

Responses to Comments on the Draft IS-MND

This section includes comments received during public circulation of the Draft Initial Study-Mitigated Negative Declaration (IS-MND) prepared for the Vincent Place Residential Project (project).

The Draft IS-MND was circulated for a 30-day public review period that began on March 22, 2021 and ended on April 21, 2021. The City received four comment letters on the Draft IS-MND. The comment letters are included herein, along with responses to the environmental concerns raised by the commenters. The commenters and the page number on which each commenter's letter appear are listed below.

Letter Number and Commenter	Page Number
1 Adriana Raza, Los Angeles County Sanitation Districts	2
2 Arlene Patton	4
3 Lydia Kristine Frey	7
4 West Covina Improvement Association	20

The comment letters and responses follow. The comment letters are numbered sequentially, and each separate issue raised by the commenter has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in Comment Letter 1).

Where a comment resulted in a change to the Draft IS-MND text, a notation is made in the response indicating that the text is revised. Changes in text are signified by ~~strikeout font~~ where text was removed and by underlined font where text was added. These changes in text are noted in the Final IS-MND.



April 19, 2021

Ref. DOC 6122936

Letter 1

Ms. Jo-Anne Burns
Planning Manager
Planning Department
City of West Covina
1920 West Pacific Lane
West Covina, CA 91790

Dear Ms. Burns:

NOI Response to Vincent Place Residential Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the subject project on March 25, 2021. The proposed project is located within the jurisdictional boundary of District No. 22. We offer the following comments:

- All information concerning Districts’ facilities and sewerage service contained in the document is current.

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

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Schmidt
A. Howard

1.1

Letter 1

COMMENTER: Adriana Raza, Los Angeles County Sanitation Districts (LACSD)

DATE: April 19, 2021

Response 1.1

The commenter states that all information contained in the Draft IS-MND regarding the LACSD facilities and sewerage service is accurate.

The commenter's consensus with the facilities and sewerage information provided in the Draft IS-MND is noted.

Letter 2

March 25, 2021

TO: Planning Commission
FROM: Arlene Patton
1133 West Teresa
West Covina, CA 91790

MAR 30 2021

Planning Division

RE: Vincent Place Project

I have been part of a group of people who have Zoomed with the developer. All of the concerns that I'm writing about have been raised. Please look into these items carefully.

1. First, I wonder how West Covina can financially afford to add these new homes and provide services for them
2. The townhomes along Vincent Ave. look like apartments, rather than townhomes. The lack of a roofline for each townhome is terrible. The architect could have created a much Better design for these townhomes.
3. Concern was raised about where trash cans and air conditioners are located.
4. The city has an ordinance that air conditioners are supposed to be fenced. However, the other property that was recently completed by this company has no air conditioner fencing. They would definitely look better with fencing.
5. The plans indicate only one entrance. That is a LARGE AMOUNT of traffic on Workman which is already a busy street. This is an area of single-family homes that does not need that much traffic on it. Where are visitors to park?

2.1

2.2

2.3

2.4

Letter 2

COMMENTER: Arlene Patton

DATE: March 25, 2021

Response 2.1

The commenter asks how the City of West Covina can afford to add new homes and provide services to them.

This comment does not remark on the adequacy of the environmental analysis and is beyond the purview of the proposed project. However, a Fiscal Impact Analysis for the project was completed by the Natelson Dale Group, Inc. and submitted to the City in December 2020. It concluded that the project would produce a net fiscal benefit to the City of about \$77,000 per year to the City's General Fund.

Response 2.2

The commenter states that the proposed townhomes along Vincent Avenue look like apartments and that the townhomes could have been designed better.

As stated on pages 25 and 26 of the Draft IS-MND:

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.

City design review would ensure that the final building elevations, colors, and materials would comply with adopted design guidelines.

Response 2.3

The commenter expresses concern regarding the placement of trash cans and air conditioning units and states that air conditioning units should be fenced pursuant to the requirements of a City ordinance.

According to the Specific Plan and other project plans and information, each single-family home and townhome unit would be provided with a trash/recycle cart and green waste cart that would be stored in the unit's garage. On trash collection day, carts would be placed on the curbs of the internal circulation paths and would not be placed on public roadways such as West Workman Avenue and Vincent Avenue. The project site is in a residential area that is already served by Athens Services and, as described on pages 132 and 133 of the Draft IS-MND, Athens Services and the local landfill have adequate capacity to serve the project.

In regard to air conditioning equipment, per the Specific Plan and other project plans and information and as described on page 104 of the Draft IS-MND, "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.” City design review of the proposed plans would ensure that this requirement is adhered to.

Response 2.4

The commenter states that the project site would only have one entrance and that West Workman Avenue already experiences large volumes of vehicle traffic. The commenter also asks where visitors will park.

As stated on Page 9 and illustrated in Figure 5 of the Draft IS-MND, the project site would be served by two entrances, one on West Workman Avenue and one on West Garvey Avenue North. Each residential unit would have two dedicated garage spaces and there would also be 56 uncovered parking spaces for guest parking within the project site. As described in Section 17, *Transportation*, the Focused Traffic Analysis determined that the project would result in approximately 971 daily vehicle trips and would represent an increase in vehicle traffic of three percent along West Workman Avenue and six percent along West Garvey Avenue North. As described on pages 119 and 120 of the Draft IS-MND, the proposed project would not result in significant vehicle miles traveled (VMT) impacts. Therefore, the project would not result in significant traffic-related impacts in the area.

Letter 3

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

RE: Draft Initial Study and Mitigated Negative Declaration for Vincent Place Residential Project located at 1024 W. Workman Avenue, West Covina, 91790

Dear Ms. Burns,

Thank you for the opportunity to review the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the project referenced above. The proposed project consists of 119 dwelling units, 72 attached and 47 detached on an approximately 8.05-acre site.

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

Section 6. Existing Setting

Provide information regarding the number of buildings to be demolished and the square footage of each building.

3.1

Section 9. Project Description

The description should also inform the public and reviewing public agencies that this is a surplus school by the Covina Valley Unified School District (CVUSD). The site is currently, which is public land, is under the ownership of the (CVUSD). The District has not yet identified sites being received as part of the “land exchanged” between the CVUSD and Project Sponsor. The current zoning is Single-Family residential zone that allows a maximum density of 8 units per acre and the developer is seeking approval to allow up to 20 units per acre; thus providing a point of reference This information is wrongfully omitted and it does not inform the public what is currently allowed by right under the City’s General Plan and Development Code.

3.2

3.3

Table 1 – Project Summary

Landscaping, Open Space, and Parking Patio walls should not be allowed to encroach into front setback a minimum of 3-feet from public right-of-way. This allowance must be deleted since there are no guidelines on the type of wall material that would be allowed nor the height.

3.4

Section 11. Required Approvals

Adoption of the Vincent Avenue Specific Plan and zone-change from Single-family Residential R-1/8 units per acre) to Vincent Avenue Specific Plan (up to 20 units per acre). This is a five acre

3.5

public land being turned into cramped urban development, in very close proximity to a major roadway-interstate highway. With this many units, this does not allow for enough greenspace for the dwellers of this development.

- Pertaining to my next point on **Air Quality and Health**: This is unhealthy and unsafe. See the following studies, which also pertains to the PIONEER SCHOOL at 1651 E Rowland Ave, rushed in by Gutierrez who unreasonably assumed to have a seconded vote by Becerra, not even in attendance at the meeting with spotty reception who wasn't on the line at the time of his motion for a second vote, for the planning commission meeting on Mar 22, but I digress:
 - The Heterogeneity of Air Temperature in Urban Residential Neighborhoods and Its Relationship with the Surrounding Greenspace Yuguo Qian 1,2, Weiqi Zhou 1,2,* , Xiaofang Hu 1,2 and Fan Fu 3
 - A Spatial Autocorrelation Approach for Examining the Effects of Urban Greenspace on Residential Property Values Delores Conway & Christina Q. Li & Jennifer Wolch & Christopher Kahle & Michael Jerrett
 - The role of neighbourhood greenspace in children's spatial working memory Eirini Flouri* , Efstathios Papachristou and Emily Midouhas Department of Psychology and Human Development, UCL Institute of Education, University College London, UK
 - Impacts of Individual Daily Greenspace Exposure on Health Based on Individual Activity Space and Structural Equation Modeling Lin Zhang 1,2 , Suhong Zhou 1,2,* , Mei-Po Kwan 3,4 , Fei Chen 1,2 and Rongping Lin 1,2

3.5
cont.

Air Quality

The IS/MND does not include a discussion regarding the siting of the project within 500 feet from the I-10 San Bernardino Freeway. The Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, published by the California Environmental Protection Agency California Air Resources Board (ARB), recommends siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural road with 50,000 vehicles/day. As stated in the ARBs Handbook, "protecting California's communities and our children from the health effects of air pollution is of the most fundamental goals of state and local air pollution control programs. Our focus on children reflects their special vulnerability to the health impacts of air pollution. Other vulnerable populations include the elderly, pregnant women, and those with serious health problems affected by air pollution." Air pollution studies indicate that living close to high traffic and associated emissions may lead to adverse health effect beyond those associated with regional air pollution in urban areas. The findings of these studies concluded that siting housing projects/sensitive land uses within close proximity of freeways increases both exposure and the potential to adverse health effects. Other affects associated with traffic emissions include premature death in elderly individuals with heart disease.

3.6

COVID-19

We shall, neither, neglect the effects of this on populations who have endured COVID-19 infection. The neglect of West Covina of this pandemic is beyond shameful; it is disgusting.

3.7

Key Health Findings (Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, p.8)

- Reduced lung function in children was associated with traffic density, especially trucks, within 1,000 feet and the association was strongest within 300 feet. (Brunekreef, 1997)
- Increased asthma hospitalization was associated with living within 650 feet of heavy traffic and heavy truck volume. (Lin, 2000)
- Asthma symptoms increased with proximity to roadways and the risk was greatest within 300 feet. (Venn, 2001)
- Asthma and bronchitis symptoms in children were associated with proximity to high traffic in a San Francisco Bay Area community with good overall regional air quality. (Kim, 2004)
- A San Diego study found increased medical visits in children living within 550 feet of heavy traffic. (English, 1999)

3.8

Criteria Pollutants of the IS/MND page 36, are stated. However, it is just an informational table without any analysis related to the siting of the project and adverse health impacts. Additionally, the project site is located within a locally Disadvantaged Communities. Although the City of West Covina General Plan does not contain an Environmental Justice Element, the Southern California Association of Governments (SCAG) has created a map tool that identifies locally disadvantaged communities. To this end, Senate Bill 1000 (SB 1000), the Planning for Healthy Communities Act, signed into law by Governor Jerry Brown on September 24, 2016, mandates that cities and counties adopt an environmental justice (EJ) element or integrate EJ goals, objectives, and policies into other elements of their general Plans. SB 1000 goal includes, but limited to the following:

- To protect public health and regenerate environment;
- Build trust and good working relationship with stakeholders; which strengthening community ownership over the process;
- Demonstrate a commitment to reducing and preventing disproportionate negative impacts on vulnerable residents and neighborhoods.

3.9

Assembly Bill 617 also includes several of the same key terms found in SB 1000 that define the term “disadvantaged community” as (1) areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation; and (2) areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of education attainment.

One of the primary goals of CEQA is to “Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the State.” For example, another goal of CEQA is to “Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic,



natural, scenic, and historical environmental qualities, and freedom from excessive noise.” Similarly, CEQA was also intended to “Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian,” a goal that “shall be the guiding criterion in public decision.” Despite a legislative intent to provide every Californian with a “decent home and suitable living environment,” a significant number of Californians in disadvantaged communities are impacted by high levels of air pollution.

3.9
cont.

CEQA is underdelivering and failing to protect our most vulnerable populations, particularly in a city that puts profits before people by stomping their feet demanding their own health department while being nearly bankrupt, and not doing any financial research or feasibility studies to support it, or support their own citizens they are putting at risk by rushing forward with unsafe housing developments.

3.10

Together, SB 1000 and AB 617 were signed into law to protect the at-risk communities that were contemplated in the legislative findings of CEQA, but not subsequently afforded the level of protection necessary to prevent “environmental injustice.” As such, the Air Quality Analysis must include a Health Risk Assessment and address the relationship of its finding upon a locally disadvantaged community. Since the IS/MND is silent on health risks associated with the siting of the project, it is premature to speculate mitigations through design and layout of improvement on the project site. Additional comments may follow once the Air Quality Analysis and Health Risk Analysis is completed and made available for public review.

3.11

Section 8 Greenhouse Gas Emissions

See above studies.

The heat island effect alone of this project, combined with others the City is rushing to complete, will be detrimental to the health of residents.

3.12

The fact that this project site is already close to many developed areas further exacerbates the limited vegetation and removal of CO2 emissions from trees and plants.

The removal of protected trees, as well, is horrible.

Section 15 Public Services

“The nearest park to the project site is Palm View Park located approximately 1 mile northeast of the site and Del Norte Park located approximately 1.1 miles northwest of the site.” Based on the Los Angeles County Park Need Assessment, the project is located in an area with a high need of parkland. It should be noted that Covina Valley Unified School District has fenced off all school sites that no longer provide access to the open space within school sites for recreational purposes. As stated above, the project site is located within a locally Disadvantaged Community, which includes a lack of access to parks, recreational amenities, and adequate public services. Additionally, this goes directly against the West Covina General Plan for providing safe and easily accessible parks for residents without crossing major roadways. See general plan.

3.13

We cannot continue to flick our noses at State, County, and West Covina plans and recommendations simply to meet housing needs that can be met simply by utilizing other already-identified priority sites for housing developments.

↑
3.13
cont.

Section 17 Transportation

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

3.14

Project Trip Generation and Distribution - The vehicle trip generation applied is based on ITE Trip Generation rather than student enrollment as reported to the California Department of Education. The programs provided at the former Vincent Children’s Center included OPTIONS learning programs. The site provided limited services with very low enrollment of children and very few employees. Therefore, the services provided from the site did not generate the number of vehicle trips per the ITE Land Use Code 565 and 520. An analysis of the previous enrollment of students and the number of employees would be the appropriate analysis to establish a baseline of daily trip generation. The site has operated with a low level of enrollment for at least the past 25 years (reason for the school site being surplus by CVUSD). Taking credits for vehicle trips that have not existed provides an inaccurate analysis that leads to inaccurate disclosure of the transportation/traffic impacts that the proposed project will generate.

3.15

Many Concessions, No Affordable Housing

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

3.16

Outreach

I also would like to request that the developer conduct additional community outreach that expands beyond the original 300-foot radius from the site. This is a significant project for the area and the public should be invited to participate. Additionally, outreach should not be limited solely to English. We are a diverse community. English, Spanish, Mandarin, Tagalog are all frequently spoken languages of West Covina residents, including Korean.

3.17

Please make an effort to include all of our community members. *Especially* when we are then mocked by Planning Commissioner Guttierrez for only showing up in-person, during a pandemic, on a weeknight, in quantities that he finds laughable and worth mocking, as he did with the Rowland/Pioneer school project, for outreach was limiting and exclusive to sixty residents within 300 ft, all in English, to residents who don’t speak English.

↓

Additionally, the site should be posted announcing any community outreach even when such meetings are taking place virtually.

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

Thank you for the opportunity to review and provide comments on the Draft IS/MND and the project in general. Like many residents, community means a lot to me.

Sincerely,

Lydia Kristine Frey



3.17
cont.

Letter 3

COMMENTER: Lydia Kristine Frey

DATE: no date

Response 3.1

The commenter requests information about the number of buildings to be demolished and the square footage of each building.

As described on Page 18 of the Draft IS-MND, the project would include the demolition of approximately 49,000 square feet of assorted school buildings. The school consists of one large semi-circular structure and three associated outbuildings, which have a combined total building area of approximately 49,000 square feet.

Response 3.2

The commenter states that the project description should indicate that the project site is a surplus school owned by the Covina Valley Unified School District (CVUSD). The commenter also states that CVUSD has not identified sites being received as part of the land exchange between CVUSD and the project applicant.

The Draft IS-MND states on page 4 that the project site was originally developed as an elementary school but was closed in 1979 due to low enrollment. Page 4 of the Draft IS-MND also indicates that the project site is currently developed with the Vincent Children's Center, which is operated by CVUSD. Page 4 of the IS-MND is further amended to clarify that the site is a surplus school, as follows:

The project site is currently developed with, and has until recently been used for¹, the Vincent Children's Center, a facility operated by the Covina Valley Unified School District (CVUSD) offering multiple services including after school child care, extended day child care, transitional kindergarten, and a preschool (CVUSD 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 project site is a surplus property owned by CVUSD.

Response 3.3

The commenter states that information regarding the existing zoning and permitted residential density are omitted from the Draft IS-MND, and that existing zoning currently permits 8 units per acre.

As stated on page 4 of the Draft IS-MND, the project site is currently zoned Residential (Single-Family) (R-1). The R-1 zone does not permit up to eight units per acre. The project site's current zoning falls within Area District I of zone R-1, which permits one residential dwelling per lot with a minimum lot size of 7,500 square feet and minimum dwelling size of 950 square feet pursuant to Section 26-401 of the West Covina Municipal Code. The project site is 350,810 square feet (8.05 acres). Assuming one dwelling per each 7,500 square feet, (the minimum lot size in the R-1 zone)

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.

approximately 46 dwelling units could be built on the site, which would result in a density of 5.7 dwelling units per acre (du/acre). However, the actual number of residential units that could be constructed on the site under the R-1 zone would depend on the manner in which the lot was subdivided, and the sizes of homes proposed, and would actually be less than 5.7 du/acre to allow for internal roadways and other required areas not occupied by residential lots. Regardless of the actual residential density that could be achieved on the site under existing zoning, page 91 of the Draft IS-MND acknowledges that the proposed project would have a higher density of residential units than permitted by the current zoning.

Response 3.4

The commenter provides an opinion that a minimum three-foot setback from the public right-of-way, including for project landscaping and walls, should be maintained.

As stated in Table 1 of the Draft IS-MND, "Patio walls shall be setback a minimum of 3-feet from public rights-of-way". City design review of the proposed plans would ensure that this requirement is adhered to.

Response 3.5

The commenter states that the project site is five acres and will not provide sufficient greenspace for the proposed number of residential units. The commenter also provides studies related to the effects of greenspace on health, property values, and other factors.

As stated on page 1 of the Draft IS-MND, the project site is 8.05 acres in size. The Specific Plan would establish minimum public and private open space and landscaping requirements to ensure that sufficient greenspace is provided on the project site. As shown in Table 1 of the Draft IS-MND, the project would include approximately 48,876 square feet of open space, as well as 109,237 square feet of landscaping (or 32 percent of the total project site).

Response 3.6

The commenter notes that the project site is within 500 feet of Interstate 10 (I-10) and that living near freeways can result in health impacts.

It is acknowledged that the southernmost portion of the project site is approximately 400 feet north of I-10 and that studies have shown living in proximity to freeways can result in health impacts to residents, particularly those vulnerable to pollution such as the elderly, children, and people with preexisting health conditions. However, CEQA Guidelines Section 15002(a) states that the purposes of CEQA are as follows:

1. Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities
2. Identify the ways that environmental damage can be avoided or significantly reduced
3. Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved

CEQA is therefore focused on identifying and mitigating the impacts of a project on the environment. As further clarified in the ruling for *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, CEQA addresses the impacts of a project on environmental hazards or conditions that already exist only insofar as whether the project would exacerbate such hazards or conditions. CEQA does not address the environmental impacts on residents of a proposed project. In other words, CEQA focuses on the analysis of the impacts of a project on the environment and not analysis of the environment's impacts on a project. It should also be noted that Subchapter 7, Section 150(m) of the 2019 California Energy Code requires the use of MERV 13 filters in all new residential buildings, which remove approximately 90 percent of diesel particulate matter, the main pollutant of concern for health risk associated with vehicular traffic on freeways, from the intake air.²

Response 3.7

The commenter expresses an opinion regarding the City's response to the COVID-19 pandemic.

This comment does not remark on the adequacy of the CEQA analysis and is beyond the purview of the IS-MND.

Response 3.8

The commenter provides a summary of findings related to vehicle traffic and health impacts.

The commenter is referred to Response 3.6 above.

Response 3.9

The commenter states that the project site is within an area mapped as a Disadvantaged Community in the Southern California Association of Governments (SCAG) mapping tool, provides background information regarding State regulations related to Disadvantaged Communities, and notes that Disadvantaged Communities are impacted by air pollution.

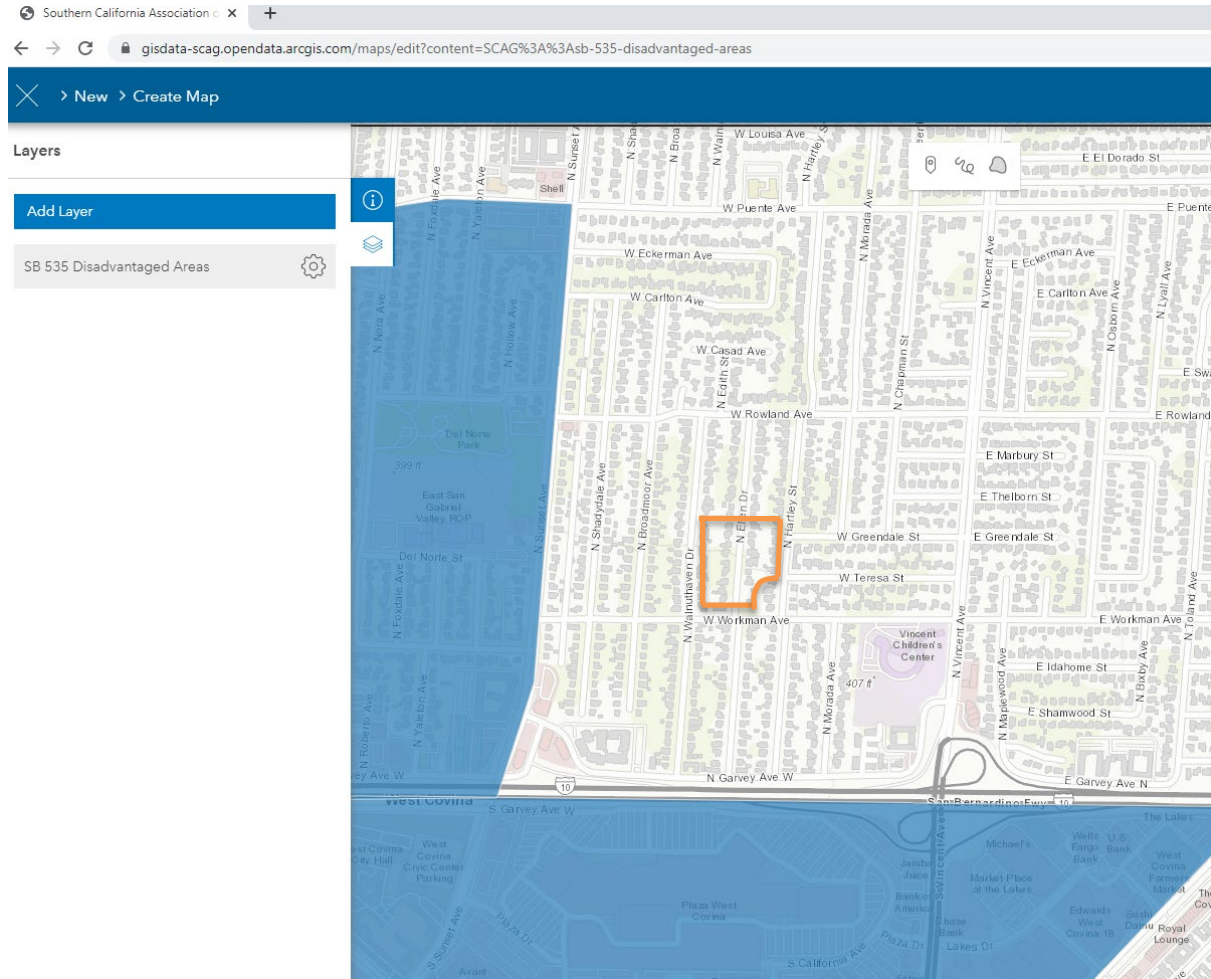
Figure 1 provides a screenshot of the SCAG disadvantaged areas mapping tool³, illustrating that the project site is not within an area mapped as a Disadvantaged community. Furthermore, the project's localized air quality impacts are evaluated in Section 3, *Air Quality*, of the Draft IS-MND using the South Coast Air Quality Management District's (SCAQMD) Localized Significance Thresholds (LSTs), which were developed in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4). The LSTs used in the analysis are described on pages 37 and 38 of the Draft IS-MND and are specific to the South San Gabriel Valley. As indicated in Table 5 and its associated discussion on pages 40 and 41 of the Draft IS-MND, the project's maximum on-site emissions during construction would not exceed the applicable LSTs. As stated on pages 37 and 38 of the Draft IS-MND, LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway. As such, LSTs are typically applied only to construction emissions because most operational emissions are associated with project-generated vehicle trips.

² Singer, B. C., W. W. Delp, D. R. Black, and I. S. Walker. 2016. Measured performance of filtration and ventilation systems for fine and ultrafine particles and ozone in an unoccupied modern California house. *Indoor Air*. LBNL-1006961. <https://escholarship.org/content/qt7x86h6ff/qt7x86h6ff.pdf> (accessed May 2021).

³ Southern California Association of Governments (SCAG). 2021. SB 535 Disadvantaged Areas Mapping Tool. https://gisdata-scag.opendata.arcgis.com/datasets/08b8b33a82b941ea878834be81c77b48_0?geometry=-117.949%2C34.072%2C-117.908%2C34.078 (accessed April 2021).

In addition, CEQA does not require an analysis of environmental justice issues or an analysis of the impact of the environment on future project users, as described in Response 3.6 above.

Figure 1 SCAG Disadvantaged Communities Mapping Tool⁴



Response 3.10

The commenter issues an opinion that CEQA and the City are not adequately protecting vulnerable populations.

This comment does not remark on the adequacy of the CEQA analysis prepared for the project and is beyond the purview of the IS-MND.

Response 3.11

The commenter states that a health risk assessment (HRA) is required for the project because the project site is within a locally Disadvantaged Community.

The commenter is referred to response 3.9 above.

⁴ The project site boundary is shown in orange and blue shaded areas represent disadvantages communities.

Response 3.12

The commenter states that the heat island effect of the proposed project would be detrimental to the health of residents and that the project's removal of trees would limit CO₂ sequestration (removal from the atmosphere) from trees and plants.

The project site is surrounded by existing development and is currently developed, with approximately 37 percent of the site consisting of buildings, paved parking, and other impermeable surfaces. Under the proposed project, the developed portion of the project site would be increased to 68 percent, as shown in Table 1 of the Draft IS-MND. As shown in Figures 6 through 10 of the Draft IS-MND, the project buildings are designed to use light colored materials and paint that reduce light and heat absorption. The project includes trees along the internal roadways and along the public right-of-way and would result in a net addition of 38 trees on the project site, which provide shading, increase the amount of carbon dioxide sequestration on the site (conservatively not included in the analysis of project GHG emissions), and reduce the potential for the heat island effect. According to the California Department of Public Health (CDPH), incorporating green space and tree canopy in neighborhoods with increased building density reduces the potential for urban heat island effects.⁵ Because the project site is already developed and is within a developed area, the proposed building materials and paint would reduce the absorption of light and heat, and the number of trees on the project site would be increased, the proposed project's contribution to the heat island effect, and any associated effects on residents, would be minimal.

Response 3.13

The commenter states that the Draft IS-MND incorrectly identifies the distance of the project site to Del Norte Park. The commenter also states that the project site is near Palm View Park in an area with inadequate parkland supply and within a Disadvantaged Community.

The Draft IS-MND incorrectly indicates that the project site is approximately 0.4 miles southeast of Del Norte Park. The IS-MND is revised as follows:

The nearest park to the project site is Del Norte Park located approximately ~~0.4 miles~~ 0.6-mile walking distance northwest of the site. The project site is also a 0.8-mile walk from Palmview Park, which includes walking paths, play structures, a baseball field, and a recreation center.

As discussed in Section 15, *Public Services*, and Section 16, *Recreation*, the proposed project would include recreational amenities onsite for residents and would not substantially decrease the City's ratio of parks to residents. Furthermore, the project would include payment of the City's impact fees that go towards park maintenance and development. Impacts related to parks and recreational facilities were therefore determined to be less than significant in the IS-MND.

Response 3.14

The commenter provides a discussion of the Clean Air Act, the South Coast Air Basin's nonattainment status for ozone standards, and the requirement for SCAQMD to establish strategies to achieve attainment of the ozone standards, including strategies to reduce VMT. The commenter states that the Draft IS-MND does not reference the adopted ozone thresholds.

⁵ CDPH. 2012. Climate Action for Health: Integrating Public Health into Climate Action Planning. February 2012. https://www.ca-ilg.org/sites/main/files/file-attachments/caps_and_health_published3-22-12.pdf?1370017309 (accessed May 2021).

Section 3, *Air Quality*, includes a discussion of the Basin’s nonattainment status for federal and State ozone standards and provides the applicable SCAQMD criteria pollutant thresholds for project construction and operation. Section 3, *Air Quality*, also describes how the SCAQMD has prepared a plan for air quality improvement for pollutants for which the Basin is in non-compliance (the 2016 Air Quality Management Plan) in order to satisfy state and federal air quality planning requirements. The Plan demonstrates strategies for attainment of the new federal eight-hour ozone standard and VMT emissions offsets, pursuant to recent USEPA requirements.⁶ Moreover, as discussed in the SCAQMD *CEQA Air Quality Handbook*, the thresholds are established, in part, based on Section 182(e) of the federal Clean Air Act’s thresholds for stationary emission sources in areas designated extreme nonattainment for ozone as well as other scientific and factual data contained in the federal and State Clean Air Acts.⁷ As described in Section 3, *Air Quality*, the project would not result in operational emissions (including mobile source emissions produced by project-related vehicle trips) of ozone precursors or any other criteria pollutant that exceed the applicable SCAQMD thresholds. Furthermore, as described in Section 17, *Transportation*, the project would not result in significant VMT impacts.

Response 3.15

The commenter states that the Vincent Children’s Center does not operate like a typical school and that the Institute of Transportation Engineers (ITE) trip rates do not accurately reflect the existing uses on the project site. Therefore, the transportation analysis should not account for the existing use on the project site when determining project impacts.

Page 118 of the Draft IS-MND addresses the unique nature of existing uses on the project site and the potential range of vehicle traffic associated with it as follows:

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 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.

As discussed in Section 17, *Transportation*, and described in detail in the Focused Traffic Analysis prepared by Ganddini Group (Appendix I of the Draft IS-MND), the project would generate approximately 971 daily trips and would not result in significant VMT impacts pursuant to the City’s established VMT criteria. As shown in Table 1 of the Focused Traffic Analysis, the analysis did not include a trip rate reduction for existing uses on the site.

Response 3.16

The commenter states that the project should include affordable housing units to justify project concessions.

⁶ SCAQMD. 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).

⁷ SCAQMD. 1993. CEQA Air Quality Handbook. April 1993.

The proposed project does not involve a request for density bonus or variance for the project site. Rather, the project proposes a new Specific Plan that would change the underlying land use and zoning designations of the project site and establish specific development standards that would apply to the site. This comment does not remark on the adequacy of the environmental review and no changes to the IS-MND are required in response, but it will be considered by the City.

Response 3.17

The commenter requests additional community outreach regarding the project in multiple languages. The commenter also requests that the City provide a full plan set on the website for public review.

While this comment does not remark on the adequacy of the environmental review and no changes to the IS-MND are required in response, the following information relating to public outreach for this project is provided in response to this comment.

Due to the COVID-19 pandemic a traditional community meeting for this project could not be held. However, the applicant sent out Community Outreach flyers in August 2020 and scheduled individual meetings with neighbors who responded to the flyers. In addition, the applicant is continuously working and meeting with adjacent neighbors. The project plans were posted on the City's website on April 22, 2021, and can be found at the following web address:
<https://www.westcovina.org/departments/community-development/planning-division/projects-and-environmental-documents>.

Letter 4

21 April 2021

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

RE: **Draft Initial Study and Mitigated Negative Declaration for Vincent Place Residential Project located at 1024 W. Workman Avenue, West Covina, 91790**

Dear Ms. Burns,

Thank you for the opportunity to review the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the project referenced above. The proposed project consists of 119 dwelling units comprised of 72 attached dwelling units and 47 detached dwelling units on an approximately 8.05-acre site.

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

Comments related to the Draft IS/MND

Section 4. Project Sponsor’s Name and Address

Property ownership should be included, which is:

Covina Valley Unified School District
Attn: Elizabeth Eminhizer, Superintendent
519 E. Badillo Street
Covina, CA 91723

4.1

Section 5. Project Location-

This section states that the project is served by “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.”

4.2

The Foothill Transit bus route 488 runs westbound and eastbound and the closet bus stop to the Project site is located at Vincent Avenue and Glendora Avenue, approximately 0.8 mile south from the project site. Please see attached map of bus stops and direction of Foothill bus route 488.

↑
4.2

Under Section 8 – Greenhouse Gas Emission General Plan Consistency, states that Foothill Transit bus 498 serves the area of the proposed project. It should be noted that the closest stop bus for Foothill Transit route 498 is located at the West Covina City Hall Park & Ride, which is approximately 1.5 miles from the proposed project site. Additional discussion is provided under the Transportation Section 17.

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4.3

Section 6. Existing Setting

Provide information regarding the number of buildings to be demolished and the square footage of each building.

↑
4.4

Section 9. Project Description

The description should also inform the public and reviewing public agencies that this is a surplus school by the Covina Valley Unified School District (CVUSD). The site is currently, which is public land, is under the ownership of the (CVUSD). The District has not yet identified sites being received as part of the “land exchange” between the CVUSD and Project Sponsor.

↑
4.5

The current zoning is Single-Family residential zone that allows a maximum density of 8 units per acre and the developer is seeking approval for up to 20 units per acre. This information is omitted and it does not inform the public what is currently allowed by right under the City’s General Plan and Development Code.

↑
4.6

Table 1 – Project Summary

Landscaping, Open Space, and Parking

Patio walls should not be allowed to encroach into front setback a minimum of 3-feet from public right-of-way. This allowance may result in the patios being enclosed. The Specific Plan does not include design guidelines. Additionally, the lot coverage and impervious surfaces would be increased, thus reducing the area where infiltration to groundwater can occur.

↑
4.7
↑
4.8

Section 11. Required Approvals

- *Adoption of the Vincent Avenue Specific Plan and zone change from Single-family Residential R-1/8 units per acre) to Vincent Avenue Specific Plan (up to 20 units per acre).*

↑
4.9

Section 4. Air Quality

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

↓
4.10

included in order to inform the public related to construction phasing, and construction staging.

The IS/MND does not include a discussion regarding the **siting of the project within less than 500 feet from the I-10 San Bernardino Freeway**. Air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. Many of these epidemiological studies have focused on children. A number of studies identify an association between adverse non-cancer health effects and living or attending school near heavily traveled roadways. These studies have reported associations between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreased lung function in children¹. The California Environmental Protection Agency California Air Resources Board (ARB), recommends avoiding siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural road with 50,000 vehicles/day. As stated in the ARBs Handbook, *“protecting California’s communities and our children from the health effects of air pollution is of the most fundamental goals of state and local air pollution control programs. Our focus on children reflects their special vulnerability to the health impacts of air pollution. Other vulnerable populations include the elderly, pregnant women, and those with serious health problems affected by air pollution.”*

Air pollution studies also indicate that living close to high traffic roads and associated emissions may lead to adverse health effect beyond those associated with regional air pollution in urban areas. The findings of these studies concluded that siting housing projects/sensitive land uses within close proximity of freeways increases both exposure and the potential to adverse health effects. Other affects associated with traffic emissions include premature death in elderly individuals with heart disease.

Key Health Findings²

- *Reduced lung function in children was associated with traffic density, especially trucks, within 1,000 feet and the association was strongest within 300 feet. (Brunekreef, 1997)*
- *Increased asthma hospitalization were associated with living within 650 feet of heavily traffic and heavy truck volume. (Lin, 2000)*
- *Asthma symptoms increased with proximity to roadways and the risk was greatest within 300 feet. (Venn, 2001)*
- *Asthma and bronchitis symptoms in children were associated with proximity to high traffic in a San Francisco Bay Area community with good overall regional air quality. (Kim, 2004)*
- *A San Diego study found increased medical visits in children living within 550 feet of heavy traffic. (English, 1999)*

These studies show the association of traffic-related emissions with adverse health effects, which was seen within 1,000 feet and was strongest within 300 feet. The proposed project is located less than 500 feet from the I-10 San Bernardino Freeway. Table 2 Health Effects Associated with Non-Attainment Criteria Pollutants of the IS/MND page 36, are stated as an informational table without any analysis related to the siting of the project and potential adverse health impacts to the proposed housing project.

¹ Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.
² Id., Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.

Additionally, the project site is located within a locally Disadvantaged Community (see attached map). Although the City of West Covina General Plan does not include an Environmental Justice Element, the Southern California Association of Governments (SCAG) has created a map tool that identifies locally disadvantaged communities. To this end, Senate Bill 1000 (SB 1000), the Planning for Healthy Communities Act, signed into law by Governor Jerry Brown on September 24, 2016, mandates that cities and counties adopt an environmental justice (EJ) element or integrate EJ goals, objectives, and policies into other elements of their general Plans. SB 1000 goal includes, but not limited to the following:

- To protect public health and regenerate environment;
- Build trust and good working relationship with stakeholders; which strengthening community ownership over the process;
- Demonstrate a commitment to reducing and preventing disproportionate negative impacts on vulnerable residents and neighborhoods.

Assembly Bill 617 also includes several of the same key terms found in SB 1000 that define the term “disadvantaged community” as: (1) areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation; and (2) areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educations attainment³.

One of the primary goals of CEQA is to “Develop and maintain a high-quality environment now and in the future, and take all caution necessary to protect, rehabilitate, and enhance the environmental quality of the State.”⁴

For example, another goal of CEQA is to “Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historical environmental qualities, and freedom from excessive noise.”⁵ Similarly, CEQA was also intended to “Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian,” a goal that “shall be the guiding criterion in public decision.”⁶

Despite the legislative intent to provide every Californian with a “decent home and suitable living environment,” a significant number of Californians in disadvantaged communities are impacted by high levels of air pollution. In some way, CEQA has failed to protect too many of the state’s most at-risk residents.

Together, SB 1000 and AB 617 were signed into law to protect the at-risk communities that were contemplated in the legislative findings of CEQA, but not subsequently afforded the level of protection necessary to prevent “environmental injustice.”

³ Cal. Health and safety Code § 39711; Assembly Bill 617 July 26. 2017)

⁴ Ca. Public Res. Code § 21001(a)

⁵ Id., § 21001(b)

⁶ Cal. Gov. Code § 65040.12

As such, the Air Quality Analysis must include a Health Risk Assessment and address the relationship of its finding upon a locally disadvantaged community. Since the IS/MND is silent on health risks associated with the siting of the project, it is premature to speculate mitigations through design and layout to improve potential adverse impacts. Additional comments may follow once the Air Quality Analysis and Health Risk Analysis is completed and made available for public review.

4.11
cont.

Section 8 Greenhouse Gas Emissions

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

Reduction Strategy	Project Inconsistency
<ul style="list-style-type: none"> ▪ Emphasize land use patterns that facilitate multimodal access to work, education 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 ▪ Prioritize infill and redevelopment of underutilize land to accommodate new growth, increase amenities and connectivity to existing neighborhoods ▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or location and orienting close to existing destinations) ▪ Identify way to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking) 	<p>No existing public transit facilities are located near the project site. The closest stop bus for Foothill Transit route 498 is located at the West Covina City Hall Park & Ride, which is approximately 1.5 miles from the proposed project site.</p> <p>There are no existing bike lanes along the project site or near the project site as shown Figure 7 -City of West Covina Proposed Bicycle Network of the Focused Traffic Analysis. Therefore, the proposed project is not focusing growth near existing destinations and mobility options.</p> <p>The project provides more parking than required by the City’s zoning code. At total of 268 spaces are required by ordinance and a total of 294 parking spaces are proposed. The project does not identify any strategies that include shared parking, parking management, smart parking, etc.</p>

4.12

Table 13 West Covina General Plan Inconsistency Analysis

General Plan Inconsistency Analysis
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General Plan Goals/Policy/Action		Inconsistency Analysis
Our Natural Community		
Air-P1.1	Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.	<p>No existing public transit facilities are located near the project site. The closest stop bus for Foothill Transit route 498 is located at the West Covina City Hall Park & Ride, which is approximately 1.5 miles from the proposed project site.</p> <p>There are no existing bike lanes along the project site or near the project site as shown Figure 7- City of West Covina Proposed bicycle Network of the Focused Traffic Analysis. Therefore, the proposed project is not focusing growth near existing destinations and mobility options.</p> <p>Providing more parking than required, as this project does, encourages driving, which will generate more vehicle emissions.</p>
Our Well Planned Community		
Goal:	Our goal is to direct new growth to the downtown area where development pressures are the greatest and change is desired, while protection the stable residential areas; target housing and job growth in strategic area along the corridor; and encourage pedestrian-oriented-use development, while providing vibrant public	The project site is located within an established neighborhood and it is not located within the City’s Downtown as defined in the Downtown Specific Plan and the City’s General Plan.

4.13

4.14

General Plan Inconsistency Analysis

P 3.1	gathering places. Preserve existing housing stock	
A 3.1	Incorporate standards in the development code to preserve the existing form and character of stable residential areas and prevent encroachment of incompatible land uses and intensity	The current zoning for the project site is Single-Family residential (R-1 Neighborhood Low) zone that allows a maximum of 8 dwelling units per acre. The project would allow up 20 units per acre with a maximum height of 38 feet for the proposed townhomes, where a maximum of 25 feet is allowed and maximum two-story. The proposed height and density are not consistent with the GP polices and action P.31. and A.3.1. The proposed project is incompatible with the existing established neighborhood.
P 3.3	New growth will complete, enhance, and reinforce the form and character of the unique West Covina neighborhoods, districts, and corridors.	The proposed project doesn't respect the existing neighborhood fabric. The project is introducing development standard that otherwise don't exist within the established neighborhood through a specific plan that it does not reinforces the form and character of the neighborhood.
P 3.4	Direct new growth to downtown area and the corridors. Adapt economically underused and blighted buildings, consistent with the character of surrounding districts and neighborhoods, to support new uses that can be more successful. Provide opportunities for healthy living, commerce, employment, recreation, education, culture, entertainment, civic engagement, and socializing.	The project site is not located within the downtown. The project site is located within 500 feet from the I-10 San Bernardino Freeway within a locally disadvantaged community. Due to the proximity to the freeway, the proposed project will not provide a healthy living nor access to housing for those seeking very low, low- and moderate-income housing.

4.15

4.16

Our Accessible Community

General Plan Inconsistency Analysis

P 4.5	<p>Work to eliminate barriers to pedestrian and bicycle travel</p> <p>Allocate street space equitably among all modes</p>	<p>The Project is not proposing any off-site improvement to facilitate bicycle lanes nor has the City established a mitigation fee structure to have project contribute to the construction/installation of bike lanes. Providing more parking spaces is a barrier to promote pedestrian and bicycle travel. Therefore, street space or public right-of-way space is not equitably distributed among all modes of transportation/mobility.</p>
<p>Our Resilient Community</p>		
P 5.2	<p>Allocate land uses based primarily on the control of physical form, intensity, and arrangement of buildings, landscapes, and public spaces that enable land and building functions to adapt to economic, environmental, energy, and social changes over time.</p>	<p>The project is not respecting the physical form, intensity, and arrangement of building, landscapes, setback, and height to be compatible with the neighborhood.</p>
P 5.4	<p>Buildings, lots, and blocks primarily scaled around the pedestrian and transit, creating a human-scaled spatial enclosure. Buildings should be informed by surrounding physical context, the adjacent landscapes, structures, local conditions, building traditions, and the microclimate.</p>	<p>The proposed buildings within the proposed project do not contribute to the existing pedestrian and human-scaled spatial enclosures. The proposed project is not considering the physical context, the adjacent landscape setbacks, local conditions and building traditions. The project disregard all of these aspects and introduces a project that makes no effort to complement the existing fabric of the neighborhood that can be achieved through a thoughtful design.</p>
P 5.9	<p>Provide adequate facilities and Services for the collection, transfer, recycling, and disposal</p>	<p><i>Consistent.</i> <i>The proposed project would include trash enclosures that provide separate waste disposal and recycling</i></p>

4.17

4.18

4.19

4.20

General Plan Inconsistency Analysis

	of refuse	<p><i>containers and would be served by Athens Services, the existing waste hauler for the City.”</i></p> <p>Contrary to the statement above, the project will not provide trash enclosures. However, the project should be designed to provide trash enclosures rather than assuming that future residents will be keeping trash receptacles within their garages. Additionally, as shown on the Focused Traffic Analysis Figures 11 through 18, the project doesn’t provide a hammer head for the trash truck to safely turn-around in the narrow network of 20 feet wide driving aisles. Additionally, the truck specifications of a “Modern Garbage Truck” does not include a measurement unit. Presumably the metric unit is meter. Aesthetically and operationally, the proposed method of trash collection would result in adverse impact for those living in the community and the residents of the established neighborhood.</p>
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4.20
cont.

Our Healthy Community

P 6.1	Promote and support transportation decision that reduce driving and increase rates of transit use, walking, and biking.	The Project site is not located within ½ mile access from transit. There are not existing or proposed bike lanes and not adequate amount of tree shade to provide a comfortable walking environment.
P 6.5	Seek to increase its amounts of parks and trails to support physical activity and reduce the incidence of chronic illness	The project proposed an outdoor space. However, the project is located within less than 500 feet from the I-10 San Bernardino Freeway.

4.21

4.22

Housing Element

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General Plan Inconsistency Analysis			
Goal 1	Maintain and enhance the quality of existing housing and residential neighborhoods in West Covina.	The proposed project doesn't enhance the quality of the existing residential neighborhoods. The houses. The proposed dwelling units are not well designed and are boxes being dictated by garages. The units lack form and articulation when compared to the existing homes within the neighborhood	4.23
Goal 4	Promote equal housing opportunity for all residents.	The Specific Plan deviates from the City's regulations in terms of setbacks, height, floor area ratio (FAR), lot coverage, and density through a Specific Plan. The project offers no affordable units as a community benefit. The Project excludes residents in the very-low, low- and moderate-income levels of the population.	4.24

13 Noise

This section does not include a discussion of the I-10 San Bernardino noise levels. No design features are discussed that would attenuate the noise impacts from inside each unit so that the interior noise does not exceeds 45 CNEL as required by the 2019 CBC, Title 24, Part 2, Section 1206.4.

The environmental analysis should include construction phasing to better understand the order in which the units will be constructed. Also, construction staging areas should be identified and be placed as further away possible from sensitive receptors.

Section 15 Public Services

a.2 The project will increase the population at least by 399 persons. The Police Department is already operating below the national average. How are the impacts associated with the increase in population being mitigated for a Police Department that is already working at low staffing levels?

a.3 The analysis does not disclose which school district, schools, and school's capacity to serve the proposed project.

a.4 *"The nearest park to the project site is Palm View Park located approximately 1-mile northeast of the site and Del Norte Park located approximately 0.4 1.1. miles northwest of the site."*

Based on the Los Angeles County Park Need Assessment, the project is located in an area with high need of parkland. It should be noted that Covina Valley Unified School District has fenced off all school sites that no longer provides access to the open space within school sites for recreational purposes. As stated above, the project site is located within a locally Disadvantaged Community, which includes lack of access to parks, recreational amenities and adequate public services.

4.29
cont.

Section 16 Recreation

See comments under Section 15 Public Service above.

Section 17 Transportation

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

4.30

Project Trip Generation and Distribution - The vehicle trips generation applied is based ITE Trip Generation rather than student enrollment as reported to the California Department of Education. The programs provided at the former Vincent Children’s Center included OPTIONS learning programs. The site provided limited services with low enrollment of children and few employees. Therefore, the services provided at the site did not generate the number of vehicles trips per the ITE Land Use Code 565 and 520. An analysis based on the number of students and number of employees would be the appropriate analysis to establish a baseline for daily trip generation. The site has operated with a low level of enrollment for at least the past 25 years (reason for the school site being surplus by CVUSD). Enrollment data can be obtained from the California Department of Education. Taking credit for vehicle trips that have not existed provides an inaccurate analysis that leads to an inaccurate disclosure of the transportation/traffic impacts that the proposed project will have in the area. As stated in Table 12, Section 8 – Greenhouse Gas Emissions, *“the project is an infill redevelopment that would replace **the existing underutilized school buildings on the project site with new**”* However, the Focus Traffic Analysis assumes that this was a use that was operating at full capacity as other elementary schools nearby the site (e.g., Rowland Elementary School).

4.31

17 a. This section states that the site is currently served by Foothill Transit bus Routes 488 and 498 along West Workman Avenue, however, it fails to inform the public that the nearest bus stops for both these routes are located 0.8 mile south from the project site at Vincent Avenue and Glendora Avenue and 1.5 miles west at West Covina City Hall Park & Ride, respectively.

4.32

17 b. This section asserts that *“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*

4.33

lower than the San Gabriel Valley Council of Governments (SGVCOG) average.” No substantial evidence is provided to reach such conclusion. Simply stating that the project screens out is inaccurate as the project is not within a Transit Priority Area and it is not consistent with the City of West Covina VMT Thresholds adopted in Resolution No. 2020-57, which is attached to this letter.

The Los Angeles-South Coast Air Basin is classified as an extreme non-attainment area for ozone as identified by the Federal Clean Air Act (Act). The Act contains requirements applicable to nonattainment areas, depending on the severity of the ozone problem in the area. One of the requirements for nonattainment areas is to develop enforceable transportation strategies and control measure “to offset any growth in emissions from growth in vehicle miles traveled... and to attain reduction in motor vehicle emissions as necessary.”

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

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

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

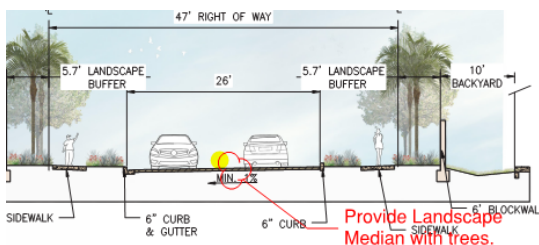
The project also proposes more parking spaces than required per the West Covina Zoning Code 26-506, such a strategy is contrary to the OPR Guidance for screening out projects as it relates to SB 743 as explained above. The project is also inconsistent with the applicable Sustainable Communities Strategy as indicated in Section 8 Table 12 under Greenhouse Gas Emissions.

The Focused Traffic Analysis does not provide any output sheets generated by the SGVCOG web-based tool that allows staff and developers to determine if a proposed project would require a full VMT analysis based on each City’s adopted CEQA criteria. Therefore, the Transportation Section of IS/MND fails to provide substantial evidence that supports the conclusion that the project screens out because it 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 transportation impacts associated with the proposed project.

Design and Layout Concerns of Proposed Project

1. It appears that a double wall condition will be created by the proposed development along the west property line. A double wall condition should be avoided and it would be best to work with the residents to have one uniform wall at the property line. The Specific Plan indicates a proposed 6'-0" high split-face CMU wall, with 4" high split-face CMC Cap (tan color). The plans don't show the location of the existing wall, including the existing chain link fence and whether the chain link fence will be removed or preserved. Section 26-414 of the West Covina Municipal Code requires that any combination of parallel retaining walls constructed in combination with other retaining walls, screen walls and/or fences on the same property that are separated and approximately parallel to each other shall be separated by a horizontal distance of three (3) feet or greater. Where two (2) or more wealls and/ or fences are approximately parallel to each other and separated by a horizontal distance of less than five (5) feet, the parallel walls and/ or fences shall be treated as a single wall and the height shall be measured at continuous points from the lowest adjacent finished grade of the lowest wall or fence segment to the top of the highest wall or fence segment. The area between parallel retaining walls and other walls and fences shall be landscaped such that a minimum of two-thirds (2/3) of the wall surface will be screened from view once the landscaping reaches maturity
2. The wall return for the proposed single-family units along the east elevation proposes a 6'-0" high split face wall, with 4" split-face CMU cap. It would be advisable to construct a 7- or 8-foot high split-face CMU wall to avoid future residents from increasing the height of the wall with a different material for privacy.
3. Provide a minimum of 25 feet font yard landscape to match the existing front yard setback required of the adjacent single-family homes in the area.
4. Provide trash enclosures to serve the development rather than relying on each future resident to comply with the rules regarding trash containers being put away. Having trash receptacles throughout the narrow network of driving aisles will be aesthetically unpleasing for the residents and adjacent neighbors and operationally is not an ideal condition.
5. Provide landscape pockets where the garage doors are proposed to break up the pavement.
6. Provide a landscape median at the entrances off Workman and Garvey Avenue.

4.34



7. Please indicate the location water heaters. If the proposed tankless water heater, please include a note on the plans. Also, the air conditioner units for the attached units along Vincent are shown in the landscape plans and are located where they will be might be visible from the public right-of

-way. However, the elevations don't show the A/C units. Please demonstrate how these units will be properly screened from public view.

8. Please clarify the type of Tract Map being proposed. Are the townhomes being processed as condominiums with air rights and the single-family fee simple? Please explain what is being proposed as part of the Tract Map.
9. All utilities including cable must be underground. Please confirm.



10. All the units are design (detached homes) boxy and their configuration are being dictated by the garage.
11. The front elevation of the units along Workman Avenue lack architectural interest. The front doors are not centered in the front porch/projection proposed. This makes the front entrance appearance very odd. For the Spanish design (1), please incorporate recessed windows (3-inch minimum) and combination of arched windows to provide a more interesting window fenestration. The larger window on the ground floor can be an arched window, which can be a focal/architectural feature that won't need wood shutters. The front projection should incorporate the same type of clay pipe vents as proposed in the second story. Also, wrought iron embellishments can help in breaking the massing of the front elevation. Windows on the second story should also be recessed.
12. Design #2, incorporate recessed windows, center the door, the straight wall should be the portion of the structure setback further away from the street and the portion of the structure that has articulation should be projecting forward.
13. The same applies to Design #4. By projecting the portion of the structure with the larger windows closer to the street, it provides a better relationship with the street and a superior human scale. Provide some type of brick or stacked stone wainscoting along the front elevation wrapping at least 24 inches on the sides. Replace the round columns with square columns using 6" x 6" posts. The thickness of the round columns is out of scale with the proportions of the proposed units using this design.
14. Design #3, center front door with the front projection element, provide a river rock wainscoting across the front elevation wrapping at least 24 inches on the sides, and incorporate river rock at the base of the proposed tapered columns.
15. Same as Design #2.
16. Incorporate nicer garage doors.

4.34
cont.

17. Off-set wall planes for the Santa Barbara elevation. Enhance the entrance so the front door is not just an opening in the front wall plane. Recessed windows and incorporate nice/good quality arched windows in the front elevation as well as on the second story elevations. The same comments apply to the Coastal – Lane Elevations and Farm House Lane Elevation and all Motor Court Elevations. Although the units might not be seen from the street, well design units will convey quality and care in the way the development was designed.
18. The Spanish and Santa Barbara design should be smooth stucco. The colors are typically more earth color tones or simple terra cotta tile roof as proposed with smooth finish off-white colored stucco. Incorporating too many colors might not be the best idea for this type of architectural design.
19. The attached units, as designed, lack articulation, visual interest, and gives the appearance of being apartment units for rent rather than ownership units. This type of housing should be well-designed to enhance the area rather than to distract from it.

4.34
cont.

Project's Concessions

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

- Building intensity – up zoning the site from 8 units per acre to allow up to 20 dwelling units per acre.
- Building setbacks
- Building height
- Lot Coverage - The underlying zoning of Single-Family Residential zone allows for a maximum lot coverage of 35 percent. Section 26-510 of the West Covina zoning code allows a maximum of 55% lot coverage for MF-15 and MF-20 zones. The project proposes almost 70% lot coverage.
- Landscape requirements

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

4.35

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

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

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

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

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

4.35
cont.

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

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

4.36

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

Thank you again for the opportunity to review and provide comments related to the Draft IS/MND and the overall project.

Sincerely,

West Covina Improvement Association

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

Letter 4

COMMENTER: West Covina Improvement Association

DATE: April 21, 2021

Response 4.1

The commenter requests that information regarding the property owner is included in the IS-MND.

The following information regarding the current project site property owner has been added to page 1 of the IS-MND:

Covina Valley Unified School District
Attn: Elizabeth Eminhizer, Superintendent
519 East Badillo Street
Covina, CA 91723

Response 4.2

The commenter states that the nearest Foothill Transit bus route 488 bus stop is 0.8 mile south of the project site and that the IS-MND incorrectly identifies the direction of travel of the bus route.

Figure 2 provides a screenshot of Google Street View imagery dated December 2020 showing the Foothill Transit bus route 488 bus stop located at the northwest corner of Vincent Avenue and West Workman Avenue. In addition, Figure 3 provides screenshots from the Metro Trip Planner⁸ and Google Maps Trip Planner⁹ tools indicating that there are active bus stops for Foothill Transit Route 488 at the intersection of Vincent Avenue and West Workman Avenue. Page 1 of the IS-MND is revised to state, “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~~ westbound, and the other at the southeast corner of Workman and Vincent and serving Foothill Transit bus route 488 ~~northbound~~ eastbound.”

⁸ Metro. Trip Planner.

http://socialtransport.org/tm_pub_start.php?svc=metro&place0=1024+W+Workman+Ave%2C+West+Covina%2C+CA+91790&place1=1000+W+Foothill+Blvd%2C+Glendora%2C+CA+91741&dirflg=rB&timecrit=LV&hour0=03&min0=44&m0=p&fht_date=&fht_time=&day0=Today (accessed April 2021).

⁹ Google Maps. Route Planner.

<https://www.google.com/maps/dir/1024+W+Workman+Ave,+West+Covina,+CA+91790/APU+%2F+Citrus+College+Station,+Azusa,+CA+91702/@34.1351854,-117.8935324,17z/am=t/data=!4m19!4m18!1m5!1m1!1s0x80c2d7d9cd46f1f7:0x457995b03a562e512m2!1d-117.9275089!2d34.0749019!1m5!1m1!1s0x80c327b84ea423a9:0xfa2bbec686e84324!2m2!1d-117.8917186!2d34.1368109!2m4!5e0!6e4!7e2!8j1619711040!3e3> (accessed April 2021).

Figure 2 Foothill Transit Route 488 Bus Stop Location



Figure 3 Foothill Transit Route 488 Metro and Google Maps Trip Planner Tools

Metro Trip Planner

New Trip | Nexttrip | Metro Fares & TAP | How to Ride Metro | Regional Partners

Trip Details

You are traveling on **?day?** and **Leaving at 6:12AM**. Fare class: **Regular**. Max walk: **1/3 Mile**. Mode: **ANY**.

Tip: Click on a location to view on the map.

Starting at 1024 W WORKMAN AV
 Find Nearby... [Pass/TAP Outlets](#) | [Park & Ride Lots](#)

Ride Foothill Transit 488 [EL MONTE] heading south

From: **Vincent Av/Workman Av NW corner Lv: 06:40AM**

To: **Francisquito Av/Sunset Av NE corner Ar: 06:53AM**

Pay \$1.75, Monthly Pass: \$60.00, EZ Pass accepted

Ride Foothill Transit 281 [GLENORA] heading north

From: **South Sunset Avenue / West Francisquito Avenue SE corner Lv: 06:58AM**

To: **West Foothill Boulevard / North Galanto Avenue Ar: 07:45AM**

Pay \$1.75, Monthly Pass: \$60.00, EZ Pass accepted

Ending at 1000 W FOOTHILL BLVD
 Find Nearby... [Pass/TAP Outlets](#) | [Park & Ride Lots](#)

1024 West Workman Avenue, West Covina, CA 91790

4:19 PM - 5:13 PM (54 min)

488

4:21 PM from Vincent Ave and Workman Ave N
 f 6 min every 30 min

ADD TO CALENDAR

SCHEDULE EXPLORER

- 4:19 PM ○ 1024 W Workman Ave
 West Covina, CA 91790
- Walk
 About 2 min, 453 ft
- 4:21 PM ○ Vincent Ave and Workman Ave N
- 488 East Glendora Citrus College
 48 min (26 stops) - Stop ID: 2651
- 5:09 PM ○ Foothill Blvd and Citrus Ave N
- Walk
 About 4 min, 0.2 mi
- 5:13 PM ○ APU / Citrus College Station
 Azusa, CA 91702

Tickets and information
 Foothill Transit - Ticket information

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

Response 4.3

The commenter requests that the IS-MND note the nearest bus stop for Foothill Transit bus route 498 in Section 8, *Greenhouse Gases*, and Section 17, *Transportation*.

The nearest bus stop for Foothill Transit bus route 498 is located approximately 0.4-mile walking distance at the intersection of Vincent Avenue and Plaza Drive. Table 13 of the IS-MND is amended as follows:

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 and is approximately 0.4-mile from bus stops that serve the Foothill Transit bus route 498.

The second paragraph of impact analysis 17a. in Section 17, *Transportation*, is also amended to include the following:

The nearest bus stops for Foothill Transit bus routes ~~488~~ is approximately 87 feet from the project site at the intersection of West Workman Avenue and North Vincent Avenue, and the nearest stop for Foothill Transit bus route 498 is approximately 0.4-mile south of the project site at the intersection of Vincent Avenue and Plaza Drive.

Response 4.4

The commenter requests information about the number of buildings to be demolished and the square footage of each building.

As described on Page 18 of the Draft IS-MND, the project would include the demolition of approximately 49,000 square feet of assorted school buildings. The school consists of one large semi-circular structure and three associated outbuildings, which have a combined total building area of approximately 49,000 square feet.

Response 4.5

The commenter states that the project description should indicate that the project site is a surplus school owned by the Covina Valley Unified School District (CVUSD). The commenter also states that CVUSD has not identified sites being received as part of the land exchange between CVUSD and the project applicant.

The Draft IS-MND states on page 4 that the project site was originally developed as an elementary school but was closed in 1979 due to low enrollment. Page 4 of the Draft IS-MND also indicates that the project site is currently developed with the Vincent Children's Center, which is operated by CVUSD. Page 4 of the IS-MND is further amended to clarify that the site is a surplus school, as follows:

The project site is currently developed with, and has until recently been used for¹⁰, the Vincent Children's Center, a facility operated by the Covina Valley Unified School District (CVUSD) offering multiple services including after school child care, extended day child care, transitional kindergarten, and a preschool (CVUSD 2021). The campus was originally developed as an elementary school site but was shut down in 1979 due to a declining student population. Special

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.

Education preschool classes, a General Child Care Program, and County Special Education classes were then moved to the campus. The project site is a surplus property owned by CVUSD.

Response 4.6

The commenter states that information regarding the existing zoning and permitted residential density are omitted from the Draft IS-MND, and that existing zoning currently permits 8 units per acre.

As stated on page 4 of the Draft IS-MND, the project site is currently zoned Residential (Single-Family) (R-1). The R-1 zone does not permit up to eight units per acre. The project site's current zoning falls within Area District I of zone R-1, which permits one residential dwelling per lot with a minimum lot size of 7,500 square feet and minimum dwelling size of 950 square feet pursuant to Section 26-401 of the West Covina Municipal Code. The project site is 350,810 square feet (8.05 acres). Assuming one dwelling per each 7,500 square feet, (the minimum lot size in the R-1 zone) approximately 46 dwelling units could be built on the site, which would result in a density of 5.7 dwelling units per acre (du/acre). However, the actual number of residential units that could be constructed on the site under the R-1 zone would depend on the manner in which the lot was subdivided, and the sizes of homes proposed, and would actually be less than 5.7 du/acre to allow for internal roadways and other required areas not occupied by residential lots. Regardless of the actual residential density that could be achieved on the site under existing zoning, page 91 of the Draft IS-MND acknowledges that the proposed project would have a higher density of residential units than permitted by the current zoning.

Response 4.7

The commenter provides an opinion that a minimum three-foot setback from the public right-of-way, including for project landscaping and walls, should be maintained.

As stated in Table 1 of the Draft IS-MND, "Patio walls shall be setback a minimum of 3-feet from public rights-of-way". This comment does not remark on the adequacy of the environmental analysis. City design review of the proposed plans would ensure that this requirement is adhered to.

Response 4.8

The commenter states that impervious surfaces would be increased on the site, which reduces groundwater infiltration.

Section 10, *Hydrology and Water Quality*, of the Draft IS-MND notes that the proposed project would result in increased impervious surface on the project site compared to existing conditions. However, as discussed in Section 10, *Hydrology and Water Quality*, the project would include catch basins, biofiltration, and other best management practices to address stormwater runoff and infiltration, consistent with the requirements of the West Covina Municipal Code and National Pollution Discharge Elimination System permitting program, and no significant impacts related to groundwater infiltration were identified.

Response 4.9

The commenter states that the Single-Family Residential (R-1) zone allows up to 8 units per acre and that the proposed Specific Plan would allow up to 20 units per acre.

The commenter is referred to Response 4.6 above.

Response 4.10

The commenter requests that information regarding construction phasing and staging be added to the IS-MND.

As described on page 19 of the Draft IS-MND, 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 phasing information has not been determined at this time. The following information has been added to page 19 of the Draft IS-MND to clarify construction staging: “Construction staging would occur within the project site boundaries.” Mitigation Measure N-1, detailed on pages 106 and 107 of the Draft IS-MND, requires construction staging to be located as far as possible from adjacent residential buildings.

Response 4.11

The commenter notes that the project site is within 500 feet of Interstate 10 (I-10) and that living near freeways can result in health impacts. The commenter also states that the project site is within an area mapped as a Disadvantaged Community in the Southern California Association of Governments (SCAG) mapping tool, provides background information regarding State regulations related to Disadvantaged Communities, and notes that Disadvantaged Communities are impacted by air pollution. The commenter states that a health risk assessment (HRA) is required for the project because the project site is located near the freeway and is within a locally Disadvantaged Community.

The commenter is referred to Responses 3.6 and 3.9 above.

Response 4.12

The commenter provides an opinion that the project is inconsistent with the SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) because the project site is not located near bus stops, there are no bike lanes near the project site, and the project provides more parking spaces than required by the existing site zoning.

The commenter is referred to Response 4.3, which illustrates that the project site is within 0.25-mile of bus stops that serve Foothill Transit bus route 488. Section 8, *Greenhouse Gas Emissions*, and Section 17, *Transportation*, acknowledge that there are no existing bike lanes within the vicinity of the project site, but that 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 project would establish a new Specific Plan and zoning designation for the project site, which would include the establishment of parking regulations appropriate for the proposed uses. The project is an infill project within an existing residential area that would replace underutilized uses currently existing on the project site, which is consistent with the 2020-2045 RTP/SCS. Furthermore, the project site is located in a Priority Growth Area¹¹ identified by SCAG because it is within a High Quality Transit Area¹². According to the 2020-2045 RTP/SCS (also called Connect SoCal), “Priority Growth Areas (PGAs) follow the principles of center focused placemaking and are locations where many Connect SoCal strategies can be fully realized. Connect SoCal’s PGAs... account for only 4 percent of region’s

¹¹ SCAG. 2021. Priority Growth Areas Map. https://hub.arcgis.com/datasets/0da9bc5fba2d4b409c8f166166bf8888_6?geometry=-117.968%2C34.069%2C-117.887%2C34.081 (accessed May 2021).

¹² SCAG. 2021. High Quality Transit Areas 2015 Map. https://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-117.948%2C34.072%2C-117.907%2C34.078 (accessed May 2021).

total land area, but implementation of SCAG’s recommended growth strategies will help these areas accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045.” As described in Section 8, *Greenhouse Gases*, the proposed project is consistent with the 2020-2045 RTP/SCS. .

Response 4.13

The commenter provides an opinion that the project is inconsistent with the City’s General Plan Policy P1.1 because the project site is not located near bus stops, there are no bike lanes near the project site, and the project provides more parking spaces than required by the existing site zoning.

The commenter is referred to Response 4.12 above.

Response 4.14

The commenter states that the project is inconsistent with the City’s General Plan “Our Well Planned Community” goal to direct new growth to the downtown area, protect stable residential areas, target housing and job growth in strategic areas, encourage pedestrian-oriented mixed development, and provide vibrant public gathering places because the project site is not within the downtown area.

It is acknowledged that the project site is not within Downtown West Covina. However, the project site is zoned for residential use and is located within a residential area of the City. The project would replace existing underutilized school buildings with residential uses that would be similar to and aesthetically compatible with the residential neighborhood surrounding the site, which is consistency with several policies and Actions within the “Our Well Planned Community” Chapter of the General Plan, as described in Responses 4.15 and 4.16, below. Additionally, the project would expand housing opportunities and options for homeownership within the City, which is consistent with the Housing Element (included under the “Our Well Planned Community” Chapter of the General Plan) goals to provide a variety of housing types and increase housing production within the City. As described in Table 13 in Section 8, *Greenhouse Gases*, and in Section 11, *Land Use and Planning*, the proposed project is generally consistent with the goals and policies of the General Plan.

Response 4.15

The commenter offers an opinion that the project is inconsistent with the City’s General Plan Policy P3.1, Action A3.1, and Policy P 3.3 because it would allow for greater development intensity on the site than the current zoning allows and would introduce denser development compared to nearby residential uses.

The commenter is referred to Response 4.6, above, regarding the existing site zoning and permitted density on the site. As discussed therein, the project would establish a new zoning designation and Specific Plan to regulate development on the project site. It is acknowledged throughout the Draft IS-MND that the proposed project would increase development intensity on the site. Nonetheless, the project would not introduce any incompatible uses to the area and would be consistent with existing residential development surrounding the site by adding residential uses to the site, with single-family units concentrated along the northern and western boundaries of the site adjacent to existing single-family residential development, and the attached townhome units concentrated along North Vincent Avenue and West Garvey Avenue North, where denser multi-family residential and commercial development is already present. Furthermore, as described in Section 1, *Aesthetics*,

and Section 11, *Land Use and Planning*, the project would help 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.

Response 4.16

The commenter states that the project is inconsistent with the City's General Plan Policy P3.4 because it is not located within downtown and is located near the freeway.

It is acknowledged that the project site is not within Downtown West Covina. However, the project site is zoned for residential use and is located within a residential area of the City. The project would replace existing underutilized school buildings with residential uses that would be similar to and aesthetically compatible with the residential neighborhood surrounding the site. This is consistent with General Plan Policy P3.4 which includes the following text, "Adapt economically underused and blighted buildings, consistent with the character of surrounding districts and neighborhoods, to support new uses that can be more successful." In general, the proposed project aligns with the goals and policies of the West Covina General Plan, as illustrated in Table 13 and Section 11, *Land Use*, of the Draft IS-MND.

Response 4.17

The commenter provides an opinion that the project is inconsistent with the City's General Plan Policy P4.5 because the project would not include off-site improvements to facilitate bicycle travel and because the City has not established a mitigation fee structure to contribute to the construction of bicycle facilities. The commenter also states that providing more parking spaces is a barrier to bicycle and pedestrian travel.

As described in Section 17, *Transportation*, West Workman Avenue is identified by the City as a roadway to receive bike lanes in the future, and the project would not alter the alignment of West Workman Avenue or introduce any features that would preclude the addition of bicycle lanes along West Workman Avenue. The project would also include four bicycle racks on the site to provide bicycle parking for residents and visitors. Furthermore, as described in Table 13 of the IS-MND, the proposed project would add street trees and landscaping to North Vincent Avenue and West Workman Avenue to provide additional shading for sidewalks adjacent to the project site, improving the pedestrian environment in the project area. These aspects of the project are consistent with General Plan Policy P4.5, which seeks to eliminate barriers to pedestrian and bicycle travel.

Response 4.18

The commenter states that the project is inconsistent with General Plan Policy P5.2 because the project is not compatible with the neighborhood due to the development intensity proposed.

It is acknowledged throughout the Draft IS-MND that the proposed project would increase development intensity on the site. Nonetheless, the project would not introduce any incompatible uses to the area and would be consistent with existing residential development surrounding the site by adding residential uses to the site, with single-family units concentrated along the northern and western boundaries of the site adjacent to existing single-family residential development, and the attached townhome units concentrated along North Vincent Avenue and West Garvey Avenue North, where denser multi-family residential and commercial development is already present. Furthermore, the project is an infill development that would replace underutilized school buildings on the project site with productive housing, which is consistent with General Plan Policy P5.2 intent

to “enable land and building functions to adapt to economic, environmental, energy, and social changes over time”.

Response 4.19

The commenter provides an opinion that the project is inconsistent with General Plan Policy P5.4 because the project does not contribute to the existing pedestrian environment and would not complement the existing fabric of the neighborhood.

As described on page 10 of the Draft IS-MND, the proposed Specific Plan would include objectives with associated development and design requirements directly related to improving the pedestrian environment and integrating with the surrounding neighborhood. These include the following:

- Locate lower density housing adjacent to existing single-family homes and higher density housing adjacent to existing multifamily and retail uses
- 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

The project would not introduce any incompatible uses to the area and would be consistent with existing residential development surrounding the site by adding residential uses to the site, with single-family units concentrated along the northern and western boundaries of the site adjacent to existing single-family residential development, and the attached townhome units concentrated along North Vincent Avenue and West Garvey Avenue North, where denser multi-family residential and commercial development is present. The proposed project would also add street trees and landscaping to North Vincent Avenue and West Workman Avenue to provide additional shading for sidewalks adjacent to the project site, improving the pedestrian environment in the project area.

Response 4.20

The commenter states that the project is not consistent with General Plan Policy P5.9 because the proposed project will not provide trash enclosures and suggests that the project should include designated trash enclosures. The commenter also states that the project’s internal roadways would not provide enough space for trash trucks to turn around and that the method of trash collection would negatively impact the neighborhood.

Table 13 of the Draft IS-MND is revised to clarify the method of trash disposal for the project as follows:

The proposed project would ~~include trash enclosures that provide for separate waste disposal and recycling containers for each residential unit~~ and would be served by Athens Services, the existing waste hauler for the City.

Each single-family home and townhome unit would be provided with a trash/recycle cart and green waste cart that would be stored in the unit’s garage, as enforced by the Homeowner’s Association for the development. On trash collection day, carts would be placed on the curbs of the internal circulation paths and would not be placed on public roadways such as West Workman Avenue and Vincent Avenue. The project site is in a residential area that is already served by Athens Services and

single-family residences in the neighborhood also utilize trash and recycle carts for waste disposal and collection. According to the Focused Traffic Analysis, which has been reviewed and approved by the City, the project site's internal circulation is accessible by garbage collection trucks, which are not expected to turn around in the drive aisle, as the commenter suggests, but rather to reverse out of each drive aisle in the same path that they entered. General Plan Policy P5.9 seeks to "Provide adequate facilities and services for the collection, transfer, recycling, and disposal of refuse." As discussed above, the proposed project would provide adequate facilities and services for the disposal of trash and recyclables. Therefore, the proposed project's trash generation and collection would not result in any impacts to Athens Services, nor would it impact the surrounding neighborhood.

Response 4.21

The commenter states that the project is not consistent with General Plan Policy P6.1 because the project site is not within a half-mile of transit, there are no existing or proposed bike lanes serving the project site, and there is inadequate tree shade in the area to provide a comfortable walking environment.

As described in Responses 4.2 and 4.3, above, the project site is within a half-mile of bus stops serving Foothill Transit Routes 488 and 498. In addition, as stated on page 119 of the Draft IS-MND, "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." Furthermore, as described in Table 13:

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.

New street trees and landscaping added by the project would provide additional shading and improve the pedestrian environment in the project area. These aspects of the project are consistent with General Plan Policy P6.1, which seeks to support public transit use and biking and walking.

Response 4.22

The commenter offers an opinion that the project is not consistent with General Plan Policy P6.5 because the project site proposed an outdoor space within 500 feet of the freeway.

General Plan Policy P6.5 seeks to increase the amounts of parks and trails within the City. The proposed project would provide 48,876 square feet of open space, including two outdoor amenity spaces for recreational uses for residents. Therefore, the project provides outdoor recreational amenities consistent with General Plan Policy P6.5. Furthermore, as shown in Figure 5 of the Draft IS-MND, the project's outdoor spaces would be located in the northern portion of the project site. Based on Geographic Information Systems (GIS) estimations, the project outdoor spaces would be approximately 780 feet north of I-10 (see Figure 4 below).

Figure 4 Project Open Space Location



Response 4.23

The commenter states that the proposed project is inconsistent with Goal 1 of the General Plan Housing Element because it would not enhance the quality of the existing residential neighborhood due to the architectural design of the project.

The proposed project would replace aging, underutilized school buildings on the site with residential development. The project would not introduce any incompatible uses to the area and would be consistent with existing residential development surrounding the site by concentrating single-family units along the northern and western boundaries of the site adjacent to existing single-family residential development and the attached townhome units along North Vincent Avenue and West Garvey Avenue North, where denser multi-family residential and commercial development is present. As described in Section 1, *Aesthetics*, of the Draft IS-MND, the project would improve the neighborhood with enhanced landscaping and new trees along the project frontage, and the design and architecture of the project site would 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 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. No significant aesthetic impacts were identified in the Draft IS-MND, and the project would provide new housing opportunities and improvements to the neighborhood, consistent with the General Plan Housing Element goals.

Response 4.24

The commenter states that proposed project conflicts with the General Plan Housing Element Goal 4 to promote equal housing opportunity because the project does not offer affordable housing units as a community benefit to justify the proposed project's development intensity, which exceeds that permitted under the existing zoning and land use designation.

The proposed project does not involve a request for density bonus or variance for the project site. Rather, the project proposes a new Specific Plan that would change the underlying land use and zoning designations of the project site and establish specific development standards that would apply to the site. There is no CEQA or City requirement to provide affordable housing in order to implement a new Specific Plan. Additionally, the project would include detached homes and attached townhomes in a variety of sizes in order to provide a range of homeownership options. The proposed detached residential units would provide a new and diverse housing choice that bridges the gap between traditional single-family homes and attached townhomes.

Response 4.25

The commenter states that the Draft IS-MND does not include a discussion of noise levels associated with I-10, and that no design features are discussed that would attenuate the noise impacts so that interior noise levels are consistent with the California Building Code (CBC).

As stated on page 106 of the Draft IS-MND:

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 noise contour maps for existing conditions in PlanWC [the City's General Plan], 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.

As described in Section 13, *Noise*, the project would be subject to Mitigation Measure N-2, which requires the following to ensure that interior noise levels would comply with the CBC:

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.

Furthermore, as discussed in Response 3.6, above, CEQA is focused on identifying and mitigating the impacts of a project on the environment. As further clarified in the ruling for *CBIA v. BAAQMD*, CEQA addresses the impacts of a project on environmental hazards or conditions that already exist only insofar as whether the project would exacerbate such hazards or conditions. CEQA does not address the environmental impacts on residents of a proposed project. In other words, CEQA focuses on the analysis of the impacts of a project on the environment and not analysis of the environment’s impacts on a project.

Response 4.26

The commenter requests that information regarding construction phasing and staging be added to the IS-MND and that staging should be placed as far from sensitive receptors as possible.

As described on page 19 of the Draft IS-MND, 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 phasing information has not been determined at this time. The following information has been added to page 19 of the Draft IS-MND to clarify construction staging: “Construction staging would occur within the project site boundaries.” Mitigation Measure N-1, detailed on pages 106 and 107 of the Draft IS-MND, requires construction staging to be located as far as possible from adjacent residential buildings.

Response 4.27

The commenter asks how the West Covina Police Department (WCPD) will be able to provide service for the increased population on the project site given existing staffing levels.

As noted in Section 15, *Public Services*, the WCPD employs approximately 90 full-time officers, for a ratio of 0.85 officers per 1,000 residents. The proposed project would add up to approximately 399 residents to the City, assuming that all residents of the project relocate from other Cities and are not already West Covina residents. Even with the addition of 399 residents, the ratio of police officers to residents would remain at 0.85 officers per 1,000 residents. Additionally, the proposed

project would be required to pay development impact fees that go towards funding police services, pursuant to WCMC Section 17-204. Therefore, the Draft IS-MND determined that the project would not have significant impacts to police services.

Response 4.28

The commenter states that the Draft IS-MND does not discuss the school district and schools that would serve the proposed project.

As stated on page 114 of the Draft IS-MND, “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.” The analysis in Section 15, *Public Services*, conservatively assumes that all 399 residents generated by the proposed project would be students, which would increase the current student enrollment within West Covina by only one percent. In reality, the project would generate far fewer students than this, and the potential impacts to WCUSD, CVUSD, and RUSD of new students generated by the proposed project would be offset by the payment of school development impact fees. Furthermore, 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 Draft IS-MND determined that the project would not have significant impacts to school services.

Response 4.29

The commenter states that the Draft IS-MND incorrectly identifies the distance of the project site to Del Norte Park and that the project site is also near Palm View Park. The commenter also states that the project is in an area with inadequate parkland supply and is within a Disadvantaged Community.

The commenter is referred to Response 3.9, above, regarding disadvantaged communities. The Draft IS-MND incorrectly indicates that the project site is approximately 0.4 miles southeast of Del Norte Park. The IS-MND is revised as follows:

The nearest park to the project site is Del Norte Park located approximately ~~0.4 miles~~ 0.6-mile walking distance northwest of the site. The project site is also a 0.8-mile walk from Palmview Park, which includes walking paths, play structures, a baseball field, and a recreation center.

As discussed in Section 15, *Public Services*, and Section 16, *Recreation*, the proposed project would include recreational amenities onsite for residents and would not substantially decrease the City’s ratio of parks to residents. Furthermore, the project would include payment of the City’s impact fees that go towards park maintenance and development. Impacts related to parks and recreational facilities were determined to be less than significant and no further changes to the IS-MND are required.

Response 4.30

The commenter provides a discussion of the Clean Air Act, the South Coast Air Basin’s nonattainment status for ozone standards, and the requirement for SCAQMD to establish strategies to reach attainment for ozone, including strategies to reduce VMT. The commenter states that the Draft IS-MND does not reference the adopted ozone thresholds.

Section 3, *Air Quality*, includes a discussion of the Basin’s nonattainment status for federal and State ozone standards and provides the applicable SCAQMD criteria pollutant thresholds for project construction and operation. Section 3, *Air Quality*, also describes how the SCAQMD has prepared a plan for air quality improvement for pollutants for which the Basin is in non-compliance (the 2016 Air Quality Management Plan) in order to satisfy state and federal air quality planning requirements. The Plan demonstrates strategies for attainment of the new federal eight-hour ozone standard and VMT emissions offsets, pursuant to recent USEPA requirements.¹³ Moreover, as discussed in the SCAQMD *CEQA Air Quality Handbook*, the thresholds are established, in part, based on Section 182(e) of the federal Clean Air Act’s thresholds for stationary emission sources in areas designated extreme nonattainment for ozone as well as other scientific and factual data contained in the federal and State Clean Air Acts.¹⁴ As described in Section 3, *Air Quality*, the project would not result in operational emissions (including mobile source emissions produced by project-related vehicle trips) of ozone precursors or any other criteria pollutant that exceed the applicable SCAQMD thresholds. Furthermore, as described in Section 17, *Transportation*, the project would not result in significant VMT impacts.

Response 4.31

The commenter states that the Vincent Children’s Center does not operate like a typical school and that the Institute of Transportation Engineers (ITE) trip rates do not accurately reflect the existing uses on the project site. Therefore, the transportation analysis should not account for the existing use on the project site when determining project impacts.

Page 118 of the Draft IS-MND addresses the unique nature of existing uses on the project site and the potential range of vehicle traffic associated with it as follows:

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 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.

As discussed in Section 17, *Transportation*, and described in detail in the Focused Traffic Analysis prepared by Ganddini Group (Appendix I of the Draft IS-MND), the project would generate approximately 971 daily trips and would not result in significant VMT impacts pursuant to the City’s established VMT criteria. As shown in Table 1 of the Focused Traffic Analysis, the analysis did not include a trip rate reduction for existing uses on the site.

Response 4.32

The commenter states that the Draft IS-MND does not include information about the location of the nearest bus stops for Foothill Transit Routes 488 and 498.

¹³ SCAQMD. 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).

¹⁴ SCAQMD. 1993. CEQA Air Quality Handbook. April 1993.

The commenter is referred to Responses 4.2 and 4.3, above regarding the location of the nearest bus stops.

Response 4.33

The commenter provides background information on VMT analysis guidance from the Governor's Office of Planning and Research and the Clean Air Act ozone standards and nonattainment. The commenter states that the Draft IS-MND does not adequately provide evidence to illustrate that the project would have less than significant VMT impacts and states that the analysis is not consistent with the City's adopted VMT thresholds.

The commenter is referred to Response 4.30 regarding ozone standards. As described in the Draft IS-MND and in the Focused Traffic Analysis, the proposed development 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 that is 15 percent below the San Gabriel Valley Council of Governments (SGVCOG) average. Appendix B of the Focused Traffic Analysis includes the scoping agreement for the project, supplied by City of West Covina staff. Included in Section 4 of Appendix B is the VMT screening analysis provided by City of West Covina staff. As stated within Section 4: "It has been determined that this project screens out from completing a full VMT CEQA analysis based on Total Daily VMT Service Per Population."

The commenter acknowledges this assertion but states the following: "Simply stating that the project screens out is inaccurate as the project is not within a Transit Priority Area (TPA) and it is not consistent with the City of West Covina VMT Thresholds adopted in Resolution No. 2020-57, which is attached to this letter." This comment fails to note that the City of West Covina provides three separate types of screening for projects to be exempt from a detailed VMT assessment, as it focuses solely on TPA's. These three screening categories are: 1) Transit Priority Area (TPA) screening; 2) Low VMT Area screening; and 3) Project Type screening. A project only needs to meet one of these three screening criteria to be exempt from a detailed VMT analysis. This comment correctly states that the project does not meet the TPA screening criteria, but then falsely concludes that because of this the VMT screening criteria is not met. The comment does not account for the other two VMT screening criteria, and the project does meet the Low VMT Area Screening criterion. Since it meets this criterion, the project is exempt from a detailed VMT analysis. Furthermore, this VMT screening analysis was not prepared by private consultants but was prepared by City staff. City of West Covina staff conducted the VMT screening analysis and concluded that the project met the screening criteria for Low VMT Area screening based on their own approved City of West Covina VMT guidelines (as shown in Appendix B of the Focused Traffic Analysis).

Response 4.34

The commenter makes a number of statements regarding the project's architectural design and requests changes to the design and architecture of the project.

The project includes approval of a new Specific Plan that would change the underlying zoning of the project site and regulate all aspects of development including design, architecture, color palette, materials and finishes, fencing, landscaping, etc. The design and architecture of the project site as proposed by the Specific Plan would 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 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.

Response 4.35

The commenter states that the project should include affordable housing units to justify project concessions and provides an overview of the California Density Bonus Law.

The proposed project does not involve a request for density bonus or variance for the project site. Rather, the project proposes a new Specific Plan that would change the underlying land use and zoning designations of the project site and establish specific development standards that would apply to the site.

Response 4.36

The commenter requests additional community outreach regarding the project. The commenter also requests that the City provide a full plan set on the website for public review and that the commenter be added to the contact list to be notified of any future community outreach.

The commenter will be added to the list of contacts for the project and will be provided with the information for any future community outreach events regarding the project, and the City will consider taking the other actions requested by the commenter. While this comment does not remark on the adequacy of the environmental review and no changes to the IS-MND are required in response, the following information relating to public outreach for this project is provided in response to this comment.

Due to the COVID-19 pandemic a traditional community meeting for this project could not be held. However, the applicant sent out Community Outreach flyers in August 2020 and scheduled individual meetings with neighbors who responded to the flyers. In addition, the applicant is continuously working and meeting with adjacent neighbors. The project plans were posted on the City's website on April 22, 2021, and can be found at the following web address:
<https://www.westcovina.org/departments/community-development/planning-division/projects-and-environmental-documents>.