**	**0.9**
Exceeds Annoyance Criteria?	**No**	**No**	**No**	**No**
Building Damage Criteria	**0.3**	**0.3**	**0.3**	**0.5**
Exceeds Building Damage Criteria?	**No**	**No**	**No**	**No**

ppv: peak particle velocity; Max: maximum; avg: average; ft: feet
Source: USEPA 1971 (Calculations can be found in Appendix G).

As shown in Table 4-25, ppv levels would be less than the annoyance and building damage criteria with implementation of MM NOI-2. Therefore, impacts would be less than significant with mitigation.

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?

No Impact. The Project site is located approximately 7 miles east of the El Monte Municipal Airport. The Project site is also located well outside the existing and projected 65 dBA CNEL noise contour, which would occur within 2 miles of an airport. Aircraft overflights do not significantly contribute to the noise environment at the Project site, and the Project would not expose future Project residents to excessive noise levels. In addition, the Project site is not located within the vicinity of a private airstrip. Therefore, the Project would not result in exposure of people residing or working in the Project area to excessive noise levels from either airport or airstrip-related activities, and no mitigation is required.

Regulatory Requirements

RR NOI-1 The Project must be designed in accordance with the applicable Title 24 interior noise standards. Residential structures shall be designed to prevent the intrusion of exterior noise so that the interior noise attributable to exterior sources shall not exceed 45 A-weighted decibel scale (dBA) Community Noise Equivalent Level (CNEL) in any habitable room.

RR NOI-2 Per the City of West Covina Municipal Code, Section 15-95, Construction of Building Projects, construction activities are prohibited to occur between the hours of 8:00 PM of one day and 7:00 AM of the next day. Construction activities may not cause the noise level at the property line to exceed the ambient noise level by more than five (5) decibels unless a permit therefor has been duly obtained.

Mitigation Measures

MM NOI-1 Noise barriers with a minimum height of 12 feet shall be erected along the northern and western boundaries of the construction site which abut residential uses. The noise barriers shall be constructed of material with a minimum density of two pounds per square foot with no gaps or perforations. Noise barriers may be constructed of, but not be 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 12-foot barrier would result in a noise reduction of approximately 16 dBA, resulting in construction noise levels that do not exceed the 80 dBA L_{eq} threshold (noise barrier performance calculations included in Appendix G).

MM NOI-2 The Applicant shall require that all construction contractors restrict the operation of the following construction equipment to beyond the following distances from off-site buildings: (1) vibratory rollers, caisson augers and large bulldozers – 25 feet, and (2) loaded trucks and other large equipment – 15 feet. Smaller construction vehicles could be used within these distances.

4.14 POPULATION AND HOUSING

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

Impact Analysis

Would the Project:

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

Less than Significant Impact. The proposed Project involves the construction of 158 dwelling units that would replace the existing school uses on the site. Using the City's 2020 average household size of 3.35 persons per household (DOF 2020), the Project would directly generate approximately 529 residents. This would increase the City's 2020 resident population of 105,999 persons by 0.5 percent to 106,528 residents. It would increase the City's 2020 housing stock of 32,919 (DOF 2020) by 0.48 percent to 33,077 units. Jobs that would be created during construction would be short-term and would not increase the City's job base permanently. However, the temporary construction crew and long-term residents of the Project would not create a significant change in demand for goods and services that may induce business investment, growth, or development in the area. Additionally, these increases would be within anticipated growth for the City as projected by SCAG at 116,700 residents, 35,000 households, and 34,300 jobs by 2040 (SCAG 2016b).

Additionally, the proposed Project functions as an infill project and is served by existing roads and utility infrastructure. No extension of roads or infrastructure is proposed by the Project such that would encourage development levels beyond what is already planned elsewhere in the City or indirectly induce growth. Therefore, the Project would not result in substantial unplanned population growth, directly or indirectly. The impacts would be less than significant, and no mitigation is required.

The significant physical impacts on the environment associated with the direct growth have been evaluated in this IS/MND.

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

No Impact. The Project site is currently developed with administrative and school buildings and site improvements. There are no existing housing and associated residents on the site that would be displaced by the development of the residential Project. The proposed Project would develop 158 dwelling units and help meet the City's housing goals under SCAG's RHNA, as identified in the Housing Element of the General Plan. Demolition of the existing school buildings would not lead to the loss of existing housing. Thus, no impact related to displacement of housing and related residents would occur, and no replacement housing is required. Therefore, no significant impacts would occur, and no mitigation is required.

Regulatory Requirements

None required.

Mitigation Measures

Project implementation would not result in significant impacts related to population and housing; therefore, no mitigation measures are required.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

Impact Analysis

Would the Project:

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

i) Fire protection?

Less than Significant Impact. Fire protection services in the City, including the Project site, are provided by the West Covina Fire Department (WCFD), which maintains and operates five stations in the City. The 24-hour protection is provided daily by trained and qualified personnel on duty through the five fire stations serving the City. Each station is staffed with trained paramedics, and the five engine companies, the truck company, and the three ambulances are staffed by California-licensed paramedics and certified Emergency Medical Technicians (City of West Covina 2020b). Fire equipment is distributed throughout the City through the five fire stations. Fire Station 3, located at 1433 West Puente Avenue, is the closest station and would provide fire response to the Project site.

The proposed Project would result in a resident population of 529 persons, which is a nominal increase in the total number of City residents (estimated at 105,999 in 2020) served by WCFD. The proposed Project would replace an existing school use, which is currently vacated, but previously generated a demand for fire protection services. Given the size of the Project and the net increase in demand for fire protection services, the incremental demand of the Project for fire protection services would not result in the need for new firefighters and other personnel,

nor would it require the construction of new or the alteration of existing fire protection facilities to maintain an adequate level of fire protection service in the City.

The proposed Project would be required to comply with all applicable codes, ordinances, and regulations (including the City's Municipal Code) regarding fire prevention and suppression measures, fire hydrants and sprinkler systems, emergency access, and other fire safety requirements (see RR PS-1). The internal drive aisles would serve as fire access lanes and have been designed to meet WFCD access width and turnaround requirements in the City's Fire Code, and the proposed dwelling units would include automatic fire sprinklers (see RR PS-1).

Development of the proposed Project would be required to comply with all applicable code and ordinance requirements including but not limited to access, water mains, fire flows, and fire hydrants. In addition, the proposed Project would be required to pay all applicable Development Impact Fees (DIFs) including police facilities, fire facilities, park facilities, administration facilities, and public works facilities, as outlined in RR PS-2. Therefore, the Project's potential impacts on public services pertaining to fire protection would be less than significant, and no mitigation is required.

ii) Police protection?

Less than Significant Impact. The West Covina Police Department (WCPD) provides law enforcement services to the City of West Covina. The WCPD provides a full range of police services within two Divisions, the Patrol Division and the Investigative & Support Services Division (ISSD). The WCPD headquarters is in the West Covina City Hall at 1444 West Garvey Avenue. The City is organized into four service areas, Service Area 1 (North), Service Area 2 (East), Service Area 3, (Central), and Service Area 4 (South). Each Service Area is assigned a Lieutenant, so that non-emergency public concerns are quickly addressed (West Covina 2016b). The Project site is located within the WCPD Service Area 1, (North) (WCPD 2020).

The Project would generate a demand for police protection services, once the proposed dwelling units are occupied. The incremental demand of the Project for police protection services is not anticipated to increase WCPD response times to the Project site or surrounding area. The net increase in demand for police protection services is also not anticipated to generate the need for new sworn officers, nor would it require construction of new or physically altered police protection facilities to maintain an adequate level of service to the Project site and surrounding areas.

In accordance with Chapter 17, Article IV, Development Impact Fees of the City's Municipal Code, the Project Applicant would be required to pay the applicable police facility fee for the Project's impact on police protection services (see RR PS-2). Compliance with City regulations would reduce Project impacts to police protection services. Therefore, no physical impacts associated with the provision of police protection services to the proposed Project would occur, and no mitigation is required.

iii) Schools?

Less than Significant Impact. The proposed Project involves the development of 158 dwelling units that would be occupied by approximately 529 residents with potential school-aged children requiring school services from the West Covina Unified School District (WCUSD). The

WCUSD serves over 14,000 students in 15 public elementary and high schools and two charter schools within the City. Students within the WCUSD may choose to attend any school within the boundaries (WCUSD 2020). According to student generation rates for residential land uses within the WCUSD, the Project may generate 28 elementary school students, 15 middle school students, and 24 high school students, for a total of 66 students (City of West Covina 2016b).

The Project would pay school development fees to the WCUSD for the improvement of school facilities that would be needed to serve the Project's demand for school services and facilities (see RR PS-3). As provided under Section 17620 of the *California Education Code* and Section 65970 of the *California Government Code,* the payment of statutory school development fees would fully mitigate a project's impacts on schools. Thus, impacts would be less than significant, and no mitigation is required.

vi) Parks?

Less than Significant Impact. The proposed 158-unit residential development would generate a total of 529 residents, which would increase demand for and use of existing parks and recreational facilities. However, the Project would provide an on-site park and open space for its residences. The Project Applicant would be required to pay a park fee as set forth in section 26-204 of Chapter 26, Article VI, of the City's Municipal Code (RR PS-4). Additionally, the Project Applicant would be required to pay all applicable DIFs, including park facilities, as outlined in RR PS-2. Given the nominal increase in population and payment of park fees (RR PS-2 and RR PS-4), the potential impact would be less than significant, and no mitigation is required. Please refer to Section 4.16, Recreation, below for a detailed discussion of potential park impacts.

vi) Other public facilities?

Less than Significant Impact. The West Covina Library provides library services in the City of West Covina and is located at 1601 West Covina Parkway, approximately 2.4 miles west of the Project site. This library has book and media collections for children, teens, and adults, along with book drops, wi-fi, 12 public computers, 6 children computers, 4 early literacy computers, a photocopier, and a microfilm reader printer (LA County Library 2020). West Covina Library is part of the Los Angeles County libraries. Library members are also able to access other nearby Los Angeles County Public Libraries, such as the Baldwin Park Library, Covina Library, Sunkist Library, El Monte Library, Norwood Library, and Charter Oaks Library, all of which are within eight miles of the West Covina Public Library (West Covina 2016b). Members of the West Covina Public Library have access to the resources of the entire Los Angeles County Public Library system, which includes 87 community libraries and provides library service to over 3.4 million residents living in unincorporated areas and to residents of 49 of the 88 incorporated cities of Los Angeles County.

The Project would generate a demand for library services that would be served by the West Covina Library in the City and other nearby libraries. Due to the limited number of residents from the Project (529 residents), compared to the City's total 2020 population of 105,999 persons, the increase in library service demand is expected to be proportionately 0.5 percent of existing demand and would not result in the need for construction of new or expanded facilities. Therefore, impacts would be less than significant, and no mitigation is required.

Regulatory Requirements

RR PS-1 The Project shall be designed and constructed in accordance with applicable regulations in Chapter 10, Fire Prevention and Protection, of the City of West Covina Municipal Code.

RR PS-2 Pursuant to Chapter 17, Article IV, Development Impact Fees of the City's Municipal Code, prior to issuance of each building permit, the Project Applicant shall be responsible for payment of the City's Development Impact Fees (DIFs) including police facilities, fire facilities, park facilities, administration facilities, and public works facilities, as appropriate and in amounts established by City Council Resolution. The fees paid shall be those in effect at the time of issuance of the building permit, subject to applicable fee credits for community facilities provided as part of the Project.

RR PS-3 The Project Applicant shall pay the applicable school development fee to the West Covina Unified School District, in accordance with Section 17620 of the California Education Code.

RR PS-4 The Project Applicant shall pay the applicable park fee, in accordance with Chapter 26, Article VI, Section 2620 for the purpose of providing park and recreational facilities to serve future residents of the Project development.

Mitigation Measures

Project implementation would not result in significant impacts related to public services; therefore, no mitigation measures are required.

4.16 RECREATION

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Impact Analysis

Would the Project:

a) 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?

Less than Significant Impact. The City's Community Services Division provides for the protection and enhancement of City parks, recreation facilities, and community services. The City of West Covina contains a range of park types that include two small pocket parkettes, eight neighborhood parks, three community parks, two wilderness areas, specialized sports facilities, paseos, and two conservation areas.

The proposed 158 dwelling units would result in a population of approximately 529 residents, which would generate a demand for parks and recreational facilities. The Project proposes one on-site common open space area at the center of the site for a total of 0.27 acre. For single family units, the Walnut Grove Specific Plan requires 100 sf of common useable open space per unit (including paseos and recreational centers) and 150 sf of private open space per unit. For multi-family units, 100 sf of common useable open space per unit and 100 sf of private open space per unit are required. These on-site open space areas are expected to meet some of the demand for recreation facilities generated by residents of the Project. The common open space area at the Project site would have open space amenities, including: three seating areas with a bench; trash receptables; picnic areas with a solid-roof covered structure; a children's tot-lot area with swings and bench seating; open turf areas; and connecting walkways. Project residents would also use nearby City parks and other public and regional parks. Palmview Park is the nearest City park to the Project, located 0.7 mile west of the Project site and is likely to be used by residents of the Project. The park has three picnic shelters, a restroom, fitness equipment, a playground, a baseball field, open space, and two surface parking lots. Due to the small number of residents that would be introduced by the Project, the increase in the use of existing public park facilities by the Project would not be at a level that would result in physical deterioration of existing parks and other recreational facilities, nor would it require the need for new or physically altered facilities. Additionally, as stated in RR PS-2, the Project Applicant would be responsible for paying

park facilities impact fees for the development of new or expanded park facilities in the City. Therefore, impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. As described above, the Project would include common open space areas that would be available for use by residents. These areas would be on the Project site and the physical impacts resulting from the construction of these facilities have been addressed through the impact analysis presented in this IS/MND document. Additionally, the Project Applicant would pay the park facilities impact fees to provide funds for parks facilities to serve Project residents (see RR PS-2, above).

Since the recreation needs of the residents would be partially met on site and through payment of the necessary park fees, the proposed Project would not result in a substantial increased demand for recreational facilities, requiring the construction of new parks that would adversely affect the environment. There are also adequate regional parks and recreational facilities that would serve the Project. Therefore, impacts would be less than significant, and no mitigation is required.

Regulatory Requirements

None required.

Mitigation Measures

Project implementation would not result in significant impacts related to recreation; therefore, no mitigation measures are required.

4.17 TRANSPORTATION

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

Impact Analysis

A Focused Traffic Study was prepared by Psomas for the Project (Psomas 2020). The findings of the Focused Traffic Study are incorporated in the following analyses, and the report is included as Appendix H to this IS/MND.

Existing Study Area Conditions

The two existing major roadways in the immediate Project vicinity are East Rowland Avenue and North Azusa Avenue. East Rowland Avenue is a four-lane divided roadway with on-street parking on both sides. In the vicinity of the Project (east of Lark Ellen Avenue), the roadway is classified as principle arterial by the City of West Covina. The roadway has a posted speed limit of 40 miles per hour (mph). North Azusa Avenue is also a four-lane divided roadway in the project vicinity with on-street parking on both sides of the street. The roadway is classified as a principle arterial by the City, and has a posted speed limit of 40 mph.

Traffic Volumes

Due to the COVID-19 pandemic, traffic volumes were not collected for this study. Instead, daily traffic volumes collected for the Engineering and Traffic Survey prepared for the City in 2017 were obtained for East Rowland Avenue along the frontage of the Project site. The 2017 volume was grown by 1 percent per year to estimate 2020 volumes, resulting in approximately 12,100 vehicles per day on East Rowland Avenue along the frontage of the Project site. The 1 percent per-year growth rate is likely conservative, particularly considering the significant decrease in traffic volumes which has occurred with the COVID-19 pandemic and is expected to continue for an extended period moving forward. In addition, most of the land on both sides of East Rowland Avenue is developed, and the roadway does not serve as a major regional connection. In order to provide estimated peak hour volumes for use in driveway analyses, the general assumptions that 8 percent of traffic occurs in the AM peak hour and 10 percent occurs in the PM peak hour were used. It was further assumed that 60 percent of traffic is eastbound on East Rowland Avenue adjacent to the Project in the AM peak hour, while the reverse is true in the PM peak hour.

Would the Project:

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

Less than Significant Impact.

Short-Term Construction-Related Traffic

Construction traffic is not expected to create any significant impact due to the size of the proposed Project. It is anticipated that construction traffic (particularly heavy trucks) would access the site via East Rowland Avenue.

To facilitate the movement of construction traffic and to minimize potential disruptions, traffic control measures would be implemented in accordance with the City requirements and followed during construction (RR HAZ-4). With compliance with City requirements, the Project would not conflict with applicable plans, ordinance, or policy, and Project's impact would be less than significant, and no mitigation is required.

Project Trip Generation

Trip generation represents the amount of traffic that would be generated by a development. Traffic generation rates for the existing use on site and the proposed Project have been derived from the Institute of Transportation Engineers' (ITE's) *Trip Generation Manual*, 10th Edition, as shown on Table 4-26, Project Trip Generation.

Based on the Focused Traffic Study, the proposed Project is anticipated to generate a total of 1,124 trips per day, with approximately 82 AM peak hour trips and 106 PM peak hour trips.

Trip generation for the existing uses was not estimated for this analysis, because the existing use does not currently generate trips.

TABLE 4-26
PROJECT TRIP GENERATION

ITE LU 210 - Single-Family Detached Housing						
Units			**66**			
Period	**Trips/Unit**	**Trips**	**% In**	**% Out**	**Trips In**	**Trips Out**
AM Peak	0.74	49	25%	75%	12	37
PM Peak	0.99	65	63%	37%	41	24
Daily	9.44	623	50%	50%	312	312
ITE LU 221 – Multi-Family Housing (Mid-Rise)						
AM Peak	0.36	33	26%	74%	9	25
PM Peak	0.44	40	61%	39%	25	16
Daily	5.44	500	50%	50%	250	250
Total						
Units			**158**			
Period	**Trips**		**Trips In**		**Trips Out**	
AM Peak	82		21		61	
PM Peak	106		66		40	
Daily	1,124		562		562	

Source: Psomas 2020.

Project Traffic Operations

The City of West Covina recently adopted the use of Vehicle Miles Traveled (VMT) analysis methodology for evaluating potential traffic impacts for development projects. The City has also elected to continue to use Level of Service (LOS) analyses for planning purposes. However, due to the COVID-19 pandemic, traffic volumes are far below normal, and therefore, the data collection needed to serve the LOS analysis is infeasible. However, per a scoping agreement, this report would include various site analyses including queuing, turning movements, sight distance, and circulation. The scoping agreement is included in Appendix H of this IS/MND. Although LOS analysis is not required, the anticipated queuing at the site driveways was evaluated. Because the driveways would only exist with the Project, the analysis was only completed for 2022 (opening year) conditions with the Project. Both driveways would operate with stop control on the driveway, so the only movements, which are expected to experience queuing are the southbound turns exiting the Project site and the eastbound left turns into the site at the west driveway. All of those movements were found to have queues of less than one vehicle in both peak hours.

The limited number of vehicle trips generated by the proposed Project would not cause significant impacts at roadways and intersections near the site and in the surrounding area. Therefore, the Project would not conflict with applicable policies, plans, ordinance, or programs related to the circulation systems, nor would it affect the performance of the surrounding intersections. Impacts would be less than significant, and no mitigation is required.

In terms of public transportation, the nearest bus routes to the Project site include: Bus Route 280 (on Azusa Avenue) and Bus Route 488 (along East Rowland Avenue). Although there have been some changes to transit service due to the COVID-19 pandemic, the Foothill Transit bus lines in the Project area are still operating as usual.

Sidewalks are present on East Rowland Avenue, which would be retained by the Project and would continue to accommodate pedestrians and bicyclists. The Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Impacts would be less than significant, and no mitigation is required.

Parking

Because this is a Specific Plan project, the parking requirements are specified separately from the typical City standards. Per the Specific Plan, the Project is required to provide two parking spaces per unit and 0.5 guest parking spaces per unit. This would result in required 316 parking spaces for residents and 79 spaces for guests. As shown in the site plan, each unit would include a 2-car garage, which meets the residential parking requirement for the Specific Plan by providing 316 resident parking spaces. In addition, there would be 99 guest parking spaces located throughout the site, which exceeds the required number of guest spaces by 20 spaces. Impacts would be less than significant, and no mitigation is required. Based on Section 26-506 – Off Street Parking of the City's Zoning Code, the Project would be required to provide 2 parking spaces per unit in an enclosed garage and 1 guest space for every four units (or 0.25 space per unit). This would result in a required 316 parking spaces for residents and 40 spaces for guests.

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

Less than Significant Impact. State CEQA Guidelines Section 15064.3, subdivision (b) provides the criteria for analyzing transportation impacts, and a project's effect on automobile delay shall not constitute a significant environmental impact. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. Vehicle miles traveled (VMT) refers to the amount and distance of automobile travel attributable to a project. According to the State of California's *Technical Advisory on Evaluating Transportation Impacts in CEQA*, "certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop or an existing stop along a high quality transit corridor would have a less than significant impact on VMT" (OPR 2018). The City of West Covina recently adopted the use of Vehicle Miles Traveled (VMT) analysis methodology for evaluating potential traffic impacts for development projects. The Project is located within a Transit Priority Area (TPA) and is exempt from a full VMT analysis by the City. Although there have been some changes to transit service due to the COVID-19 pandemic, it was confirmed that the Foothill Transit bus lines in the Project area are still operating as usual. Therefore, the TPA exemption is still valid. The proposed Project would have a less than significant impact on VMT, and no mitigation is required.

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

Less than Significant Impact. Construction of the Project would require the transport of construction equipment and building materials to and from the site, as well as the hauling of demolition and construction debris from the site. Large trucks used for these activities would have to use designated truck routes in the City, in compliance with Chapter 22, Division 5, Truck Routes, of the Municipal Code (RR TRA-1). Roadway hazards from these trucks and equipment would be less than significant.

The Project would have two access points onto East Rowland Avenue. The on-site driveway, drive aisles, and cul-de-sacs would comply with City roadway standards for adequate sight distance (RR TRA-2). It is anticipated that the median on East Rowland Avenue would be reconstructed to provide full access at the west driveway of the Project, as the existing median opening is slightly east of the proposed west driveway location. The median reconstruction would also include a left-turn cutout to allow left turns directly into the Project site (PDF TRA-1). With the proposed improvement, all proposed dwelling units would have access to both driveways.

The existing conditions of the site and its surrounding area includes curb parking along the northern side of East Rowland Avenue, at the Project frontage. However, to provide the two access points from East Rowland Avenue to the Project site, site visibility would be impaired if cars were to be parked along East Rowland Avenue. However, to address this issue, much of the curb on the north side of East Rowland Avenue along the Project frontage would be painted red to prohibit parking and to provide sufficient site distance (PDF TRA-2). This would provide site visibility for vehicles and other roadway users and reduce potential hazards from dangerous intersections. The queues for vehicles entering and existing the site are expected to be minimal, and traffic projections for East Rowland Avenue indicate that the roadway is operating far under its capacity.

Therefore, with implementation of the said planned improvements, impacts from hazards due to a geometric design feature would be less than significant, and no mitigation is required. Thus, it would not interfere with access, circulation, or activities at the surrounding land uses. Additionally, the Project would not introduce an incompatible use that may create a traffic hazard to surrounding residences.

d) Result in inadequate emergency access?

Less than Significant Impact. During demolition and construction, construction equipment would be staged on the Project site and would not block the roadways surrounding the Project site. Construction on and obstruction of public rights-of-way associated with utility connections to existing utility infrastructure would be made in accordance with applicable City regulations, including City Standard Plans, Section 19-302, Standard Specifications for Public Works Construction (Greenbook), of the Municipal Code (Greenbook) (see RR HAZ-4). No full road closures would occur during the construction phase of the Project. Accordingly, temporary construction activities would not impede the use of surrounding roadways for emergency evacuation or access for emergency response vehicles. Adjacent streets would also be returned to their original conditions after construction activities. Impacts would be temporary and less than significant, and no mitigation is required.

At the north end of the Project site, the existing North Eileen Street cul-de-sac extends onto the Project site. The cul-de-sac would remain as an emergency access point only for the Project–all other site traffic would not have access to North Eileen Street. A driveway cutout would be provided in the cul-de-sac for emergency vehicles, along which parking would not be allowed. It is expected that on-street parking would remain available along the remaining areas of the North Eileen Street cul-de-sac. Access to individual dwelling units on the site would be provided by internal drive aisles and from both access points to the Project site. These would be subject to review and approval by the City of West Covina Fire Department to ensure adequate access for emergency vehicles, as required under RR PS-1 in Section 4.15, Public Services. Truck turning

movement evaluations in the Focused Traffic Study show that although trash (and potentially delivery) trucks would back out of the drive aisles into the main site circulation aisles, the trucks are expected to be able to maneuver throughout the site. In addition, the drive aisles and cul-de-sacs would comply with City roadway standards for adequate sight distance, implemented by improvements discussed above. As designed, the proposed Project would provide adequate emergency access. Impacts would be less than significant, and no mitigation is required.

Regulatory Requirements

RR TRA-1 All trucks used during demolition and construction and during long-term occupancy of the Project shall use designated truck routes, in compliance with Chapter 22, Division 5, Truck Routes, of the West Covina Municipal Code.

RR TRA-2 The Project shall be designed and constructed to provide adequate sight distance for drivers at all entrances and exits (driveways), drive aisles, and roadways, per West Covina Municipal Code Section 22.8, Obstruction to Visibility at Intersections or Driveways.

Project Design Features

PDF TRA-1 The Project Applicant shall implement a left-in turn-pocket for eastbound traffic on East Rowland Avenue and left-out turn movements from the Project entrance. The new turn pocket will require modifications to the existing median to align the new turn-pocket with the Project entrance. Final engineering will determine the precise dimensions and details of the proposed turn-pocket and the required median modifications.

PDF TRA-2 The Project Applicant shall implement red curbing along the Project frontage on East Rowland based on line of site distance determined during final engineering to identify the limits of guest parking along the frontage.

Mitigation Measures

Project implementation would not result in significant impacts related to transportation; therefore, no mitigation measures are required.

4.18 TRIBAL CULTURAL RESOURCES

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

This section evaluates the Project's potential to have adverse effects on Tribal Cultural Resources. The analysis in this section is based on the results of the archaeological record searches conducted by Psomas and consultation with California Native American Tribes, conducted by the City of West Covina for the Project, as required by CEQA per Assembly Bill 52 (AB 52) and Senate Bill 18 (AB 18).

An inquiry was made to the Native American Heritage Commission (NAHC) by Psomas to request a review of the Sacred Lands File (SLF) database regarding the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented on other databases. The NAHC completed its SLF search on July 15, 2020. The NAHC SLF did not identify the presence of Native American traditional sites/places within the Project site or the immediate vicinity of the site.

The City of West Covina initiated consultation on August 20, 2020 by notifying the City's consultation list of the Walnut Grove Project, located at 1561 East Rowland Avenue, as required by AB-52 and SB 18. One Tribe, the Gabrieleno Band of Mission Indians – Kizh Nation, requested to participate in consultation with the City. Consultation between the lead agency, the City of West Covina, and the Kizh Nation took place on September 3, 2020 at 11:00 AM. During the consultation, the Applicant indicated that ground disturbing activities would be isolated to 2-4 feet within soil that may have been imported from a secondary location during the construction of the existing school during the 1950's.

The Tribe requested documentation that the original, native soil was exported from the Project site during the construction of the school during the 1950's. Specifically, they requested trucking invoices that proved someone was hired to relocate the native sediment. The Tribe's primary concern is that the original material was mixed with imported soil to backfill the site. This is a

concern for the Kizh Nation because the original material, although disturbed, may contain human remains (cremated) and resources related to a prehistoric village site.

Although the Applicant indicted that the Pioneer school did not document if the excavated soil was exported or reused as backfill, the Project will submit a soil analysis (geo-technical report) to confirm that the first five feet of soil (the imported fill) is different from the native sediment that underlies the Project site. The Kizh Nation indicated that the soil analysis would reduce their concerns regarding earth moving activities within the first five feet of soil.

The City contacted the Tribe on September 16th because based on the site research, the native sediment was removed and subsequently mixed with artificial fill to backfill the site during the construction of the Pioneer school during the 1950s. The Kizh Nation requested the Project implement Native American monitoring to ensure that the Project does not impact any human remains or buried resources related to the prehistoric village site. The City and the Kizh Nation agreed to implement Native American monitoring during grading activities within the first five feet of soil. Consultation was closed after the mitigation was agreed upon on November 6, 2020.

Impact Analysis

Would the Project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Less than Significant Impact with Mitigation. As discussed in Section 4.5, Cultural Resources, the SCCIC record search and literature review did not identify any previously recorded prehistoric or historic archaeological sites or historic structures within the Project site. Furthermore, the SLF search did not identify the Project site as sensitive for known sacred lands/ sites. As such, there are no known tribal cultural resources within the Project site. However, the absence of known cultural resources in the Project site does not preclude the possible presence of undiscovered cultural resources, including tribal cultural resources, that may lie in the subsurface. The soil analysis for the Project site indicates that the underlying soil contains native sediment and artificial fill that was excavated and redeposited during the construction of the existing Pioneer school. Although the native sediment has been disturbed, the Project may encounter cultural or tribal cultural resources during earth moving activities. To mitigate this potential effect, the Project would implement Native American monitoring (MM TCR-1) during construction grading activities within the first five feet of the soil. Thus, impacts to tribal cultural resources that are listed or may be eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k), are considered less than significant with mitigation.

2. ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Less than Significant Impact with Mitigation. The Project site does not contain any known resources determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. However, the tribal consultation between the Gabrieleno Band of Mission Indians – Kizh Nation and the City of West Covina indicated that the Project site may contain buried resources related to human burials, cremated remains, and/or resources pertaining to a prehistoric village site. If discovered, these resources may be considered significant to a California Native American tribe.

To mitigate these potential effects, the Project would implement MM TCR-1 developed with and agreed upon by the City of West Covina and the consulting Tribe, the Gabrieleno Band of Mission Indians – Kizh Nation. MM TCR-1 prescribes Native American monitoring during construction grading activities within the first five feet of the soil to ensure the Project does not adversely impact unknown buried tribal cultural resources. Furthermore, the discovery of human remains will comply with existing regulatory requirements (RR TCR-1).

In compliance with State and federal regulations, if human remains are encountered during excavation activities, all work shall halt at the site and or any nearby areas reasonably suspected to overlie adjacent remains, and the County Coroner shall be notified. The Coroner shall determine whether the remains are of forensic interest within two working days of receiving notification. If the Coroner, with the aid of the qualified Archaeologist, determines that the remains are prehistoric and the find is on federal land, the Coroner shall notify the field archaeologist of the appropriate federal agency for the proper treatment and/or disposition of the remains. If the find is on non-federal lands, the Coroner shall contact the NAHC within 24 hours of the determination. The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the California Public Resources Code.

The implementation of RR TCR-1 and MM TCR-1 would ensure the Project would not have a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency *or a California Native American tribe,* in its discretion and supported by substantial evidence, as defined in Public Resources Code Section 21074 and 5024.1. Thus, impacts are considered less than significant with mitigation.

Regulatory Requirements

RR TCR-1 If human remains are encountered during any Project-related ground-disturbing activities, Section 7050.5 of the *California Health and Safety Code* states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition of the materials pursuant to Section 5097.98 of the *California Public Resources Code.* The provisions of Section 15064.5 of the California Environmental Quality Act Guidelines shall also be followed. The

County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner shall notify the Native American Heritage Commission (NAHC). The NAHC will determine and notify a Most Likely Descendent (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The descendent must complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. These requirements shall be included as notes on the contractor specification and verified by the Community Development Department, prior to issuance of grading permits. This measure shall be implemented to the satisfaction of the City in consultation with the County Coroner.

Mitigation Measures

MM TCR-1 Prior to the commencement of any ground disturbing activity at the Project site, the Project Applicant shall retain a Native American Monitor approved by the Gabrieleno Band of Mission Indians-Kizh Nation (the tribe that consulted on this Project, pursuant to Assembly Bill A52 [the "Tribe" or the "Consulting Tribe"]) and the City of West Covina. A copy of the executed contract shall be submitted to the City of West Covina Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal Monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Tribal Representatives and Tribal Monitor, in consultation with the City and the Applicant, have indicated that all upcoming ground-disturbing activities at the Project site have little to no potential for impacting Tribal Cultural Resources or when activities occur within previously disturbed soil that was observed by the on-site Tribal Monitor. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by Project activities shall be evaluated by the qualified archaeologist and Tribal Monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project site while evaluation and, if necessary, mitigation takes

place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and 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, it shall be offered to a local school or historical society in the area for educational purpose.

4.19 UTILITIES AND SERVICE SYSTEMS

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

Impact Analysis

Would the Project:

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

Less than Significant Impact.

Water

Water service for the Project would be provided by Suburban Water Systems. Approximately 80 percent of water from Suburban Water Systems is supplied from wells within the San Gabriel Valley and Central Basins. The onsite water system would be a minimum of an 8-inch water line that would provide both domestic and fire service to the site. Exhibit 3-8, Conceptual Utility Plan, shows the layout of the proposed water improvements.

The proposed development is estimated to create a water demand of 30,589 gpd or 34.3 acre-feet per year (afy)[1]. With the elimination of water demand from the existing school use, the net water demand is not anticipated to be significantly different, and upgrades to existing water lines would not be anticipated. Water service to the Project would also be provided in compliance with Chapter 23, Article III, Water of the West Covina Municipal Code, which sets regulations for service connections, water rates, and other water system provisions (see RR UTL-1).

Prior to the issuance of the building permit, the applicant would be required to verify that the City's water system can accommodate the proposed Project's fire flows and potable water demand. The estimated water demand of the Project is not expected to exceed available supplies or the available capacity within the distribution infrastructure that would serve the Project site. Based on the analysis above, the Project would not require or result in the relocation or construction of new or expanded water facilities, which would cause significant environmental effects. The Project would comply with RR UTL-1. Impacts would be less than significant, and no mitigation required.

Wastewater Treatment/Storm Drainage

The City of West Covina Public Services Department (Maintenance Division) maintains the City's sewer system. Wastewater from the City's system is treated by the Los Angeles County Sanitation District (LACSD). West Covina's wastewater is treated and disposed of at the LACSD's San Jose Creek Water Reclamation Plant (SJCWRP) and/or the Whittier Narrows Reclamation Plant (WNRP). West Covina is spread across three LACSD sanitation districts: 15, 21, and 22. The SJCWRP has a maximum permitted capacity of 100 million gallons of wastewater per day (mgd) and serves a large residential population of approximately one million people. The SJCWRP treats an average flow of 65.7 mgd (LACSD 2020a). The WNRP has a maximum permitted capacity of 15 mgd and serves a population of approximately 150,000 people. Currently, the WNRP treats an average flow of 7 mgd (LACSD 2020b). Within each sanitation district there are differing sewer connection fees. Connection fees are paid for by the connection of new service, expansion of service, change of use category, demolition or rebuilding of a facility, and application for an industrial wastewater permit (City of West Covina 2016b).

The Project would convey sewage through an onsite 8-inch polyvinyl chloride (PVC) sewer line and 4-inch PVC laterals, which would tie into the existing sewer main in East Rowland Avenue, as shown in Exhibit 3-8. As stated above, SJCWRP has a maximum permitted capacity of 100 mgd and treats an average flow of 65.7 mgd. The remaining available capacity is 34.3 mgd. WNRP has a capacity of 15 mgd and treats an average flow of 7 mgd, which leaves an available capacity of 8 mgd. The Project is estimated to generate 24,648 gpd of wastewater, based on LACSD's generation rate source of 156 gpd/residential unit. This would be less than 0.1 mgd of the available capacity. Wastewater generation of the Project would increase the demand of SJCWRP

[1] Assumptions:
1. Indoor residential water use at 55 gpcd based on State Department of Water Resources goal of new residential construction. (The rest of the assumptions are on the following page, as footnote)
2. Private yard area at 150 sf per unit for single family units and 100 sf for multi-family units with 50 percent landscape and 50 percent hardscape.
3. Project common area at 100 sf per unit with 75 percent landscape and 25 percent hardscape.
4. Neighborhood park at 0.27 acre (11,761 sf) with 90 percent landscape and 10 percent hardscape.
5. Total landscape irrigation use is based on State Model Water Efficient Landscape Ordinance (MWELO) using 50 inches for local evapotranspiration rate and an evapotranspiration adjust factor of 0.55 for residential landscaping.

and WNRP by less than 0.1 percent. Given the existing capacities at SJCWRP and WNRP, both facilities would be able to serve the Project. Additionally, payment of the LACSD capital facilities capacity charges would provide funds for the incremental increase in demand for wastewater treatment that would occur with the Project (see RR UTL-2).

Under existing conditions within the Project area, prevailing drainage is southwesterly at a rate of one percent. The City of West Covina holds storm drain easements over strips of land along the north and west side of the Project site. An existing earthen swale within these easement strips conveys runoff from a portion of the Project site, the residential property along North Eileen Street north of the Project site, and a portion of the Food 4 Less/Big Lots shopping center adjacent to the northeast corner of the Project site. This swale outlets through an existing parkway drain onto East Rowland Avenue at the southwest corner of the Project site. The drainage area of the properties along North Eileen Street and the shopping center, which contribute storm runoff to the Project site, is approximately 5.8 acres. The tributary areas are fairly equally split between the two land uses. Runoff from the shopping center is picked up in a catch basin at the southwest corner of the Project site and is then conveyed via pipe underground along the adjacent westerly residential property to the earthen swale west side of North Eileen Street on the Project site. A curb depression was also constructed at this location to discharge runoff from North Eileen Street into the swale. The pipe drainage and the runoff from North Eileen Street meanders along the swale to the parkway drain outlet at East Rowland Avenue. Approximately 70 percent of the Project site currently drains to the swale as well. The remaining percentage of the Project site, which contains mostly of impervious surfaces, drains out to East Rowland Avenue by sheet flowing through the southeastern portion of the Project site (DJP Engineering 2020).

As part of the Project, a private storm drain system located within the main drive aisles would convey the Project's stormwater runoff to an underground detention system in the guest parking lot adjacent to East Rowland Avenue. Stormwater would infiltrate and be detained and meter the runoff onto East Rowland Avenue, to match historical drainage patterns and volumes. In addition, stormwater from North Eileen Avenue would be intercepted and re-routed through the onsite storm drain system. This would allow for abandonment of the existing storm drain swale and easement along the westerly boundary of the site, and improved drainage for the area. Exhibit 3-8, Conceptual Utility Plan, shows the layout of the proposed storm drain improvements.

The storm water runoff from the Project site would not exceed the capacity of the existing storm drain system, and no infrastructure improvements would be required beyond the installation of on-site storm drain facilities. The construction of the on-site water quality BMPs and storm drain lines within the Project site has the potential for temporary construction-related impacts. Since utility installations are within the construction impact limits identified for the proposed Project, the potential impacts associated with the construction of storm drain lines have been addressed in the respective sections of this IS/MND. No impacts would occur, and no mitigation is required.

Electricity

Southern California Edison (SCE) currently provides electricity to the City of West Covina, including the Project Site (SCE 2020). The Project's projected electricity usage is shown in Table 4-10, Energy Use During Operations. Electrical service to the Project site would be provided in accordance with SCE's policies and extension rules on file with the California Public Utilities

Commission (CPUC). Therefore, a significant impact related to the need for new systems or supplies or substantial alterations related to electricity would not occur. Additionally, the Project Applicant will coordinate with SCE to ensure avoidance of any notable service disruptions during the extension of, relocation of, upgrade of, or connection to services. Impacts are considered less than significant, and no mitigation is required.

Natural Gas

The Southern California Gas Company (SCGC) currently provides natural gas service to the City of West Covina, including the Project site (SCGC 2020). The Project's projected natural gas usage is shown in Table 4-10, Energy Use During Operations. The service would be provided in accordance with SCGC's policies and extension rules on file with the CPUC. Therefore, a significant impact related to the need for new systems or supplies or substantial alterations related to natural gas would not occur. Additionally, the Project Applicant would coordinate with SCGC to ensure avoidance of any notable service disruptions during the extension of, relocation of, upgrade of, or connection to services. Impacts are considered less than significant, and no mitigation is required.

Telecommunications

Verizon provides telecommunications service to the area, including the Project site. The service would be provided in accordance with Verizon's policies and extension rules on file with the CPUC. Therefore, a significant impact related to the need for new systems or supplies or substantial alterations related to telecommunications would not occur. Additionally, the Project Applicant would coordinate with Verizon to ensure avoidance of any notable service disruptions during the extension of, relocation of, upgrade of, or connection to services. Impacts are considered less than significant, and mitigation is not required.

The Project would not require the construction or expansion of water or wastewater infrastructure and treatment facilities, storm water drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. As stated in response to Threshold 4.19a above, water service for the Project would be provided by Suburban Water Systems. Approximately 80 percent of water from Suburban Water Systems is supplied from wells within the San Gabriel Valley and Central Basins. As indicated under Threshold (a) on page 4-100, above, the proposed development is estimated to create a water demand of 30,589 gpd or 34.3 afy. The assumptions for these calculations are included on that page as a foot note.

With the elimination of water demand from the existing school use, the net water demand is not anticipated to be significantly different, and upgrades to existing water lines would not be anticipated. Water service to the Project would also be provided in compliance Chapter 23, Article III, Water of the West Covina Municipal Code, which sets regulations for service connections, water rates, and other water system provisions (see RR UTL-1).

Suburban Water Systems (Suburban) is a retail water company that provides water to the City of West Covina in addition to eight other cities. Based on Suburban's 2015 Urban Water Management Plan (UWMP), it services approximately 300,000 people within its service boundary, which is primarily divided into two main service areas, the San Jose Hills and the Whittier/La Mirada service areas. The City of West Covina is within the San Jose Hills Service Area (Suburban 2015).

As identified in the UWMP, water demand (potable and raw) for single family residential in the San Jose Service Area was projected at 14,854 acre-feet (af) through the year 2040. It should be noted that Suburban does not differentiate between single-family and multi-family uses, and all residential demands have been included under the single-family category. The UWMP identifies the water supplies needed to meet future demand and includes current and planned conservation measures to reduce water demand. It takes into consideration projected growth within the service area and availability of future water supplies. As discussed in the 2015 UWMP, Suburban has sufficient water supply and is cable of meeting future water demands during normal, single-dry, and multiple-dry years through the year 2040.

The Project would comply with Sections 4.303 and 4.304 of the CALGreen Code (as adopted by the City), which require indoor and outdoor water conservation measures such as low flush toilets, aerators on sinks and showerheads, other water-efficient appliances, and water-efficient automatic irrigation system controllers. Compliance with these regulations and programs is provided as RR UTL-3.

The increase in water demand generated by the proposed Project would be minimal; would be served by the City with minor impacts on current water supplies; and is within the projected growth and increased water demand within City's service area. With compliance with the City's water conservation measures, the proposed Project would not significantly impact the City's domestic water supply. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. As estimated above, the proposed Project would generate approximately 24,648 gpd of wastewater. As stated above, SJCWRP has a maximum permitted capacity of 100 mgd and treats an average flow of 65.7 mgd. The remaining available capacity is 34.3 mgd. WNRP has a capacity of 15 mgd and treats an average flow of 7 mgd, which leaves an available capacity of 8 mgd. The Project is estimated to generate 24,648 gpd of wastewater, based on LACSD's generation rate source of 156 gpd/residential unit. This would be less than 0.1 mgd of the available capacity. Wastewater generation of the Project would increase the demand of SJCWRP and WNRP by less than 0.1 percent. The Project would also pay LACSD capital facilities capacity charges to fund wastewater treatment that would be needed by the Project (see RR UTL-2). The Project would not exceed the capacities of the wastewater treatment facilities. Impacts would be less than significant, and no mitigation is required.

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

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

Less than Significant Impact. The City of West Covina contracts with Athens Services to provide trash, recycling, and special pickup services throughout the City. Athens Services provides trash and recycling collection service to residences, as well as all commercial, governmental, and industrial facilities within West Covina (City of West Covina 2016a). Waste collected by Athens Services within the City is taken to a Materials Recovery Facility (MRF) in the City of Industry, which accepts trash as well as commingled materials such as glass, plastic, cardboard, etc. that is sorted and separate at the facility. The City of Industry MRF can process 5,000 tons of mixed material each day (City of West Covina 2016a). Solid waste that is not diverted is disposed of at the Victorville Sanitary Landfill, a Class III (i.e., municipal waste) landfill located in the City of Victorville. Victorville Sanitary Landfill is owned and operated by the County of San Bernardino Solid Waste Management Division. The landfill has a permitted daily throughput of 3,000 tons/day, a max permitted capacity of 83,200,000 cubic yards, and an estimated remaining capacity of 81,510,000 (CalRecycle 2020). The City's solid waste disposal activities are required to be in compliance with the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939). AB 939 requires jurisdictions to meet the statewide goal to divert 25 percent and 50 percent of solid waste generated by year 1995 and 2000.

The proposed Project involves demolition of the existing structures and paved surfaces on the Project site, which would generate 100 truckloads of demolition debris to be hauled off site. In accordance with Section 4.408 of the CALGreen Code, at least 65 percent of demolition and construction debris would need to be diverted from landfills by recycling, reuse, and/or salvage (see RR UTL-4). Chapter 7, Article XVI, Waste Reduction, Reuse and Recycling of Construction and Demolition Debris, of the City's Municipal Code, outlines the requirements for diverting construction waste into landfills for every "covered project" as set forth in section 7-261(a) and (b). Construction and demolition wastes are required to be made available for deconstruction, salvage, and recovery prior to demolition. Further, demolition and construction waste requires diversion of a minimum of 65 percent of the construction and demolition debris resulting from that project in compliance with state and local statutory goals and policies and to create a mechanism to secure compliance with the stated diversion requirements.

Project implementation would result in the development of 158 single and multi-family residential units. Based on a solid waste generation rate of 4.48 pounds per person per day, assuming a maximum occupancy of 529, the Project's residential uses would generate approximately 2,386 pounds of trash per day (USEPA 2020). The Victorville Sanitary Landfill with remaining capacity of 81,510,000 and an anticipated closure date of October 1, 2047 would accommodate the short-term disposal of construction and demolition wastes from the Project.

On October 6, 2011, the California Governor signed AB 341, establishing a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020. The bill also mandates local jurisdictions to implement commercial recycling by July 1, 2012 for businesses and public entities generating four cubic yards of trash or more and multi-family residential dwellings with five or more units. Solid waste storage and collection at the

Project would comply with Chapter 12, Garbage and Rubbish Collection, of the Municipal Code. The proposed residences would have regular waste collection services; be provided with recycling bins to promote residential recycling; and be encouraged to participate in the City's solid waste diversion programs.

As discussed in Section 4.9, Hazards and Hazardous Materials, of this IS/MND, hazardous wastes generated during demolition and construction activities would be disposed of in accordance with existing regulations (including RR HAZ-2 and RR HAZ-3 for the handling of ACM wastes and RR HAZ-1 for the handling of LBP). Similarly, hazardous material used during construction and occupancy of the proposed Project, including maintenance activities, would be conducted in compliance with applicable regulations.

Solid waste generation during demolition and construction activities for the proposed Project would be short-term and could be accommodated within the remaining capacities of the Victorville Sanitary Landfill. No conflict with statutes and regulations related to solid waste would occur. Thus, the Project would result in less than significant impact, and no mitigation is required.

Regulatory Requirements

RR UTL-1 Water service to the Project, including application for water service, service connections, water rates, fire service, and water mains, shall be constructed and provided in accordance with Chapter 23, Article III, Water, of the West Covina Municipal Code.

RR UTL-2 The Project Applicant shall pay the applicable Connection Fee Program capital facilities fees to the Los Angeles County Sanitation District (LACSD), as authorized by the California Health and Safety Code Sections 5400 to 5474.

RR UTL-3 The Project shall be designed and constructed with water-efficient fixtures and systems, as required by the CALGreen Code, which has been adopted by reference into Section 7-301, Adoption of Title 31 (Green Building Standards Code), of the West Covina Municipal Code.

RR UTL-4 The Project contractor shall recycle, reuse, and/or salvage at least 65 percent of demolition and construction debris, in accordance with Section 4.408 of the CALGreen Code.

Mitigation Measures

Project implementation would not result in significant impacts related to utilities and service systems; therefore, no mitigation measures are required.

4.20 WILDFIRE

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

Impact Analysis

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

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

No Impact. The proposed Project is not within a designated Very High Fire Hazard Severity Zones (VHFHSZ), as defined by the California Department of Forestry and Fire Prevention (CalFire). The nearest designated disaster route to the Project site is Azusa Boulevard, which is approximately 340 feet east of the site (City of West Covina 2008). The nearest designated freeway disaster route is I-10 freeway, located 0.47-mile south of the site. Temporary lane closures on adjacent streets (East Rowland Avenue, East Pioneer Drive, and/or North Eileen Street) may be required during the short-term construction period in order to connect the proposed Project to the existing utility infrastructure within these roadways. However, Project construction would not involve full closure of any public roadway during construction. Implementation of traffic control measures during construction in accordance with Chapter 19, Article X, Section 19-302, Standard Specifications for Public Works Construction, of the Municipal Code, which adopts the Greenbook by reference (see RR HAZ-4), would further reduce the potential for traffic hazards and the obstruction of access to adjacent parcels. Additionally, because Checklist Response thresholds 4.20a through 4.20d apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

In the long-term, the Project would provide an access driveway off North Eileen Street that would be used for emergency response to the site and for emergency evacuation of the site, in addition to two primary ingress and egress points, located on East Rowland Avenue, on the southern

boundary of the Project site. The Project would not affect emergency response or emergency evacuation of adjacent land uses. Additionally, East Rowland Avenue, East Pioneer Drive, and/or North Eileen Street are not designated evacuation corridors at the City. No impact would occur, and no mitigation is required.

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

No Impact. As indicated in Checklist Response 4.9.g, Hazards and Hazardous Materials, the Project site is in a highly urbanized area of the City, and there are no large, undeveloped areas and/or steep slopes on or near the site that would exacerbate fire risks such that would expose the Project and its occupants to wildfire related hazards. The site and the surrounding areas are not located in designated VHFHSZ, as identified by CalFire. Rather, the site is within a Non-VHFHSZ area. Additionally, based on review of the Natural Hazard Mitigation Plan, the Project site is not located within designated Wildland Very High Fire Hazard Areas or Wildland High Fire Hazard Areas (West Covina 2011). Therefore, the Project is not expected to exacerbate wildfire risks and create pollutants associated with wildfire or uncontrolled spread of wildfire. Additionally, because Checklist Response thresholds 4.20a through 4.20d apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As previously described, the proposed Project is not within a designated VHFHSZ as defined by CalFire. As discussed in Section 3.0, Project Description, the site is located in a highly urbanized area and surrounded by developed land on all sides. While Project construction may result in temporary lane closures, it would not involve full closure of any public roadway during construction. Implementation of traffic control measures during construction (see RR HAZ-4), would reduce the potential for traffic hazards and the obstruction of access to adjacent parcels. All proposed structures would be constructed to meet current building and fire codes. Implementation of the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Additionally, because Checklist Response thresholds 4.20a through 4.20d apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. As previously described, the proposed Project is not within a designated VHFHSZ as defined by CalFire. The Project is in a highly urbanized area that is in a generally flat topographical area away from downslope or landslide areas. Proposed drainage changes are described in Section 4.10, Hydrology and Water Quality. Specifically, implementation of the

Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Additionally, because Checklist Response thresholds 4.20a through 4.20d apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

Regulatory Requirements

RR HAZ-4, in Section 4.9, Hazards and Hazardous Materials, would be applicable to this topic.

Mitigation Measures

Project implementation would not result in significant impacts related to wildfire; therefore, no mitigation measures are required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

Impact Analysis:

Would 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?

Less than Significant Impact with Mitigation. There are no sensitive biological resources, habitats, or species on the Project site that would be affected by the Project. As indicated in Section 4.4, Biological Resources, of this IS/MND, given the current developed condition and the existing trees and shrubs on the site, migratory birds may nest on the vegetation on-site. However, MM BIO-1 would avoid impacts to active bird nests during construction of the Project. Impacts on migratory birds would be less than significant after mitigation.

There are no historic resources on the Project site that would be impacted by the proposed Project. Additionally, implementation of MM CUL-1 would prevent or reduce impacts on buried archaeological resources and tribal cultural resources that may be uncovered during grading and excavation activities. Implementation of MM GEO-2 would also mitigate impacts on paleontological resources. Implementation of MM TCR-1 would reduce impacts to tribal cultural resources to less than significant. With implementation of these mitigation measures, the Project's potential impacts on cultural resources and tribal cultural resources would be less than significant.

Therefore, the Project would not 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; 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. Impacts would be less than significant with mitigation.

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)?

Less than Significant Impact. As identified in the preceding analyses, all Project-level impacts have been determined to be less than significant with or without compliance with regulatory requirements or mitigated to a level considered less than significant with incorporation of mitigation measures. While the Project would contribute to potential environmental effects related to biological resources, cultural resources, geology and soils, noise, and tribal cultural resources these impacts would not be cumulatively considerable, since mitigation measures would be implemented to avoid or reduce potential Project-specific impacts associated with these environmental issues. As discussed in Section 4.3, Air Quality, and Section 4.8, Greenhouse Gas Emissions, of this IS/MND, the Project's air quality and GHG emissions impacts would be less than significant and its impacts would not be considered cumulatively considerable.

Review of the City's development shows that no new development or redevelopment is planned adjacent to the site that would occur concurrently with Project construction (City of West Covina 2020c). Development projects would be subject to environmental review by the City, pursuant to CEQA, the State CEQA Guidelines, and the City's Local CEQA Guidelines, to determine if they would lead to cumulative environmental effects as part of the appropriate CEQA analysis for each project. Since the proposed Project would not have significant impacts after mitigation, the impacts of the Project are not expected to result in cumulatively considerable impacts when added to the impacts of other projects planned or proposed in the vicinity of the site. Cumulative impacts would be less than significant, and no mitigation is required.

c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact with Mitigation. Based on the environmental analyses above, with compliance with applicable regulatory requirements and/or the implementation of mitigation measures, the Project would have less than significant impacts on humans, as it relates to the following environmental issue areas: aesthetics, agriculture and forestry resources, air quality, energy, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire.

The proposed Project's impacts on the following issue areas would be significant and would require the implementation of mitigation measures: biological resources, cultural resources, geology and soils, noise, and tribal cultural resources. All impacts would be avoided or reduced to less than significant levels after mitigation.

Therefore, the proposed Project would not result in environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, with the implementation of mitigation measures. All impacts would be less than significant after mitigation.

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