

Responses to Comments on Draft Initial Study/Mitigated Negative Declaration

Walnut Grove Residential Project

SCH No. 2020110322

Prepared for

City of West Covina
Planning Division
1444 West Garvey Avenue South, 2nd Floor, Room 208
West Covina, California 91790
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February 2021

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1.0 INTRODUCTION AND SUMMARY

1.1 INTRODUCTION

The purpose of this document is to present public comments and responses to those comments received on the Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Walnut Grove Residential Project (State Clearinghouse Number 2020110322). The City of West Covina, as the Lead Agency, has evaluated all substantive comments and has prepared written responses. In accordance with the California Environmental Quality Act (CEQA) Guidelines (Title 14 California Code of Regulations [CCR] Section 15074[b]), the decision-making body of the Lead Agency must consider the IS/MND and comments received before approving the Project. This document, which will be provided to the City Council, as the decision-making body, has been prepared in accordance with CEQA and represents the independent judgment of the Lead Agency.

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 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 East Rowland Avenue, is a large commercial retail shopping center, and beyond that is a single-family residential neighborhood.

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

The 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) and 99 uncovered guest surface parking spaces throughout the Project site. 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 common open space area would consist of 0.27 acre of neighborhood park use, which would include bench seating areas and trash receptacles; picnic areas; children’s tot-lot area; open turf area; connecting walkways; and mailboxes.

In accordance with the State CEQA Guidelines, Section 15073, the Draft IS/MND was circulated for a 30-day public review and comment period beginning on November 19, 2020 and ending on December 21, 2020. Additionally, the Draft IS/MND was available at the City of West Covina website. During the public review period, the City received a total of eight comment letters from State agencies, regional/local agencies, and individuals on the Draft IS/MND. Written responses

have been prepared to all comments received during the comment period and are included in Section 3.0 of this document.

The Final IS/MND consists of three documents: (1) the Draft IS/MND; (2) the Technical Appendices; and (3) the Responses to Comments document. The Responses to Comments document includes three sections: Section 1.0, provides the introduction; Section 2.0 provides a list of commenters on the Draft IS/MND; Section 3.0 provides responses to environmental comments received on the environmental document; and Section 4.0 includes the revisions to the text of the Draft IS/MND.

2.0 LIST OF COMMENTERS

The following is a list of commenters that submitted written comments on the Draft IS/MND. The comments included written and e-mail correspondence. The comments are listed chronologically and numbered. The responses have been prepared to match the bracketing on the comment letters. Each comment letter is followed by responses to address the comments. The comment letters and responses are included in Section 3.0 of this document.

No.	Commenter	Date of Correspondence	Page Number
<i>State Agencies</i>			
1	Department of Transportation, District 7 (DOT)	December 16, 2020	3-3
<i>Local and Regional Agencies</i>			
2	Los Angeles County Sanitation Districts (LACSD)	December 21, 2020	3-9
<i>Individuals</i>			
3	Michael and Patricia Dobszewicz (M&PD)	December 18, 2020	3-15
4	Andrew and Elizabeth Guerrero (A&EG)	December 18, 2020	3-23
5	Miguel Diaz (MD)	December 21, 2020	3-31
6	Fabiola Zelaya Melicher (FZM)	December 21, 2020	3-35
7	Mr. and Mrs. Santos (SAN)	December 21, 2020	3-51
8	Ward and Phyllis Wenner (W&PW)	December 22, 2020	3-57

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3.0 RESPONSES TO COMMENTS

The City's responses to comments received on the Draft IS/MND are provided below. The responses are numbered to match the bracketing on the comment letter. Comment letters received are categorized by State agencies, regional/local agencies, and individuals. Within each category, the responses are provided chronologically.

3.1 STATE AGENCIES

One comment letter was received from the State agencies. The comment letter is listed below:

- Department of Transportation, District 7 (DOT)—December 16, 2020

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DOT

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-8391
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Serious Drought.
Making Conservation
a California Way of Life.

December 16, 2020

Ms. Jo-Anne Burns
City of West Covina
Development Services Department
1444 West Garvey Avenue South
West Covina, CA 91790

RE: Walnut Grove Residential Project
Vic. LA-10 PM 36.48
SCH # 2020110322
GTS # LA-2020-03429AL-MND

Dear Ms. Burns:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. 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. The existing vacant school uses on the site would be demolished to accommodate the 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.

DOT-1

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) has been codified into CEQA law. It mandates that CEQA review of transportation impacts of proposed developments be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts. As a reminder, Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. You may reference The Governor's Office of Planning and Research (OPR) website for more information.

DOT-2

<http://opr.ca.gov/ceqa/updates/guidelines/>

This development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

DOT-3

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Ms. Jo-Anne Burns
December 16, 2020
Page 2 of 2

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in July 2020.

DOT-3
(cont.)

<https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743>

This project is located in a Transit Priority Area (TPA) and is therefore exempt from a full VMT analysis stated by the traffic consultant. The project will generate 1,124 daily traffic trips, 82/106 AM/PM peak hour traffic trips. We concluded that a project contribution of 106 peak-hour trips to the adjacent intersections or the State facility is nominal, and the potential for an intersection or State facility impact is unlikely.

DOT-4

For this project, transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods and idle time not to exceed 10 minutes.

DOT-5

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2020-03429AL-MND.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Letter 1: Department of Transportation, District 7

Comment Letter Dated December 16, 2020

- DOT-1 The comment reiterates the Project description. No response is required.
- DOT-2 The comment regarding the mission of Caltrans and the use of Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts is noted. No further response is required.
- DOT-3 The comment regarding incorporation of the multi-modal and complete streets transportation elements, which promote alternative modes of transportation is noted and will be forwarded to the decision makers.

As identified in the IS/MND, the Project would be consistent with adopted policies, plans, or programs regarding public transit, bike, or pedestrian facilities. As discussed in the IS/MND, Section 4.8, Greenhouse Gas Emissions and 4.17, Transportation of the IS/MND, the Project is an infill development and would result in trip reductions due to the Project site's proximity to nearby commercial uses within walking distance of the Project site. As such, the Project would promote pedestrian activity in an area with complementary uses, which would reduce reliance on single-passenger vehicles.

Additionally, sidewalks are present on East Rowland Avenue, which would be retained by the Project and would continue to accommodate pedestrians and bicyclists. As presented in Project Design Feature (PDF) TRA-2 in Section 3.0, Project Description and Section 4.17, Transportation of the IS/MND, the on-street parking along Project frontage (i.e., East Rowland Avenue) would be removed by implementing red curbing, which would improve visibility and provide additional on-street space for bicyclists.

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. The proximity to and availability of bus lines would encourage use of this mode of public transportation.

While features such as internal paseos and walkways are included in the Project to accommodate pedestrians, in light of the commenter's comments and to accommodate use of bikes, the text of the IS/MND and the associated exhibit (Exhibit 3-6, Conceptual Park Enlargement Plan) will be revised to incorporate bike racks on-site for use by future residents of the Project and their guests. The bike racks will be provided in two locations adjacent to the mailboxes around the perimeter of the park. These revisions do not require recirculation of the IS/MND under CEQA Guidelines Section 15073.5(c)(4). The following addition is hereby

made to the text of the IS/MND under Section 3.1, Residential Land Use, on page 3-2 of the IS/MND (new text is shown in *red italics*):

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. *Additionally, to accommodate use of bikes by future residents and their guests, bike racks will be provided at two locations adjacent to mail boxes and wood arbor trellis entries, around the perimeter of the proposed park.*

The above modification will also be reflected in Exhibit 3-6, Conceptual Park Enlargement Plan. The exhibit is hereby modified to incorporate the proposed bike racks. The updated exhibit is included in Section 4.0, Revisions as Part of the Final IS/MND.

The comment regarding complete streets and pedestrian safety measures as road diets is noted and will be forwarded to the decision makers. This comment is beyond the scope of the proposed Project. No further response is required.

The comment regarding Caltrans’ publication of the VMT-focused Transportation Impact Study Guide (TIGS) is noted and will be forwarded to the decision makers. No further response is required.

DOT-4 The commenter concurs with the finding that the Project is in a Transit Priority Area (TPA), and as such, exempt from a VMT analysis. Further, the commenter indicates that Project’s contribution to the adjacent intersections or the State facility is nominal, and potential impact to an intersection or State facility is unlikely. Comment is noted and will be forwarded to the decision makers. No further response is required.

DOT-5 The comment regarding requirement for a transportation permit from Caltrans for use of oversized transport vehicles on State highways is noted. The Applicant is aware of this requirement and will obtain the permit, as appropriate. The comment adds that the truck trips should be limited to off-peak commute period and that idle time should not exceed 10 minutes. Comment is noted. No further response is required.

3.2 REGIONAL/LOCAL AGENCIES

One comment letter was received from the local/regional agencies. The comment letter is listed below:

- Los Angeles County Sanitation Districts (LACSD)—December 21, 2020

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LACSD

Robert C. Ferrante
 Chief Engineer and General Manager
 1955 Workman Mill Road, Whittier, CA 90601-1400
 Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
 (562) 699-7411 • www.lacsd.org

December 21, 2020

Ref. DOC 5977210

Ms. Jo-Anne Burns, Planning Manager
 City of West Covina
 1444 West Garvey Avenue South
 2nd Floor, Room 208
 West Covina, CA 91790

Dear Ms. Burns:

NOI Response for Walnut Grove Residential Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the subject project on November 19, 2020. The proposed project is located within the jurisdictional boundary of District No. 22. We offer the following comments regarding sewerage service:

- | | | |
|----|--|---------|
| 1. | The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts’ Joint Outfall H Unit 8N Trunk Sewer, located in Lark Ellen Avenue at Rowland Avenue. The Districts’ 21-inch diameter trunk sewer has a capacity of 7.3 million gallons per day (mgd) and conveyed a peak flow of 2.6 mgd when last measured in 2014. | LACSD-1 |
| 2. | The wastewater generated by the proposed project will be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average flow of 58.5 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson. | LACSD-2 |
| 3. | The expected average wastewater flow from the project site, described in the application as 66 units of detached single-family homes and 92 attached multi-family units, is 35,100 gallons per day. For a copy of the Districts’ average wastewater generation factors, go to www.lacsd.org , under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the Table 1. Loadings for Each Class of Land Use link. | LACSD-3 |
| 4. | The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts’ Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System. Payment of a connection fee may be required before this project is permitted to discharge to the Districts’ Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org , under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts’ Wastewater Fee Public Counter at (562) 908-4288, extension 2727. | LACSD-4 |

DOC 6007419.D22

Ms. Jo-Anne Burns

2

December 21, 2020

-
5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

LACSD-5

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at araza@lacs.org.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Schmidt
A. Howard

DOC 6007419.D22

Letter 2: Los Angeles County Sanitation Districts

Comment Letter Dated December 21, 2020

- LACSD-1 The comment acknowledges receipt of the Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) and identifies the jurisdictional boundary where the Project is located as District 22. The comment is noted, and no further response is required.
- The comment additionally identifies the Project’s wastewater flow, which would ultimately convey to the District’s Joint Outfall H Unit 8N Trunk Sewer. The comment indicates that the District’s trunk sewer has a capacity of 7.3 million gallons per day (mgd) and its peak flow of 2.6 was recorded in 2014. The comment and the capacity of District’s trunk sewer line is noted. No further response is required.
- LACSD-2 The comment identifies the San Jose Creek Water Reclamation Plant (WRP) as the facility that would be treating the wastewater generated by the proposed Project. The comment also notes that the effluent exceeding the capacity of the said plant are treated at the Joint Water Pollution Control Plant in the City of Carson. The comment is noted, and no further response is required.
- LACSD-3 The comment identifies the Project’s wastewater flow as 35,100 gallons per day. The comment also provides direction as to where the District’s wastewater generation factors can be retrieved. The comment is noted, and no further response is required.
- LACSD-4 The comment discusses the Districts’ connection fee that may be required of the Project. For information pertaining to the fee, the comment references the Districts’ website. Additionally, the comment indicates that for specific information regarding the connection fee and application produces, the developer should contact the Districts’ Wastewater Fee Public Counter. The comment is noted, and no further response is required.
- LACSD-5 The comment discusses the correlation between the capacity of the Districts’ wastewater facilities and the Southern California Association of Governments’ (SCAG’s) regional growth forecast. The comment notes that while this letter provides information regarding the existing capacity and informs that the Project will be served by the Districts up to the levels that are legally permitted, it is not a guarantee of wastewater service. The comment is noted, and no further response is required.

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3.3 INDIVIDUALS

A total of six comment letters/emails were received from the individuals and members of the community. The comment letters/emails are listed below:

- Michael and Patricia Dobszewics (M&PD)— December 18, 2020
- Andre and Elizabeth Guerrero (A&EG)—December 18, 2020
- Miguel Diaz (MD)—December 21, 2020
- Fabiola Zelaya Melicher (FZM)—December 21, 2020
- Mr. and Mrs. Santos (SAN)—December 21, 2020
- Ward and Phyllis Wenner (W&PW)—December 21, 2020

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Michael and Patricia Dobszewicz
600 N. Eileen St.
West Covina, CA 91791

M&PD

December 18, 2020

Sent via E-mail

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

Re: Walnut Grove Residential Project

Dear Ms. Burns:

We write in response to the city's Notice of Intent to Adopt a Mitigated Negative Declaration. Our home borders the northern side of the proposed project at the cul-de-sac on Eileen Street. We have a few concerns we would like to raise concerning this project: M&PD-1

Privacy/Solar Panels

The proposed 3-story single-family units on the north side of the property will be constructed a mere 15 feet from our southern property line. The height of these new units and the proximity to our property will impinge upon the privacy we have enjoyed for over 17 years since we purchased this property. This privacy--essentially having no neighbors to the south of our property--was a driving force in our purchase of this property in 2003. We believe during the community meetings we were told these new units would be at least 30 feet from our property lines. This no longer is the case and is obviously a result of the builder's desire to cram as many units as possible into this project. We ask that these units be moved back so the northernmost structures are no closer than 30 feet from our property line. M&PD-2

Additionally, as one mitigating factor, we discussed with the builders this summer during our neighborhood meeting to not have any usable windows--those that can be used to look down at our property--included on the north side of the properties immediately bordering our property. We were told the only windows installed would be high and not practical for tenants to use to peer onto our property. The photos included in the Initial Study and Mitigated Negative Declaration only show photos of the front side of the property, not the side facing our property. We would like confirmation that only high, inaccessible windows will be installed on the upper floors facing our property. M&PD-3

In an additional effort to mitigate the privacy concerns, we understand the builder has designated a 7.5 foot wide landscape lot between our respective properties to be maintained by the Walnut Grove HOA. The Initial Study and Mitigated Negative Declaration indicates that this landscape lot will be filled with Podocarpus Gracilior, aka Fern Pines. While in some settings this would M&PD-4

Dobszewicz Letter to West Covina re Walnut Grove.docx

Ms. Jo-Anne Burns
December 18, 2020

be an ideal choice, we believe these trees will disrupt the natural lighting that hits our property and may have a negative impact on the solar panels that sit on the south facing rooftop of our home. According to the US Forest Service, this tree can grow up to 50 feet tall¹. The Initial Study and Mitigated Negative Declaration does not indicate how these Fern Pines will be maintained, does not mention how tall they will be allowed to grow, nor do they confirm that all sides of these trees will be maintained.

M&PD-4
(cont.)

As the city of West Covina is aware, we have invested a significant amount of money to upgrade our property, including remodeling the backyard of our property by adding a pool and significant tropical landscaping, including the aforementioned solar panels. We object to any structure or landscaping that will introduce unwanted shade to our property, directly impacting the light hitting our solar panels or the aura we have created in our backyard. We would like to come to an acceptable agreement on this issue.

M&PD-5

Traffic

Anyone in this immediate area that drives their kids to school in the morning or leaves for work during that time is well aware of the local congestion caused by Rowland Elementary, Traweek Middle School, and Covina High School. Leaving Eileen Street and attempting to make a left onto Puente or a right to access the left-hand lane of Puente heading east, the only lane that continues across Azusa towards Traweek or Covina High, is in for a long wait. In fact, it often takes at least three light cycles to make it from Eileen across Puente during these times. One way around this is to traverse Eckerman Ave., Homerest Ave., Pioneer Dr., and Leaf Ave. to gain access to Rowland Ave. and to then use Rowland Ave. to cross Azusa. Adding all of the cars that will be housed in the Walnut Grove development is going to directly impact all of the above. We are asking the city of West Covina to take a hard look at the traffic issues on Puente and Rowland as they intersect with Azusa. This is equally an issue in the afternoons going the opposite direction.

M&PD-6

One mitigating factor would be to change the deep drainage passages on Azusa that forces cars to slow well below the listed speed limits while crossing. These may carry a built-in safety mechanism as it forces cars to slow before crossing, but it severely limits the number of cars that can pass during each traffic light cycle.

M&PD-7

Additionally, there are a limited number of cars that can pass by any of these schools while children are present due to the sheer number of cars on the road, the cross-walks being utilized, left-hand turns being allowed--which holds up all of the cars behind, or cars backed up into the main streets while cars are dropping off children. With this already being a problem in this immediate area, adding a large number of cars exiting from the new Walnut Grove development is only going to increase traffic and cause additional frustration. We are aware the city has a financial interest in building as many units as possible, but at the same time, they have to take active measures to manage the flow of traffic in our neighborhood.

M&PD-8

¹ https://hort.ifas.ufl.edu/database/documents/pdf/tree_fact_sheets/podgraa.pdf

Ms. Jo-Anne Burns
December 18, 2020

Additional Concerns

During our summertime neighborhood meeting with the designers for this development, we discussed a few things unique to our property. We want to note them here and mention one not previously discussed.

- There's a large palm tree that sits on the southwest boarder of our property. We would like that palm removed and believe it sits on the school property. We raised this with the designers and they said they would take care of removing the palm. We would like this confirmed in writing. M&PD-9

- When we remodeled our backyard, we replaced the block wall on the south side of our property with a new 6-foot block wall. At that time, we extended that wall west to align with the front of our house. What remains is a chain link fence on the school's property that runs the entire length of our property and ends just about where the aforementioned palm tree sits. We are aware the chain link fence will be removed and replaced with a block wall. We discussed either extending our newly built wall west to end where the exiting chain link fence ends, or taking down the entire wall we built and replacing it with the wall proposed by the builder. We have concerns in taking down our existing wall as it would directly impact the large shrubs we've since planted along a long portion of that wall which have taken over three years to reach the desired height. Additionally, we had custom caps created for our wall which match the caps on our northern wall and a portion behind our garage. We are open to continued discussions with the builder concerning this wall. M&PD-10

- We do not recall seeing any lighting from the Walnut Grove design that would shine onto our property. To the extent any lighting will be added that has the potential to shine onto our property, we would like an assurance that proper shielding will be implemented to prevent these lights from polluting our property. M&PD-11

- Holes have been placed into the asphalt on Eileen by the surveying company. These holes have the potential for scooters or skateboards to be wedged into them. We ask that the builders or the city repair these holes and perhaps resurface Eileen following the construction as additional damage may occur during construction. M&PD-12

We look forward to working with you to resolve these issues.

Respectfully submitted,

/s/ Michael and Patricia Dobszewicz

Michael and Patricia Dobszewicz

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Letter 3: Michael and Patricia Dobszewicz

Comment Letter Dated December 18, 2020

M&PD-1 The comment identifies the location of the commenters' home in relation to the Project and indicates that they have concerns. The comment is noted, and no further response is required.

Privacy / Solar Panels

M&PD-2 The comment identifies the location of their property in relation to the proposed Project at their southern property line. The comment states that unlike what they were told at the community meeting, the proposed Project would be 15 feet from their property and not 30 feet. In light of this distance, the commenter expresses concern for lack of privacy.

It should be noted that the site plan presented to the surrounding neighbors at the community meeting has not changed relative to the setback from the northerly property line. The setback is larger than what the zoning requires for the adjacent residential zone. The adjacent property is zoned R-1, which requires a 25-foot front setback and a 5-foot side and rear setbacks with a maximum building height of 25 feet. For comparison, the second floor would require a 30-foot front setback, a 10-foot side setback, and a 25-foot rear setback. The proposed Project provides a 15-foot side setback, 7.5-foot landscaper buffer, and a 25-foot building height.

M&PD-3 The next concern expressed by the commenter is the usable windows to the north side of the proposed structures facing their backyard. The comment adds that based on discussions at the neighborhood meeting, it is anticipated that usable windows would not be installed such that would invade their backyard privacy. The comment asserts that the graphics in the IS/MND do not depict the back side of the proposed structures, so they cannot confirm lack of such windows. The comment is noted and will be forwarded to the decision makers. However, lack of graphics showing the back side of the proposed structures, does not imply that the preferred windows would not be installed. In fact, the windows on the second story units along the north side of the property have been modified to a height that will make it impractical for the future residents in those units to have downward visibility into the existing adjacent properties.

M&PD-4 The comment expresses concern over the type of trees that would be installed between the proposed Project and their property casting shade on their solar panels that are installed on the south facing rooftop of their home. In light of growth potential of these trees, the natural light onto their property would be impacted.

The designated 7.5-foot landscape buffer is intended to be planted with Podocarpus Gracilior (or similar) and maintained on a regular basis. The purpose of the buffer is to provide additional privacy. The landscape buffer will not be a maintenance obligation of the individual unit owner. To keep the landscape buffer uniform, the plant material will be maintained by the homeowners association for the Project

and will be kept at a manageable height that will not impact roof-mounted solar panels.

M&PD-5 The commenter explains the upgrades to their backyard and objects to structures that would cast shade on their property or their solar panels. Please refer to Response M&PD-4, above. No further response is required.

Traffic

M&PD-6 The comment shared concerns regarding local congestion resulted by schools in the area and identifies specific issues in the local circulations system. The commenters add that the proposed Project will exacerbate the existing congestion. The comment is noted and will be forwarded to the decision makers.

It should be recognized that the improvements for the intersections on North Azusa Avenue are not required for this Project. If the desire is to reach Trawek or Covina High, a right turn from Puente Avenue onto North Azusa Avenue followed by a left turn on East Rowland Avenue would likely be more efficient than traveling through the neighborhood to reach East Rowland Avenue directly. Additional concerns regarding the Azusa intersections are beyond the scope of this Project and can be addressed to the City, and no further response is warranted.

Additionally, Section 4.17, Transportation, of the IS/MND includes a detailed analysis of the potential traffic impacts of the proposed Project. While it is acknowledged that the Project would generate trips and increase traffic, as identified in Section 4.17, construction traffic is not likely to create any significant impact due to the size of the proposed Project. Additionally, during Project operations, the limited number of Project trips (69) traveling through the Azusa Avenue/Rowland Avenue intersection is unlikely to result in any impacts to the operation of the intersection. Thus, potential impacts are considered less than significant, and no mitigation measures are deemed necessary.

M&PD-7 The comment identifies changing the deep drainage passages on North Azusa Avenue as a mitigating factor, as they will slow down cars while crossing. Your comment is noted and will be forwarded to the decision makers. The changes proposed are beyond the scope of this Project and can be addressed to the City. No further response is warranted.

M&PD-8 The comment regarding congestion due to the schools in the area is noted and will be forwarded to the decision makers. It should be recognized that school zones are generally areas of congestion, particularly in the morning peak period where school drop offs corresponds with the overall peak travel period of all (non-school) traffic. Congestion issues around schools are common throughout the City, but school traffic impacts to peak hour commuter travel are generally limited to a relatively short period in the AM peak hour (school release times generally do not overlap with the PM peak commute period). As discussed in Section 4.17, Transportation, of the IS/MND, in the morning, the Project is expected to add approximately 32 vehicles in the area of Rowland Avenue Elementary, with the remaining 48 vehicles expected to travel on East Rowland Avenue only between Azusa Avenue and the

Project site. While the introduction of only a few vehicles to an already-congested situation can worsen conditions, the number of vehicles being added will be a relatively small percentage of the existing traffic in the area. As indicated in Response M&PD-6, above, the limited number of vehicle trips generated by the proposed Project are unlikely to result in any impacts at roadways and intersections near the site and in the surrounding area. As such, the analysis does not identify any mitigation measures, as none is required.

Additional Concerns

- M&PD-9 The comments expresses concern over a palm tree that is believed to be on the school property. The commenters request that the tree be removed. It should be noted that if the tree is outside the Project boundary, the Applicant is not responsible for removing the tree. However, based on discussions between the Applicant and the commenters, the Applicant has agreed to remove the said palm tree.
- M&PD-10 The comment is regarding the wall on the south side of the property that the commenters built. While the commenters previously discussed replacing their wall with the proposed block wall, they are concerned about the potential impact to their large plants (shrubs) along their existing wall. It should be noted that the Applicant is currently working with the commenters on either an extension or replacement of the wall, and the Applicant is aware of the commenters' concerns about their plants along the existing wall.
- M&PD-11 The comment regarding potential light spillover onto the commenters' property is noted and will be forwarded to the decision makers. The discussion in Section 4.1, Aesthetics, of the IS/MND acknowledges that the Project would change lighting levels; however, it indicates that the lighting would be consistent with the ambient and night-time lighting at the existing residential uses around the site. To further 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 exterior 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". This is generally accomplished with shielding and directional lighting methods, and lighting will specifically focus on streets, parking, and pedestrian areas. Thus, in light of the provisions in place, the potential impacts pertaining to light spillover would be less than significant.
- M&PD-12 The comment regarding holes on the asphalt on Eileen by the survey company is noted. It should be recognized that the Applicant will modify the cul-de-sac at the south of North Eileen Street to improve drainage, but it will remain essentially in its current configuration. The cul-de-sac will not be removed or incorporated into the new community. A solid perimeter wall will be installed around the cul-de-sac to

discourage access and parking for new residents and guests. There will be a gated access point restricted to emergency vehicles only.

Following completion of the drainage improvements at the North Eileen Street cul-de-sac, the road will be repaired to resurface damaged areas associated with the construction effort and the holes identified by the commenters.

Andrew and Elizabeth Guerrero
601 N. Eileen Ave.
West Covina, CA 91791

A&EG

December 18, 2020

Sent via E-mail

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

Re: Walnut Grove Residential Project

Dear Ms. Burns:

We write in response to the city's Notice of Intent to Adopt a Mitigated Negative Declaration. Our home borders the northern side of the proposed project at the cul-de-sac on Eileen Street. We have a few concerns we would like to raise concerning this project: A&EG-1

Privacy/Solar Panels

The proposed 3-story single-family units on the north side of the property will be constructed a mere 15 feet from our southern property line. The height of these new units and the proximity to our property will impinge upon the privacy we have enjoyed for over 13 years since we purchased this property. This privacy--essentially having no neighbors to the south of our property--was a driving force in our purchase of this property in 2007. Also wanted to note that purchasing a home in a cul-de-sac was a HUGE selling point when we purchased our home. We believe during the community meetings we were told these new units would be at least 30 feet from our property lines. This no longer is the case and is obviously a result of the builder's desire to cram as many units as possible into this project. We ask that these units be moved back so the northernmost structures are no closer than 30 feet from our property line. A&EG-2

Additionally, as one mitigating factor, we discussed with the builders this summer during our neighborhood meeting to not have any usable windows--those that can be used to look down at our property--included on the north side of the properties immediately bordering our property. We were told the only windows installed would be high and not practical for tenants to use to peer onto our property. The photos included in the Initial Study and Mitigated Negative Declaration only show photos of the front side of the property, not the side facing our property. We would like confirmation that only high, inaccessible windows will be installed on the upper floors facing our property. A&EG-3

In an additional effort to mitigate the privacy concerns, we understand the builder has designated a 7.5 foot wide landscape lot between our respective properties to be maintained by the Walnut Grove HOA. The Initial Study and Mitigated Negative Declaration indicates that this landscape A&EG-4

Guerrero Letter to West Covina re Walnut Grove

lot will be filled with Podocarpus Gracilior, aka Fern Pines. While in some settings this would be an ideal choice, we believe these trees will disrupt the natural lighting that hits our property and may have a negative impact on the solar panels that sit on the south facing rooftop of our home. According to the US Forest Service, this tree can grow up to 50 feet tall¹. The Initial Study and Mitigated Negative Declaration does not indicate how these Fern Pines will be maintained, does not mention how tall they will be allowed to grow, nor do they confirm that all sides of these trees will be maintained.

A&EG-4
(cont.)

As the city of West Covina is aware, we have invested a significant amount of money to upgrade our property by adding solar panels. We object to any structure or landscaping that will introduce unwanted shade to our property, directly impacting the light hitting our solar. We would like to come to an acceptable agreement on this issue.

A&EG-5

Traffic

Anyone in this immediate area that drives their kids to school in the morning or leaves for work during that time is well aware of the local congestion caused by Rowland Elementary, Traweek Middle School, and Covina High School. Leaving Eileen Street and attempting to make a left onto Puente or a right to access the left-hand lane of Puente heading east, the only lane that continues across Azusa towards Traweek or Covina High, is in for a long wait. In fact, it often takes at least three light cycles to make it from Eileen across Puente during these times. One way around this is to traverse Eckerman Ave., Homerest Ave., Pioneer Dr., and Leaf Ave. to gain access to Rowland Ave. and to then use Rowland Ave. to cross Azusa. Adding all of the cars that will be housed in Walnut Grove is going to directly impact all of the above. We are asking the city of West Covina to take a hard look at the traffic issues on Puente and Rowland as they intersect with Azusa. This is equally an issue in the afternoons going the opposite direction.

A&EG-6

One mitigating factor would be to change the deep drainage passages on Azusa that forces cars to slow well below the listed speed limits while crossing. These may carry a built-in safety mechanism as it forces cars to slow before crossing, but it severely limits the number of cars that can pass during each traffic light cycle.

A&EG-7

Additionally, there are a limited number of cars that can pass by any of these schools while children are present due to the sheer number of cars on the road, the cross-walks being utilized, the left-hand turns being allowed, which holds up all of the cars behind, or cars backed up into the main streets while cars are dropping off children. With this already being a problem in this immediate area, adding a large number of cars exiting from the new Walnut Grove neighborhood is only going to increase traffic and cause additional frustration. We are aware the city has a financial interest in building as many units as possible, but at the same time, they have to take active measures to manage the flow of traffic in our neighborhood.

A&EG-8

Additional Concerns

During our summertime neighborhood meeting with the designers for this development, we discussed a few things unique to our property. We want to note them here and mention one not previously discussed.

- We do not recall seeing any lighting from the Walnut Grove design that would shine onto our property. To the extent any lighting will be added that has the potential to shine onto our property, we would like an assurance that proper shielding will be implemented to prevent these lights from polluting our property. A&EG-9
-

- We would also like it in writing that we would keep our cul-de-sac. That was a huge factor when we purchased our home. Our kids have enjoyed the cul-de-sac for many years and have many fond memories. A&EG-10
-

Holes have been placed into the asphalt on Eileen by the surveying company. These holes have the potential for scooters or skateboards to be wedged into them. We ask that the builders or the city repair these holes and perhaps resurface Eileen following the construction

- as additional damage may occur during construction

We look forward to working with you to resolve these issues.

Respectfully submitted,

Andrew and Elizabeth Guerrero

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Letter 4: Andre and Elizabeth Guerrero

Comment Letter Dated December 18, 2020

A&EG-1 The comment identifies the location of the commenters' home in relation to the Project and indicates that they have concerns. The comment is noted, and no further response is required.

Privacy / Solar Panels

A&EG-2 The comment identifies the location of their property in relation to the proposed Project at their southern property line. The comment states that unlike what they were told at the community meeting, the proposed Project would be 15 feet from their property and not 30 feet. In light of this distance, the commenter expresses concern for lack of privacy.

It should be noted that the site plan presented to the surrounding neighbors at the community meeting has not changed relative to the setback from the northerly property line. The setback is larger than what the zoning requires for the adjacent residential zone. The adjacent property is zoned R-1, which requires a 25-foot front setback and a 5-foot side and rear setbacks with a maximum building height of 25 feet. For comparison, the second floor would require a 30-foot front setback, a 10-foot side setback, and a 25-foot rear setback. The proposed Project provides a 15-foot side setback, 7.5-foot landscape buffer, and a 25-foot building height.

A&EG-3 The next concern expressed by the commenter is the usable windows to the north side of the proposed structures facing their backyard. The comment adds that based on discussions at the neighborhood meeting, it is anticipated that usable windows would not be installed such that would invade their backyard privacy. The comment asserts that the graphics in the IS/MND do not depict the back side of the proposed structures, so they cannot confirm lack of such windows. The comment is noted and will be forwarded to the decision makers. However, lack of graphics showing the back side of the proposed structures, does not imply that the preferred windows would not be installed. In fact, the windows on the second story units along the north side of the property have been modified to a height that will make it impractical for the future residents in those units to have downward visibility into the existing adjacent properties.

A&EG-4 The comment expresses concern over the type of trees that would be installed between the proposed Project and their property casting shade on their solar panels that are installed on the south facing rooftop of their home. With the growth of these trees, the natural light onto their property would be impacted.

The designated 7.5-foot tall landscape buffer is intended to be planted with *Podocarpus Gracilior* (or similar) and maintained on a regular basis. The purpose of the buffer is to provide additional privacy. The landscape buffer will not be a maintenance obligation of the individual unit owner. To keep the landscape buffer uniform, the plant material will be maintained by the homeowners association for

the Project and will be kept at a manageable height that will not impact roof-mounted solar panels.

- A&EG-5 The commenters explain the upgrades to their property by installing solar panels and object to structures that would cast shade on their property or their solar panels. Please refer to Response A&EG-4, above. No further response is required.

Traffic

- A&EG-6 The comment shared concerns regarding local congestion resulted by schools in the area and identifies specific issues in the local circulations system. The commenters add that the proposed Project will exacerbate the existing congestion. The comment is noted and will be forwarded to the decision makers.

It should be recognized that the improvements for the intersections on North Azusa Avenue are not required for this Project. If the desire is to reach Trawek or Covina High, a right turn from Puente Avenue onto North Azusa Avenue followed by a left turn on East Rowland Avenue would likely be more efficient than traveling through the neighborhood to reach East Rowland Avenue directly. Additional concerns regarding the Azusa intersections are beyond the scope of this Project and can be addressed to the City, and no further response is warranted.

Additionally, Section 4.17, Transportation, of the IS/MND includes a detailed analysis of the potential traffic impacts of the proposed Project. While it is acknowledged that the Project would generate trips and increase traffic, as identified in Section 4.17, construction traffic is not likely to create any significant impact due to the size of the proposed Project. Additionally, during Project operations, the limited number of Project trips (69) traveling through the Azusa Avenue/Rowland Avenue intersection is unlikely to result in any impacts to the operation of the intersection. Thus, potential impacts are considered less than significant, and no mitigation measures are deemed necessary.

- A&EG-7 The comment identifies changing the deep drainage passages on North Azusa Avenue as a mitigating factor, as they will slow down cars while crossing. Your comment is noted and will be forwarded to the decision makers. The changes proposed are beyond the scope of this Project and can be addressed to the City. No further response is warranted.

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Project site. While the introduction of only a few vehicles to an already-congested situation can worsen conditions, the number of vehicles being added will be a relatively small percentage of the existing traffic in the area. As indicated in Response M&PD-6, above, the limited number of vehicle trips generated by the proposed Project are unlikely to result in any impacts at roadways and intersections near the site and in the surrounding area. As such, the analysis does not identify any mitigation measures, as none is required.

Additional Concerns

- A&EG-9 The comment regarding potential light spillover onto the commenters' property is noted and will be forwarded to the decision makers. The discussion in Section 4.1, Aesthetics, of the IS/MND acknowledges that the Project would change lighting levels; however, it indicates that the lighting would be consistent with the ambient and night-time lighting at the existing residential uses around the site. To further 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 exterior 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". This is generally accomplished with shielding and directional lighting methods, and lighting will specifically focus on streets, parking, and pedestrian areas. Thus, in light of the provisions in place, the potential impacts pertaining to light spillover would be less than significant.
- A&EG-10 The comment regarding maintain the cul-de-sac is noted. It should be recognized that the Applicant will modify the cul-de-sac at the south of North Eileen Street to improve drainage, but it will remain essentially in its current configuration. The cul-de-sac will not be removed or incorporated into the new community. A solid perimeter wall will be installed around the cul-de-sac to discourage access and parking for new residents and guests. There will be a gated access point restricted to emergency vehicles only.
- A&EG-11 The comment regarding holes on the asphalt on Eileen by the survey company is noted. Following the completion of the drainage improvement at the North Eileen Street cul-de-sac, as discussed in Response A&EG-10, above, the road will be repaired to resurface damaged areas associated with the construction effort and the holes identified by the commenters.

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MD

Miguel Diaz
607 N. Eileen Ave.
West Covina, CA 91791

Sent via E-mail

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

Re: Walnut Grove Residential Project

Dear Ms. Burns:

We write in response to the city's Notice of Intent to Adopt a Mitigated Negative Declaration. Our home borders the northern side of the proposed project at the cul-de-sac on Eileen Street. We have a few concerns we would like to raise concerning this project: MD-1

Traffic

Anyone in this immediate area that drives their kids to school in the morning or leaves for work during that time is well aware of the local congestion caused by Rowland Elementary, Traweek Middle School, and Covina High School. Leaving Eileen Street and attempting to make a left onto Puente or a right to access the left-hand lane of Puente heading east, the only lane that continues across Azusa towards Traweek or Covina High, is in for a long wait. In fact, it often takes at least three light cycles to make it from Eileen across Puente during these times. One way around this is to traverse Eckerman Ave., Homerest Ave., Pioneer Dr., and Leaf Ave. to gain access to Rowland Ave. and to then use Rowland Ave. to cross Azusa. Adding all of the cars that will be housed in Walnut Grove is going to directly impact all of the above. We are asking the city of West Covina to take a hard look at the traffic issues on Puente and Rowland as they intersect with Azusa. This is equally an issue in the afternoons going the opposite direction. MD-2

One mitigating factor would be to change the deep drainage passages on Azusa that forces cars to slow well below the listed speed limits while crossing. These may carry a built-in safety mechanism as it forces cars to slow before crossing, but it severely limits the number of cars that can pass during each traffic light cycle. MD-3

Additionally, there are a limited number of cars that can pass by any of these schools while children are present due to the sheer number of cars on the road, the cross-walks being utilized, the left-hand turns being allowed, which holds up all of the cars behind, or cars backed MD-4

up into the main streets while cars are dropping off children. With this already being a problem in this immediate area, adding a large number of cars exiting from the new Walnut Grove neighborhood is only going to increase traffic and cause additional frustration. We are aware the city has a financial interest in building as many units as possible, but at the same time, they have to take active measures to manage the flow of traffic in our neighborhood.

MD-4
(cont.)

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- We do not recall seeing any lighting from the Walnut Grove design that would shine onto our property. To the extent any lighting will be added that has the potential to shine onto our property, we would like an assurance that proper shielding will be implemented to prevent these lights from polluting our property.

MD-5

-
- We would also like it in writing that we would keep our cul-de-sac. That was a huge factor when we purchased our home. Our kids have enjoyed the cul-de-sac for many years and have many fond memories.

MD-6

**Holes have been placed into the asphalt on Eileen by the surveying company. These holes have the potential for scooters or skateboards to be wedged into them. We ask that the builders or the city repair these holes and perhaps resurface Eileen following the construction
□ as additional damage may occur during construction

MD-7

We look forward to working with you to resolve these issues.

Respectfully submitted,

Miguel Diaz

Letter 5: Miguel Diaz

Comment Letter Dated December 21, 2020

MD-1 The comment identifies the location of the commenter's home in relation to the Project and indicates that he has concerns. The comment is noted, and no further response is required.

Traffic

MD-2 The comment shared concerns regarding local congestion resulted by schools in the area and identifies specific issues in the local circulations system. The commenters add that the proposed Project will exacerbate the existing congestion. The comment is noted and will be forwarded to the decision makers.

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vehicles in the area of Rowland Avenue Elementary, with the remaining 48 vehicles expected to travel on East Rowland Avenue only between Azusa Avenue and the Project site. While the introduction of only a few vehicles to an already-congested situation can worsen conditions, the number of vehicles being added will be a relatively small percentage of the existing traffic in the area. As indicated in Response M&PD-6, above, the limited number of vehicle trips generated by the proposed Project are unlikely to result in any impacts at roadways and intersections near the site and in the surrounding area. As such, the analysis does not identify any mitigation measures, as none is required.

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- MD-7 The comment regarding holes on the asphalt on Eileen by the survey company is noted. Following the completion of the drainage improvement at the North Eileen Street cul-de-sac, as discussed in Response MD-6, above, the road will be repaired to resurface damaged areas associated with the construction effort and the holes identified by the commenters.

FZM

December 21, 2020

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

RE: **Draft Initial Study and Mitigated Negative Declaration for Walnut Grove Residential Project located at 1651 East Rowland Avenue, West Covina, 91790**

Dear Ms. Burns,

Thank you for the opportunity to review the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the project referenced above. The proposed project consists of a 158-unit attached and detached residential development on an approximately 9.14-acre site.

FZM-1

Additionally, this letter provides some preliminary comments related to the design of the proposed project and concerns related to the number of concessions/incentives that the project is requesting without delivering any community benefit.

Comments related to the Draft IS/MND

Section 3.6.1 and 3.6.2 General Plan Use Amendment/Zone Change and Specific Plan Adoption

The section should disclosed that this a surplus school site being disposed by the Covina Valley Unified School District. The current zoning is Single-Family residential zone that allows a maximum density of 8 units per acre; thus providing a point of reference. This information is omitted and it does not inform the public what is currently allowed by right under the City's General Plan and Development Code.

FZM-2

4.3 Air Quality

Localized Criterial Pollutants from On-Site Construction

This section state "The LST method is recommended to be limited to project that are five acres or less...."

FZM-3

The site is over 5 acres. The discussion does not include any phasing of the work and how the sensitive receptors (existing single-family homes) adjacent to the site can be better protected during the demolition and construction phases. Therefore, additional disclosure and information should be included in order to inform the public related to phasing, location within the site, and construction staging.

Carbon Monoxide Hotspot

While it is appreciated that the analysis include the anticipated Traffic Generation of 82 trips in the AM peak hour and 106 trips in the PM peak hour with a total of 1,124 trips per day, the metric to be used for CEQA traffic

FZM-4

related impacts is Vehicle Miles Traveled. Therefore, this section must be revised to reflect the correct metric to be evaluated.	FZM-4 (cont.)
Regulatory Requirements	
Please provide a list of the regulatory requirements included in the South Coast Air Quality Management District's Rules 402 and 403, rather than assuming that the average member of the public understands what is expected from the project proponent during site clearance and construction. Also, include the contact information where the residents can call to report any violations related to air quality, noise and any other concerns.	FZM-5
4.10 Hydrology and Water Quality	
The existing site coverage of the school is 53 percent. The underlying zoning of Single-Family Residential zone allows for a <u>maximum lot coverage of 35 percent</u> . Section 26-510 of the West Covina zoning code allows a <u>maximum of 55% lot coverage</u> for MF-15 and MF-20 zones. The project proposes an <u>80 percent lot coverage</u> . The project should be required to decrease the amount of lot coverage, provide more landscaping areas to provide other means of controlling water run-off and to allow groundwater recharge. Additional comments are provided in a different section related to project design. Additionally, the amount of lot coverage will be detrimental for the future residents that will be experience heat island effect with no way to mitigate such impact.	FZM-6
4.13 Noise	
The environmental analysis should include construction phasing to better understand the order in which the units will be constructed. Also, construction staging areas should be identified and be placed as further away possible from sensitive receptors.	
Additional noise mitigations measures should include:	
<ol style="list-style-type: none">1. Construction staging areas for each phase shall be as far from sensitive receptors as possible and all affected residents should be provided an opportunity to provide input and be notified 72 hours in advance prior to work being started.2. All construction equipment shall be stored on the project site during the construction to eliminate daily heavy-duty truck trips on vicinity roadways.3. All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices4. Due to the current pandemic that limits indoor gatherings, construction should only take place from Monday through Friday to allow the existing single-family homes immediately adjacent to the site the opportunity to enjoy their weekends.5. The site must display information where to report noise violations and the person/party responsible for enforcement and resolution.	FZM-7
4.15 Public Services	
Revise section related to school. The proposed project falls under the jurisdiction of the Covina-Valley Unified School District and <u>not</u> West Covina Unified School District. Provide information of the different schools that would serve the project, average class size, etc., and whether the schools can accommodate new students.	FZM-8

The park related section doesn't identify park (s) that can serve the project. The project itself doesn't provide adequate amount of open space to off-set the "very high" park need category as identified in the Los Angeles County Park Need Assessment and to serve the future residents of the project. The Los Angeles County Need Assessment identified the area where the project is located in need of park land. The project should be redesigned to provide additional open space to serve the future residents of the project.

FZM-8
(cont.)

4.17 Transportation

The Los Angeles-South Coast Air Basin is classified as an extreme non-attainment are for ozone as identified by the Federal Clean Air Act (Act). The Act contains requirements applicable to nonattainment areas, depending on the severity of the ozone problem in the area. One of the requirements for nonattainment areas is to develop enforceable transportation strategies and control measure "to offset any growth in emissions from growth in vehicle miles traveled... and to attain reduction in motor vehicle emissions as necessary." The analysis in the Draft IS/MND does not make reference to the thresholds adopted and applied to this project (i.e., 15 percent reduction from the City's baseline).

This section fails to provide a thoughtful analysis and substantial evidence to support the conclusion that the project is exempt because it is located within ½ mile from a Priority Transit Area (TPA). A Vehicle Miles Traveled (VMT) analysis is required by State law effective July 1, 2020.

The Governor's Office of Planning and Research (OPR) has identified guidelines for projects which may be screened and would therefore be exempt from a VMT analysis. The theory is that the development of these projects will by their nature reduce vehicle trips and therefore be in conformance with SB 743. A project might be screened out if the project is an affordable, supportive, or transitional housing, assisted living facilities, senior housing (as defined by HUD) or if the project generates less than 110 daily vehicle trips, which would generally equate to 11 single-family homes, 16 multi-family, condominium or townhouse housing units.

FZM-9

Project located within a TPA may be presumed to have a less than significant impact absent substantial evidence to the contrary. This presumption may not be appropriate if the project:

- Has a Floor Area Ration (FA) of less than 0.75;
- Include more parking for use by residents
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization (SCAG); or
- Replaces affordable residential units with a small number of moderate- or high-income residential units.

The proposed project doesn't meet the criteria above and therefore, a thoughtful analysis with substantial evidence that clearly supports the conclusion in the IS/MND must be provided.

The traffic section of the Draft IS/MND fails to provide a thoughtful analysis and evidence to support the conclusion that the project is exempt because the proposed project is within ½ mile of an existing major transit stop or an existing stop along a high quality transit corridor would have less than significant impact on VMT. As explained above, the project is not automatically exempt because it is located within ½ mile of an existing major transit stop and such conclusion must be supported by substantial evidence.

Additionally, the lack of disclosure/analysis related to VMT will require recirculation of the IS/MND. Section 15088.5 of the CEQA Guidelines lists under what circumstances recirculation of a CEQ document is needed prior to certification. This section clarifies that lead agency is required to recirculate a CEQA document when significant new information is added after the public notice period has begun and such information should not deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project.

The Draft IS/MND contains a number of statements that appear to be “selective” on sections of the West Covina Zoning Code to support the conclusions of the analysis but omitting such approach in other areas of concerns (i.e., lot coverage, setbacks, height, etc.) For example, the Focused Traffic Study prepared by Psomas states under the Section 5.5 Parking *“Because this project 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 (the City Code requires 0.25 guest spaces per unit). The Specific Plan conditions would result in a required 316 parking spaces for residents and 79 spaces for guests. As shown in the site plan, each unit will include a two-car garage, which meets the residential parking requirement. In addition, there are 99 guest parking spaces located throughout the site, which exceeds the required number of guest spaces”*

FZM-9
(cont.)

Although the proposed project proposes more than one parking space per every four units as required under the West Covina Zoning Code Section 26-506, such a strategy is contrary to the OPR Guidance for screening out projects as it relates to SB 743 as explained above.

Preliminary Design and Layout Concerns

The project, as designed, lacks a good design, layout, landscaping and amenities that would result in a good quality housing development that will stand the test of time.

The comments are preliminary and due to limitations placed on all of us to review plans at City Hall, I will respectfully request that the plans be made available in the City’s website to allow for public review.

Some of these concerns are as follow:

- All walls should be decorative splitface. Eliminate the proposed 6’ tall precision block perimeter wall along the northern and westerly property lines.
- Increase the landscape buffer to a minimum of 20 feet along the northerly and westerly property lines. The project proposes a 7’-6” landscape strip. An adequate buffer will provide more privacy to the existing single family homes and will attenuate noise generated by the series of air conditioner units that the project proposes to install. Additionally, the landscape buffer will support the planting of a variety of trees that can provide shade, privacy, attenuate noise, reduce water run-off, reduce heat island effect, reduce the amount of lot coverage with hard surfaces and provide a better design and quality of life for the future residents.
- Provide a minimum of 25 feet front yard landscape to match the existing front yard setback required of the adjacent single-family homes in the area.

FZM-10

-
- Eliminate all parking spaces in the front of the project. The project should provide an interesting and attractive design. Having a parking lot detracts from celebrating the entrance of the project. The parking lot area can be designed as an open space and still accommodate an underground detention system. It should be noted that Section 26-506 of the West Covina zoning code prohibits off-street parking within any front or side yard setback are when adjacent to a street. Section 26-507 requires a minimum landscape buffer of 15 feet with an average of 20 feet for multi-family housing projects.
 - The project will be served by an interior network of 24-foot wide drive aisles and a 25-foot loop. The project proposes that each unit will contain a trash pad inside the garage. The project should be revised to incorporate adequate number of well-designed trash enclosures to be distributed throughout the project. What would those 24-foot wide drive aisles look like on trash day? The enforcement of keeping trash cans properly put away will become a nightmare through time. Rethink the design. This is not a single-family development project and design and amenities should be well thought out to ensure that the project can perform successfully through the years, contributes to the built environment and delivers a project that the community can support. Visible trash cans is a poor operational characteristic, aesthetically detrimental to public view and the quality of life of the future residents of the project.
 - The proposed single-family units should provide a front porches that are functional and more landscape in front of each unit. Not enough information provided to determine front door recessed.
 - The 5-plex 3-story townhomes lacks interest in design. The project proposes minimum variation in materials and the design relies in providing different stucco paint colors rather incorporating stacked stone, brick, wood siding or other comparable materials to convey quality and provide a more interesting design. Window fenestration can include recessed windows to enhance the elevations. All units should also provide some covered area at the front door so the door is not just an opening on the wall plane.

FZM-10
(cont.)

Concessions Requested.

The applicant is seeking a number of concessions through the proposed specific plan but offers no community benefits. Some of the concession being requested include:

- Building intensity – up zoning the site from 8 units per acre to allow a density between 15 to 18 dwelling units per acre.
- Building setbacks
- Building height
- Lot Coverage
- A decrease of landscape requirements

FZM-11

Government Code Section 65915 (California Density Bonus Law) states the following:

- (2) The applicant shall receive the following number of incentives or concessions:

(A) One incentive or concession for projects that include at least 10 percent of the total units for lower income households, at least 5 percent for very low income households, or at least 10 percent for persons and families of moderate income in a common interest development.

(B) Two incentives or concessions for projects that include at least 20 percent of the total units for lower income households, at least 10 percent for very low income households, or at least 20 percent for persons and families of moderate income in a common interest development.

FZM-11
(cont.)

(C) Three incentives or concessions for projects that include at least 30 percent of the total units for lower income households, at least 15 percent for very low income households, or at least 30 percent for persons and families of moderate income in a common interest development.

(D) Four incentives or concessions for projects meeting the criteria of subparagraph (G) of paragraph (1) of subdivision (b). If the project is located within one-half mile of a major transit stop, as defined in subdivision (b) of Section 21155 of the Public Resources Code, the applicant shall also receive a height

The proposed project doesn't include any affordable units to justify all the concessions being requested. As such, the project should include a percentage of affordable units that aligns with the incentives or concessions being sought out.

FZM-12

I also would like to request that the developer conduct additional community outreach that expands beyond the original 300-foot radius from the site. This is a significant project for the area and the public should be invited to participate. I would kindly request that you provide my contact information to the developer so I can be notified of any future community outreach. Additionally, the site should be posted announcing any community outreach even when such meetings are taking place virtually.

FZM-13

Also, a full set of plans should be made available on the City' website for the public to review and provide comments.

FZM-14

Thank you for the opportunity to review and provide comments on the Draft IS/MND and the project in general.

Sincerely,



Fabiola Zelaya Melicher
West Covina Resident

cc: West Covina Improvement Association (WCIA)
California Department of Housing and Community Development (HCD) – publiclands@hcd.ca.gov

Letter 6: Fabiola Zelaya Melicher

Comment Letter Dated December 21, 2020

FZM-1 The commenter reiterates the description of the Project and indicates that she has comments regarding the design and concerns over the concessions requested by the Project. The comment is noted, and no further response is required.

Section 3.6.1 and 3.6.2 General Plan Use Amendment/Zone Change and Specific Plan Adoption

FZM-2 The comment regarding the surplus school site and existing zoning is noted and will be forwarded to the decision makers. However, the IS/MND correctly identifies the existing designations of the site: General Plan Land Use designation of Civic: Schools and Zoning designation of Residential Single-Family (R-1). The Project is seeking approval and adoption of the Walnut Grove Specific Plan and concurrent adoption of a General Plan Land Use Amendment to allow the “Neighborhood Medium” land use designation, which permits densities between 9 and 20 dwelling units per acre. The current R-1 zoning of the site is not consistent with the current General Plan land use designation, and the General Plan Amendment and accompanying Zone Change to Specific Plan comprising the Project will eliminate this inconsistency.

It should be noted that the proposed 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). A specific plan is a legislative planning tool and as such serves as the zoning for the property involved. The Walnut Grove Specific Plan can set the parameters for the proposed development including distribution, location, extent, and intensity of land uses. As explained in Section 4.11 of the IS/MND, the Walnut Grove Specific Plan would be consistent with the General Plan and its relevant goals and objectives, and the proposed land uses will be consistent with the Zoning as described in the Specific Plan. The Walnut Grove Specific Plan will be consistent with Section 26-547 of the West Covina Zoning Code, which provides for (S-P) specific plan zones.

4.3 Air Quality

Localized Criteria Pollutants from On-Site Construction

FZM-3 The commenter indicates that the site is over five acres and the LST (Localized Significance Threshold) method is recommended to projects that are five acres or less. The commenter is correct that SCAQMD recommends that the LST methodology should be applied to project sites that are five acres or less. However, SCAQMD’s “Fact Sheet for Applying CalEEMod to Localized Significance Thresholds”¹ makes clear that the relevant acreage for purposes of applying the LST

¹ SCAQMD webpage. Accessed January 14, 2021. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/calmod-guidance.pdf?sfvrsn=2#:~:text=Fact%20Sheet%20for%20Applying%20CalEEMod%20to%20Localized%20Significance,tables%20based%20on%20site%20acreage%20to%20determine%20the>

methodology is the acreage disturbed by construction activities. The disturbance area for the Project is calculated to be 4.5 acres based on the equipment anticipated to be used to develop the site. SCAQMD's Example 1 is instructive: It describes a 15-acre development using equipment that could disturb a maximum of 2 acres per day, so the project should compare CalEEMod reported emissions against the 2-acre LST lookup tables. Here, because Project-related construction activities would not exceed the LSTs for 4.5 acres, the Project is not anticipated to result in excessive exposure of air pollutants to nearby residential uses and no mitigation measures beyond regulatory requirements are necessary. Regulatory requirements include dust control measures established under SCAQMD Rule 403 as well as limiting unnecessary idling of off-road diesel vehicles to five minutes or less, emission performance compliance options or adoption of Best Available Control Technology for fleet owners, bans on adding older dirtier (Tier 0, Tier 1, Tier 2) vehicles to large and medium sized fleets, and labeling and registration of their equipment to the California Air Resources Board through the DOORS (Diesel Off-road Online Report System) program for fleets.

The commenter has also requested information on phasing of construction activities. Section 3.5 Construction Activities of the Project Description of the IS/MND provides construction information for the Project. All construction staging would occur within the Project site boundaries. Further construction details are provided in Section 3.0, Construction Detail, of the IS/MND.

Carbon Monoxide Hotspot

FZM-4 The commenter indicates that Vehicle Miles Traveled (VMT) should be used to assess Carbon Monoxide (CO) hotspots instead of hourly traffic volumes. As explained in the IS/MND, potential impacts associated with CO emissions are appropriately evaluated by analyzing congested intersections, consistent with California Department of Transportation, *Transportation Project-Level Carbon Monoxide Protocol*, Revised December 1997. The magnitude of hourly traffic volumes, rates of CO emissions, and level of service at intersections are the primary factors that affect CO concentrations at intersections. VMT is used to determine Project-related air pollutant emissions emitted into the region as described and not for local concentrations of CO. The CO hotspot analysis was evaluated properly and found to not result in a significant air quality impact because the volume of traffic was insufficient to result in a CO hotspot, as defined by the State of California and National Ambient Air Quality Standards.

Regulatory Requirements

FZM-5 The commenter requests additional information on SCAQMD's Rule 402 and 403. SCAQMD Rule 403 is 23 pages long, and its incorporation would result in an excessive level of detail for an IS/MND. A summary of the most common dust suppression measures is described below.

SCAQMD Rule 403, Fugitive Dust, focuses on controlling fugitive dust and avoiding nuisance. Compliance with this rule will reduce short-term particulate pollutant emissions. Contractor compliance with Rule 403 requirements will be mandated in

the contractor's specifications. Some of the potential rules may include, but not be limited to:

- Non-toxic soil stabilizers/dust suppressants that create a crust on the surface to be resistant to wind erosion would be selected and applied consistent with Rule 403.
- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
- All materials to be loaded for export would be pre-watered.
- All haul trucks would either be covered (with on board tarp) or would maintain at least six inches of freeboard between the top of the soil and the edge of the truck bed.
- For inactive disturbed surface areas, apply water to at least 80 percent of all inactive disturbed surface areas on a daily basis when there is evidence of wind driven fugitive dust or establish a vegetative ground cover within 21 days after active operations have ceased.

The full SCAQMD requirements for Rule 403 can be found at <http://www.aqmd.gov/home/rules-compliance/compliance/rule-403-dust-control-information#:~:text=Rule%20403%20requires%20the%20implementation%20of%20best%20available,the%20South%20Coast%20AQMD%20by%20submitting%20specific%20forms.>

SCAQMD Rule 402 is reproduced below and can be found at <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

“A person 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. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.”

Additionally, the commenter requests that information for a contact person be provided for future complaints regarding air quality, noise, and other concerns. Comment is noted; Rule 403 requires contact signage for large operations. A large operation is defined as one with 50 or more acres of disturbed surface area or a daily earth-moving throughput of 5,000 cubic yards (cy) or more three times in a year. The Project involves approximately 9,740 cy of import, with 86,150 cy of cut, and 95,900 cy of fill over the construction duration. The grading duration is one month, which results in 4,359 cy/day of earth movement on average. Nevertheless,

the Applicant will provide contract information at a sign that will be posted at the Project site.

4.10 Hydrology and Water Quality

FZM-6 The comment expresses concern over the Project's lot coverage of 80 percent in comparison to the existing school and underlying zoning of single-family residential. The commenter further asserts that lot coverage should be decreased, and landscaping increased in light of heat island effect.

It should be recognized that the Walnut Grove Specific Plan is a planning tool that 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). As such, the Walnut Grove Specific Plan can set the parameters for the proposed development, including distribution, location, extent, intensity of land uses, building setbacks, building height, lot coverage, and landscape requirements. See response to comment FZM-2 above regarding the Project's consistency with the General Plan and Zoning Code. The purpose of the Specific Plan is to establish guidelines and standards specific to that Project, and the IS/MND accurately disclosed and analyzes the potential environmental impacts associated with the Project, including the updated zoning designations associated with the Specific Plan.

Regarding the heat island effect, it is acknowledged that hard, dry surfaces such as roofs, sidewalks, roads, buildings, and parking lots provide less shade and moisture than natural landscapes and therefore contribute to higher temperatures. However, it should also be noted that heat island effect occurs as a result of several factors (e.g., urban materials properties, urban geometry, human activity, weather and geology, and more) and not just lack of higher percentage of landscaping (EPA 2021). Additionally, the Project is too small in the context of an urban metropolitan area that is the main generator of heat island effect. The Project site is currently developed, and more than half of the site is asphalt and includes structures, and other development in the area are of similar characteristics. Thus, the Project in and of itself would not significantly contribute to heat island effect in the area.

4.13 Noise

FZM-7 The commenter requests information on phasing of construction activities. Please note, Section 3.5, Construction Activities, of the IS/MND provides construction information for the proposed Project. See response to comment FZM-3 above regarding construction phasing details.

The commenter also requests incorporation of additional mitigation measures for Noise. The comment is noted; however, it should be recognized that based on the detailed analysis in Section 4.13, Noise, of the IS/MND, the Project has implemented all necessary mitigation measures to reduce Project related construction noise impacts. The Project will comply with all applicable noise control regulations, and

additional mitigation measures are not required since the Project will result in less than significant noise impacts.

4.15 Public Services

FZM-8 The comment states that the IS/MND incorrectly identified the Project being within the jurisdiction of the West Covina Unified School District (WCUSD), and that the Project is within the Covina-Valley Unified School District (C-VUSD). The comment is noted, and the IS/MND will be revised for clarification. These revisions do not require recirculation of the IS/MND under CEQA Guidelines Section 15073.5(c)(4). The following revision is hereby made to the text of the IS/MND under *iii) Schools*, on pages 4-90 and 4-91 and under Regulatory Requirements on page 4-92 of Section 4.15, Public Services, of the IS/MND (deleted text is shown in ~~red strikethrough~~ while new text is shown in *red italics*):

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 Covina-Valley Unified School District (WCUSD) (C-VUSD)~~. The ~~WCUSD C-VUSD serves 12,500 students² in eight elementary schools, three middle schools, and four high schools (C-VUSD 2021). 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 C-VUSD~~, 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 C-VUSD~~ 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.

The Project would pay school development fees to the ~~WCUSD C-VUSD~~ 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

² Based on 2013-2014 student enrollment at C-VUSD, last available data from California Department of Education Educational Demographics Unit: <https://dq.cde.ca.gov/dataquest/Enrollment/EthnicEnr.aspx?cChoice=CoEnrEth2&cYear=2013-14&TheCounty=19,Los%20Angeles&cLevel=County&cTopic=Enrollment&myTimeFrame=S&cType=ALL&cGender=B>

fees would fully mitigate a project's impacts on schools. Thus, impacts would be less than significant, and no mitigation is required.

Regulatory Requirements

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

References

Covina-Valley Unified School District (C-VUSD). 2021 (January 22, last accessed). Covina-Valley Unified School District School Directory. Covina, CA: C-UVSD. <https://www.c-vusd.org//site/default.aspx?PageType=2&PageModuleInstanceID=105&ViewID=5e297a0a-8ad3-4901-bc02-5599a28a44e5&RenderLoc=0&FlexDataID=0>.

The comment asserts that the Project does not provide adequate parkland, and that the Project should be redesigned to provide additional open space. As indicated in Section 4.16, Recreation, of the IS/MND document, Project provides an on-site common open space area at the center of the development that would include a variety of open space amenities. Additionally, the boundary to the south would include trees and a parkway along East Rowland Avenue. 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 single family units and 100 sf of common useable open space per unit and 100 sf of private open space per unit for multi-family units. The Project's demand for parks will be met in part onsite and in part by payment of park fees for the development of new or expanded park facilities in the City. This is a standard practice for all new developments in West Covina and elsewhere. Therefore, in light of provision of onsite park and open space and payment of park fees, the Project meets its parkland requirements, and it does not need to be redesigned to provide more open space.

4.17 Transportation

FZM-9 The commenter provides a discussion of VMT and points out that "a Vehicle Miles Traveled (VMT) analysis is required by State law effective July 1, 2020" and asserts that the analysis in the IS/MND does not provide evidence to support the conclusion that the Project is exempt from VMT analysis. Specifically, the commenter asserts that the Project's approach of providing surplus guest parking is contrary to the OPR Guidance for screening out projects from VMT analysis.

The discussion in Section 4.17, Transportation, of the IS/MND accurately describes SB 743 and states the following:

"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 Project is located less than ¼ mile from two major transit stops (Foothill Transit bus lines 280 and 488) and is therefore in a Transit Priority Area (TPA).

City guidelines, consistent with the OPR Guidance, state that the presumption that a project located within a TPA will have less-than-significant VMT impacts "*might* not be appropriate if the project includes more parking for use by residents, customers, or employees of the project than required by the City." (emphasis added). While the guest parking spaces provided exceed the typical City zoning requirement, the additional parking is not expected to be used on a daily basis. Further, the additional guest parking spaces are not expected to generate additional trips or increase the VMT per capita for the Project. It should be noted that there is limited parking in the area surrounding the proposed Project site. Neighbors in those areas have already expressed their concerns about overflow and visitor parking on their streets. In response to this concern, the Applicant modified the site plan to include a solid wall, without gate or access, around the perimeter of the cul-de-sac on North Eileen Street to prevent/discourage the future Project residents or their guests from using the adjacent neighborhood for parking and external access to their units. In light of this condition and to address the existing neighbors' concerns, the Applicant provided additional guest parking spaces. Additionally, the Applicant will add a provision in the governing documents for the Homeowners' Association that will apply within the Project that will require residents to utilize their garages for parking, reserving street parking and guest parking spaces for guests only. Owner vehicles in the guest spaces would be subject to violation. This will ensure that residents do not own more than two vehicles and will promote the use of public transit and ensure the guest parking spaces do not result in an increase in VMT.

Per City guidelines and direction, providing additional guest parking spaces is not grounds for dismissing the TPA screening exemption for the proposed Project. Therefore, the IS/MND will not require recirculation due to this point. The comment incorrectly cites CEQA Guidelines Section 15088.5, which provides the requirements for recirculation of an Environmental Impact Report (EIR), not an MND. The criteria for recirculation of an MND are provided in CEQA Guidelines Section 15073.5, and none of those criteria is triggered here.

Preliminary Design and Layout Concerns

FZM-10 The comments pertaining to design and layout of the Project and its components are noted and will be forwarded to the decision makers. Upon submittal of the Project application and plans, the Applicant received comments from the City and addressed them prior to resubmittal. At this time, the design and layout of the Project are in accordance with the provisions of the Walnut Grove Specific Plan and in addition to the City requirements. As such no modifications to the design and layout of the Project are required nor anticipated. Most of these comments relate to the commenter's opinions on design features the Project, not its environmental impacts. The purpose of the IS/MND is to evaluate the physical environmental effects of a project, not to defend or criticize the project itself. Regarding noise attenuation, see Response FZM-7, above. The comment cites several provisions of the City's Zoning Code, which do not apply to the Project since it will be governed by the Walnut Grove Specific Plan, as explained above in Response FZM-2.

Concessions Requested

FZM-11 The commenter incorrectly asserts that the Project Applicant has requested a number of concessions for the Project and in return has not offered any community benefits. The commenter incorrectly cites the state Density Bonus Law (Cal. Gov. Code 69515-69518), which is not relevant to the Project. The Applicant has not applied for Project benefits or concessions under the provisions of the Density Bonus Law. As explained above in Response FZM-2, the Walnut Grove Specific Plan is a planning tool that 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). As such, the Walnut Grove Specific Plan can set the parameters for the proposed development, including distribution, location, extent, intensity of land uses, building setbacks, building height, lot coverage, and landscape requirements. The purpose of the Specific Plan is to establish guidelines and standards specific to that Project. These are not considered "concessions" and none has been requested by the Applicant. Thus, what is listed by the commenter is not a list of concessions but rather provisions of the Specific Plan to implement the proposed development. These provisions would achieve the vision of the Project and are consistent with the provisions of the Government Code governing Specific Plans cited above. Accordingly, the Project is not required to provide community benefits.

FZM-12 The comment regarding lack of affordable units to justify the concession and that the Project should include affordable units is noted and will be forwarded to the decision makers. As discussed in Response FZM-13, above, the Applicant has not requested any concessions, nor is the Project required to provide a certain number of affordable housing units as mitigation.

FZM-13 The commenter requests additional community outreach and being notified of future meetings. The comment is noted and will be forwarded to the decision makers. However, it should be recognized that the Project has met all applicable noticing requirements in accordance with CEQA and the West Covina Municipal Code. The surrounding property owners within 300 feet of the Project limits were

notified of the 30-day public review of the IS/MND, and a notice was also published in the San Gabriel Valley Tribune and the City's website regarding the availability of the IS/MND for review. Therefore, City met the requirements to encourage public participation.

Additionally, the Applicant organized a community meeting with the surrounding property owners on August 15, 2020. Thus, in light of the noticing discussed above, the community meeting in August, and regular discussions with the surrounding residents, the Applicant is not required to organize additional community meetings.

FZM-14 The comment regarding availability of a full set of plans on the City's website for public to review is noted and will be forwarded to the decision makers.

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From: rswc2000@aol.com <rswc2000@aol.com>

SAN

Sent: Monday, December 21, 2020 12:09 PM

To: Jo-Anne Burns <JBurns@westcovina.org>

Cc: LLopez-Viado@westcovina.org <LLopez-Viado@westcovina.org> <LLopez-Viado@westcovina.org> <LLopez-Viado@westcovina.org>; teamsantos@live.com; audrey.sells.homes@hotmail.com

Subject: Mitigated Negative Declaration - Walnut Grove residential project

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

My family and i have been residing at 1638 E Rowland Ave, West Covina for over 20 years.

Our home is directly across, which would be the entrance of the proposed construction site.

SAN-1

We would like to express our serious concerns involving the construction of these new houses. We believe that the proposed project would have many negative impacts that will affect quality of life and living conditions of the surrounding community.

1. 158 New units - Immediately we would have over 400 new residents in the area.

SAN-2

2. Parking - In a 2016 survey there were a minimum of 2 cars per household in West Covina, in our own experience most homes in the area have at least 3 cars. That would not only impact the amount of parking in the streets, but the amount of new traffic will be increased tremendously.

SAN-3

3. Safety - Rowland Ave is used by many commuters to get through and from, the new traffic would increase amount of traffic incidents that are a constant problem at the turnaround right in front of the currently closed Pioneer school.

SAN-4

Section 4.0 environmental Checklist - we believe aesthetics, utilities, population and housing, transportation, air quality, energy should also be looked at and studied.

SAN-5

Section 4.1 environmental Checklist, a) have a substantial effect on scenic vista - less than significant impact - We believe to be incorrect and would like to be further researched.

SAN-6

Section 4.1 View 1 Description: "partial views of the San Gabriel and San Bernardino Mountains. Views of the mountains can be clearly seen from about any view facing north and north east of Rowland Ave between Azusa Ave and Lark Ellen. Pictures included in report do NOT present a true picture of what is seen walking, driving, or living in the area.

SAN-7

Section 4.1 View - The proposed project as it is presented is a breach of under the Our Natural Community Element, Access to Nature, policy 19 -encouraging minimizing 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 policies impact.

SAN-8

Living in the city for over 20 years and raising our 2 kids here, we appreciate and support improvements to services and quality of life. During the assessment of the project traffic, although steady, is significantly diminished prior to the pandemic and its sure to increase once things start to normalize. the added traffic and street parking will once again be an issue as it

SAN-9

was prior to the pandemic and will be like when Pioneer school was open, with constant traffic exiting the school causing traffic jams and accidents.

SAN-9
(cont.)

We appreciate the study and urge you to consider these impacts on behalf of the residents of the area.

Sincerely,

Mr and Mrs Santos
1638 E. Rowland Ave. West Covina, CA 91791
(626)339-9001

Letter 7: Mr. and Mrs. Santos

Comment Letter Dated December 21, 2020

SAN-1 The comment discusses the location of the commenters' home and expresses their opinion that the Project would result in many negative impacts that would affect the quality of life and living conditions. The comment is noted and will be forwarded to the decision makers. It should be noted that the IS/MND document included detailed analyses of all topical issues supported by substantial evidence and justifications and provided mitigation measures for potential significant impacts that were identified to reduce them to less than significant levels. Additionally, please note that the "quality of life" is not a required CEQA topic, and as such no further response is required.

SAN-2 The commenter asserts that the Project will result in increased population. The comment is acknowledged, and as identified in Section 4.14, Population and Housing, and elsewhere in the IS/MND document, the 158 proposed dwelling units would generate approximately 529 residents. However, this is a minimal increase equating to 0.5 percent of the existing City population. Additionally, it should be recognized that this increase is within the anticipated growth projection for the City. Therefore, the Project would not result in direct unplanned population growth that was not previously anticipated.

SAN-3 The comment expresses concern for parking and new traffic in the area. The comment is noted and will be forwarded to the decision makers. As indicated in Section 3.2, Project Access/Parking, of the IS/MND, in accordance with the provisions of the Walnut Grove Specific Plan, the proposed Project is required to provide a total of 316 parking spaces for residents and 79 spaces for guests. The Project would meet and exceed this requirement by providing 20 surplus guest parking spaces. The commenter's opinion regarding most homes having at least three cars is noted; however, the Project is not required to provide parking in excess of requirements or based on hypothetical scenarios.

Regarding new traffic in the area, we concur that the Project would generate new traffic; however, the increase in traffic is not quantified based the number of cars in each household but rather based on the type of development that is proposed, in this case single- and multi-family residential. Thus, traffic trips commensurate with the type of residential development. The single-family detached units would generate 9.44 daily trips per day, and the multi-family units would generate 5.44 daily trips per unit. These generation rates have been derived from the Institute of Transportation Engineers' (ITE's) *Trip Generation Manual*, 10th Edition, as discussed in Section 4.17, Transportation, of the IS/MND. Using these rates, the proposed Project's daily trip generation is calculated.

SAN-4 The comment regarding traffic incidents on East Roland Avenue is noted and will be forwarded to the decisions makers. However, the comment does not provide any evidence to support the statement regarding these traffic incidents, and the Project traffic increasing these incidents is the opinion of the commenter.

Additionally, as discussed in detail in Section 4.17, Transportation, of the IS/MND, 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. As part of the Project, 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. The implementation of the said planned improvements in compliance with City standards would not result in impacts from hazards due to a geometric design feature. Thus, Project traffic would not interfere with access, circulation, or activities at the surrounding land uses.

- SAN-5 The comment suggests analysis of aesthetics, utilities, population and housing, transportation, air quality, and energy. We believe the commenter is referring to the checklist on page 4-1 of the IS/MND. The boxes that are checked in this three-column checklist represent the topics with potential impact that require mitigation measures. The checklist does not mean that the topics with boxes not checked do not include analysis. In accordance with CEQA requirements for preparation of an IS/MND, all topics require full analyses. Please refer to Sections 4.1, Aesthetics; 4.3, Air Quality; 4.6, Energy; 4.14, Population and Housing; 4.17, Transportation; and 4.19, Utilities and Service Systems, of the IS/MND for detailed discussion and analysis of the identified topics. No further response is required.
- SAN-6 The comment regarding the checklist question (a) in Section 4.1, Aesthetics, of the IS/MND is not clear. We understand the commenter does not agree with the conclusion and asks for additional research. However, the comment does not elaborate on the particular aspect of the discussion that the commenter disagrees with. The analysis under this checklist question has been fully discussed and analyzed in the context of the “Our Natural Community” Element of the City’s General Plan and the existing and future conditions of the area, which is a fully built and urban portion of the City. Thus, the discussion is a full qualitative analysis of the checklist question in accordance with the CEQA guidance. No further response is required.
- SAN-7 The comment objects to the description of View 1 in Section 4.1, Aesthetics, of the IS/MND. It should be noted that this and other views depicted in the section are just snapshots of where the photographer was standing, and they are not representations of what is experienced or seen walking, driving, or living in the area. This comment expresses the opinion of the commenter, and no further response is required.
- SAN-8 The comment regarding the Project being a breach of Policy 19 (correction, the referenced policy is 1.9 and not 19) of “Our Natural Community” Element of the General Plan is an opinion of the commenter, and no further response is required. However, it should be noted that Section 4.1, Aesthetics of the IS/MND included analysis of views of the Los Angeles National Forest and San Gabriel Mountains from public areas surrounding the Project site. The analysis identified that no obstruction of natural areas would occur with implementation of the Project.

SAN-9 The commenter's appreciation for the improvements in the City is noted and will be forwarded to the decision makers. The comment also repeats the potential impact pertaining to parking and traffic. Please refer to Responses SAN-3 and SAN-4, above. No further response is required.

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From: Teresa Cozad <cozadteresa9@gmail.com>
Sent: Tuesday, December 22, 2020 7:38 PM
To: Jo-Anne Burns <JBurns@westcovina.org>
Subject: Pioneer school site

W&PW

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Ms Burns:

I am writing this for Mr. Ward Wenner and Mrs. Phyllis Wenner who live at 353 Leaf Ave West Covina. Their house is located where Pioneer Dr dead ends into Leaf Ave. As discussed in our meeting Dec.21 they are concerned about a drainage ditch that runs along the western edge of the Pioneer property. There have been past issues with flooding and water run off out into Pioneer and Leaf. That was corrected by extending the ditch out to Rowland Ave which now causes flooding of the sidewalk when we have heavy rains. How will this issue be addressed with the new development? They are also concerned about the project having enough green/park areas for so many families as well a designated pet area.

W&PW-1

Sincerely,
Teresa Cozad

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Letter 8: Ward and Phyllis Wenner

Comment Letter Dated December 21, 2020

W&PW-1 This comment email was sent by Teresa Cozad on behalf of Ward and Phyllis Wenner. The comment provides the location of the commenters' residence and identifies the issues of concern to Wenners.

The first concern is a drainage ditch that has caused runoff and flooding at Pioneer and Leaf and flooding of sidewalk later at East Rowland Avenue during heavy rains. The comment also asks if the development has addressed this issue. The comment is noted and will be forwarded to the decision makers. The channel that extends across the northwest and western boundary of the site currently accepts offsite drainage from the commercial center north of the Project. With implementation of the proposed Project, the current flows from offsite will be intercepted at the northern cul-de-sac (North Eileen Street) and re-routed through the Project site through an underground drainage system.

However, it should be recognized that the drainage ditch is part of the existing condition and is not relevant to the development of the proposed Project. The Project has not created the condition and as such, the Project Applicant is not responsible for addressing the issue. Resolving the drainage ditch issue is outside the scope of the Project.

Regarding the second concern for availability of park and green areas within the Project site, as indicated in Section 4.16, Recreation, of the IS/MND document, Project provides an on-site common open space area at the center of the development that would include a variety of open space amenities. Additionally, the boundary to the south would include trees and a parkway along East Rowland Avenue. 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 single family units and 100 sf of common useable open space per unit and 100 sf of private open space per unit for multi-family units. The Project's demand for parks will be partially met onsite and by payment of park fees for the development of new or expanded park facilities in the City. This is a standard practice for all new developments in West Covina and elsewhere. Regarding provision of a pet area, the comment is noted and will be forwarded to the decision makers. While the Project is required to provide open space and pay for park fees, it is not required to provide for a pet area within the development.

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4.0 REVISIONS AS PART OF THE FINAL IS/MND

Revisions have been made to the Draft IS/MND based on input received during the public review period and while preparing the responses to comments on the Draft IS/MND. The revisions requested do not reflect a substantial change to the Project description, nor would any of the changes result in a new impact or intensification of an impact already identified in the Draft IS/MND. The changes are not in response to comments that raise significant environmental issues. Additions to the Draft IS/MND are shown in *red italicized* text and deletions are shown in ~~red strikethrough~~ text.

4.1 REVISIONS TO THE DRAFT IS/MND

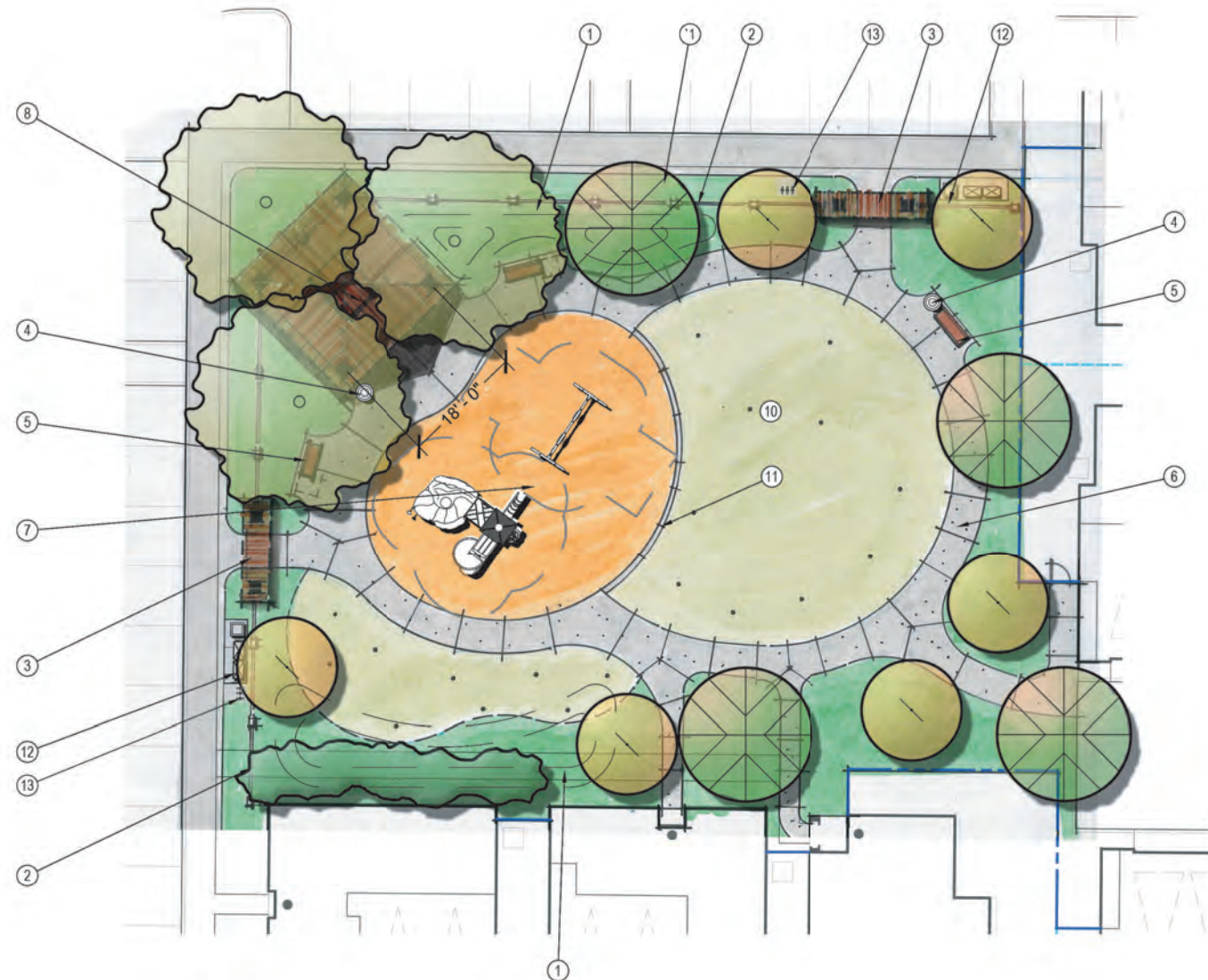
4.1.1 SECTION 3.0, PROJECT DESCRIPTION

While features such as internal paseos and walkways are included in the Project to accommodate pedestrians, in light of the commenter's comments and to accommodate use of bikes, the text of the IS/MND and the associated exhibit (Exhibit 3-6, Conceptual Park Enlargement Plan) will be revised to incorporate bike racks on-site for use by future residents of the Project and their guests. The bike racks will be provided in two location adjacent to the mailboxes around the perimeter of the park. These revisions do not require recirculation of the IS/MND under CEQA Guidelines Section 15073.5(c)(4). The following addition is hereby made to the text of the IS/MND under Section 3.1, Residential Land Use, on page 3-2 of the IS/MND (new text is shown in *red italics*):

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. *Additionally, to accommodate use of bikes by future residents and their guests, bike racks will be provided at two locations adjacent to mail boxes and wood arbor trellis entries, around the perimeter of the proposed park.*

The above modification will also be reflected in Exhibit 3-6, Conceptual Park Enlargement Plan. The exhibit is hereby modified to incorporate the proposed bike racks. The updated exhibit is included in the following page.

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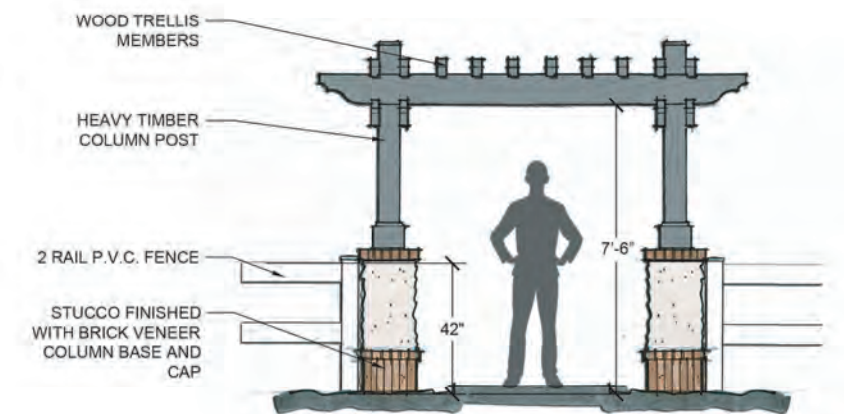
PLANT PALETTE:

TREES & VINES

LARGE MULTI-TRUNK SPECIMEN TREE <i>Arbutus 'Marina'</i>	Strawberry Tree	36" Box
FLOWERING SHADE TREE <i>Bauhinia x. blakeana</i>	Hong Kong Orchid Tree	24" Box
SMALL FLOWERING ACCENT TREE <i>Handroanthus chrysotrichus</i>	Golden Trumpet Tree	24" Box
EVERGREEN SCREENING TREE MASS <i>Prunus caroliniana 'Bright and Tight'</i>	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 Bloom 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.
- ⑬ Bike Racks.



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

Walnut Grove Residential Project



Map not to scale

Exhibit 3-6



4.1.2 SECTION 4.15, PUBLIC SERVICES

In response to comments on the Draft IS/MND, there are a number of revisions pertaining to the applicable school district. These revisions are included under the appropriate sections below. The comment is addressed, and the following revision is hereby made to the text under *iii) Schools*, on pages 4-90 and 4-91 and under Regulatory Requirements on page 4-92 of Section 4.15, Public Services, of the IS/MND (deleted text is shown in ~~red strikethrough~~ while new text is shown in *red italics*):

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 Covina-Valley~~ Unified School District ~~(WCUSD)~~ *(C-VUSD)*. ~~The WCUSD C-VUSD serves 12,500 students³ in eight elementary schools, three middle schools, and four high schools (C-VUSD 2021). 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 C-VUSD~~, 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 C-VUSD~~ 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.

The Project would pay school development fees to the ~~WCUSD C-VUSD~~ 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.

³ *Based on 2013-2014 student enrollment at C-VUSD, last available data from California Department of Education Educational Demographics Unit: <https://dq.cde.ca.gov/dataquest/Enrollment/EthnicEnr.aspx?cChoice=CoEnrEth2&cYear=2013-14&TheCounty=19,Los%20Angeles&cLevel=County&cTopic=Enrollment&myTimeFrame=S&cType=ALL&cGender=B>*

Regulatory Requirements

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

References

Covina-Valley Unified School District (C-VUSD). 2021 (January 22, last accessed). Covina-Valley Unified School District School Directory. Covina, CA: C-UVSD. <https://www.covusd.org//site/default.aspx?PageType=2&PageModuleInstanceID=105&ViewID=5e297a0a-8ad3-4901-bc02-5599a28a44e5&RenderLoc=0&FlexDataID=0>.

5.0 REFERENCES

Covina-Valley Unified School District (C-VUSD). 2021 (January 22, last accessed). Covina-Valley Unified School District School Directory. Covina, CA: C-UVSD. <https://www.cvusd.org//site/default.aspx?PageType=2&PageModuleInstanceID=105&ViewID=5e297a0a-8ad3-4901-bc02-5599a28a44e5&RenderLoc=0&FlexDataID=0>.

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