Vincent Place Residential Project

Draft

Initial Study – Mitigated Negative Declaration

prepared by

Rincon Consultants, Inc.
250 East 1st Street, Suite 1400
Los Angeles, California 90012
Contact: Greg Martin, AICP

prepared for

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

March 2021

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
rinconconsultants.com

Vincent Place Residential Project

Draft

Initial Study – Mitigated Negative Declaration

prepared by

Rincon Consultants, Inc.
250 East 1st Street, Suite 1400
Los Angeles, California 90012
Contact: Greg Martin, AICP

prepared for

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

March 2021

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
rinconconsultants.com

This report prepared on 50% recycled paper with 50% post-consumer content.

Table of Contents

Tables

Figures

Appendices

This page intentionally left blank.

Initial Study

1. Project Title

Vincent Place Residential Project

2. Lead Agency Name and Address

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

3. Contact Person and Phone Number

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

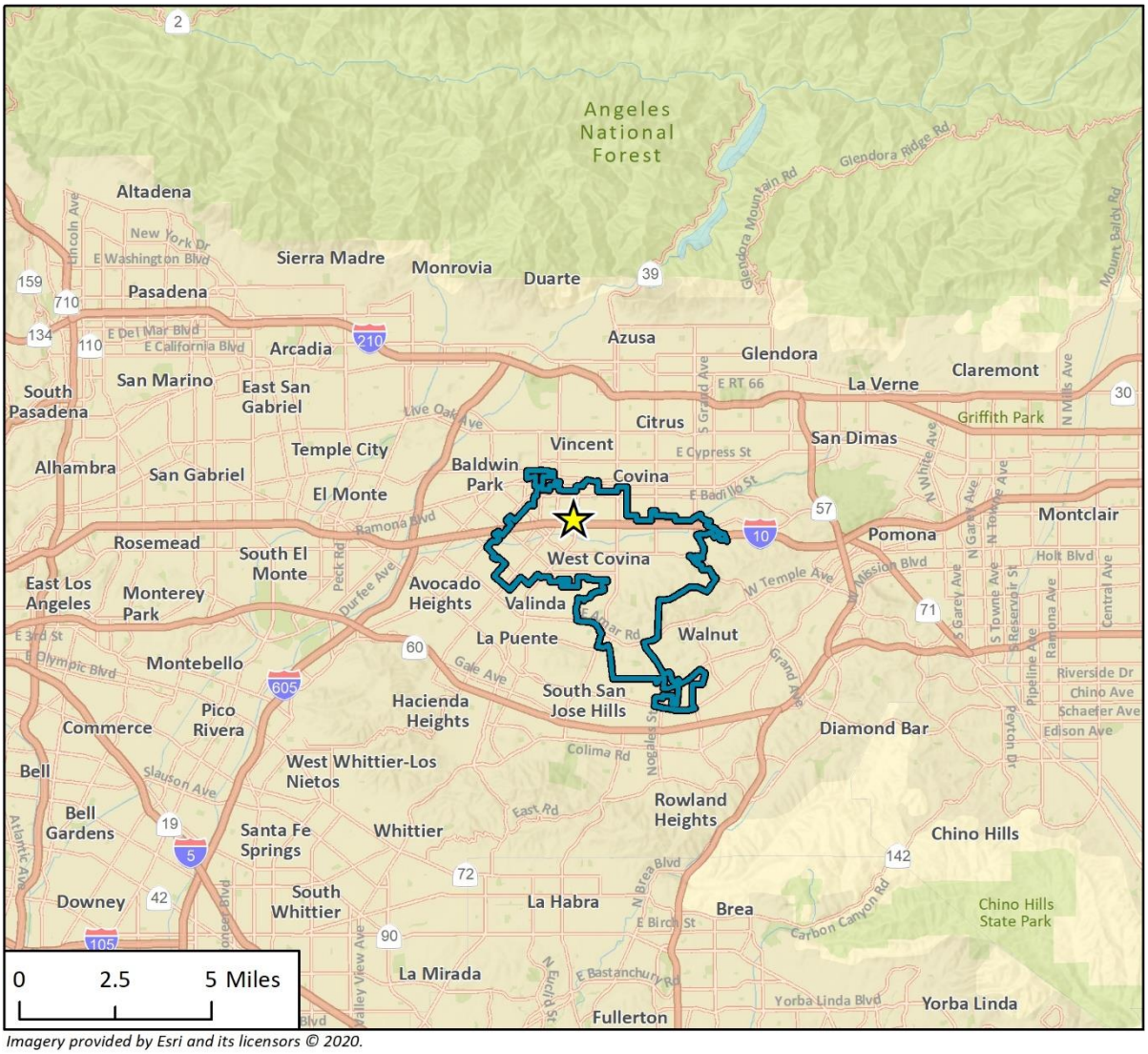
4. Project Sponsor's Name and Address

MLC Holdings, Inc.
1932 East Garvey Avenue South
West Covina, California 92606

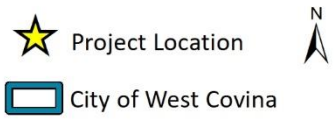
5. Project Location

The project site is located at 1024 West Workman Avenue in the City of West Covina, California. The project site encompasses 350,810 square feet (sf), or approximately 8.05 acres, and is identified as Assessor Parcel Number (APN) 8457-029-906. The project site is bordered by West Workman Avenue to the north, North Vincent Avenue and West Garvey Avenue North to the east, two-story residential apartment buildings and townhomes on the south, and single-story single-family homes to the west. Regional vehicular access to the project site is provided by the San Bernardino Freeway (Interstate 10, or I-10), with on- and off-ramps available at Vincent Avenue. The project site is locally accessible by West Workman Avenue, North Vincent Avenue, and West Garvey Avenue North. Regional mass transit service is provided by Foothill Transit, with the closest bus stops being on Vincent Avenue, one at the northwest corner of the intersection of Workman and Vincent and serving Foothill Transit bus route 488 southbound, and the other at the southeast corner of Workman and Vincent and serving Foothill Transit bus route 488 northbound. Both stops are effectively across the street from the northeast corner of the project site. Figure 1 shows the location of the project site in the region and Figure 2 depicts the location of the site in its neighborhood context.

Figure 1 Regional Location



Imagery provided by Esri and its licensors © 2020.



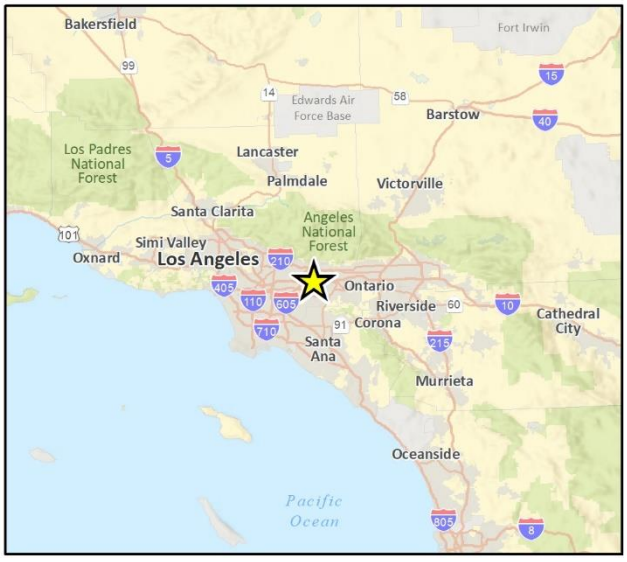


Figure 2 Project Location

Imagery provided by Microsoft Bing and its licensors © 2020.

6. Existing Setting

The project site is in a previously graded and developed urban area and is surrounded by roads and urban structures (i.e., residential, office, and commercial buildings). The project site is currently developed with, and has until recently been used for[1], the Vincent Children's Center, a facility operated by the Covina Valley Unified School District offering multiple services including after school child care, extended day child care, transitional kindergarten, and a preschool (CVUSD, 2020-2021). The campus was originally developed as an elementary school site but was shut down in 1979 due to a declining student population. Special Education preschool classes, a General Child Care Program, and County Special Education classes were then moved to the campus. The site contains school buildings, plays structures, and a surface parking lot. Vegetation on the project site is limited to grass lawns, 17 trees,[2] hedges, ruderal vegetation, and ornamental landscaping. Figure 3 shows recently taken photos of the project site and Figure 4 shows photos of the site's surroundings.

7. General Plan Designation

Civic- Schools (S)

8. Zoning

Residential Zone (Single-Family) (R-1)

[1] Currently, use of the site as a school may be limited or it may be non-operational because of COVID-19 pandemic conditions or for other reasons.
[2] For a description of all trees on the project site please refer to the Arborist Report included as Appendix B of this IS-MND.

Figure 3 Site Photos

Parking lot and Vincent Children's Center in the northern portion of the site.

View from North Vincent Avenue of the playgrounds and portions of the school building in the eastern portion of the site.

View from West Garvey Avenue North of the grassy field in the southern portion of the site.

Western boundary of the site, looking south

Figure 4 Photos of Site Surroundings

West Workman Avenue and single-family residences to the north of the site.

North Vincent Avenue, single-family residences, and commercial uses to the east of the site.

Multifamily residences to the south of the project site.

Single-Family residences to the west of the project site.

9. Description of Project

The Vincent Place Residential Project (hereafter referred to as "proposed project" or "project") involves demolition of the existing buildings and structures on the project site (all of which are associated with the Vincent Children's Center) and construction in their place of up to 47 detached single-family "cluster" homes and up to 72 attached townhomes, for a total of up to 119 homes on the 8.05-acre project site. The detached homes would be two stories (maximum permitted height 26'-3") and include three-bedroom homes and four-bedroom homes. The attached townhomes would be three stories (maximum permitted height 37'-5") and include a mix of two-bedroom homes and three-bedroom homes. The attached townhomes would be contained within 10 buildings. Each of the residential units would include a two-car garage (for a total of 238 enclosed parking spaces) and there would also be 56 uncovered parking spaces provided for guest parking, resulting in 294 total parking spaces.

The project would also provide approximately 25,540 sf of common open space (a minimum of 150 sf of common open space per unit would be required), including a minimum 10,000-sf central area with at least one major amenity such as a play structure, picnic pavilion, sports court, or similar. In addition, a minimum of 60 sf of private open space would be provided for each attached townhome unit, and a minimum of 150 sf of private open space would be provided for each detached home. Fencing and walls would be used throughout the project site and along its border to define private and semi-private spaces and would serve as a unifying design element. Infrastructure improvements associated with the proposed project include installation of new stormwater drainage infrastructure; new domestic water piping that would connect to existing eight-inch water mains in Workman Avenue and West Garvey Avenue North; replacing the existing water main in West Garvey Avenue North; and a public sewer system that would convey flows to an existing eight-inch sewer pipe in Workman Avenue. The project approvals include establishing a new Specific Plan for the site, the Vincent Avenue Specific Plan, which would provide land use and development standards for the proposed project. The objectives of the Vincent Avenue Specific Plan are as follows:

- Locate lower density housing adjacent to existing single-family homes and higher density housing adjacent to existing multifamily and retail uses
- Require new development to include design features that preserve the privacy of existing adjacent residential backyards
- Design new homes that improve the Vincent Avenue corridor as a transitional gateway to West Covina's downtown, while respecting the residential character of the adjacent neighborhood
- Engage surrounding neighborhoods by facing front doors toward public streets and providing porches, patio walls, and similar features that define the street edge and add pedestrian scale
- Enhance community design through landscaping and recreational amenities that promote a high-quality living environment
- Implement sustainable development practices that promote water and energy efficiency, minimize impacts to stormwater, and support alternative modes of travel
- Establish a Homeowners Association (HOA) to ensure that the Vincent Avenue Community is well maintained and remains an asset to the neighborhood

Vehicles would be able to access the proposed project via a primary entrance on Workman Avenue and a secondary entrance on West Garvey Avenue North. The primary entry would be defined by pedestrian entry portals, enhanced landscaping and paving, potential project monumentation, and

parkways and sidewalks on both sides. Behind the sidewalk, landscaping would soften the appearance of community walls on either side of the entry. Taller palms would be layered in with medium sized canopy trees along the main entry drive. The secondary entry would include pilasters, enhanced paving, and a decorative pot that would complement the primary entry design. Pedestrians would be able to access the project site via the sidewalks along Workman Avenue and West Garvey Avenue North. Table 1 provides the anticipated details of the proposed buildings and Figure 5 shows the anticipated proposed conceptual site plan. Figure 6 through Figure 9 illustrate the proposed building elevations. Figure 10 shows the proposed conceptual landscape plan for the project site.

Table 1 Project Summary

Buildings	
Up to 47 Detached Homes ▪ Plan 3060 - 1,465 sf, 3 bedrooms ▪ Plan 3522- 1,955 sf, 4 bedrooms ▪ Plan 3522X- 1,955 sf, 4 bedrooms ▪ Plan 3852- 2,125 sf, 4 bedrooms	
Up to 72 Attached Townhomes ▪ Plan 1 - 1,214 sf, 2 bedrooms ▪ Plan 2- 1,505 sf, 3 bedrooms ▪ Plan 3- 1,822 sf, 3 bedrooms ▪ Plan 3Y- 1,822 sf, 3 bedrooms	
Total Housing Units	**Up to 119 units**
Density	14.8 homes/acre, maximum
Building Coverage	Approximately 138,639 sf (39.5% of site)
Gross Building Area	Approximately 201,192 sf
Building Heights and Setbacks	
Detached Homes Maximum Height	26'-3" (two-story)
Detached Homes Minimum Building Setbacks	To Workman Avenue Right-of-way: 10' to porch/15' to living area To Specific Plan Boundary (West PL): 15' To Private Lane (Back of Walk): 5' to porch/8' to living area
Attached Townhomes Maximum Height	37'-5" (three-story)
Attached Townhomes Minimum Building Setbacks	To Vincent Avenue and West Garvey Avenue North Right-of-ways: 10' To Specific Plan Boundary (South PL): 15' To Private Lane[1]: 5'
Landscaping, Open Space, and Parking	
Landscape area	109,237 sf (32% of site)
Common Open Space	Approximately 25,540 sf (minimum of 150 sf per unit required)
Private Open Space	Approximately 23,336 sf
Total Open Space	Approximately **48,876 sf**
Garage/Driveway Parking	242 spaces
Parallel Parking (Workman Avenue)	21 spaces
Uncovered Parking Stalls	31 spaces
Total Parking	**294 spaces**

sf: square feet

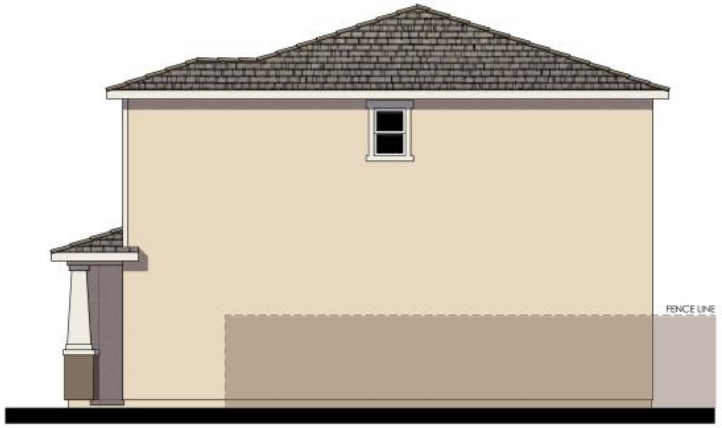
[1] Patio walls may encroach into setbacks. Patio walls shall be setback a minimum of 3-feet from public rights-of-way.

Figure 5 Conceptual Site Plan

Source: Vincent Place Draft Specific Plan, 2021.

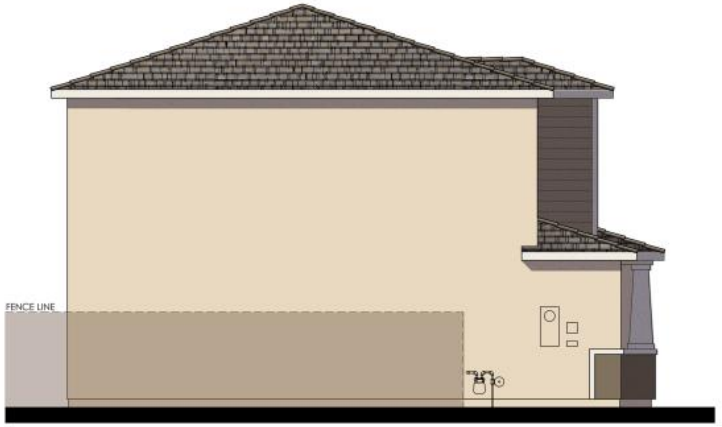
Figure 6 Conceptual Detached Single-Family Home Elevations (Three-Bedroom Units, Coastal Design)

FRONT



RIGHT

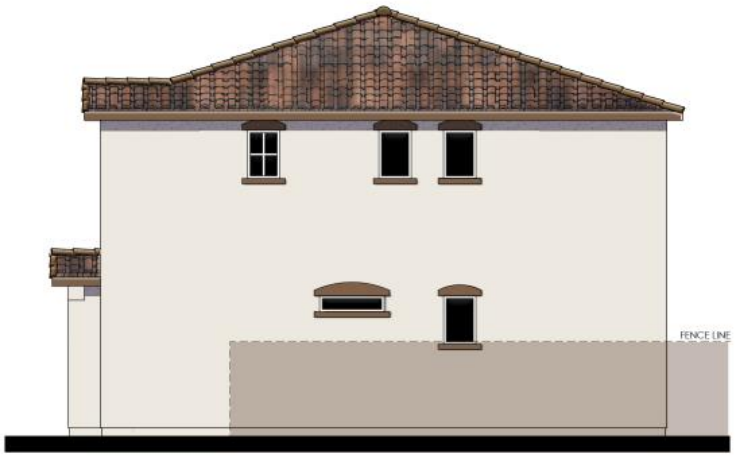
REAR



LEFT

Figure 7 Conceptual Detached Single-Family Home Elevations (Four-Bedroom Units, Santa Barbara Design)

A - FRONT



B - RIGHT

C - REAR

D - LEFT

Figure 8 Conceptual Attached Townhomes Elevations (6-Unit Building, Contemporary Eclectic Design)

FRONT

REAR

Figure 9 Conceptual Attached Townhomes Elevations (10-Unit Building, Contemporary Eclectic Design)

FRONT

REAR

Figure 10 Conceptual Landscape Plan

LEGEND

1. Central community open space area with Central shade structure, accented BBQ wall-counter, rectangular fire-pit, community lounge and table seating for small social events and group gatherings.
2. Tot-lot with rubberized play surface (in colored band pattern).
3. Large open lawn area for both passive and active play.
4. Corner Plaza space / pedestrian walkway node.
5. Decomposed granite walkway and native herb garden.
6. Seven community cluster mailboxes, per USPS review and approval.
7. Proposed wall, pilaster, gate or fence, per Wall & Fence Plan.
8. Enhanced paving at main project entry.
9. Proposed tree, per Planting Plan.
10. 5' wide pedestrian esplanade, integral colored concrete, with light top-cast finish and saw-cut joints.
11. 4' wide community natural colored concrete sidewalk, with light top-cast finish and saw-cut joints.
12. 6' Long park seating, style to complement architecture.
13. Accessible parking stall and striping, per Civil plans.
14. Guest parking stall.
15. Natural colored concrete driveway, with light broom finish and tooled joints.
16. Private patio / yard area, homeowner maintained.
17. Common area landscape, builder installed and HOA maintained.
18. Community dog bag station (black in color), for pet owners.
19. Property line, per civil plans.
20. Entry wood arbor gateway.
21. Proposed public street sidewalk ROW, per Civil plans.
22. Transformer to be screened with landscape, quantity and final locations TBD.
23. Short term bike parking (4 bike racks to accommodate 8 bike stalls).
24. Proposed AC condenser locations, per Architecture plans.
25. Large decorative planters.
26. HOA maintained area, sloped, with tree buffer.

Not to Scale

Source: Vincent Place Draft Specific Plan, 2021.

Construction

The construction process would include demolition of approximately 49,000 sf of existing buildings located on the project site and construction of up to 119 homes along with associated community amenities on the site. Construction phases would include demolition, site preparation, grading, building construction, asphalt paving, and architectural coating. Construction of the proposed project is anticipated to occur over an approximately three-year period beginning in June 2022 and ending in January 2025. Construction would occur Monday through Saturday between the hours of 7:00 a.m. and 8:00 p.m. pursuant to the West Covina Municipal Code construction standards. Occupancy is anticipated to take place in 2025.

10. Surrounding Land Uses and Setting

The project site is in an urban area and is surrounded by residential and commercial uses consisting of West Workman Avenue and single-family homes to the north, North Vincent Avenue and West Garvey Avenue North beyond which are single-family homes and commercial uses to the east, multifamily homes to the south, and single-family residences to the west. Figure 4 provides example photos of surrounding land uses.

11. Required Approvals

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

- General Plan Amendment (GPA) to change the land use designation from Civic: Schools to Neighborhood Medium Residential (up to 20 units per acre)
- Adoption of the Vincent Avenue Specific Plan and zone change from Single-Family Residential (R-1) to Vincent Avenue Specific Plan
- Approval of a Precise Plan for the site plan and architecture for the development
- Approval of a Tentative Tract Map (TTM) to subdivide the property
- Tree Permit for Removal of approximately 20 trees

12. Other Public Agencies Whose Approval is Required

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

13. Tribal Consultation

Three tribes have requested notification of projects in West Covina: the Soboba Band of Luiseño Indians, Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation), and Gabrieleño/Tongva Nation. Per Public Resources Code (PRC) Section 21080.3.1, the City mailed consultation letters to these three tribes on January 7, 2021 and January 21, 2021.[3] The City received a response from the Kizh Nation on February 1, 2021 requesting consultation to discuss the proposed project in further detail. Following the request from the Kizh Nation, a consultation meeting between Kizh Nation representatives and City Staff was scheduled for March 3, 2021, but the Kizh Nation representatives

[3] The January 21, 2021 letters were to inform the recipients that the proposed project is subject to SB 18 as well as AB 52. For further information on these laws see Section 18, *Tribal Cultural Resources* of this IS-MND.

later declined this invitation and submitted an undated letter requesting that the City include specific tribal cultural resources mitigation measures in this IS-MND. For further discussion of tribal cultural resources in this IS-MND please refer to Section 18, *Tribal Cultural Resources* and Section 5, *Cultural Resources*, and for further discussion of on-site soils (including paleontological resources) please refer to Section 7, *Geology and Soils.* The City of West Covina will continue to comply with all applicable tribal consultation requirements of PRC Section 21080.3.1 and all other applicable regulations as the proposed project moves through the required review and approval process.

This page intentionally left blank.

Environmental Factors Potentially Affected

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

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

Determination

Based on this initial evaluation:

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

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

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

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

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

Signature

3/18/2021

Date

Jo-Anne Burns

Printed Name

Environmental Checklist

1 Aesthetics

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

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

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

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

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

According to the City's General Plan, the City of West Covina does not have any officially designated scenic vistas (West Covina 2016). However, the Angeles National Forest and San Gabriel Mountains lie approximately seven miles north of the City and are visible throughout West Covina. The proposed project would involve construction of up to 47 two-story detached homes (maximum height 26'-3") and ten three-story attached townhome buildings containing up to 72 homes (maximum height 37'-5") on the project site. Upon completion of the proposed project, the site would have a density of 14.8 homes per acre. The project site is surrounded by single-family and multifamily residential development of one to two stories in height, with some commercial development to the southeast of the project site across North Vincent Avenue.

Public views of the Angeles National Forest and San Gabriel Mountains from and through the project site and its vicinity are limited due to the distance of the project site from these resources (approximately 5.9 miles) and visual obstructions such as existing buildings, signs, and trees on and around the project site. The San Gabriel Mountains within the Angeles National Forest are visible to the north from parts of the project site and its surroundings, including West Garvey Avenue North, North Vincent Avenue, and West Workman Avenue (see Figure 3 and Figure 4).

The proposed project would not substantially block views of the San Gabriel Mountains from North Vincent Avenue because it would be located to the west of North Vincent Avenue and would not interfere with the line of sight along the north-south corridor of the roadway. The project would not substantially block views of these mountains from West Workman Avenue because it would be located to the south of this roadway and thus would be behind the viewer when looking towards the mountains from this roadway. The project would also be unlikely to substantially blocks views of the San Gabriel Mountains from West Garvey Avenue North in areas adjacent to the project site because the distance separation between the proposed three-story townhomes on the nearest (southern) part of the site and the roadway (including setbacks on the site and the public sidewalk) would most likely provide enough room to see the mountains above or around visual obstacles created by on-site structures or landscaping. Additionally, public views of these mountains would remain available from other nearby locations, such as further south along West Garvey Avenue North; or along North Vincent Avenue, which is approximately 150 feet east of West Garvey Avenue North in this location.

The San Jose Hills are visible from West Workman Avenue and areas south of the project site. However, these views are distant, background views and highly obstructed by existing development on the project site and surrounding properties, such as buildings, the soundwall adjacent to I-10, and trees. Therefore, the proposed project would not substantially block existing public views of the San Jose Hills from West Workman Avenue or other nearby roadways. As such, the proposed project would not significantly obstruct or affect any publicly accessible scenic vistas in the City. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is in an urban area consisting of residential, office, and commercial uses. The project site does not contain any scenic resources such as natural habitats or rock outcroppings, nor is it in proximity to any such resources. Additionally, as described in Section 5, *Cultural Resources*, the project site does not contain any historic buildings. Furthermore, the City of West Covina does not contain any officially designated state scenic highways (West Covina 2016). State Route (SR) 57 between SR 91 and SR 60 and SR 39 between Route 2 and I-210, located 7.5 and 3.5 miles from the project site, respectively, are identified as Eligible for State Scenic Highway designation (Caltrans 2020b). However, the project site is not visible from SR 57 or SR 39, as it is located 7.5 and 3.5 miles away from these roadways, respectively. Therefore, the project would not substantially degrade views of mature trees, rock outcroppings, historic buildings, or any other scenic resources along or visible from a scenic highway. There would be no impact.

NO IMPACT

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

The project is in an urban area of the City that is primarily developed with one- to two-story residential buildings. The project site is occupied by the Vincent Children's Center, which contains single-story buildings and associated surface parking lots and play areas. As discussed in Section 4, *Biological Resources*, on-site vegetation is limited to grass fields, 17 trees, and hedges/ornamental landscaping. The project involves construction of up to 47 two-story detached homes and ten three-story buildings containing up to 72 attached townhomes, access roadways, a centralized open space area with community amenities such as a barbeque and picnic area, and landscaping. The design and architecture of the proposed new residential community would be controlled by the provisions of a new Specific Plan for the project site, the Vincent Avenue Specific Plan.

Implementation of the project would replace the school buildings currently on the project site with new residential buildings that would be taller and more massive than the buildings currently on the project site, which would significantly reduce the amount of open space on the site. The project would thus change the visual character of the site. While development of the project would change the appearance and use of the project site relative to its existing conditions, it would not degrade the visual character or quality of the site and its surroundings because the proposed residential uses would be similar to and aesthetically compatible with other residential uses in the project area and the project would upgrade the existing landscaping. The Specific Plan contains detailed provisions for the design and aesthetics of the community, including 11 unique but visually compatible building architectural styles/color schemes (see Figure 6 through Figure 9 for elevations and Figure 11 for material and color scheme palettes), unifying landscaping and wayfinding features, and community amenities such as gardens, playgrounds, and barbequing areas. The project would, therefore, aesthetically enhance the project area.

The proposed project would also be subject to City design review, including review of building elevations, colors and materials, and compliance with the Precise Plan standards per Article VI, Division 2 of the West Covina Municipal Code (WCMC). In addition, the project design would be reviewed for approval by the Planning Commission as part of the Precise Plan application process. The City uses this regulatory procedure to verify that the design, colors, and finish materials of

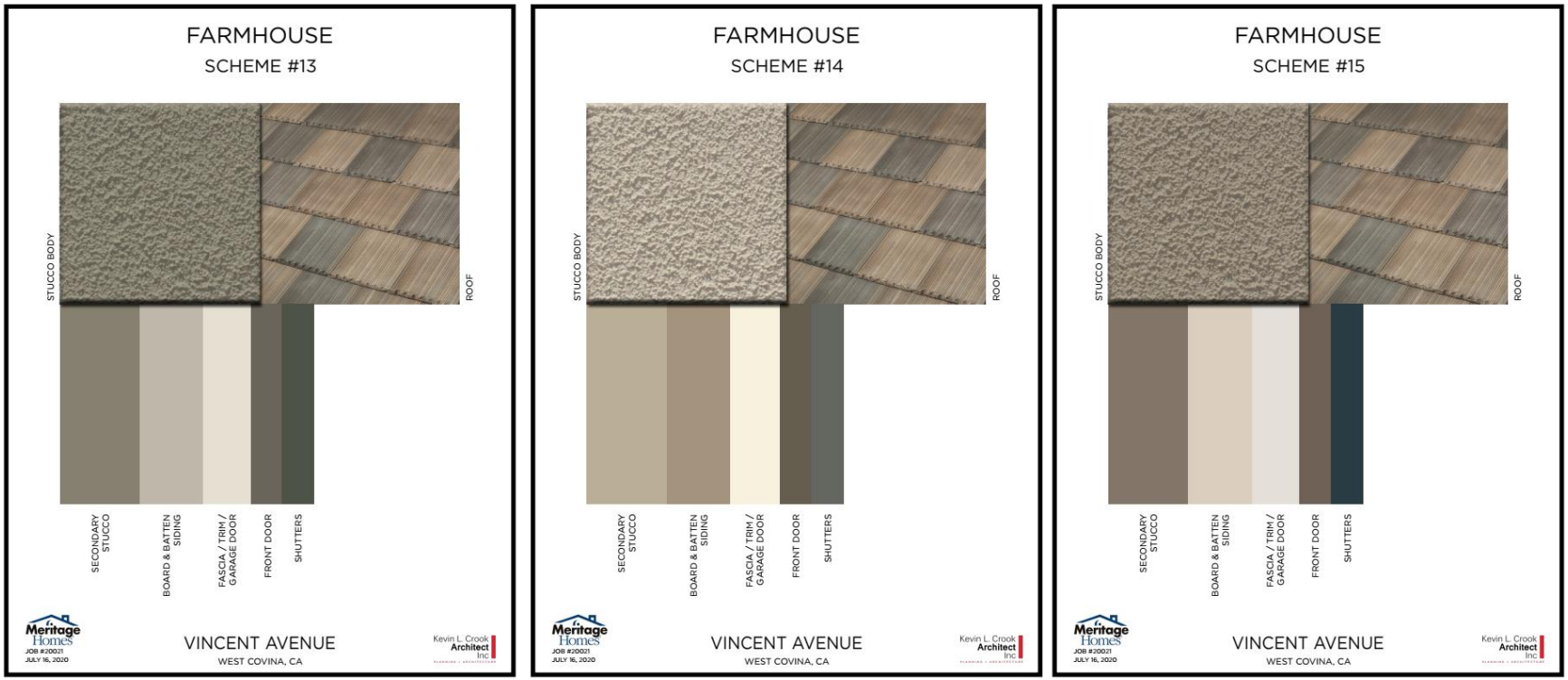
development projects comply with adopted design guidelines and achieve compatibility with the surrounding area. Although the project would not degrade the visual character and quality of the site and surroundings, this regulatory procedure provides the City with further assurances for aesthetic review and an opportunity to incorporate additional conditions to increase the aesthetic value of the project. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

Figure 11 Project Material and Color Scheme Palettes

Santa Barabara Style Detached Homes Materials and Color Palettes

Coastal Style Detached Homes Materials and Color Palettes



Farmhouse Style Detached Homes Materials and Color Palettes

Contemporary Eclectic Townhomes Materials and Color Palettes

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

The project is in an urban area of the City that is primarily developed with residential buildings and some commercial uses. The main sources of light and glare in the project area are streetlights and exterior lighting associated with residential and commercial structures and associated vehicles, including vehicles on nearby major roadways such as North Vincent Avenue and I-10. Implementation of the project would replace existing lighting on the project site with new outdoor lighting for the proposed residential buildings, internal access streets, landscaping, and other safety-related lighting. All proposed lighting would be equipped with the appropriate shielding material to minimize light spillage onto adjacent properties and to minimize skyglow, as specified in Section 2.3.10 of the Specific Plan. Furthermore, Section 2.3.10 of the Specific Plan requires that site lighting be evaluated as part of the design review process and includes lighting standards based on the recommendations of the Dark Sky Society designed to minimize skyglow and reduce light trespass onto adjacent properties. The proposed project would increase outdoor lighting on the project site compared to existing conditions, but light sources associated with the proposed project would not substantially increase the overall levels of day or nighttime lighting in the area because they would be comparable to the area's existing light levels from surrounding residential and commercial land uses. Furthermore, streets adjacent to the project site, including North Vincent Avenue, West Workman Avenue, and West Garvey Avenue North, are already illuminated by street lighting. For these reasons, the proposed project would not result in a substantial new source of light such that day or nighttime views in the area would be adversely affected. Rather, the proposed exterior lighting and building materials would be consistent with those of surrounding uses and would be an important aide to public safety.

In addition, as shown in Figure 11, the project design does not include any new highly reflective materials that could potentially cause significant glare during the day, such as stainless-steel panels or expansive glass windows. The design of the project, including its finish, colors, and materials, would be reviewed for approval through the City's design review process described in impact discussion *1.c*. This regulatory procedure provides the City with an additional layer of review for aesthetics including light and glare, and an opportunity to incorporate additional conditions to improve the project's building materials and lighting plans. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank.

2 Agriculture and Forestry Resources

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

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

The project site is in an urban area of the City and is currently occupied by a school campus. According to the City's Zoning and Land Use Maps, the project site is zoned Single-Family Residential (R-1) and has a land use designation of Civic: School (S). The California Department of Conservation (DOC) has not designated important farmland areas for the project site (California DOC 2020a). The project site is also not zoned for agricultural production, it has been previously developed, and it is not located in the vicinity of agricultural operations. Therefore, the proposed project would have no impact on designated Farmland.

NO IMPACT

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

As discussed under impact discussion *2.a*, the project site is currently occupied by a school campus and is not zoned or designated for agricultural use. In addition, the project site is not under a Williamson Act contract (California DOC 2016). The proposed project involves demolition of existing school buildings and construction of a new residential community in an urban area. The project site does not include conversion of farmland to non-agricultural uses; therefore, the project would not conflict with agricultural zoning or a Williamson Act contract. No impact would occur.

NO IMPACT

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

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

As discussed under impact discussion *2.a*, the project site is currently occupied by a school campus and is not zoned or designated for forest land or timberland. Therefore, the project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

NO IMPACT

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

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

NO IMPACT

3 Air Quality

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

Air Quality Standards and Attainment

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

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

Table 2 Health Effects Associated with Non-Attainment Criteria Pollutants

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

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

Sources: USEPA 2020a, 2020b, and 2020c

Air Quality Management

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

The 2016 AQMP addresses several State and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality models. The Southern California Association of Governments' (SCAG) projections for socioeconomic data (e.g., population, housing, employment by industry) and transportation activities from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) are integrated into the 2016 AQMP. This Plan builds upon the approaches taken in the 2012 AQMP for the attainment of federal PM and ozone standards and highlights the significant amount of reductions to be achieved. It emphasizes the need for interagency planning to identify additional strategies to achieve reductions within the timeframes allowed under the federal Clean Air Act, especially in the area of mobile sources. The 2016 AQMP also includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-

emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The Plan also demonstrates strategies for attainment of the new federal eight-hour ozone standard and vehicle miles travelled (VMT) emissions offsets, pursuant to recent USEPA requirements (SCAQMD 2017).

Air Emission Thresholds

CEQA Guidelines, Section 15064.7 provides that, when available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make determinations of significance. These thresholds are designed such that a project that would not exceed the adopted thresholds would not have an individually or cumulatively significant impact on the Basin's air quality. Therefore, a project that does not exceed these SCAQMD thresholds would result in a less than significant impact. This Initial Study conforms to the methodologies recommended in the SCAQMD's *CEQA Air Quality Handbook* (1993) and supplemental guidance provided by the SCAQMD, including recommended thresholds for emissions associated with both construction and operation of the project (SCAQMD 2019). Table 3 presents the significance thresholds for construction and operational-related criteria air pollutant and precursor emissions being used for the purposes of this analysis.

Table 3 SCAQMD Regional Significance Thresholds

Construction Thresholds	Operational Thresholds
75 pounds per day of VOC[1]	55 pounds per day of VOC
100 pounds per day of NO_X	55 pounds per day of NO_X
550 pounds per day of CO	550 pounds per day of CO
150 pounds per day of SO_X	150 pounds per day of SO_X
150 pounds per day of PM_{10}	150 pounds per day of PM_{10}
55 pounds per day of $PM_{2.5}$	55 pounds per day of $PM_{2.5}$

VOC: volatile organic compound; NO_X: nitrogen oxides; CO: carbon monoxide; SO_X: sulfur oxides; PM_{10}: particulate matter measuring 10 microns in diameter or less; $PM_{2.5}$: particulate matter measuring 2.5 microns in diameter or less

[1] California Air Resources Board (CARB) defines VOC and reactive organic gas (ROG) similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term VOC is used in this analysis.

Source: SCAQMD 2019

Localized Significance Thresholds

In addition to the above regional thresholds, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the *CEQA Air Quality Handbook* (1993). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and have been developed for nitrogen oxides (NO_X), carbon monoxide (CO), PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), distance to the sensitive receptor, and project size. LSTs have been developed for emissions generated in construction areas up to five acres in size. However, LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a

roadway (SCAQMD 2008a). As such, LSTs are typically applied only to construction emissions because most operational emissions are associated with project-generated vehicle trips.

The project site is in Source Receptor Area 11 (SRA 11, South San Gabriel Valley) (SCAQMD 2008a). Sensitive receptors closest to the project site consist of single-family and multifamily residences located approximately 25 feet to the west and south of the project site. The SCAQMD's publication *Final Localized Significant (LST) Thresholds Methodology* (2008) provides LSTs for receptors at a distance of 82 to 1,640 feet (25 to 500 meters) from the project site boundary. According to the SCAQMD, projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 feet. The project site is 8.05 acres; however, construction activities would disturb no more than 5 acres during any given day of construction. Therefore, Table 4 summarizes the LSTs for a 5-acre site in SRA 11 with sensitive receptors located at a distance of 82 feet.

Table 4 SCAQMD LSTs for Construction Emissions

Pollutant	Allowable Emissions from a 5-acre site in SRA 11 for a receptor 82 feet away
Gradual conversion of NO_X to NO_2	183
CO	1,814
PM_{10}	14
$PM_{2.5}$	9

NO_x: nitrogen oxides; NO_2: nitrogen dioxide; CO: carbon monoxide; PM_{10}: particulate matter measuring 10 microns in diameter or less; $PM_{2.5}$: particulate matter measuring 2.5 microns in diameter or less

Source: SCAQMD 2009

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

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP relies on local general plans and the SCAG 2016 RTP/SCS forecasts of regional population, housing, and employment growth in its own projections for managing air quality in the Basin.[4] As such, projects that are consistent with the growth anticipated by SCAG's growth projections and/or the General Plan would not conflict with the AQMP. If a project is less dense than anticipated by the growth projections, the project would likewise be consistent with the AQMP.

The City's General Plan EIR estimated that buildout of the General Plan would result in 7,161 new residents by the year 2036, which represents cumulative growth in West Covina for the year 2036 (West Covina 2016b). As the General Plan only accounts for growth through the year 2036, this analysis utilizes a forecast year of 2036 rather than 2040 because this is the year for which an estimated cumulative population forecast associated with General Plan buildout in West Covina is readily available and supported by substantial evidence in the General Plan EIR. According to the California Department of Finance (CDOF), the City currently has an estimated population of 105,999 (CDOF 2020). SCAG's 2016 RTP/SCS estimates that the City's population will increase to 116,700 by

[4] On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (titled Connect SoCal). However, the 2016 AQMP was adopted prior to this date and relies on the demographic and growth forecasts of the 2016-2040 RTP/SCS; therefore, these forecasts are utilized in the analysis of the project's consistency with the AQMP.

2040 (SCAG 2016). Based on linear interpolation, the 2036 population is forecast to be approximately 114,560 (SCAG 2016).

The proposed project involves construction of up to 119 homes on a site that is currently zoned Single-Family Residential (R-1), with a General Plan land use designation of Civic: School (S). The proposed project would require a General Plan Amendment to designate the site Neighborhood Medium Residential (up to 20 units per acre). The proposed project would directly increase the City's population if the new homes are occupied by people that currently reside in other localities. According to the CDOF, the average household size in West Covina is 3.35 persons per household (CDOF 2020). Therefore, the proposed project could result in the addition of approximately 399 new residents in the City.[5] The City's cumulative plus project population forecast of approximately 113,559 residents (105,999 + 7,161 + 399) would not exceed SCAG's interpolated forecast 2035 population of 114,560 residents for West Covina, which represents the forecast for the City under General Plan buildout. Furthermore, the City of West Covina currently contains approximately 32,919 housing units (CDOF 2020). The project would increase the City's housing stock by up to 119 units to approximately 33,038 units. SCAG forecasts that the number of households in West Covina will increase to approximately 35,000 units by 2040 (SCAG 2016). Therefore, the project's increase in housing units would be within SCAG's projected 2040 housing stock for West Covina.

Although the project proposes a land use for this site that was not included in SCAG's 2016 RTP/SCS demographics forecasts, the project would not generate population or housing growth that would exceed SCAG's 2016 RTP/SCS population forecasts for West Covina. Therefore, the proposed project would not conflict with SCAQMD's AQMP, and the project would be consistent with the underlying assumptions of the emissions forecasts contained in the AQMP. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

In accordance with CEQA Guidelines Section 15064(h)(3), the SCAQMD's approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. If the project's mass regional emissions do not exceed the applicable SCAQMD thresholds, then the project's criteria pollutant emissions would not be cumulatively considerable.

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

The following analysis evaluates air pollutant emissions generated by project construction and operation in comparison to the regional significance thresholds established by the SCAQMD (2019), as well as the SCAQMD LSTs. Construction and operational air pollutant emissions were modeled using the California Emissions Estimator Model (CalEEMod), version 2016.3.2. In addition, because

[5] 119 homes x 3.35 persons per home= 399 persons

the proposed project would replace the existing uses on the project site, operational air pollutant emissions from existing uses were calculated using CalEEMod to determine net new operational emissions associated with the proposed project. CalEEMod modeling results are available in Appendix A of this document.

Construction Emissions

Project construction would primarily generate temporary criteria pollutant emissions from the operation of construction equipment on-site, construction worker and vendor vehicle trips to and from the site, and haul trips for export of materials off-site. Construction emissions were modeled based on an applicant-provided construction schedule and CalEEMod defaults for construction equipment inventories. Construction input data for CalEEMod also included the volumes of soil material and demolished building materials to be exported from the project site based on applicant-provided information. The analysis assessed maximum daily emissions from individual construction activities, including demolition, site preparation, grading, building construction, paving, and architectural coating. Grading, excavation, hauling, and site preparation would involve the greatest use of heavy equipment and generation of fugitive dust.

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

As shown in Table 5, construction of the proposed project would not result in criteria pollutant emissions that would exceed the SCAQMD regional thresholds or LSTs. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant.

Table 5 Estimated Construction Emissions

Construction Year	Estimated Maximum Daily Emissions (lbs/day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
2022	3	33	22	<1	10	6
2023	2	15	19	<1	2	1
2024	8	25	36	<1	2	1
2025	6	10	17	<1	1	1
Maximum Daily Emissions	**8**	**33**	**36**	**<1**	**10**	**6**
SCAQMD Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum On-site Emissions	8	33	33	<1	10	6
Local Significance Thresholds (LSTs) (on-site emissions only)[1]	N/A	183	1,814	N/A	14	9
Threshold Exceeded?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

VOC: volatile organic compounds; NO_x: nitrogen oxides; NO_2: nitrogen dioxide; CO: carbon monoxide; PM_{10}: particulate matter measuring 10 microns in diameter or less; $PM_{2.5}$: particulate matter measuring 2.5 microns in diameter or less

[1] LSTs are for a 5-acre project site in SRA 11 within 82 feet of the site boundary.

Notes: See Appendix A for modeling results. Some numbers may not add up precisely due to rounding considerations. Maximum on site emissions are the highest emissions that would occur on the project site from on-site sources, such as heavy construction equipment and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips.

Operational Emissions

Development of the project would result in long-term air pollutant emissions over the course of operations. Emissions include area sources, energy sources, and mobile emissions. Area sources include use of consumer products, use of gas-powered landscaping equipment, and re-application of architectural coating (re-painting). Energy sources include natural gas for uses such as space and water heating and appliances. Mobile sources consist of vehicle trips (including residents, deliveries, and visitors). Vehicle trip rates for the proposed land uses on the project site were based on the Focused Traffic Analysis prepared for the project (see Appendix I). A detailed description of emissions sources is provided in the Air Quality and GHG Emissions Study (Appendix A).

Table 6 summarizes the estimated maximum daily emissions of pollutants associated with operation of the proposed project, accounting for emissions generated by the current use of the site. According to the Specific Plan, all homes would include rooftop solar panels and would be constructed to achieve net zero electricity to meet 2019 Title 24 requirements. Therefore, operational air pollutant emissions from energy sources would be limited to natural gas usage. Most project-related operational emissions would result from vehicle trips to and from the site. As shown in Table 6, neither total project emissions nor net new operational emissions would exceed the SCAQMD regional thresholds for criteria air pollutants. Operation of the proposed project would result in a net reduction in NO_x, CO, PM_{10}, and $PM_{2.5}$ emissions compared to the existing uses on the site, primarily due to the reduced

energy use and vehicle trips associated with the proposed project. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant.

Table 6 Estimated Operational Emissions

	Maximum Daily Emissions (lbs/day)					
Emission Source	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area	5	2	11	<1	<1	<1
Energy	<1	1	<1	<1	<1	<1
Mobile[1]	1	6	17	<1	7	2
Total Project Emissions	**6.0**	**8**	**28**	**<1**	**7**	**2**
Existing Emissions (School)[2]	5	16	33	<1	11	3
Net New Emissions (Project- Existing)	**1**	**(8)**	**(5)**	**0**	**(4)**	**(1)**
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

VOC: volatile organic compounds; NO_x: nitrogen oxides; CO: carbon monoxide; SO_2: sulfur dioxide; PM_{10}: particulate matter measuring 10 microns in diameter or less; $PM_{2.5}$: particulate matter measuring 2.5 microns in diameter or less; (): negative value

[1] To account for the effects of the Part One Rule, California Air Resources Board (CARB) released off-model adjustment factors on November 20, 2019 to adjust criteria air pollutant emissions outputs from the EMFAC model. These off-model adjustment factors are applied by multiplying the emissions calculated for light- and medium-duty vehicles by the adjustment factor. With the incorporation of these adjustment factors, operational emissions generated by light-duty automobiles, light-duty trucks, and medium-duty trucks associated with project-related vehicle trips at the year 2025 would be approximately 0.2 percent greater for VOC, 0.7 percent greater for particulate matter, 0.2 percent greater for NO_x, and 0.7 percent greater for CO. These increases would have a negligible impact on overall operational emissions generated by the project and would not alter the significance of the project's operational emissions.

[2] Emissions from the existing Vincent Children's Center were subtracted from the project operational emissions to calculate net new operational emissions on the project site.

Notes: See Appendix A for modeling results. Some numbers may not add up precisely due to rounding considerations.

LESS THAN SIGNIFICANT IMPACT

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

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). Off-site sensitive receptors nearest to the project site consist of single-family residences located immediately south and west of the project site. In addition, the proposed project would introduce new sensitive receptors to the project site.

Local Carbon Monoxide Hotspots

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

A detailed CO analysis was conducted during the preparation of SCAQMD's 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the Basin, which would be expected to experience the highest CO concentrations. The highest CO concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of Los Angeles near Interstate 405, which has an ADT of approximately 100,000 vehicles per day. The concentration of CO at this intersection was 4.6 ppm, which is well below the 35-ppm 1-hour CO federal standard and the State standard of 20 ppm. Furthermore, the Basin has been in attainment of federal CO standards since 2007 (SCAQMD 2016). The highest 8-hour CO average recorded at the nearest monitoring, the Azusa monitoring station located approximately five miles northeast of the project site, was 1.1 ppm in 2019, which is well below the 8-hour CO federal and State standard of 9 ppm (CARB 2020a).

As shown in Table 5, maximum daily CO construction emissions would be approximately 36 pounds and maximum on-site emissions would be approximately 33 pounds, which would not exceed the SCAQMD's regional threshold or LST for CO. Likewise, as shown in Table 6, the project would result in a net reduction in operational CO emissions from area and mobile sources as compared to emissions generated by existing uses on the project site. Both the SCAQMD's regional thresholds and LSTs are designed to be protective of public health. Based on the low background level of CO in the project area, stricter vehicle emissions standards for new cars and new technology that increases fuel economy, and the project's low level of operational CO emissions, the project would not result in or substantially contribute to concentrations that exceed the one-hour or eight-hour CO standard. Therefore, no impact would occur.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer, typically based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology (OEHHA 2015). Construction-related activities would result in short-term, project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts and is therefore the focus of this discussion (CARB 2017a).

Generation of DPM from construction projects typically occurs in a single area for a short period. Based on applicant-provided information, construction of the proposed project is anticipated to take approximately 2.5 years. The dose to which the receptors are exposed is the primary factor used to

determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the OEHHA, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends in a household). OEHHA recommends this risk be bracketed with nine-year and 70-year exposure periods. Health risk assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015).

The maximum on-site $PM_{2.5}$ emissions, which are used to represent DPM emissions for this analysis[6], would occur during site preparation activities. Maximum daily onsite $PM_{2.5}$ emissions during site preparation would be 6 pounds per day, which is well below the SCAQMD LST of nine pounds per day that is designed to be protective of human health. While site preparation emissions represent the worst-case condition, such activities would only occur for about two weeks, which would be less than one percent of the typical health risk calculation periods of nine years, 30 years, and 70 years. $PM_{2.5}$ emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less construction equipment. Therefore, given the aforementioned, DPM generated by project construction is not expected to create conditions where the probability that the Maximally Exposed Individual would contract cancer is greater than ten in one million or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual.

Upon completion of construction, the proposed project would involve operation of residential uses on the site. The proposed project's operational uses do not include the types of uses that generate substantial TAC emissions (e.g. distribution centers, rail yards, ports, refineries, etc.). Therefore, operation of the project would not expose sensitive receptors to substantial amounts of TACs. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project, which would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, and architectural coatings. Such odors would disperse rapidly from the project site, generally occur at magnitudes that would not affect substantial numbers of people and would be limited to the construction period. Furthermore, construction would be required to comply with SCAQMD Rule 402, which regulates nuisance odors. Impacts associated with odors during construction would be temporary and less than significant.

[6] It can be conservatively assumed that DPM emissions would be equivalent to $PM_{2.5}$ because $PM_{2.5}$ emissions make up 92 percent of total diesel off-road equipment (e.g., construction equipment) PM emissions based on SCAQMD guidance (SCAQMD 2006).

With respect to operation, the SCAQMD's *CEQA Air Quality Handbook* (1993) identifies land uses associated with odor complaints as agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Residential uses are not identified on this list. In addition, solid waste generated by the proposed on-site uses would be properly stored in lidded dumpsters and/or trash cans and collected by a contracted waste hauler, ensuring that on-site waste would be managed and collected in a manner to prevent the proliferation of odors. Therefore, the proposed project would not generate other emissions such as those leading to odors affecting a substantial number of people, and no operational impact would occur.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank.

4 Biological Resources

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

An Arborist Report was prepared for the proposed project, which included a site visit in September 2020 to assess the trees on and nearby the project site (available in full in Appendix B of this document). The information contained in this section is partially based on the results of the Arborist Report, as well as searches of pertinent U.S. Fish and Wildlife Service (USFWS) and other agency databases.

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

The project site encompasses 8.05 acres and is currently developed with school buildings, play areas, and grassy fields. The site is in a developed urban area and is approximately 2.6 miles from the nearest open space, the Santa Fe Dam Recreation Area. The nearest USFWS designated Critical Habitat, located approximately 2.2 miles to the southeast, is habitat for the Coastal California gnatcatcher (*Polioptila californica californica*), a threatened bird species (USFWS 2020a). The project site is also approximately 3.0 miles south of Critical Habitat for the Southwestern willow flycatcher (*Empidonax traillii extimus*), an endangered bird species (USFWS 2020a). Project implementation would not affect or modify these protected habitats or wildlife habitats for this protected species within the City. The project site contains 17 trees, as well as shrubbery and grasses. There are also three trees located with the public right-of-way adjacent to the project site. It is anticipated that all 17 trees on the project site, along with the three trees in the public right-of-way, would be removed during construction of the proposed project. Given the project site's developed nature and urban location away from identified critical habitat for special status species, it is unlikely that these trees serve as habitat for protected species.

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

Mitigation Measure

BIO-1 Nesting Bird Avoidance

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

- To avoid disturbance of nesting birds, including raptorial species protected by the MBTA and CFGC, construction activities related to the project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 31). If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of construction activities. The nesting bird pre-construction survey shall be conducted on foot inside the project site, including a 100-foot buffer, and in inaccessible areas

(e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California.

- If nests are found, an avoidance buffer shall be demarcated by a qualified biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No parking, storage of materials, or construction activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.
- A survey report by the qualified biologist documenting and verifying compliance with the mitigation and with applicable State and federal regulations protecting birds shall be submitted to the City. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

Plant communities are considered sensitive biological resources if they have limited distributions, have high wildlife value, including sensitive species, or are particularly susceptible to disturbance. California Department of Fish and Wildlife (CDFW) ranks sensitive communities as "threatened" or "very threatened" and keeps records of their occurrences in the CNDDB. The project is in a developed urban area and is not located within a vegetated or open space area. Vegetation present on site includes 17 trees, grasses, shrubs and ornamental landscaping. These existing trees, shrubs, and grasses do not constitute a sensitive natural community. Additionally, there is no riparian habitat on or near the project site (USFWS 2020b). Therefore, the proposed project would not have a substantial adverse effect on riparian habitat or other sensitive natural communities as none exist on the site or in nearby areas. No impact would occur.

NO IMPACT

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

As discussed above, the project site is in an urban area and is developed with school buildings, play areas, a parking lot, and landscaping. No riparian habitats, wetlands, or other water features have been identified on or adjacent to the project site (USFWS 2020b). Furthermore, the project site does not include any discernable drainage courses, inundated areas, wetland vegetation, or hydric soils (USDA 2020). As a result, no state or federally protected wetlands or other waters that may be considered jurisdictional by the CDFW, United State Army Corps of Engineers (USACE), or Regional

Water Quality Control Board (RWQCB) occur on or adjacent to the project site. The nearest mapped wetlands are located approximately 1.6 miles north of the project site (USFWS 2020b). Therefore, the proposed project would not directly or indirectly have a substantial adverse effect on State or federally protected wetlands or other jurisdictional waters. No impact would occur.

NO IMPACT

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

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

As discussed above, the project site is developed with school buildings in an urban area surrounded by roads, residential neighborhoods, and commercial development. As previously discussed, the site is located approximately 2.6 miles from the nearest open space and is separated from open space areas by existing development and roadways. The project site does not contain any natural communities or habitat areas that would be expected to support populations of native wildlife nurseries or movement. While the project site contains trees, these trees are not a part of larger habitat area; they are surrounded by development and do not form a natural community or constitute a habitat area.

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

NO IMPACT

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

Article VI, Division 9 of the West Covina Zoning Code regulates the preservation, protection, and removal of trees on public and private property in the City. An Arborist Report was prepared for the proposed project in accordance with the City's Tree Ordinance. Pursuant to the Tree Ordinance, a Significant and Heritage Tree Permit must be obtained prior to damaging or removing any significant or heritage trees. A heritage tree generally means any tree(s) identified as such by the City's Planning Commission[7] and/or any of the Southern California black walnut tree species (*Juglans californica*) located in the San Jose Hills, as found within West Covina's jurisdictional boundaries.

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

[7] Based on a phone conversation with the City's Planning Manager on September 30, 2020; the City has not identified any heritage trees at this time other than the southern California black walnut tree.

- The tree is located in the front yard of a lot or parcel and has a caliper[8] of one foot or more, as measured four and one-half feet above mean natural grade.
- The tree is located in the street-side yard of a corner lot and has a caliper of one foot or more.
- The tree is located anywhere on a lot, has a caliper of six inches, or more, and is one of the following species: any native tree of the oak genus *Quercus*, California sycamore (*Platanus racemosa*), American sycamore (*Platanus occidentalis*), and southern California black walnut (*Juglans californica).*

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

The project site contains 17 trees and would affect another three trees in the public right-of-way adjacent to the project site. Of the 20 trees that the proposed project would impact, five are crape myrtle (*Lagerstoemia* sp.) trees, three are mulberry (*Morus* sp.) trees, two are camphor (Cinnamomum sp.) trees, one is a fern pine (*Podacarpus* sp.) tree, seven are coast live oak (*Quercus agrifolia*) trees, one is an orange tree (*Citrus* sp.), and one was dead and unidentifiable. Of these trees, eight are considered Significant Trees pursuant to the City's Tree Ordinance, including one crape myrtle and seven coast live oaks. No Heritage Trees were identified in the Arborist Report.

It is anticipated that all 20 trees would be removed during construction of the proposed project. If it is determined at the time of construction that removal of a significant subject tree is not necessary, the tree would be protected per Section 26-294 of the Tree Ordinance. Removal of the eight Significant Trees would require a permit from the City, and mitigation would be required to mitigate the loss of Significant Trees on the project site.

Mitigation Measure

BIO-2 Significant Trees

Significant trees that are removed due to the project shall be mitigated by one or more of the following measures:

- Replacement with trees of a comparable species, size, and condition as determined by the Planning Director
- Relocation on or off site with submission of an arborist report describing the method and one-year survival guarantee
- Payment of the proper restitution value of the tree(s), or donation of a boxed tree(s) to the City or other public agency to be used elsewhere in the community

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

Implementation of Mitigation Measure BIO-2 would provide for the mitigation of the loss of Significant Trees on the project site and would ensure that the City's Tree Ordinance is adhered to.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

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

NO IMPACT

5 Cultural Resources

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

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

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

A resource shall be considered historically significant if it:

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

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

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

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

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

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

The project site is currently developed with the former Vincent School public elementary school campus and has until recently been used for[9] the Covina Valley Children's Center (CVUSD, 2020-2021). The City of West Covina has published two Historic Context Reports (HCSs) and Historic Resources Inventories (HRIs), which provide for the identification of buildings within the City that may be eligible for listing as a historic resource and evaluates them for their historic significance (West Covina 2006 and 2019). The project site was evaluated in the *Historic Context Statement, 1945-1978, & Historic Resource Inventory Update* (2019) by GPA. The property was found to be typical of a public elementary school dating from the mid-twentieth century. On this basis, the property was recommended ineligible for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR), and for designation as a City of West Covina Landmark. Therefore, the City, serving as lead agency, has determined that the property is not considered a historical resource.

In addition, a search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC) located at the California State University, Fullerton was undertaken. The purpose of the records search was to identify previously conducted cultural resources studies within the project site and a 0.5-mile radius, and previously recorded cultural resources within the project site and a 0.5-mile radius. The CHRIS search included a review of the NRHP, CRHR, the Office of Historic Preservation Historic Properties Directory, the California Inventory of Historic Resources, and the Archaeological Determinations of Eligibility list.

The SCCIC records search identified eight previously conducted cultural resources studies performed within a 0.5-mile radius of the project site and 12 previously recorded cultural resources within a 0.5-mile radius of the project site. The search results did not identify any historic resources on the project site or within its immediate vicinity. Therefore, none of the buildings that exist on the project site are considered historic resources, and the proposed project would have a less than significant impact on historical resources.

LESS THAN SIGNIFICANT IMPACT

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

The project site is partially developed with school buildings, athletic fields, and surface parking lot, and is located in an urbanized area. Subsurface soils on the project site were previously disturbed to accommodate existing development

Rincon conducted a pedestrian field survey of the project site on January 5, 2021. All accessible areas of the project site were inspected using ten-meter transect intervals. Areas of exposed ground were inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), ecofacts (marine shell and bone), soil discoloration that might indicate

[9] Currently, use of the site as a school may be limited or it may be non-operational because of COVID-19 pandemic conditions or for other reasons.

the presence of a cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historic debris (e.g., metal, glass, ceramics).

Ground disturbances such as burrows and drainages were also visually inspected. Results of the field survey identified no evidence of archaeological remains or historic built-environment resources within the project site. Ground visibility throughout the project site was very poor (approximately less than 10 percent) due to vegetation including grass and weeds.

Based on the findings of the records search and archaeological survey, no archaeological resources were identified on the project site. Although no archaeological resources are known to exist on the project site, encountering unanticipated archaeological resources during ground disturbance is a possibility and impacts to unknown resources are potentially significant. Mitigation is required to reduce impacts to a less than significant level. The following mitigation measures require a Worker's Environmental Awareness Program (WEAP) training prior to commencement of any ground-disturbing activities, and steps to take in the event of an unanticipated discovery during construction. These steps include evaluating whether the resource meets the definition of a historical and/or unique archaeological resource and is therefore significant under CEQA, and requiring treatment for any resources identified as significant.

Mitigation Measures

The following mitigation measures are required to avoid or reduce the project's potentially significant impacts to any archaeological resources that may be found during ground disturbing activities.

CR-1 Worker's Environmental Awareness Program

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

CR-2 Unanticipated Discovery of Archaeological Resources

If archaeological resources are encountered during ground-disturbing activities, all work in the immediate vicinity shall be halted, and the City of West Covina Community Development Department shall be immediately informed of the discovery. The qualified archaeologist required under Mitigation Measure TCR-2 shall be retained by the project applicant to determine if the find is classified as a significant cultural resource pursuant to the CEQA definition of historical (CEQA Guidelines 15064.5[a]) and/or unique archaeological resources (PRC 21083.2[g]). If the resource is classified as a significant cultural resource, the qualified archaeologist shall make recommendations on the treatment and disposition of the finding. The final recommendations on the treatment and disposition of the finding shall be developed in accordance with all applicable provisions of the PRC Section 21083.2 and CEQA Guidelines Sections 15064.5 and 15126.4 and shall be reviewed by the City of West Covina Community Development Department prior to implementation. The final recommendations shall be implemented and the City shall be provided with a final report on the treatment and disposition of the finding prior to issuance of a Certificate of Occupancy.

Implementation of Mitigation Measures CR-1, CR-2, and TCR-1 through TCR-3 would reduce impacts to significant archaeological resources, if any are discovered during project construction, to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

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

LESS THAN SIGNIFICANT IMPACT

6 Energy

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

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

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

Construction Energy Demand

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site and export soil and demolition material from the site. Project construction would require demolition, site preparation, grading, pavement and asphalt installation, building construction, architectural coating, and landscaping and hardscaping. As shown in Table 7, project construction would require approximately 32,244 gallons of gasoline and approximately 155,336 gallons of diesel fuel. These construction energy estimates are conservative because they assume that the construction equipment used in each phase of construction is operating every day of construction.

Table 7 Estimated Fuel Consumption during Construction

	Fuel Consumption (gallons)	
Source	Gasoline	Diesel
Construction Equipment & Hauling Trips	–	155,336
Construction Worker Vehicle Trips	32,244	–

See Appendix D for energy calculation sheets.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, per applicable regulatory requirements such as California's Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11), the project would comply with construction waste management practices to divert a minimum of 65 percent of construction and demolition debris. These practices would result in efficient use of energy necessary to construct the project. In the interest of cost-efficiency, construction contractors also would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Operational Energy Demand

Operation of the project would primarily contribute to area energy demand by consuming gasoline and diesel fuel for vehicle trips to and from the site. According to the Specific Plan, all homes would include rooftop solar panels and would be constructed to achieve net zero electricity to meet 2019 Title 24 requirements; therefore, operation of the project would not involve net new electricity consumption.

Table 8 summarizes estimated operational energy consumption for the proposed project and existing uses on the site.[10] As shown therein, project operation would require approximately 190,159 gallons of gasoline and 47,794 gallons of diesel for transportation fuels. The homes would be net zero electricity and all electricity consumption would be offset by the project's rooftop solar panels. Natural gas use for appliances and HVAC would require approximately 27,191 U.S. therms per year. Transportation of workers, customers, and deliveries would represent the greatest operational use of energy associated with the proposed project. As illustrated in Table 8, the proposed project would result in reduced energy consumption compared to existing uses on the site due to the homes being net zero electricity and the reduced VMT associated with the proposed project.

The project would be required to comply with all standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California's Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. Furthermore, the project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase to comply with State requirements through Senate Bill (SB) 100,

[10] Currently, use of the site as a school may be limited or it may be non-operational because of COVID-19 pandemic conditions or for other reasons.

which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Table 8 Estimated Project Annual Operational Energy Consumption

Source	Energy Consumption[1]	
Transportation Fuels		
Gasoline	254,200 gallons	27,908 MMBtu
Diesel	63,171 gallons	8,052 MMBtu
Electricity	0 GWh	0 MMBtu
Natural Gas Usage	27,191 U.S. therms	2,528 MMBtu
Total Energy Consumption		**38,488 MMBtu**
Existing Uses		
Transportation Fuels[2]		
Gasoline	334,548 gallons	36,729 MMBtu
Diesel	83,138 gallons	10,597 MMBtu
Electricity	0.35 GWh	1,184 MMBtu
Natural Gas Usage	6,214 U.S. therms	578 MMBtu
Total Existing Energy Consumption		**49,088 MMBtu**
Net Energy Consumption (Proposed-Existing)[3]		
Transportation Fuels		
Gasoline	(80,348) gallons	(8,821) MMBtu
Diesel	(19,967) gallons	(2,545) MMBtu
Electricity	(0.35) GWh	(1,184) MMBtu
Natural Gas Usage	20,977 U.S. therms	1,950 MMBtu
Project Net Energy Consumption		**(10,600) MMBtu**

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

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

[2] The estimated number of average daily trips associated with the project is used to determine the energy consumption associated with fuel use from operation of the project. According to CalEEMod calculations (see Appendix A), the project would result in approximately 2,957,004 annual VMT, whereas existing uses result in approximately 3,891,665 annual VMT.

[3] Parentheses indicate negative values

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

To help achieve Title 24 reduction targets, the project applicant proposes to incorporate several energy efficient features into overall project design. Energy efficient design features include the installation of solar panels that would meet all energy needs for the residences, energy-efficient appliances and lighting, water-efficient indoor fixtures throughout the project site, and drought tolerant landscaping. Furthermore, as illustrated in Table 8, the proposed project would result in less consumption of vehicle fuels compared to the existing use on the project site due to reduced VMT associated with the project. Operation of the project would consume fuel; however, the project would conform to the latest version of California's Green Building Standards Code and Building Energy

Efficiency Standards and would result in reduced energy consumption on the project site compared to the existing use. Therefore, the proposed project would not lead to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The City adopted its Energy Action Plan (EAP) in 2011, which includes energy conservation goals and policies for municipal operations in the City, as well as outreach programs to encourage local businesses and residents to implement utility energy efficiency measures such as design features that achieve water and energy use reductions, including compliance with Title 24 (West Covina 2011). The goals and policies established by the EAP are geared towards municipal operations and the establishment of new local energy policies, and, therefore, have limited applicability to residential projects within the City. However, the proposed project would be in accordance with the overall intent of the EAP. For example, the project would be designed to comply with the residential requirements of the latest version of the California Green Building Standards Code, Title 24, Part 11, which would reduce energy consumption compared to standard building practices. Measures included in the proposed project to meet these energy standards include installation of rooftop solar panels, low-flow plumbing fixtures, water-efficient irrigation systems, and lighting conservation features. Furthermore, the new homes would be net zero electricity. Compliance with these regulations would ensure the project aligns with the City's EAP. Therefore, the project would have no impact.

NO IMPACT

7 Geology and Soils

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

A Preliminary Geotechnical Report was prepared for the project site by Group Delta in March 2020 to analyze the geotechnical factors that may impact the redevelopment of the site. The report included review of relevant United States Geological Survey (USGS) and California Geological Survey (CGS) maps for the site and surrounding area; geological field investigation to evaluate subsurface conditions; laboratory testing on selected soil samples to evaluate physical, engineering, and chemical properties of on-site soil soils; evaluation of geologic and seismic hazards (i.e., seismicity, surface fault rupture, ground shaking, liquefaction); and evaluation of design parameters in accordance with the CBC. The report concluded that the project is feasible from a geotechnical engineering standpoint, provided that the recommendations presented in the report are adhered to during planning and construction of the project, to the satisfaction of the City's Building Division. The following analysis is based on the information contained in this project-specific Preliminary Geotechnical Report (Group Delta 2020; see Appendix E).

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

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

The project site is in a seismically active area of southern California, and, therefore, could experience strong ground shaking from local and regional faults. A fault that has ruptured in at least the last 11,700 years is considered to have a higher potential of future seismicity and is considered an active fault by the Alquist-Priolo Earthquake Fault Zoning Act. Faults with evidence of longer earthquake frequency events are considered to have a lower potential of future seismicity. According to CGS, the project site is not located in an Alquist-Priolo Fault Zone (CGS 2020). There are no faults present on the project site, and the nearest fault to the project site is the Indian Hill Fault located approximately 2.3 miles east of the site. While the San Andreas Fault is the most significant seismically active fault in the region, it is located over 25 miles northeast of the site (Group Delta 2020). Implementation of the project would not exacerbate the existing risk of fault rupture, as the project would not include uses such as hydraulic fracturing or minerals extraction which can exacerbate earthquake risks. Though the project site is not located above an Alquist-Priolo Fault Zone, strong ground shaking at the site may occur in the event of a sufficiently large earthquake on this or other nearby faults.

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

project would not exacerbate existing ground shaking hazards, impacts related to seismically induced ground shaking would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

Liquefaction is a process whereby soil is temporarily transformed to fluid form during intense and prolonged ground shaking or because of a sudden shock or strain. Typically, liquefaction occurs in areas where there are loose soils and the depth to groundwater is less than 50 feet from the surface. According to the Preliminary Geotechnical Report, the site is not located within an Earthquake Required Investigation Zone for liquefaction. Furthermore, groundwater was not encountered during the associated field investigation at the maximum drilled depth of 51.5 below ground surface (bgs) and the site's historical highest groundwater level is 100 feet deep (Group Delta 2020). Therefore, the report concluded that site has low potential for liquefaction. Furthermore, design and construction of the project would conform to the current seismic design provisions of the CBC, which incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program, to mitigate losses from an earthquake and provide for the latest in earthquake safety. While the project would be susceptible to seismic activity given its location within a seismically active area, the project site is not susceptible to liquefaction and would be required to minimize this risk, to the extent feasible, through the incorporation of applicable CBC standards. Therefore, the potential effects of differential settlement as a result of liquefaction would be less than significant.

In addition, the project site and surrounding areas are relatively flat and located centrally within an alluvial valley with a gentle slope to the southwest. There are no significant slopes that would present a landslide hazard at or near the site (Group Delta 2020). The proposed project would not involve changes to the site grading or terrain that would destabilize soils prone to landslide. Therefore, the project would not directly or indirectly cause potential adverse effects related to landslides. Potential impacts related to liquefaction and landslides would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

The potential for project construction activities involving soil disturbance, such as excavation, stockpiling, and grading to result in increased erosion and sediment transport by stormwater to surface waters would be minimized because the project would be required to comply with a Construction General Permit, which is issued by the State Water Resources Control Board (SWRCB). The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP), which outlines best management practices (BMPs) to reduce erosion and topsoil loss

from stormwater runoff (also refer to the discussion in Section 9, *Hydrology and Water Quality*). Compliance with the Construction General Permit would ensure that BMPs are implemented during construction and minimize substantial soil erosion or the loss of topsoil. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

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

LESS THAN SIGNIFICANT IMPACT

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

Expansive soils are highly compressible, clay-based soils that tend to expand as they absorb water and shrink as water is drawn away. According to the Preliminary Geological Report, field explorations performed at the site indicated the presence of fill at the northern portion where the school building and parking areas are located. The historic topographic map indicates the northern portion of the site had previously been graded with five to eight feet of fill. Fill materials encountered during drilling consisted of medium dense silty sand with gravels and cobbles. Native material encountered below the fills at the northern portion and ground surface at the lawn areas consisted mostly of medium-dense to very-dense silty sand, poorly-graded sand, and well-graded sand interlayered with lean clay with sand and clayey sand to the maximum explored depth of 51.5 feet bgs. The sand was found to be mostly fine to medium with some coarse grained, and the few gravels were fine grained. Furthermore, the depth to groundwater at the project site is reported to exceed 51.5 feet bgs, and the historic high ground water is approximately 100 feet bgs at the site. In addition, laboratory testing performed on representative samples of the near surface soils indicates that the on-site sandy soils are expected to have a very low expansion potential. Therefore, the proposed project would not

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

LESS THAN SIGNIFICANT IMPACT

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

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

NO IMPACT

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

The project site is currently developed and in an urban region of the City. Due to the site being previously graded and developed, with previously placed artificial fill to a depth of five to eight feet bgs, it is unlikely that unique paleontological resources exist on the project site. Although project implementation is not expected to uncover paleontological resources, a remote possibility for such resources to be uncovered during the over excavation and compaction process exists, and therefore the potential for impacts to previously undiscovered paleontological resources cannot be ruled out. Mitigation Measure GEO-1 is therefore required to avoid impacts to paleontological resources in the case of unanticipated fossil discoveries. This measure would apply to all phases of project construction and would reduce the potential for impacts to fossils present on site by providing for the recovery, identification, and curation of paleontological resources.

Mitigation Measure

GEO-1 Unanticipated Discovery of Paleontological Resources

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

This page intentionally left blank.

8 Greenhouse Gas Emissions

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

Overview of Climate Change and Greenhouse Gases

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

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, and CH_4 results from off-gassing associated with agricultural practices and landfills. Different types of GHGs have varying global warming potentials (GWPs), which are the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the GHG emissions, referred to as carbon dioxide equivalent (CO_2e), and is the amount of a GHG emitted multiplied by its GWP. CO_2 has a 100-year GWP of one. By contrast, CH_4 has a GWP of 28, meaning its global warming effect is 28 times greater than that of CO_2 on a molecule per molecule basis (IPCC 2014a).[11]

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

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

Greenhouse Gas Emissions Inventory

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

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

Based on the CARB's California Greenhouse Gas Inventory for 2000-2018, California produced 425 MMT of CO_2e in 2018. The major source of GHG emissions in California is the transportation sector, which comprises 39.9 percent of the state's total GHG emissions. The industrial sector is the second largest source, comprising 21 percent of the state's GHG emissions, while electric power accounts for 14.8 percent (CARB 2020b).

Regulatory Setting

California Regulations

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

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

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

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

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

SENATE BILL 375

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

Regional Regulations

2020-2045 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (titled Connect SoCal). The 2020-2045 RTP/SCS builds upon the progress made through implementation of the 2016-2040 RTP/SCS and includes ten goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The SCS establishes a land use vision of center focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation (SCAG 2020).

Local Regulations

ENERGY ACTION PLAN

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

GENERAL PLAN

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

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

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

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

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

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

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

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

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

Methodology

GHG emissions associated with the proposed project were calculated using CalEEMod version 2016.3.2 (see Appendix A for CalEEMod worksheets). Construction emissions were modeled based on an applicant-provided construction schedule and CalEEMod defaults for construction equipment inventories. It is assumed that all construction equipment used would be diesel-powered. In accordance with SCAQMD guidance, construction emissions were amortized over a period of 30 years (the assumed life of the project), and amortized construction emissions were added to operational emissions so that the GHG emissions analysis addresses construction GHG emissions as part of the operational GHG emissions (SCAQMD 2008b).

CalEEMod calculates operational emissions of CO_2, CH_4, and N_2O associated with energy use, area sources, waste generation, and water use and conveyance as well as CO_2 and CH_4 emissions associated with mobile sources. Emissions were calculated for year 2026.[12] The default electricity consumption values in CalEEMod include the CEC-sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies. According to the Specific Plan, all homes would

[12] Project construction is anticipated to end in early 2025 and occupancy is planned for later that year; however, CalEEMod requires the selected project opening year to be the first full calendar year that the project will be operational (California Air Pollution Control Officers Association 2017). Therefore, an operational year of 2026 was selected in CalEEMod.

be constructed to achieve net zero electricity to meet the 2019 Title 24 requirements. Therefore, operational electricity use was set to zero in the CalEEMod model.

The project would be served by Southern California Edison (SCE). Therefore, SCE's energy intensity factors (i.e., the amount of CO_2, CH_4, and N_2O per kilowatt-hour) were used to calculate GHG emissions. The default SCE energy intensity factors included in CalEEMod are based on data from 2012. As of 2012, SCE procured 20.6 percent of its electricity from renewable sources (SCE 2012); however, per SB 100, the statewide RPS Program requires electricity providers to increase procurement from eligible renewable energy sources to 33 percent by 2020, 44 percent by 2024, and 60 percent by 2030. To account for the continuing effects of the RPS, the energy intensity factors included in CalEEMod were reduced based on the percentage of renewables reported by SCE. Linear RPS goals were identified between 2024 and 2030 so that an appropriate renewable power generation mix could be applied to the annual electricity related GHG emissions in 2026. Based on linear interpolation, this analysis assumes that 49.3 percent of electricity provided to the project site would be generated by renewable power in 2026. SCE energy intensity factors that include this reduction are shown in Table 9.

Table 9 SCE Energy Intensity Factors

	2012 (lbs/MWh)	2026 (lbs/MWh)
Percent procurement	20.6[1]	49.3[2]
Carbon dioxide (CO_2)	702.43	448.24
Methane (CH_4)	0.029	0.019
Nitrous oxide (N_2O)	0.006	0.004

[1] Source: SCE 2012

[2] Linear interpolation of RPS targets established by SB 100 of 44 percent for year 2024 and 60 percent for year 2030

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

Mobile source emissions are generated by vehicle trips to and from the project site associated with operation of on-site development. The estimated trip generation rates used in CalEEMod were based on the Focused Traffic Analysis prepared for the proposed project by Ganddini (see Appendix I). CalEEMod calculates emissions of CO_2 and CH_4 generated by project-generated vehicle trips (i.e., mobile sources). However, CalEEMod does not calculate N_2O emissions from mobile sources; therefore, N_2O emissions were quantified separately using guidance from CARB (see Appendix A for calculations).

The project site is currently developed with the former Vincent School public elementary school campus and has until recently been used for[13] the Covina Valley Children's Center (CVUSD, 2020-2021). Because existing uses on the project site would be removed, operational emissions from these uses were subtracted from the proposed project's emissions to account for the net change in GHG emissions associated with the project. Operational emissions from existing on-site uses were calculated using CalEEMod defaults for 2026 (see Appendix A for CalEEmod outputs).

[13] Currently, use of the site as a school may be limited or it may be non-operational because of COVID-19 pandemic conditions or for other reasons.

Significance Thresholds

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

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

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

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

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

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

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

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

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

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

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

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

Project construction is assumed to occur over a period of approximately three years. Based on CalEEMod modeling results, construction activities for the project would generate an approximately 1,643 MT of CO_2e (Table 10). Amortized over a 30-year period (the assumed life of the project per SCAQMD guidance), project construction would generate about 55 MT of CO_2e per year.

Table 10 Estimated Construction GHG Emissions

Construction Year	Emissions (MT of CO_2e)
2022	298
2023	507
2024	837
2025	1
Total	1,643
Total Amortized over 30 Years	55

MT of CO_2e: metric tons of carbon dioxide equivalent

See Appendix A for CalEEMod worksheets. Some numbers may not add up precisely due to rounding considerations.

Table 11 summarizes the project's combined construction and operational GHG emissions. The project site currently contains buildings that were until recently used by the Covina Valley Children's Center (CVUSD, 2020-2021). These buildings would be demolished under the proposed project. Therefore, emissions from these existing uses were subtracted from those of the proposed project to obtain the overall net change in GHG emissions. Once construction activities are complete, the source of GHG emissions associated with the project would be mainly from mobile sources (i.e., vehicle trips). A breakdown of emissions by source type is available in the CalEEMod modeling worksheets in Appendix A of this IS-MND.

Table 11 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT of CO_2e)
Construction	55
Operation	
Area	26
Energy	136
Solid Waste	44
Water	35
Mobile	
CO_2 and CH_4	1,094
N_2O	19
Project Annual Emissions	**1,409**
Existing Annual Emissions (School)	1,733
Net Project Annual Emissions (Project-Existing)	(324)
SCAQMD Threshold	3,000
Exceeds Threshold?	**No**

CO_2: carbon dioxide; CH_4: methane; N_2O: nitrous oxide; MT of CO_2e: metric tons of carbon dioxide equivalent

Notes: Emissions modeling was completed using CalEEMod, except for N_2O mobile emissions, which were calculated separately. See Appendix A for modeling results and N_2O emissions calculations. Some numbers may not add up precisely due to rounding considerations.

As shown in Table 11, the proposed project's annual emissions would be 1,409 MT of CO_2e per year, which is below the SCAQMD threshold of 3,000 MT of CO_2e. The proposed project would result in a net decrease in GHG emissions of approximately 324 MT of CO_2e per year compared to existing uses on the site. This reduction in GHG emissions is primarily due to the project's net zero electricity use and reduced vehicle trips compared to the uses currently on the project site. Therefore, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

As discussed under *Regulatory Setting*, plans and policies have been adopted to reduce GHG emissions in the Southern California region, including the State's 2017 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and local policies contained in the City's General Plan and EAP. The proposed project's consistency with these plans is discussed in the following subsections. As discussed therein, the

proposed project would not conflict with plans and policies aimed at reducing GHG emissions. No impact would occur.

2017 Scoping Plan

The principal state plan and policy addressing GHG emissions is AB 32, the California Global Warming Solutions Act of 2006, and the follow up, SB 32. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020 and the goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. Pursuant to the SB 32 goal, the 2017 Scoping Plan was created to outline goals and measures for the state to achieve these reductions. The 2017 Scoping Plan's goals include reducing fossil fuel use and energy demand and maximizing recycling and diversion from landfills. The project would be consistent with these goals through project design, which includes complying with the latest Title 24 Green Building Code and Building Efficiency Energy Standards and installing energy-efficient LED lighting, water-efficient faucets and toilets, rooftop solar panels, and water efficient landscaping and irrigation. In addition, the buildings would be net zero electricity. Therefore, the project would be consistent with the 2017 Scoping Plan.

SCAG 2020-2045 RTP/SCS

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

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

Reduction Strategy	Project Consistency
Focus Growth Near Destinations & Mobility Options. ▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations ▪ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets ▪ Plan for growth near transit investments and support implementation of first/last mile strategies. ▪ Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses ▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods ▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)	**Consistent.** The proposed project is an infill redevelopment that would replace the existing underutilized school buildings on the project site with new residential uses in an urbanized area with good access to existing regional-serving commercial retail development, jobs, and services. Existing public transit facilities are located near the project site, including bus stops for Foothill Transit Routes 488 and 498 and the Go West Shuttle Red Route. The proposed project would also be within walking and biking distance of existing residential, commercial, and recreational uses and would provide bicycle parking options on the site. Therefore, the proposed project would focus growth near existing destinations and mobility options.

Reduction Strategy	Project Consistency
▪ Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	
Leverage Technology Innovations. ▪ Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space ▪ Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments ▪ Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Consistent.** The project would include solar panels on all building rooftops and residential parking garages would include electrical infrastructure for electric vehicle (EV) charging. The new homes would also be zero net energy.
Support Implementation of Sustainability Policies. ▪ Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions ▪ Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations ▪ Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space ▪ Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies ▪ Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region ▪ Continue to support long range planning efforts by local jurisdictions ▪ Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Consistent.** The project would be consistent with the City of West Covina EAP (see discussion in Section 5, *Energy*), Title 24, and the latest CALGreen requirements. Therefore, the project would support implementation of sustainability policies.
Promote a Green Region. ▪ Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards ▪ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration ▪ Integrate local food production into the regional landscape ▪ Promote more resource efficient development focused on conservation, recycling and reclamation	**Consistent.** The project is an infill redevelopment that would involve construction of residential uses in an urbanized area and would therefore not interfere with regional wildlife connectivity or convert agricultural land. The project would comply with the applicable conservation policies such as the City's EAP (discussed in Section 6, *Energy*), Title 24, and CALGreen. The project would include solar panels on all building rooftops and would thus support renewable energy production. Therefore, the project would support development of a green region.

Reduction Strategy	Project Consistency
▪ Preserve, enhance and restore regional wildlife connectivity ▪ Reduce consumption of resource areas, including agricultural land ▪ Identify ways to improve access to public park space	

Source: SCAG 2020

Local Regulations

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

Table 13 West Covina General Plan Consistency Analysis

General Plan Policy	Project Consistency
P1.1. Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular traffic.	**Consistent.** The project site is within 0.25 mile of bus stops along Vincent Avenue and West Workman Avenue that serve Foothill Transit Routes 488 and 498. In addition, the project site is within 0.25 mile of bus stops for the Go West Red Route operated by the City. The proposed project would also be within walking and biking distance of existing residential, commercial, and recreational uses and would provide bicycle parking options on the site. Therefore, the proposed project would be accessible by alternative transportation modes.
P1.2. Promote the use of energy-efficient vehicles.	**Consistent.** The proposed project would include electrical infrastructure in all residential garages capable of supporting EV charging, reducing barriers to the adoption of EVs for residents.
P1.11. Plant to maximize the social, economic, and environmental benefits of trees.	**Consistent.** Though the project would require the removal of existing trees on the site, the proposed project would result in the net addition of 38 trees to the project site.
P4.5. Work to eliminate barriers to pedestrian and bicycle travel.	**Consistent.** The proposed project would add street trees to Vincent Avenue and West Workman Avenue to provide additional shading for sidewalks adjacent to the project site and would provide bicycle parking infrastructure, improving walkability and bikeability in the area.
P4.8. Implement "green" streetscape elements for purposes of beautification, carbon reduction and stormwater runoff management.	**Consistent.** Vincent Avenue currently has no street trees, and West Workman Avenue has limited, widely spaced street trees. The proposed project would add new trees throughout the project site and street trees along the project frontages with West Workman Avenue and Vincent Avenue. Upon project implementation, the number of street trees along roadways adjacent to the project site would be increased.
P5.6. Continue existing beneficial energy conservation programs, including adhering to the California Energy Code in new construction & major renovations.	**Consistent.** The proposed project would be required to comply with the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24). According to the Specific Plan, the project would include energy efficient design features such as energy-efficient lighting, drought tolerant landscaping, water-

General Plan Policy	Project Consistency
	efficient indoor fixtures, installation of solar panels on all rooftops, and increased insulation and low-E windows. The project's efficiency features would result in the homes being net zero electricity.
P5.9. Provide adequate facilities & services for the collection, transfer, recycling, & disposal of refuse.	**Consistent.** The proposed project would include trash enclosures that provide for separate waste disposal and recycling containers and would be served by Athens Services, the existing waste hauler for the City.
P6.1. Promote and support transportation decisions that reduce driving and increase rates of transit use, walking, and biking.	**Consistent.** The project site is within 0.25 mile of bus stops along Vincent Avenue and West Workman Avenue that serve Foothill Transit Routes 488 and 498. In addition, the project site is within 0.25 mile of bus stops for the Go West Red Route operated by the City. The proposed project would also be within walking and biking distance of existing residential, commercial, and recreational uses and would provide bicycle parking options on the site. Therefore, the proposed project would promote and support transportation decisions that reduce driving and increase rates of transit use, walking, and biking.

Source: West Covina 2016

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

NO IMPACT

9 Hazards and Hazardous Materials

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

Group Delta Consultants, Inc. prepared a Phase I Environmental Site Assessment (ESA) for the project site in February 2020 to evaluate present and historical land uses on the site in order to identify any potential recognized environmental conditions (RECs).[14] The full Phase I ESA is available in Appendix F. The below analysis is based on the results of the Phase I ESA.

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

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

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

LESS THAN SIGNIFICANT IMPACT

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

A Phase I ESA and site reconnaissance were performed for the project site in February 2020. During the site visit, no large-scale use of hazardous materials was noted and there were no transformers, hydraulic equipment, or other uses identified on the project site that could pose a risk to site occupants or the environment. In addition, the results of the database search conducted for the Phase I ESA indicate that there are no RECs associated with the project site, including historical RECs and controlled RECs. Likewise, the Phase I ESA determined that no properties in the vicinity of the project site (within a one-mile radius) pose a potential threat to the project site due to hazardous materials use. There is one property, a gas station located approximately 250 feet southeast of the project site on North Vincent Avenue, that is included in a list of leaking underground storage tank (LUST) cases. The two LUST cases associated with the gas station were closed in September 2016, and according to the Phase I ESA, the soils-only nature of the releases, low or undetectable concentrations

[14] REC is defined as the presence or likely presence of any hazardous substances of petroleum products in, on, or at a property: (1) due to any release to the environment, (2) under conditions indicative of release to the environment, or (3) under conditions that pose a material threat of a future release to the environment. The REC term does not include *de minimis* conditions that generally do not present a threat to human health or the environment, and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

of petroleum product in soils, and the distance of the gas station from the project site indicate that this facility does not pose a likely environmental concern for the project site.

However, due to the age of the existing buildings associated with the Vincent Children's Center, there is the potential for asbestos-containing materials (ACMs) to be present in these buildings. According to the Phase I ESA, ACMs were removed from the buildings in 1996 and 2010, and a total of approximately 10.6 tons of ACMs were removed and disposed of. Though ACMs have previously been removed from the project site, ACMs could still be present within the buildings. Demolition of structures potentially containing ACMs could pose a risk to construction workers and the public if not conducted according to applicable federal, state, and local regulations. Therefore, Mitigation Measure HAZ-1 would be required to reduce potential impacts related to ACMs to a less than significant level.

Mitigation Measure

HAZ-1 Suspect Asbestos-Containing Materials

Prior to the issuance of a demolition permit, the applicant shall obtain a letter from a qualified asbestos abatement consultant that no ACMs are present in the building. If ACMs are found to be present, the materials shall be abated in compliance with SCAQMD Rule 1403, as well as other applicable State and federal rules and regulations. Only asbestos trained and certified abatement personnel shall be allowed to perform asbestos abatement activities on-site. All ACMs removed from any on-site structure shall be hauled and disposed off-site by a transportation company certified to handle asbestos and hazardous materials.

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The nearest school is the Rowland Avenue Elementary School, located approximately 0.52 miles northeast of the project site. During construction of the proposed project, hazardous and potentially hazardous materials would be utilized for the transport and operation of vehicles and machinery. As discussed above, the transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. As discussed under impact discussion *9.a*, construction of the project, and associated air pollutant emissions, would be temporary and less than significant. Furthermore, operation and maintenance of the proposed project would likely only involve the use of common cleaning and landscape maintenance materials comparable to those materials already in use in the project site vicinity. Because the nearest school is located over 0.25 miles away from the project site and operation of the proposed residential community would not include emissions or use of substantial quantities of hazardous materials, there would be no impact to nearby schools.

NO IMPACT

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

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

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

The SEMS database search did not produce any results associated with the project site, indicating that the site is free of known hazards and contaminants (USEPA 2019b). A search of the DTSC Envirostor database did not identify any hazardous or known contamination sites within 0.25 miles of the site (DTSC 2020a). Furthermore, according to the DTSC Cortese list, the only hazardous materials release site in the City of West Covina is the BKK Sanitary Landfill located approximately 2.61 miles southeast of the project site (DTSC 2020b). According to GeoTracker, the project site does not contain any LUST or other cleanup sites (SWRCB 2020). There is one LUST cleanup site within a 0.25-mile radius of the project site, the gas station previously discussed under impact discussion *9.b*. The LUST cases at the gas station have been completed and the cases are closed (SWRCB 2020). Furthermore, as discussed under impact discussion *9.b*, the Phase I ESA determined that there is no history of hazardous materials use or contamination on the project site. Therefore, impacts related to hazardous material sites would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is not located within two miles of a public airport or within an airport land use plan. The airports nearest to the project site are the Brackett Field Airport, located 7.9 miles to the northeast, and the San Gabriel Airport, located 6.1 miles west. Furthermore, there are no private airstrips in the vicinity of the project site. Therefore, the project would not result in safety hazards related to airports for people residing or working at the project site and its vicinity. No impact would occur.

NO IMPACT

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

The proposed project would involve the construction of a new residential community with a total of up to 119 residential units. During construction, temporary and occasional lane closures may be required, but two-way traffic would still be maintained at construction entry points. The City, as part of its requirements for obtaining an encroachment permit (West Covina 2021), would require the contractor to submit a construction work site traffic control plan for any street/lane closures to the City for review and approval prior to the commencement of construction activities, which would

ensure that construction would not interfere with local traffic or emergency response and evacuation procedures.

Vehicles, including emergency response vehicles, would be able to access the project site via the main entrance off West Workman Avenue and the secondary entrance off West Garvey Avenue North. The proposed project would not modify existing roadways in the vicinity, other than by adding these new site access points. Implementation of the proposed project would not create new obstructions to an emergency response plan or evacuation plan. In addition, the project would not result in inadequate emergency access because it would be subject to Fire Department review of site plans, site construction, and the actual structures prior to occupancy to ensure that required fire protection safety features, including building sprinklers and emergency access, are implemented. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. No impact would occur.

NO IMPACT

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

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

NO IMPACT

This page intentionally left blank.

10 Hydrology and Water Quality

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

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

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

As required by the WCMC and NPDES permit, construction activities on the project site would use a series of BMPs to reduce erosion and sedimentation, and the construction contractor would be required to operate and maintain these controls throughout the duration of construction. According to project plans, the grading plan is designed to drain all stormwater from within the Specific Plan area into a private storm drain system. Catch basins and inlets would collect stormwater and convey water via 12-inch and 24-inch pipes to two detention basins and two biofiltration systems. Drainage from the north half of the site would be diverted to a system in the common recreation area and drainage from the south part of the site would be diverted to a system located at the southerly private street. Biofiltration was selected as the primary method for treating stormwater. Biofiltration involves filtering water through barriers, soil, and other natural or mechanical filters to remove coarse and fine sediment, trash and debris, oil, and heavy metals bound to particulate matter. Because the project includes catch basins and biofiltration systems that would improve infiltration and stormwater quality and would comply with all applicable local and federal stormwater drainage requirements, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site receives its water service from Azusa Light and Water (ALW). ALW primarily sources its water supply from 11 groundwater wells that pump water from the Main San Gabriel Basin, which account for 65 percent of its water supply, and surface water from the San Gabriel River, which accounts for approximately a third of the water supply (ALW 2016). Imported water is sourced from Metropolitan Water District of Southern California and is only used on an emergency basis to supplement groundwater and surface water supplies (ALW 2016).

As discussed in Section 19, *Utilities and Service Systems,* the proposed project's water demand would not substantially affect the City's ability to meet water demands. According to its 2015 Urban Water Management Plan (UWMP), ALW would be able to provide reliable water supplies for an average

year, single dry year, and multiple dry years for its existing and planned supplies through 2040 (ALW 2016). Though the project would increase the amount of impervious surface on the site compared to existing conditions, the incorporation of catch basins and biofiltration systems would improve the infiltration mechanism and ensure stormwater is captured and treated on the project site prior to conveying to the off-site storm drain systems. The proposed project would be served by available water supply and would not significantly deplete groundwater supplies or interfere with groundwater recharge. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is generally flat, with minimal elevation change across the site. The project site does not contain any streams, rivers, or other drainage features. According to project plans, drainage for the developed northern portion of the site is directed toward West Workman Avenue or North Vincent Avenue. The southern portion of the site consists of open play fields with drainage directed to a low point located in the southwest corner of the site. Though the project would increase the amount of impervious surface on the site compared to existing conditions, the incorporation of catch basins and biofiltration systems would improve the infiltration mechanism and ensure stormwater is captured and treated on the project site prior to conveying to the off-site storm drain systems. Therefore, polluted runoff leaving the project site would not be increased compared to existing conditions. Furthermore, as listed under impact discussion *10.a*, the project would comply with the provisions of the NPDES General Construction Permit and the City's urban runoff requirements as stated in the WCMC, which would reduce the quantity and level of pollutants in runoff leaving the project site. Therefore, impacts related to erosion and siltation would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

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

LESS THAN SIGNIFICANT IMPACT

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

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

LESS THAN SIGNIFICANT IMPACT

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

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

LESS THAN SIGNIFICANT IMPACT

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

The project would receive water service from ALW, which maintains a UWMP (ALW 2016). ALW primarily sources water from groundwater wells and purchases imported water from Metropolitan on an emergency basis (ALW 2016). The proposed residential uses on the project site would not be point source generators of water pollutants and would not interfere with the ability of the City to maintain water quality standards per the UWMP. Furthermore, as discussed under impact discussion *10.a*, the proposed project would include catch basins and biofiltration systems that would improve infiltration and ensure stormwater is captured and treated on the project site prior to conveying to

the off-site storm drain systems. Section 19, *Utilities and Service Systems* provides additional details about project water demand. The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank.

11 Land Use and Planning

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

a. Would the project physically divide an established community?

Existing development on the project site consists of school buildings, a parking lot, and play areas that are fenced in by a chain link fence on the northern half of the site, with an open grass lawn area on the southern half of the site. Vegetation on the project site consists of grass lawns, 17 trees, hedges, ruderal vegetation, and ornamental landscaping. The proposed project involves demolition of the existing structures on the site and construction of a new residential community in a predominantly residential area. Primary vehicular access to the project is and would continue to be provided via West Workman Avenue. In addition, a secondary entrance would be provided via West Garvey Avenue North near its intersection with North Vincent Avenue. The project would also include the addition of internal access driveways throughout the project site, and walls and fencing to delineate the boundaries of the community and individual properties within the community. As the project site is already fenced, the proposed project would not substantially alter access in and around the project site or divide an established community. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The proposed project involves the construction of a residential community built in accordance with a new Specific Plan on a site that is currently zoned Single-Family Residential (R-1) and has a land use designation of Civic: Schools (S). The current zoning and land use designation do not permit the proposed land uses due to the proposed density. Therefore, the project would require a General Plan Amendment to Neighborhood Medium, which allows a density of 9-20 dwelling units per acre, and a Zoning Map Amendment to rezone the property from R-1 to Vincent Avenue Specific Plan.

Sections 65450 through 65457 of the California Government Code authorize local jurisdictions to adopt Specific Plans. A Specific Plan is a legislative tool for the systematic implementation of the General Plan. Specific Plans can range from general policy documents to very detailed regulatory documents that specify every facet of development. The proposed Vincent Avenue Specific Plan would be regulatory in nature and would serve as the zoning law for the project site, including the

development standards for the distribution, location, and extent of land uses, public utilities, and architecture and design of the project.

Though the proposed project would require amendments to the site's General Plan land use designation and zoning, the project would be consistent with existing residential development surrounding the site and would improve the neighborhood character and pedestrian environment through provisions of the Specific Plan that would enhance the area's landscaping, recreational amenities, and street edges and sidewalks (see also Section 1, *Aesthetics*, of this IS-MND). In addition, the proposed project would include sustainable development practices such as water and energy efficient fixtures and appliances, rooftop solar panels, cool roofs, and low-impact development biofiltration BMPs for stormwater capture and treatment. The Specific Plan would be subject to approval by the City and project design would be reviewed for approval by the Planning Commission as part of the Precise Plan application process. These regulatory procedures provide the City with further assurances for review and opportunities to incorporate additional conditions to ensure that the project would not result in environmental impacts but would instead improve the character and condition of the project site. With City approval of the necessary entitlements, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

12 Mineral Resources

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

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

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

The California Surface Mining and Reclamation Act of 1975 (SMARA) was enacted to promote conservation and protection of significant mineral deposits. According to the California Department of Conservation Mineral Land Classification Maps, the project site is in an area with MRZ-2 designation, indicating that the area contains identified mineral resources (DOC 1994). However, according to the EIR for the City's 2016 General Plan Update and Downtown Plan and Code, the City does not contain mineral resources appropriate for extraction (West Covina 2016b). The proposed project involves demolition of the existing structures on the project site and construction of a new residential community in a predominantly residential area of the City. The project site and its vicinity are therefore not used for or compatible with mineral deposit recovery. Given the existing conditions of the site and its surroundings and the nature of the project, the proposed project would not result in the loss of availability of a known mineral resource, and there would be no impact.

NO IMPACT

This page intentionally left blank.

13 Noise

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

Fundamentals of Noise

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

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

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

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

Descriptors

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

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

Propagation

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

Fundamentals of Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body starts from a low frequency of less than 1 Hz and goes to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general people are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when

foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Descriptors

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

Response to Vibration

Vibration associated with construction of the project has the potential to be an annoyance to nearby land uses. Caltrans has developed limits for the assessment of vibrations from transportation and construction sources. The Caltrans vibration limits are reflective of standard practice for analyzing vibration impacts on structures. The Transportation and Construction Vibration Guidance Manual (Caltrans 2020) identifies impact criteria for buildings and additional impact criteria for humans from transient and continuous/frequent sources: Table 14 presents the impact criteria for buildings, and Table 15 presents the impact criteria for humans.

Table 14 Vibration Damage Potential

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

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

Source: Caltrans 2020

Table 15 Vibration Annoyance Potential

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

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

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

Source: Caltrans 2020

Propagation

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

Sensitive Receivers

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

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

The sensitive receivers nearest to the site consist of single-family residences located approximately 50 feet to the north across West Workman Avenue, single-family residences located approximately 100 feet to the east across North Vincent Avenue, multi-family residences immediately to the south, and single-family residences immediately to the west.

Project Noise Setting

The predominant noise source on and around the project site is vehicular traffic, particularly on I-10, West Workman Avenue, and North Vincent Avenue. Ambient noise levels would be expected to be highest during the daytime and peak traffic hours unless congestion slows speeds substantially.

Four 15-minute noise level measurements were collected by Rincon on November 6, 2020 between 7:15 a.m. and 9:30 a.m. using an Extech (Model 407780A) ANSI Type 2 integrating sound level meter. Noise Measurement (NM) 1 was taken along West Garvey Avenue North at the southeastern corner of the site adjacent to multi-family residences, NM 2 was taken along North Morada Avenue west of the site adjacent to single-family residences, NM 3 was taken along West Workman Avenue at the project site's northern boundary across West Workman Avenue from single-family residences, and NM 4 was taken east of the site across North Vincent Avenue adjacent to single-family residences. Because of restrictions associated with COVID-19, which were in effect at the time on-site measurements were taken and are still ongoing, there is a decreased use of area roadways and on-site noise measurements cannot be considered fully representative of typical noise conditions. Nonetheless, on-site measurements were conducted for informational purposes.

Table 16 summarizes the noise measurement results and Figure 12 shows the noise measurement locations. Measured noise levels are provided in L_{eq} for the measurement period; L_{min} and L_{max} are also provided. These measurements are representative of existing ambient noise levels at these locations

although, as described above, they may not be representative of typical conditions without COVID-19 restrictions. Detailed sound level measurement data are included in Appendix H.

Table 16 Project Vicinity Sound Level Monitoring Results

#	Measurement Location	Sample Times	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
1	Southeastern corner of site, adjacent to multi-family residences	8:14 a.m. – 8:29 a.m.	25 feet to centerline of West Garvey Avenue North; 440 feet to centerline of I-10	61.6	58.3	69.7
2	West of the site, adjacent to single-family residences	8:35 a.m. – 8:49 a.m.	25 feet to centerline of North Morada Avenue; 740 feet to centerline of I-10	51.3	47.6	69.1
3	Northern boundary of the site, across West Workman Avenue from single-family residences	8:56 a.m. – 9:11 a.m.	30 feet to centerline of West Workman Avenue	55.1	42.1	71.6
4	East of the site, adjacent to single-family residences	9:16 a.m. – 9:31 a.m.	50 feet to centerline of North Vincent Avenue	68.1	51.3	86.1

See Appendix H for noise monitoring data.

Source: Rincon field visit on November 6, 2020.

Figure 12 Noise Measurement Locations

Imagery provided by Microsoft Bing and its licensors © 2020.

Fig X Noise Measurement Locations

Regulatory Setting

State of California

According to the 2019 CBC, Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations, interior noise levels attributable to exterior sources shall not exceed 45 CNEL in any habitable room (e.g., a residential room used for living, sleeping, eating, or cooking). Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable rooms for this regulation.

City of West Covina General Plan

The City of West Covina adopted the General Plan Update (PlanWC) in December 2016. The *Our Healthy and Safe Community* Chapter of PlanWC provides a description of existing noise levels and sources and incorporates comprehensive goals and policies, which focus on establishing and applying criteria for acceptable noise levels for different land uses in order to minimize the negative impacts of noise. In support of these goals and policies, the City has adopted the State's noise and land use compatibility matrix into PlanWC, which determines the "normally acceptable,[15]" "conditionally acceptable,[16]" "normally unacceptable,[17]" and "clearly unacceptable[18]" noise levels for various land uses. According to the City's noise compatibility matrix in PlanWC, ambient noise up to 60 CNEL is normally acceptable, ambient noise up to 70 CNEL is conditionally acceptable, ambient noise between 70 CNEL and 75 CNEL is normally unacceptable, and ambient noise above 75 CNEL is clearly unacceptable for single- and multi-family residences (West Covina 2016a).

City of West Covina Municipal Code

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

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

Section 15-95 of the Noise Ordinance prohibits any construction activities between the hours of 8:00 p.m. and 7:00 a.m. (or 6:00 a.m. for unloading and loading activities) within a residential zone, or within a radius of 500 feet therefrom, that causes the noise level at the property line to exceed the ambient noise level (defined as the all-encompassing noise associated with a given environment) by

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

more than five decibels, unless a permit to do so has been obtained from the City, or in the case of emergency work as defined in the Noise Ordinance.

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

The project involves demolition of the existing school buildings and structures on the project site and construction in their place of up to 47 detached single-family "cluster" homes and up to 72 attached townhomes, for a total of up to 119 homes. Noise-sensitive receivers, consisting of single- and multi-family residences, may be subject to both temporary construction noise and long-term operational noise. The following discussions address construction and operational noise associated with the project.

Construction Noise

Construction activity would result in temporary increases in ambient noise in the project site vicinity on an intermittent basis and, as such, would expose surrounding noise sensitive receivers to increased noise. As discussed under *Regulatory Setting* of this section, WCMC Section 15-95 prohibits any construction activities between the hours of 8:00 p.m. and 7:00 a.m. (or 6:00 a.m. for unloading and loading activities) within a residential zone, or within a radius of 500 feet therefrom, that causes the noise level at the property line to exceed the ambient noise level by more than 5 dBA. While the City does not have specific noise level criteria for assessing daytime construction impacts, the FTA has developed criteria for determining whether construction of a project would result in a substantial temporary increase in noise levels. Based on FTA guidance, a significant impact would occur if construction noise exceeds an eight-hour 80 dBA L_{eq} noise limit during the day and an eight-hour 70 dBA L_{eq} noise limit during the night at the nearest residences (FTA 2018).

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

Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some may have discontinuous high-impact noise levels. The maximum hourly L_{eq} of each phase is determined by combining the L_{eq} contributions from each piece of equipment used in that phase (FTA 2018). Project construction phases would include demolition, site preparation, grading, building construction, architectural coating, and paving of the project site. It is assumed that diesel engines would power all construction equipment. The construction equipment modeled in RCNM to analyze construction noise levels by phase are consistent with CalEEMod defaults used for the air quality, GHG, and energy analyses. CalEEMod modeling results are available in Appendix A of this document.

Construction equipment would be continuously moving across the site, coming near and then moving further away from individual receivers. Construction equipment could operate as near as 25 to 50 feet from the nearest receivers. However, due to the dynamic nature of construction, maximum hourly noise levels are also calculated at various distances from the center of on-site construction activity to the receivers nearest the project site. Based on the configuration of the project site,

construction activities would occur, on average, 300 feet from single-family residences to the north and east; 250 feet from multi-family residences to the south; and 200 feet from single-family residences to the west. Therefore, using the FHWA RCNM, construction noise was modeled at these various distances from existing residences. Construction noise levels and distances to the nearest receivers are shown in Table 17. RCNM calculations are included in Appendix H.

Table 17 Construction Noise Levels at Receivers

	Receiver, Distance from Noise Source, and dBA L_{eq}				
Construction Phase/Equipment	**Multiple Residences West/South 25 Feet**	**Multiple Residences West/South 50 Feet**	**Single-Family Residences West 200 Feet**	**Multi-Family Residences South 250 Feet**	**Single-Family Residences North/East 300 Feet**
Demolition – Concrete/Industrial Saw, Excavator, Dozer	91	85	73	71	69
Site Preparation – Dozer, Tractor/Loader/Backhoe	89	83	71	69	68
Grading – Excavator, Grader, Dozer, Tractor/Loader/Backhoe	92	86	74	72	70
Building Construction – Crane, Forklift, Generator Set, Tractor/Loader/Backhoe	92	86	74	72	70
Paving – Paver, Paving Equipment, Roller	90	84	72	70	68
Architectural Coating – Air Compressor	80	74	62	60	58

See Appendix H for RCNM results.

As shown in Table 17, maximum hourly noise levels during project construction were calculated at 92 dBA L_{eq} at 25 feet from the nearest noise-sensitive receivers, and at 86 dBA L_{eq} at 50 feet from the nearest noise-sensitive receivers. Construction would also reach noise levels up to 74 dBA L_{eq} when calculated from the center of on-site activity. Based on these calculations. Based on these calculations, construction noise levels would exceed the FTA eight-hour daytime noise criterion of 80 dBA L_{eq} for construction noise at residences located 25 feet and 50 feet from activity. Therefore, project construction would require implementation of sound attenuation features to reduce noise levels below 80 dBA L_{eq}.

WCMC Section 15-95 also prohibits any construction activities between the hours of 8:00 p.m. and 7:00 a.m. (or 6:00 a.m. for unloading and loading activities) within a residential zone, or within a radius of 500 feet therefrom, that causes the noise level at the property line to exceed the ambient noise level by more than 5 dBA. While construction of the project would occur during the day outside of nighttime hours and would not exceed the standard described by WCMC Section 15-95, construction noise impacts would still exceed the FTA eight-hour daytime noise criterion of 80 dBA L_{eq} for construction noise at the nearest residences south and west of the site. Therefore, Mitigation Measure N-1 (listed in the *Mitigation Measures* section below) is required to reduce daytime

construction noise levels through implementation of noise barriers at the western and southern project boundaries adjacent to residential receivers.

On-Site Operational Noise

The primary on-site noise sources associated with operation of the project would include those typical of residences, such as noise from delivery trucks, trash hauling trucks, vehicle parking, and air conditioning and heating systems. According to WCMC Section 15-85, any noise source that is plainly audible at 50 feet from the property line of the property in which it is located would be in violation of the Noise Ordinance. However, these project noise sources are already a common occurrence in the project area as they are typical of daily activities associated with residential and commercial uses. Furthermore, according to project plans, no mechanical equipment (air-conditioning, heating units, etc.) would be mounted on, or attached to, any pitched roof. Ground-mounted equipment would be located in a fenced rear yard, behind patio walls, or otherwise screened to minimize the visual impact of equipment on streetscapes and common open space areas. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (FHWA 2011). Therefore, any ground-mounted equipment would likely be located in such a manner that noise levels are reduced at off-site receivers. In addition, based on on-site noise measurements, the primary noise source in the project vicinity is vehicular traffic on major roadways (i.e., I-10, West Workman Avenue, and North Vincent Avenue) not on-site noise. Therefore, the project would not generate noise that is plainly audible at a distance of 50 feet from the site when compared to existing ambient noise levels in the urban area without the project. On-site operational noise generated by the project would not exceed the City's noise standards and impacts would be less than significant.

Off-Site Traffic Noise

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

As discussed in Section 17, *Transportation*, the project is forecast to generate approximately 971 daily trips, including 69 trips during the a.m. peak hour and 86 trips during the p.m. peak hour (Ganddini 2020). According to the Focused Traffic Analysis conducted by Ganddini (see Appendix I), 40 percent of daily project trips (or approximately 388 vehicles) would utilize the access driveway at West Workman Avenue and 60 percent of daily project trips (or approximately 583 vehicles) would utilize the access driveway at West Garvey Avenue North. Based on 15-minute traffic counts conducted during the a.m. peak hours on November 6, 2020, the segment of West Workman Avenue nearest to the project site carries approximately 14,000 daily vehicles while the segment of West Garvey Avenue North nearest to the project site carries approximately 9,000 daily vehicles. The project would increase traffic by an estimated three percent along West Workman Avenue and by an estimated six percent along West Garvey Avenue North, which would generate a less than 1 CNEL increase in traffic

noise.[19] Therefore, the project would not create a perceptible increase in traffic noise at surrounding roadways. Noise impacts associated with off-site traffic generated by the proposed project would be less than significant.

Land Use Compatibility

The predominant noise source on and around the project site is vehicular traffic, particularly on I-10, West Workman Avenue, and North Vincent Avenue. According to the City's noise compatibility matrix in PlanWC, ambient noise up to 60 CNEL is normally acceptable, ambient noise up to 70 CNEL is conditionally acceptable, ambient noise between 70 CNEL and 75 CNEL is normally unacceptable, and ambient noise above 75 CNEL is clearly unacceptable for single- and multi-family residences (West Covina 2016a). According to the noise contour maps for existing conditions in PlanWC, the project site is exposed to noise levels between 60 and 70 CNEL. Therefore, the site is exposed to ambient noise levels within the "normally acceptable" to "conditionally acceptable" range. According to PlanWC, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design of new development exposed to "conditionally acceptable" noise levels (West Covina 2016a).

According to the 2019 CBC, Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations, interior noise levels attributable to exterior sources shall not exceed 45 CNEL in any habitable room. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (FHWA 2011). Structures can substantially reduce occupants' exposure to noise as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows (FHWA 2011). Based on a noise exposure level of up to 70 CNEL and a noise attenuation of at least 20 dBA, the interior noise levels at proposed residences would be up to 50 CNEL. Therefore, interior noise levels for the building could exceed the interior noise standard of 45 CNEL for habitable rooms. Implementation of Mitigation Measure N-2 would require implementation of sound insulation to minimize exterior noise levels at interior habitable rooms and otherwise show that the project would be consistent with Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations.

Mitigation Measures

N-1 Construction Noise Reduction

The project contractor shall be required to implement noise reduction measures during construction, which may include but are not limited to:

- Schedule construction activities to avoid operating several pieces of equipment simultaneously, which can cause high noise levels
- Enclose stationary equipment with materials capable of reducing noise levels by at least 10 dBA (see Appendix H for barrier specifications)
- Locate all construction areas for staging and warming up as far as possible from adjacent residential buildings and sensitive receivers

[19] A doubling of traffic is required for an audible 3 dB increase in traffic noise levels. However, the increase in traffic generated by the proposed project would be at most three percent of the existing estimated ADT on West Workman Avenue and six percent of the existing estimated ADT on West Garvey Avenue North.

- Erect temporary noise barriers with a minimum height of 10 feet along the western and southern boundaries of the construction site when construction is performed within 50 feet of the residences at these boundaries. The noise barriers shall be constructed of material with a minimum weight of two pounds per square foot with no gaps or perforations. Noise barriers may be constructed of, but not limited to, 5/8-inch plywood, 5/8-inch oriented strand board, and hay bales. Per the specification in Appendix H, barriers would be able to reduce construction noise by 10 to 20 dBA.

According to the Housing and Urban Development's Barrier Performance Module, a ten-foot barrier would result in a noise reduction of approximately 10 dBA. Noise barrier performance calculations are included in Appendix H. A 10 dBA reduction would reduce the maximum construction noise level at the nearest sensitive receptor shown in Table 17 from 92 dBA to 82 dBA. Although construction noise may intermittently and temporarily exceed the FTA eight-hour daytime noise criterion of 80 dBA L_{eq}, other construction noise reduction measures included in Mitigation Measure N-1 (i.e., scheduling construction activities to avoid operating several pieces of equipment simultaneously, enclosing stationary equipment in noise barriers, and locating all construction areas for staging as far as possible from the nearest receivers) would further reduce construction noise levels. Implementation of Mitigation Measure N-1 and compliance with the construction hours requirements of the WCMC would reduce construction noise impacts to a less than significant level.

N-2 Sound Insulation

To comply with Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations, the applicant shall install exterior building materials with sufficient Sound Transmission Class (STC) ratings to reduce interior noise levels in habitable rooms to 45 CNEL or lower. To reduce potential noise impacts to future project residents, residential units with line of sight to any area roadway shall incorporate design measures for windows, walls, and doors that achieve a composite STC rating of at least 30 and all exterior doors and windows shall be installed such that there are no air gaps or perforations. Both aforementioned STC rating standard requirements shall be incorporated into the plans to be submitted by the applicant to the City of West Covina for review and approval prior to the issuance of building permits. Acoustical analysis shall be performed prior to the issuance of an occupancy permit to demonstrate that noise levels in the interior livable spaces do not exceed the interior noise standard of 45 CNEL in any habitable room as set forth by the City and California Code of Regulations, Title 24, Section 1206.4.

Implementation of Mitigation Measure N-1 would reduce construction noise levels at nearby noise-sensitive receivers, and implementation of Mitigation Measure N-2 would reduce interior noise levels at the project site to a less than significant level meeting the interior noise standard of 45 CNEL.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

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

The City has not adopted specific standards for vibration impacts during construction. Therefore, the Caltrans *Transportation and Construction Vibration Guidance Manual* (2020) is used to evaluate potential construction vibration impacts related to both potential building damage and human annoyance. Based on the Caltrans criteria shown in Table 14 and Table 15 , construction vibration impacts would be significant if vibration levels exceed 0.5 in./sec. PPV for residential structures and 2.0 in./sec. PPV for commercial structures, which is the limit where minor cosmetic (i.e., non-structural) damage may occur to these buildings. In addition, construction vibration impacts would cause human annoyance at nearby receivers if vibration levels exceed 0.25 in./sec. PPV, which is the limit above which temporary vibration activities become distinctly perceptible.

Because groundborne vibration could cause physical damage to structures, vibration impacts were modeled based on the distance from the location of vibration-intensive construction activities, conservatively assumed to be at edge of the project site, to the edge of nearby off-site structures. Therefore, the analysis of groundborne vibrations differs from the analysis of construction noise levels in that modeled distances for vibration impacts are those distances between the project site to nearest off-site structures (regardless of sensitivity) whereas modeled distances for construction noise impacts are based on the property line of the nearest off-site sensitive receivers. Based on the distance from the project site to nearby residential structures, equipment was modeled at 80 feet from single-family residences to the north; 120 feet from single-family residences to the east; and 15 feet from single- and multi-family residences to the south and west. Table 18 shows estimated groundborne vibration levels from project equipment. Vibration calculations are included in Appendix H.

Table 18 Vibration Levels at Receivers

	in./sec. PPV		
Equipment	**Single-/Multi-Family Residences 15 Feet**	**Single-Family Residences 80 Feet**	**Single-Family Residences 120 Feet**
Large Bulldozer	0.156	0.025	0.016
Loaded Truck	0.133	0.021	0.014
Jack hammer	0.061	0.010	0.006
Small Bulldozer	0.005	0.001	<0.001
Threshold for Building Damage[1]	**0.5**	**0.5**	**0.5**
Threshold for Human Annoyance[2]	**0.24**	**0.24**	**0.24**
Thresholds Exceeded?	No	No	No

See Appendix H for vibration analysis worksheets.

[1] Caltrans 2020c. See Table 15

[2] Caltrans 2020c. See Table 15

As shown in Table 18, construction activities would generate peak vibration levels of approximately 0.16 in./sec. PPV at the nearest off-site structures to the west. Therefore, according to the Caltrans vibration criteria, groundborne vibration from typical construction equipment would not exceed the applicable threshold of 0.5 in/sec. PPV for building damage at nearby residences. Furthermore, groundborne vibration would not exceed the threshold of 0.24 in./sec. PPV for human annoyance at

any of the modeled distances. Project construction would not result in groundborne vibration that would cause building damage or human annoyance. Vibration impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

As discussed in Section 9, *Hazards and Hazardous Materials*, the project site is not located within two miles of a public airport or within an airport land use plan. The airports nearest to the project site are the Brackett Field Airport, located 7.9 miles to the northeast, and the San Gabriel Airport, located 6.1 miles west of the site. Although the project site would potentially be subject to occasional aircraft overflight noise, such occurrences would be intermittent and temporary. There are also no private airstrips in the vicinity of the project site. Therefore, the project would not expose people working in the project area to excessive noise levels associated with airports or airstrips and the project would not exacerbate existing noise conditions related to airports or airstrips. No impact would occur.

NO IMPACT

14 Population and Housing

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

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

Existing development on the project site includes buildings and ancillary structures associated with the Vincent Children's Center. The project involves the construction of a total of up to 119 residential units and associated community amenities. According to SCAG's 2020 RTP/SCS, the City of West Covina is anticipated to have a population of 118,900 and 34,800 households by the year 2045 (SCAG 2020). According to the CDOF, the City has an estimated population of 105,999, with 32,919 households with an average of 3.35 persons per household (CDOF 2020). Therefore, the City's population is anticipated to increase by 12,901 persons and 1,881 households over the next 25 years. The 119 housing units generated by the project would represent approximately 6.3 percent of the anticipated household growth within the City.[20] If all of the project's housing units were filled by new residents of the City, the project would increase the City's existing population by 399, or approximately 0.4 percent, to 106,391, which would be within SCAG's 2045 population forecast of 118,900 residents (SCAG 2020). Therefore, population and housing growth generated by the proposed project would be within SCAG forecasts for the City and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

NO IMPACT

[20] Assuming one household per housing unit.

This page intentionally left blank.

15 Public Services

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

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

The West Covina Fire Department (WCFD) provides fire protection and paramedic emergency services to residents and businesses within the City. The project site is in located in the district of Fire Station No. 3, which is located at 1433 West Puente Avenue approximately 0.75 miles northwest of the site. According to project plans, response time to the site is less than three minutes. According to the City, the WCFD responds to the average emergency medical service (EMS) call with one fire engine and paramedic ambulance with a total of five personnel, and the average fire emergency call with four fire engines, one fire ladder truck, two rescue ambulances, and one command units with a total of 22 personnel (West Covina 2020d).

The proposed project is designed to accommodate emergency access to the site. As shown in project plans, fire access routes have been designed to meet the minimum width and turning dimensions as required by WCFD. Furthermore, all buildings would be constructed to meet the current building code requirements for fire safety. The West Covina Fire Prevention Bureau of the WCFD provides technical review of all building construction plans within the City to ensure proposed buildings meet the City's adopted 2019 California Fire Code, 2019 CBC, California Health and Safety Code, and WCMC standards prior to construction. As such, the WCFD would review the site and building plans for the project as

part of the City's review process. The project would demolish the school facilities currently on the site and replace them with up to 47 detached single-family "cluster" homes and up to 72 attached townhomes, for a total of up to 119 homes, which would incrementally increase demand for fire protection services. However, the project site is located in an urbanized area already served by the WCFD and the project would be required to adhere to all applicable Fire Code standards and requirements. Therefore, the project would not have a significant impact on fire response times nor create a substantially greater need for additional fire protection services above current capacity.

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

LESS THAN SIGNIFICANT IMPACT

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

The West Covina Police Department (WCPD) provides police protection services to residents and businesses within the City. The WCPD consists of a full-time workforce of 90 sworn Officers and 66 civilians, with approximately 67 percent of all sworn Officers pertaining to the Patrol Division. The Patrol Division focuses on patrolling City streets, answering calls for service, and identifying potential crime problems. In addition, there are approximately 55 part-time positions in the force, which include reserve Officers and clerical staff (WCPD 2020a and 2020b). With approximately 106,000 residents in West Covina and 90 sworn officers, the WCPD currently operates with 0.85 officers per 1,000 residents, which is below the national average of 1.7 officers per 1,000 residents for police departments serving a population between 100,000 to 249,999. The WCPD would need an additional 90 officers to reach the 180 total officers that would allow it to meet the national average.

The project site is located within WCPD Service Area 1 (North), and the police station is located at 1444 West Garvey Avenue, approximately 0.7 mile southwest of the project site. The project would incrementally increase demand for police protection services. However, the project site is in a highly urbanized area already served by the WCPD and the project would not have a significant impact on police response times nor create a substantially greater need for additional police services above current capacity.

General Plan policy P6.11 aims to provide community safety through enhanced police services. Specifically, Action A6.11-a under Policy P6.11 states that an increase of public access to police services would be enhanced by an increase in police staffing and funding to coincide with increasing population, development, and call for public services. Consistent with the City's General Plan policies and actions, developers in the City are required to pay development impact fees that go toward police facilities, as per WCMC Section 17-204. Because it would not create a substantially greater need for

additional police services above current capacity, the project would not result in the need for new or physically altered police protection facilities that could have an environmental impact, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

West Covina is primarily served by the West Covina Unified School District (WCUSD), Covina-Valley Unified School District (CVUSD), and Rowland Unified School District (RUSD), as well as other districts at least partially within West Covina. Based on available enrollment data, the estimated number of students enrolled is 13,494 at WCUSD, 11,660 at CVUSD, and 13,854 at RUSD, which is a total estimated 39,008 students for the 2019-2020 academic school year (Ed-Data 2020). The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause new schools to be constructed. The project involves the construction of a total of up to 119 residential units and associated community amenities. As discussed in Section 14, *Population and Housing*, if all of the project's housing units were filled by new residents of the City, the project would increase the City's existing population by 399 residents. Conservatively assuming that the project would generate 399 students, the project would increase the combined current enrollment of 39,008 students by approximately one percent.

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

LESS THAN SIGNIFICANT IMPACT

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

According to the CDOF, the City has an existing population of 105,999 (CDOF 2020). West Covina has 501.5 acres of existing parks and open space, which results in an estimated service ratio of 4.7 acres per 1,000 residents (West Covina 2016b). The City is urbanized and nearly built out, with limited open space available to meet recreational needs associated with anticipated population growth. However, public schools in West Covina have 287 acres of additional open space, which provide potential recreational access for residents through joint use agreements between the City and school districts (West Covina 2016b). The proposed project would reduce the amount of school open space that is currently potentially available for recreational use by 4.2 acres, from 287 to 282.8 acres, because it would replace the approximately 4.2 acres of open space currently on the site with residential uses. Nonetheless, these 282.8 acres of school open space, added to the City's existing 501.5 acres of parks

and open space, equals approximately 784 acres of parks and open space within the City, which increases the service ratio to approximately 7.4 acres per 1,000 residents.

The nearest park to the project site is Del Norte Park located approximately 0.4 miles northwest of the site. Del Norte Park includes baseball fields, picnic tables, children's play areas, splash pads, and a dog park. As discussed under Section 14, *Population and Housing*, if all the project's housing units were filled by new residents of the City, the project would increase the City's existing population by 399 residents. However, this influx of population would not substantially decrease the existing parkland-to-resident ratio, which would remain at approximately 7.4 acres per 1,000 residents. Furthermore, the project would provide 25,540 sf of common open space (including a 10,000 sf central area with amenities such as a play structure, picnic pavilion, sports field, or similar), 63 sf of private open space for each attached townhome unit, and a minimum of 400 sf of private open space for each detached single-family home. Additionally, the project would be required to pay the City's Quimby Fees for future park maintenance and development. The proposed project would therefore not create the need for new or expanded park facilities and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

The project site in an urban area already served by other commonly used public facilities such as public libraries, including the West Covina Library, and medical facilities. As discussed in Section 14, *Population and Housing*, if all new residents of the project were new to the City, the project would increase the City's existing population of 105,999 by 399 residents to 106,391 residents, which would be an increase of approximately 0.4 percent. This would be within SCAG's 2045 population forecast of 118,900 residents. Therefore, the project would not generate an unforeseen population increase that would substantially affect existing public facilities or necessitate the provision of new public facilities. In addition, the West Covina Library is part of the County of Los Angeles Public Library system, which is financed by property taxes from the service area, general county funds, parcel tax, grants, feeds, and funds raised by the Library Foundation. As a result, the proposed project would contribute to the financing of library services through property taxes, which would mitigate the need for new or physically altered government facilities that support library use. Therefore, the project would not substantially affect existing governmental facilities or require the need for new or altered governmental facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

16 Recreation

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

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

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

According to the CDOF, the City has an existing population of 105,999 (CDOF 2020). West Covina has 501.5 acres of existing parks and open space, which results in an estimated service ratio of 4.7 acres per 1,000 residents (West Covina 2016b). The City is urbanized and nearly built out, with limited open space available to meet anticipated population growth or to increase the current level of service. However, as discussed in Section 15, *Public Services*, additional open space at public schools within the City would provide an additional 282.8 acres of open space and would provide potential recreational access for residents through joint use agreements between the City and school districts (West Covina 2016b). The additional acres of school open space added to the existing City park acreage totals approximately 784 acres of parks and open space within the City, which increases the service ratio to approximately 7.4 acres per 1,000 residents.

The nearest park to the project site is Del Norte Park located approximately 0.4 miles northwest of the site, which includes baseball fields, picnic tables, children's play areas, splash pads, and a dog park. As discussed under impact discussion *15.a.4,* the project's influx of population would not substantially decrease the existing parkland-to-resident ratio, which would remain at approximately 7.4 acres per 1,000 residents. Furthermore, the project would provide 25,540 sf of common open space (including a 10,000 sf central area with amenities such as a play structure, picnic pavilion, sports field, or similar), 63 sf of private open space for each attached townhome unit, and a minimum of 400 sf of private open space for each detached single-family home. The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and it does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Additionally, the project will be required to pay

the City's Quimby Fees for future park maintenance and development. Impacts would therefore be less than significant.

LESS THAN SIGNIFICANT IMPACT

17 Transportation

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

Ganddini Group, Inc. (Ganddini) prepared a Focused Traffic Analysis in October 2020 to evaluate the traffic operations for the proposed project. The following analysis (except where noted otherwise) is based on the findings of the Focused Traffic Analysis, which is included as Appendix I.

Project Trip Generation and Distribution

In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines package. The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of VMT as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects. Therefore, this analysis does not use project trip generation to measure level of service (LOS) as a means of determining transportation impacts. The information presented below regarding project trip generation and distribution is therefore for informational purposes only, not for determining environmental impacts under CEQA.

Project trip generation is based upon standard rates obtained from the Institute of Transportation Engineers (ITE), Trip Generation Manual, 10th Edition, 2017. Trip generation rates for Single-Family Detached Residential (ITE Land Use Code 210) and Low-Rise Multi-Family Housing (Land Use Code 220) were used. Based on calculations in the Focused Traffic Analysis, the project is forecast to generate approximately 971 daily trips, including 69 trips during the a.m. peak hour and 86 trips during the p.m. peak hour (Ganddini 2020). Based on review of existing volume data, surrounding land uses, and the local and regional roadway facilities in the project vicinity, 40 percent of daily project trips (or approximately 388 vehicles) would utilize the access driveway at West Workman Avenue and 60 percent of daily project trips (or approximately 583 vehicles) would utilize the access driveway at West Garvey Avenue North. Based on 15-minute traffic counts conducted during the a.m. peak hours on November 6, 2020, the segment of West Workman Avenue nearest to the project site

carries approximately 14,000 daily vehicles while the segment of West Garvey Avenue North nearest to the project site carries approximately 9,000 daily vehicles. The project would increase traffic by an estimated three percent along West Workman Avenue and by an estimated six percent along West Garvey Avenue North.

The project site is currently developed with the former Vincent School public elementary school campus and has until recently been used for[21] the Covina Valley Children's Center (CVUSD, 2020-2021). The Focused Traffic Analysis did not analyze the number of trips generated by the existing use on the project site. Using the trip generation rate for ITE Land Use Code 565 (Day Care Center) of 47.62 daily trips per thousand square feet, the 49,000 square foot building currently located on the project site would generate approximately 2,333 daily trips, which is significantly higher than the proposed project's expected daily weekday trip generation of approximately 971 daily trips. Using the trip generation rate for ITE Land Use Code 520 (Elementary School) of 19.52 daily trips per thousand square feet, the 49,000 square foot building on the project site would generate approximately 956 daily trips, which is slightly lower than the proposed project's expected daily weekday trip generation of approximately 971 daily trips. The ITE pages showing the trip generation rates for these land uses are shown in Attachment A of Appendix I.

Because of the unusual nature of the existing use, which offers multiple services including after school child care, extended day child care, transitional kindergarten, and a preschool (CVUSD, 2020-2021), it is difficult to classify this use as either simply a Day Care Center or an Elementary School, and the use's actual trip generation rate under normal circumstances is probably somewhere between the 956 daily trips expected for an elementary school of this size and the 2,333 daily trips for a Day Care Center of this size. Furthermore, the site may not be currently operating under "normal circumstances" due to COVID-19 restrictions or for other reasons, and it is difficult to know if and when the site will return to normal operations.

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

Regional access to the project site is provide by I-10, which is approximately 0.1 miles south of the project site. Local access to the site is provided by West Workman Avenue, North Vincent Avenue, and West Garvey Avenue North. Sidewalks are provided along all roadways abutting the project site for pedestrian access. The project would continue to be served by, and would not interfere with, existing roadway or pedestrian facilities currently available to the project site. In addition, there are currently no bicycle lanes along any of these roadways. Workman Avenue is classified as a proposed bike route, indicating that bike lanes may be added along the project frontage of West Workman Avenue in the future. The proposed project would not alter the alignment of West Workman Avenue or introduce features that would preclude the addition of bike lanes. Therefore, the project would not interfere with any program for bicycle lanes.

The site is currently served by Foothill Transit bus Routes 488 and 498 along West Workman Avenue and North Vincent Avenue, and by the Go West Shuttle Red Route along West Workman Avenue. The nearest bus stops for the Foothill Transit bus routes is approximately 87 feet from the project site at the intersection of West Workman Avenue and North Vincent Avenue, and the nearest stop for the Go West Shuttle is approximately 0.4 miles west of the project site at the intersection of West Workman Avenue and Sunset Avenue. The project would continue to be served by, and would not

[21] Currently, use of the site as a school may be limited or it may be non-operational because of COVID-19 pandemic conditions or for other reasons.

interfere with, existing transit facilities currently available to the project site. Therefore, project operation would not conflict with a program, plan, ordinance or policy addressing the circulation system.

Furthermore, compared to the project trip generation, construction traffic is expected to be minor and temporary. To further lessen the impact of construction traffic, the project would be required to comply with all standard conditions pertaining to construction including work hours, traffic control plan, haul route, access, oversized-vehicle transportation permit, site security, noise, vehicle emissions, and dust control. Whenever possible, construction-related trips would be restricted to off-peak hours. Transportation of heavy construction equipment and or materials requiring the use of oversized vehicles would require the appropriate transportation permit. In addition, the construction contractor would be required to submit a construction work site traffic control plan to the City for review and approval prior to the start of any construction work. The plans would be required to demonstrate the location of any roadway, sidewalk, bike route, bus stop or driveway closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. Temporary traffic controls used around the construction area would be required to adhere to the standards set forth in the California Manual of Uniform Traffic Control Devices and construction activities would be required to adhere to applicable City ordinances. Therefore, project construction would not conflict with any program, plan, ordinance or policy addressing the circulation system. Impacts would be less than significant.

As further described in impact discussion *17.b*, the City of West Covina, consistent with the updated CEQA Guidelines adopted in December 2018, is required to use VMT as the primary metric for evaluating transportation impacts associated with land use and transportation projects. The City of West Covina adopted VMT guidelines consistent with these requirements in June 2020. The operational traffic impacts of the proposed project are therefore evaluated according to the City's adopted VMT guidelines in impact discussion *17.b* in terms of VMT.

LESS THAN SIGNIFICANT IMPACT

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

Vehicle Miles Travelled (VMT)

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

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

The City of West Covina adopted its VMT guidelines in June 2020. Therefore, the project VMT impact has been assessed in accordance with the City's VMT guidelines and guidance from City staff. Consistent with recommendations in the OPR Technical Advisory, the City has established screening criteria for certain projects that may be presumed to have a less than significant VMT impact.

According to the Focused Traffic Analysis, the project is screened out from a detailed VMT analysis because the project site is located in a low VMT area that generates a total VMT per service population 15 percent lower than the San Gabriel Valley Council of Governments (SGVCOG) average. The residential uses associated with the project are consistent with the predominant land uses in the vicinity of the project site, which includes a residential neighborhood. Therefore, the project is reasonably expected to generate similar VMT as the existing land uses in this low-VMT area. In accordance with the City's VMT guidelines, VMT impacts associated with the project would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The proposed project would involve operation of residential uses on the site that would be similar to other uses in the vicinity, and the project would therefore not pose any hazards related to incompatible uses. The following analysis therefore focuses on potential hazards from design features and includes a description of project improvements necessary to provide safe and compatible site access and circulation.

Project Design Features

The Focused Traffic Analysis assumes that the proposed project will construct the following improvements as project design features to provide project site access:

- Construct the Project Driveway (North-South) at West Workman Avenue (East-West) to provide one inbound lane and one outbound lane with northbound stop-control and the following lane configurations:
  - Northbound – One shared left/ right turn lane
  - Eastbound – One shared through/ right turn lane
  - Westbound – One shared left/ through lane
- Construct the West Garvey Avenue North (North-South) at Project Driveway (East-West) to provide one inbound lane and one outbound lane with eastbound stop-control and the following lane configurations:
  - Northbound – One shared left/ through lane
  - Southbound – One shared through/ right turn lane
  - Eastbound – One shared left/ right turn lane

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

- A construction work site traffic control plan shall comply with State standards set forth in the California Manual of Uniform Traffic Control Devices and shall be submitted to the City for review and approval prior to the issuance of a grading permit or start of construction. The plan shall

identify any roadway, sidewalk, bike route, or bus stop closures and detours as well as haul routes and hours of operation. All construction related trips shall be restricted to off-peak hours to the extent possible

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

On-Site Truck and Vehicle Turning

The applicant has provided trash truck turning templates for each project driveway and vehicle turning templates for each on-site garage. According to the Focused Transit Analysis, trash trucks would be able to sufficiently navigate the on-site drive aisles and adequate vehicle turning appears to be provided from the proposed garages on-site (Ganddini 2020). Impacts associated with hazardous or incompatible vehicle turning would be less than significant.

Sight Distance Analysis

The posted speed limit on Workman Avenue adjacent to the project is 35 miles per hour. According to the Focused Traffic Analysis, stopping sight distance requires 250 feet of unobstructed line of sight for a 35 mile per hour design speed. The driver's eye for a vehicle located at a project driveway intending to head either eastbound or westbound on West Workman Avenue is situated 42 inches above the pavement and 15 feet back from the edge of the travel way. The driver must have a minimum unobstructed sight line of 250 feet looking westbound at an object 42 inches above the pavement situated in the center of the eastbound travel lane, and must have a minimum unobstructed sight line of 300 feet looking eastbound at an object 42 inches above the pavement situated in the center of the westbound travel lane.

The recommended on-site speed limit for drive aisles within the project site is 15 miles per hour. According to the Focused Traffic Analysis, stopping sight distance requires 100 feet of unobstructed line of sight for a 15 mile per hour design speed. The driver's eye for a vehicle located at a project drive aisle intending to head either northbound/eastbound or southbound/westbound on a drive aisle is situated 42 inches above the pavement and 15 feet back from the edge of the travel way. The driver must have a minimum unobstructed sight line of 100 feet looking northbound/westbound at an object 42 inches above the pavement situated in the center of the southbound/eastbound travel lane, and must have a minimum unobstructed sight line of 100 feet looking southbound/eastbound at an object 42 inches above the pavement situated in the center of the northbound/westbound travel lane.

The posted advisory speed limit on West Garvey Avenue North adjacent to the project is 20 miles per hour. According to the Focused Traffic Analysis, stopping sight distance requires 125 feet of

unobstructed line of sight for a 20 mile per hour design speed. The driver's eye for a vehicle located at a project driveway intending to head either northbound or southbound on Garvey Avenue is situated 42 inches above the pavement and 15 feet back from the edge of the travel way. The driver must have a minimum unobstructed sight line of 125 feet looking northbound at an object 42 inches above the pavement situated in the center of the southbound travel lane, and must have a minimum unobstructed sight line of 125 feet looking southbound at an object 42 inches above the pavement situated in the center of the northbound travel lane.

The following are part of the Conditions of Approval for the proposed project, as determined by the Focused Traffic Analysis, and must be shown on the final plans submitted to the City for approval:

1. For safety purposes, in addition to other requirements for red curb at the projects access points, a minimum of 20 feet of red curb be painted on either side of the Garvey Avenue driveway (Driveway K) since vehicles traveling NB on Vincent Avenue will be entering Garvey Avenue in an uncontrolled movement
2. Referring to Figure 19 in the Focused Traffic Analysis:
   a. Install 70.6 feet of red curb to the west of Driveway A
   b. Install 39 feet of red curb to the east of Driveway A
   c. Install Stop Bar and Stop Sign for Exiting traffic at Driveway A
3. All Red Curb and signage on Internal Streets in the development shown in Figures 20 thru Figure 28 of the Focused Traffic Analysis should meet applicable Engineering Standards. All internal streets should provide for clear sight triangles at each internal intersection by removing either parking or shrubs that may obscure vehicles sight from other vehicles or pedestrians
4. Stop bar and Stop Sign will need to be installed for exiting traffic at Driveway K
5. Construction Work Site Traffic Control Plan shall be submitted to City for review and approval

The Focused Traffic Analysis determined that adequate stopping sight distance is provided as part of the project. In addition, West Workman Avenue, West Garvey Avenue North, on-site drive aisles, and the surrounding terrain at and adjacent to the project site are relatively flat with minimal changes in gradient. Therefore, vertical sight distance concerns are not prevalent (Ganddini 2020). Nonetheless, the Focused Traffic Analysis recommends that sight distance be confirmed in the final project grading, landscaping, and street improvement plans. For this reason, and to ensure that all necessary recommendations and Conditions of Approval related to traffic safety and control are implemented, Mitigation Measure TRAN-1 is required.

Mitigation Measure

TRAN-1 Traffic Safety and Control

For safety purposes, the applicant shall incorporate all recommendations provided by the City traffic engineer and City Conditions of Approval into the final grading, landscaping, and street improvement plans submitted to the City for review; and these plans shall also show the following improvements:

- The Project Driveway (North-South) at West Workman Avenue (East-West) shall provide one inbound lane and one outbound lane with northbound stop-control and the following lane configurations:
  - Northbound – One shared left/ right turn lane
  - Eastbound – One shared through/ right turn lane

  - Westbound – One shared left/ through lane
- The West Garvey Avenue North (North-South) at Project Driveway (East-West) shall provide one inbound lane and one outbound lane with eastbound stop-control and the following lane configurations:
  - Northbound – One shared left/ through lane
  - Southbound – One shared through/ right turn lane
  - Eastbound – One shared left/ right turn lane

The City traffic engineer shall confirm that these recommendations, conditions of approval, and project design features have been incorporated into the final grading, landscaping, and street improvement plans before they are approved by the City.

Implementation of Mitigation Measure TRAN-1 would reduce hazards due to incompatible uses or geometric design features to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project result in inadequate emergency access?

During construction, temporary and occasional lane closures may be required, however two-way traffic would still be maintained at construction entry points as required by the City of West Covina's Application for Encroachment Permit (West Covina, 2021). At operation, vehicles, including emergency response vehicles, would be able to access the project site via the main entrance off West Workman Avenue and the secondary entrance off West Garvey Avenue North. The proposed project would not modify existing roadways in the vicinity, other than by adding these new site access points. In addition, the project would not result in inadequate emergency access because it would be subject to WCFD review of site plans, site construction, and the actual structures prior to occupancy to ensure that required fire protection safety features, including building sprinklers and emergency access, are implemented. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank.

18 Tribal Cultural Resources

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

Assembly Bill 52

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

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

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

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

Senate Bill 18 of 2004

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

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

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

Three tribes have requested notification of projects that occur in West Covina: the Soboba Band of Luiseño Indians, Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation), and Gabrieleño/Tongva Nation. Pursuant to PRC Section 21080.3.1, the City mailed consultation letters to these three tribes on January 7, 2021. The City received a response from the Kizh Nation on February 2, 2021 requesting consultation with the City regarding the project. This was scheduled for March 3, 2021, but the Kizh Nation representatives later declined this invitation and submitted an undated letter requesting that the City include specific tribal cultural resources mitigation measures in this IS-MND.

Given the developed nature of the site, excavation and grading activities required for project construction are not expected to uncover tribal cultural resources. Although no tribal cultural resources are expected to be present on-site, the possibility of encountering undisturbed subsurface tribal cultural resources cannot be ruled out. The proposed excavation of the project site could potentially result in adverse effects to unanticipated tribal cultural resources. However, impacts from the unanticipated discovery of tribal cultural resources during construction would be less than significant with implementation of Mitigation Measures TCR-1 through TCR-3. These mitigation measures are consistent with the mitigation measures recommended by the Kizh Nation.

[22] The January 21, 2021 letters were to inform the recipients that the proposed project is subject to SB 18 as well as AB 52.

Mitigation Measures

The following mitigation measures would reduce potential impacts related to disrupting tribal cultural resources to a less than significant level.

TCR-1 Retain a Native American Monitor

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

TCR-2 Unanticipated Discovery of Tribal Cultural Resources

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

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

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

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

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

19 Utilities and Service Systems

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

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

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

The project site is in an urbanized area and is well-served by existing utilities infrastructure. The project site lies within the service boundaries of ALW, from which it would receive potable water service. As discussed further under *Impact b* of this section, ALW would have adequate water supplies

available for the proposed project and no new or expanded water facilities would be required to serve the project. Pursuant to the Specific Plan, each residential unit would have its own water meter and the project would install backflow devices, low-flow fixtures, water efficient irrigation systems, and replace 1,200 linear feet of the existing public water main on Garvey Avenue with a new 8-inch minimum ductile iron public water main from Vincent Avenue to Morada Avenue and reconnect all existing services and laterals to the new water main. These upgrades would ensure that the proposed project would have no impacts to potable water service in the area.

Local wastewater service in West Covina is provided by the City's Public Services Department, while trunk lines and treatment facilities are provided by the Los Angeles County Sanitation District (LACSD). Wastewater from the City's system is treated at and disposed of by the San Jose Creek Water Reclamation Plant (SJCWRP) and/or the Whittier Narrows Reclamation Plant (WNRP), operated by the LACSD. The SJCWRP and WNRP have a design capacity of 100 million gallons per day (mgd) and 15 mgd, respectively, for a combined design capacity of 115 mgd (LACSD 2020). The project site is in the SJCWRP's tributary area. The average daily flow to the SJCWRP is approximately 66 mgd, leaving approximately 34 mgd in available capacity (West Covina 2016b). LACSD provided a Will-Serve Letter for the project in August 2020, indicating that LACSD's wastewater treatment facilities have adequate capacity to serve the project (Appendix J)

According to the Sewer Area Study prepared for the proposed project, the main sewer facilities in the project vicinity are a 27-inch reinforced concrete pipe (RCP) trunk located along West Workman Avenue, which was approved in 1954 and is maintained by LACSD, and a 8-inch vitrified clay pipe (VCP) sewer on Vincent Avenue (see Appendix K). The project would install an 8-inch VCP within the project site, which would connect to the RCP on West Workman Avenue. Based on the results of the Sewer Analysis Study, operation of the residential community would result in a 165 percent increase in flow at the trunk sewer connection, which would result in the flow in the sewer mainline increasing from 15.6 percent capacity under existing conditions to 41.36 percent capacity. Therefore, the sewer mainline has existing capacity for the proposed project and no improvements to the sewer system would be required.

CalEEMod is a statewide emissions computer model and comprehensive tool for quantifying emissions associated with both construction and operations from a variety of land use projects, including project water demand. Conservatively assuming that wastewater generation would be approximately 100 percent of water demand[23], which is based on CalEEMod results (see Appendix A), the proposed project would generate approximately 11,040,000 gallons of wastewater per year, or 30,247 gallons of wastewater per day.

The project site is currently developed with the former Vincent School public elementary school campus and has until recently been used for[24] the Covina Valley Children's Center (CVUSD, 2020-2021). When operational, existing uses on the site would demand an estimated 7,500,000 gallons of wastewater per year, or 20,548 gallons of wastewater per day. Therefore, the project would demand a net increase of 9,699 gallons of wastewater per day compared to existing on-site uses if and when fully operational. The project's estimated daily wastewater generation accounts for approximately 0.03 percent of the SJCWRP's available daily capacity of approximately 34 mgd. Therefore, the SJCWRP would have sufficient capacity to accommodate additional wastewater flows generated by

[23] This analysis conservatively assumes that wastewater generation would be approximately 100 percent of the project's water demand, whereas a more likely scenario is that the project's water demand includes landscape irrigation which does not result in wastewater.
[24] Currently, use of the site as a school may be limited or it may be non-operational because of COVID-19 pandemic conditions or for other reasons.

the proposed project, the proposed project would not require the construction of new or expanded treatment facilities.

The project site would continue to connect to the existing storm drain system operated and maintained by the City. According to the Preliminary Hydrology and LID Report prepared for the proposed project, project implementation would result in similar drainage patterns to existing conditions (see Appendix G). The project would include two bio-filtration systems to treat a total of 29,959 cubic feet of water during high water flow events. Treated water would then by directed via diversion structure to the existing storm drain on Vincent Avenue and flows from the project site to this storm drain would be restricted to 20.225 cubic feet per second, in conformance with the Los Angeles County design criteria, guidelines, policies, and procedures. Therefore, the project would not necessitate the construction of new stormwater drainage facilities or expansion of existing facilities.

Furthermore, as discussed in Section 6, *Energy*, the project would not result in the wasteful, inefficient or unnecessary consumption of energy. The new homes would be net zero electricity and would be equipped with energy efficient appliances and HVAC to minimize the natural gas requirements of the homes. Therefore, the project would not require the construction of new electric power or natural gas facilities. Likewise, the project site is an infill project served by existing telecommunications facilities within the City and would not require the expansion or construction of new telecommunications infrastructure.

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

LESS THAN SIGNIFICANT IMPACT

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

As discussed in Section 9, *Hydrology and Water Quality*, the project site receives its water service from ALW, which is a retail water supplier that serves a 14.2-square mile service area, including customers in Azusa, West Covina, Covina, Glendora, and Irwindale, and portions of unincorporated Los Angeles County (ALW 2016). ALW primarily sources its water supply from 11 groundwater wells that pump water from the Main San Gabriel Basin, which account for 65 percent of its water supply, and surface water from the San Gabriel River, which accounts for approximately a third of the water supply (ALW 2016). Imported water is sourced from Metropolitan Water District of Southern California and is only used on an emergency basis to supplement groundwater and surface water supplies (ALW 2016).

According to the 2015 Urban Water Management Plan (UWMP), ALW would have an adequate supply of water, with normal conservation efforts, to meet projected demand through 2040 in average year, single dry year, and multiple dry year scenarios (ALW 2016). Table 19 and Table 20 show projected water supply and demand under normal year and multiple dry year conditions and single dry year conditions, respectively, in the ALW service area through 2040 according to the 2015 UWMP.

Table 19 Normal Year and Multiple Dry Year Water Supply and Demand Comparison

	2020	2025	2030	2035	2040
Estimated Service Area Population	109,200	111,600	114,100	116,600	119,200
Water Supply Totals[1]	38,450	38,450	38,450	38,450	38,450
Water Demand Totals[1]	20,550	21,001	21,472	21,942	22,432

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

Source: ALW 2016

Table 20 Single Dry Year Water Supply and Demand Comparison

	2020	2025	2030	2035	2040
Estimated Service Area Population	109,200	111,600	114,100	116,600	119,200
Water Supply Totals[1]	38,450	38,450	38,450	38,450	38,450
Water Demand Totals[1]	21,310	21,778	22,266	22,754	23,262

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

Source: ALW 2016

The project would be constructed in accordance with all applicable CBC standards, including those that mandate water-efficient fixtures and features, and would also be mandated to adhere to applicable water conservation measures for landscaping. According to CalEEMod results (see Appendix A), the project would demand approximately 29,568 gallons of water per day, or approximately 35.6 acre-feet per year (AFY); and existing uses on the site (if and when operational) would demand approximately 20,564 gallons of water per day, or approximately 23.0 AFY. The proposed project would therefore lead to a net increase of 9,004 gallons of water per day, or approximately 12.6 acre-feet per year (AFY) of water, compared to the existing land use. This water use (for either the project alone or the project compared to the existing land use) would be accommodated by the water supply available for the City during normal, single dry year, and multiple dry year conditions through the year 2040 as shown in Table 19 and Table 20. Therefore, existing water infrastructure and supplies would be adequate to serve the anticipated residents and other users of the proposed project, and the project's impact on water supply would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

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

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

According to the CalEEMod results (see Appendix A), existing uses on the project site would generate approximately 64 tons of solid waste per year while operation of the proposed project would generate approximately 88 tons of solid waste per year. Therefore, neither the project's net increase of 24 tons of solid waste generated per year (0.07 tons per day) nor its gross generation of approximately 88 tons of solid waste per year (0.24 tons per day) would exceed the current estimated remaining daily capacity of 1,875 tons at Victorville Sanitary Landfill. Therefore, the project's impacts on solid waste would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank.

20 Wildfire

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

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

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

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

The project would demolish existing on-site facilities for construction of up to 47 detached single-family "cluster" homes and up to 72 attached townhomes, for a total of up to 119 homes, which would incrementally increase demand for fire protection services. As discussed in Section 15, *Public Services*, the project site is in an urbanized area already served by the WCFD and would not have a significant impact on fire response times nor create a substantially greater need for additional fire protection services above current capacity. The project site is in the district of Fire Station No. 3, which is located at 1433 West Puente Avenue approximately 0.75 miles northwest of the site. Response time to the project site is less than three minutes. According to project plans, the project is designed to accommodate emergency access to the site. Fire access routes have been designed to meet the minimum width and turning dimensions required by the WCFD. Furthermore, all buildings would be constructed to meet the current building code fire safety requirements. The WCFD provides technical review of building construction plans to ensure proposed buildings meet the City's adopted 2019 California Fire Code prior to construction. As such, the WCFD would review the site and building plans for the project as part of the City's review process. Construction of the proposed project would maintain emergency access to the site and on area roadways and would not interfere with an emergency response plan or evacuation route. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

As discussed under impact discussion *20.a*, the project site is not located in a FHSZ or Very High FHSZ for wildland fires. The nearest Very High FHSZ is approximately three miles southeast of the site (California State Geoportal 2020). There are no streams or rivers located on or adjacent to the project site, and the project site and surrounding areas are not at high risk of downslope or downstream flooding or landslides. Therefore, the project would not exacerbate wildfire risks, and risks to people or structures due to runoff, post-fire slope instability, or drainage changes would not occur. Employees and customers at the project site would not be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur.

NO IMPACT

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

As discussed under impact discussion *20.a*, the project site is not in a FHSZ or Very High FHSZ for wildland fires. The nearest Very High FHSZ is located approximately three miles southeast of the site (California State Geoportal 2020). The proposed project is an infill development in an urbanized area involving the demolition of existing on-site facilities for construction of up to 47 detached single-family "cluster" homes and up to 72 attached townhomes, for a total of up to 119 homes. The project site would be adequately served by existing facilities and utilities. Therefore, the proposed project would not require additional infrastructure such as roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk, and no temporary or ongoing impacts to the environment would occur.

NO IMPACT

This page intentionally left blank.

21 Mandatory Findings of Significance

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

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

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

season to avoid potential impacts to on-site nesting birds. Furthermore, of the 20 trees affected by implementation of the project, eight are considered Significant Trees pursuant to the City's Tree Ordinance. Therefore, Mitigation Measure BIO-2 is required to mitigate the loss of on-site Significant Trees. Furthermore, as discussed in Section 5, *Cultural Resources*, Section 7, *Geology and Soils*, Section 9, *Hazards and Hazardous Materials,* and Section 18, *Tribal Cultural Resources*, the proposed project would have a less than significant impact on or from unanticipated archaeological resources, paleontological resources, and tribal cultural resources with implementation of Mitigation Measures CR-1, CR-2, GEO-1, HAZ-1, and TCR-1. Implementation of these mitigation measures, as well as adherence to existing local, State, and federal regulations and specific monitoring procedures related to the discovery of any unanticipated cultural resources, hazardous materials, paleontological resources, tribal cultural resources, and human remains during construction activity, would reduce these potential impacts to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

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

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

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed in analyses for air quality, hazards and hazardous materials, and noise, the proposed project would not result, either directly or indirectly, in adverse hazards related to air quality, hazardous materials or noise. Compliance with applicable rules, regulations, and mitigation measures included in this IS-MND (including Mitigation Measure HAZ-1, which would reduce potential impacts related to ACMs during project construction; Mitigation Measure N-1, which would require various construction noise reduction measures; Mitigation Measure N-2, which would require implementation of building materials capable of reducing exterior-to-interior noise levels consistent with the California Code of Regulations, Title 24, Section 1206; and Mitigation Measure TRAN-1, which would require traffic safety and control measures), would reduce potential impacts on human beings to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

This page intentionally left blank.

References

Bibliography

Association of Environmental Professionals (AEP). 2016. Final White Paper Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California. https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf (accessed December 2020).

Azusa Light and Water (ALW). 2016. 2016 Urban Water Management Plan. https://www.ci.azusa.ca.us/DocumentCenter/View/33711/ALW-2015-Urban-Water-Mangement-Plan?bidId= (accessed November 2020).

CalFire. 2011. Very High Fire Hazard Severity Zones in LRA. https://osfm.fire.ca.gov/media/5852/west_covina.pdf (accessed July 2020).

California Air Pollution Control Officers Association. 2017. California Emissions Estimator Model User's Guide. http://162.80.26.25/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4 (accessed January 2021).

California Air Resources Board (CARB). 2014. AB 32 Scoping Plan Website. Updated June 2014. http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm (accessed March 2020).

_____. 2015. CA-GREET 2.0 Supplemental Document and Tables of Changes. https://ww3.arb.ca.gov/fuels/lcfs/ca-greet/ca-greet2-suppdoc-060415.pdf (accessed March 2020).

_____. 2016. Ambient Air Quality Standards. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf (accessed December 2019).

_____. 2017a. *2017 Amendments Health Risk Analysis*.

_____. 2017 b. California's 2017 Climate Change Scoping Plan. December 14, 2017. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf (accessed September 2020).

_____. 2018. California Greenhouse Gas Emission Inventory - 2018 Edition. https://www.arb.ca.gov/cc/inventory/data/data.htm (accessed March 2020)

_____. 2020a. Top 4 Summary: Select Pollutant, Years, & Area. https://www.arb.ca.gov/adam/topfour/topfour1.php (accessed August 2020).

_____. 2020b. California Greenhouse Gas Emissions for 2000 to 2020. https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2018/ghg_inventory_trends_00-18.pdf (accessed November 2020).

California Department of Conservation (DOC). 1994. Generalized Mineral Land Classification Map of Los Angeles County- South Half. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf (accessed September 2020).

_____. 2016. Los Angeles County Williamson Act FY 2015/2016. Document.

_____. 2020a. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed October 2020).

_____. 2020b. Los Angeles County Tsunami Inundation Maps. https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles (accessed July 2020).

California Department of Finance (CDOF). 2020. "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020, with 2010 Census Benchmark." http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/ (accessed December 2020).

California Department of Fish and Wildlife. 2019. California Natural Community Conservation Plans. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline (accessed September 2020).

California Department of Transportation (Caltrans). 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol. (CT-HWANP-RT-13-069.25.2) https://www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_10-Noise/Caltrans_2013a_Tech_Noise_Supplement.pdf (accessed August 2020).

_____. 2018. Traffic Census Program. https://dot.ca.gov/programs/traffic-operations/census (accessed August 2020).

_____. 2020a. Scenic Highways- Frequently Asked Questions. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways/lap-liv-i-scenic-highways-faq2 (accessed April 2020).

_____. 2020b. California Scenic Highways. https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=f0259b1ad0fe4093a5604c9b838a486a (accessed July 2020).

_____. 2020c. Transportation and Construction Vibration Guidance Manual CT-HWANP-RT-20-365.01.01. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf (accessed August 2020).

California Energy Commissions (CEC). 2019a. Energy Consumption by Entity. http://ecdms.energy.ca.gov/elecbyutil.aspx (accessed October 2020).

_____. 2019b. Gas Consumption by Entity. http://ecdms.energy.ca.gov/gasbyutil.aspx. (accessed October 2020).

California Environmental Protection Agency (CalEPA). 2006. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

California Energy Commission (CEC). 2017. Renewables Portfolio Standard Eligibility Commission Guidebook. https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard (accessed March 2020).

_____. 2018a. Energy Consumption by Entity. http://ecdms.energy.ca.gov/elecbyutil.aspx. (accessed August 2020).

_____. 2018b. Gas Consumption by Entity. http://ecdms.energy.ca.gov/gasbyutil.aspx. (accessed August 2020).

California Geological Survey (CGS). 2020. Earthquake Zones of Required Investigation. https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed July 2020).

California State Geoportal. 2020. California Fire Hazard Severity Zone Viewer. https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414 (accessed August 2020).

CalRecycle. 2020. SWIS Facility/Site Activity Details. Victorville Sanitary Landfill (36-AA-0045). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652 (accessed September 2020).

Covina Valley Unified School District (CVUSD). 2020-2021. https://www.c-vusd.org/Page/1242 (accessed March 2021).

Crocker, Malcolm J. Crocker (Editor). 2007. *Handbook of Noise and Vibration Control Book*, ISBN: 978-0-471-39599-7, Wiley-VCH, October.

Department of Toxic Substances and Control (DTSC). 2020a. Envirostor Database. https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=190th+street+and+fisk+lane (accessed July 2020).

_____. 2020b. Cortese list. https://dtsc.ca.gov/dtscs-cortese-list/ (accessed July 2020).

Ed-Data. 2020. Home Page. https://www.ed-data.org/ (accessed September 2020).

Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Map Number 06037C1700F. https://msc.fema.gov/portal/search?AddressQuery=2539%20E%20garvey%20Ave%20N%2C%20West%20Covina%2C%20CA#searchresultsanchor (accessed July 2020).

Federal Highway Administration (FHWA). 2006. *FHWA Highway Construction Noise Handbook*. (FHWAHEP-06-015; DOT-VNTSC-FHWA-06-02). https://rosap.ntl.bts.gov/view/dot/8837/dot_8837_DS1.pdf? (accessed August 2020).

_____. 2011. *Highway Traffic Noise: Analysis and Abatement Guidance* (FHWA-HEP-10-025). https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/revguidance.pdf (accessed August 2020).

Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual.* https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed August 2020).

Ganddini Group, Inc. 2020. 1024 West Workman Avenue. Focused Traffic Analysis. Appendix I.

Institute of Transportation Engineers (ITE). 2017. *Trip Generation Manual, 10th Edition.*

Intergovernmental Panel on Climate Change (IPCC). 2007. Summary for Policymakers. In: Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

_____. 2014a. Climate Change 2014 Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)]. IPCC, Geneva, Switzerland.

_____. 2014b. Summary for Policymakers. In: Climate Change 2014, Mitigation of Climate Change. Contribution of Working Group III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Edenhofer, O., R. Pichs-Madruga, Y. Sokona, E. Farahani, S. Kadner, K. Seyboth, A. Adler, I. Baum, S. Brunner, P. Eickemeier, B. Kriemann, J. Savolainen, S. Schlömer, C. von Stechow, T. Zwickel and J.C. Minx (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

Kinsler, Lawrence E. and R. Frey, Austin and B. Coppens, Alan and V. Sanders, James. 1999. Fundamentals of Acoustics, 4th Edition. ISBN 0-471-84789-5. Wiley-VCH, December 1999.

Los Angeles, County of. 2003. Airport Land Use Plan. http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf (accessed August 2020).

MFKessler. 2020a. Low-Impact Development Plan. Appendix G.

_____. 2020b. Hydrology Study. Appendix G.

National Park Service. 1983. Archaeological and Historic Preservation: Secretary of the Interior's Standards and Guidelines. Electronic document, online at http://www.nps.gov/history/local-law-Arch_Standards.htm (accessed December 6, 2011).

Nick's Environmental Consulting. 2020a. Asbestos Report for 2501 E. Garvey Avenue (Lotus Dealership). Appendix F.

_____. 2020b. Asbestos and Lead Survey Report for 2539 E. Garvey Avenue (Carport Garage). Appendix F.

_____. 2020c. Asbestos and Lead Survey Report for 2539 E. Garvey Avenue (Carport Garage). Appendix F.

Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program. Risk Assessment Guidelines. https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf (accessed March 2020).

South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. April 1993.

_____. 2008a. Final Localized Significance Threshold Methodology. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed December 2020).

_____. 2008b. Draft Guidance Document-Interim CEQA Greenhouse Gas (GHG) Significance Threshold. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf (accessed August 2020).

_____. 2009. Appendix D – Mass Rate LST Look-up Tables. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2 (accessed September 2020).

_____. 2010. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf (accessed December 2020).

_____. 2016. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=2 (accessed March 2020).

_____. 2017. Final 2016 Air Quality Management Plan (AQMP). https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15 (accessed March 2020).

_____. 2019. SCAQMD Air Quality Significance Thresholds. http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf (accessed August 2020).

Southern California Association of Governments (SCAG). 2016. RTP/SCS Growth Forecast by Jurisdiction. http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf (accessed August 2020).

Southern California Edison (SCE). 2012. Corporate Responsibility and Sustainability Report. https://www.edison.com/content/dam/eix/documents/sustainability/2012-sce-corporate-responsibility-report.pdf (accessed September 2020).

State Water Resources Control Board (SWRCB). 2020. GeoTracker Database. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=2505+E+garvey+avenue+N+west+covina (accessed July 2020).

Suburban Water Systems. 2016. 2015 Urban Water Management Plan. https://cadwr.app.box.com/s/hg3k8bc9vuka689jkh1x4f9i1n58ey9a/file/521567401108 (accessed July 2020).

_____. 2020. About Our Water Webpage. http://www.swwc.com/suburban/about-our-water/ (accessed July 2020).

United States Department of Agriculture (USDA). 2020. Natural Resources Conservation Service (NRCS) Web Soil Survey. http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm (accessed July 2020).

United States Department of Transportation (U.S. DOT). 2018. Bureau of Transportation Statistics. National Transportation Statistics. https://www.bts.gov/topics/national-transportation-statistics. (accessed March 2020).

United States Energy Information Administration (EIA). 2019. Annual Energy Outlook 2019 with projections to 2050. https://www.eia.gov/outlooks/aeo/pdf/aeo2019.pdf (accessed March 2020).

United States Environmental Protection Agency (USEPA). 2018a. Criteria Air Pollutants. https://www.epa.gov/criteria-air-pollutants (accessed March 2020).

_____. 2018b. Exhaust and Crankcase Emission Factors for Nonroad Compression-Ignition Engines in Moves2014b. https://nepis.epa.gov/Exe/tiff2png.cgi/P100UXEO.PNG?-r+75+-g+7+D%3A%5CZYFILES%5CINDEX%20DATA%5C16THRU20%5CTIFF%5C00000416%5CP100UXEO.TIF (accessed March 2020).

_____. 2019a. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2017. USEPA #430-R-19-001. April 2019. https://www.epa.gov/sites/production/files/2019-04/documents/us-ghg-inventory-2019-main-text.pdf (accessed March 2020).

_____. 2019b. SEMS Search. https://www.epa.gov/enviro/sems-search (accessed July 2020).

_____. 2020a. Health Effects of Ozone Pollution. https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution (accessed October 2020).

_____. 2020b. Health and Environmental Effects of Particulate Matter. https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm (accessed October 2020).

_____. 2020c. Learn about Lead. https://www.epa.gov/lead/learn-about-lead#effects (accessed October 2020).

_____. 2020d. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2018. USEPA #430-R-20-002. April 2020. https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2018 (accessed September 2020).

United States Fish and Wildlife Service (USWFS). 2020a. Critical Habitat for Threatened and Endangered Species. https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77 (accessed July 2020).

_____. 2020b. National Wetlands Inventory. https://www.fws.gov/wetlands/data/mapper.html (accessed July 2020).

United States Green Business Council (USGBC). 2008. Building Area per Employee by Business Type. May 13, 2008.

West Covina, City of. 2011. Energy Action Plan (EAP). https://www.ca-ilg.org/sites/main/files/file-attachments/west_covina_energy_action_plan.pdf (accessed July 2020).

_____. 2016a. West Covina General Plan. https://www.westcovina.org/home/showdocument?id=18138 (accessed August 2020).

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

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

_____. 2020b. 2539 East Garvey Avenue Project. https://www.westcovina.org/home/showpublisheddocument?id=19017 (accessed December 2020).

_____. 2020c. Natural Hazards Mitigation Plan. https://www.westcovina.org/departments/fire/disaster-preparedness/natural-hazard-mitigation-plan/section-8-flood (accessed December 2020).

_____. 2020d. Fire/Emergency Medical Services (EMS) Delivery Options. https://www.westcovina.org/home/showdocument?id=18487 (accessed September 2020).

_____. 2021. Application for Encroachment Permit. https://www.westcovina.org/home/showdocument?id=18487 (accessed January 2021).

West Covina Police Department (WCPD). 2020a. About. https://www.wcpd.org/about/ (accessed September 2020).

_____. 2020b. Services. https://www.wcpd.org/services/?open=patrol (accessed September 2020).

World Meteorological Organization. 2020. "Greenhouse Gases." https://public.wmo.int/en/our-mandate/focus-areas/environment/greenhouse%20gases (accessed September 2020).

List of Preparers

Rincon Consultants, Inc. prepared this IS-MND under contract to the City of West Covina. Persons involved in data gathering, analysis, project management, and quality control are listed below.

RINCON CONSULTANTS, INC.

Deanna Hansen, Principal
Greg Martin, Senior Environmental Planner, Project Manager
Vanessa Villanueva, Associate Environmental Planner
Emily Marino, Associate Environmental Planner
Alyssa Newcomb, Senior Archaeologist and Project Manager
Alexandra Madsen, Architectural Historian
Annaliese Miller, Associate Environmental Planner/Scientist
Hannah Haas, Associate Environmental Planner/Scientist
Steven Treffers, Senior Architectural Historian
Yuling Huo, TRAQ, Associate Biologist/ISA Certified Arborist (#WE-11975A)

Appendices Table of Contents