Cameron II Project

Final
Initial Study – Mitigated Negative Declaration

prepared by

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

prepared for

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

June 2021

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

Cameron II Project

Final
Initial Study – Mitigated Negative Declaration

prepared by

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

prepared for

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

June 2021

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

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

Table of Contents

Tables

Figures

Appendices

This page left intentionally blank

Initial Study

1. Project Title

Cameron II Project

2. Lead Agency Name and Address

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

3. Contact Person and Phone Number

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

4. Project Location

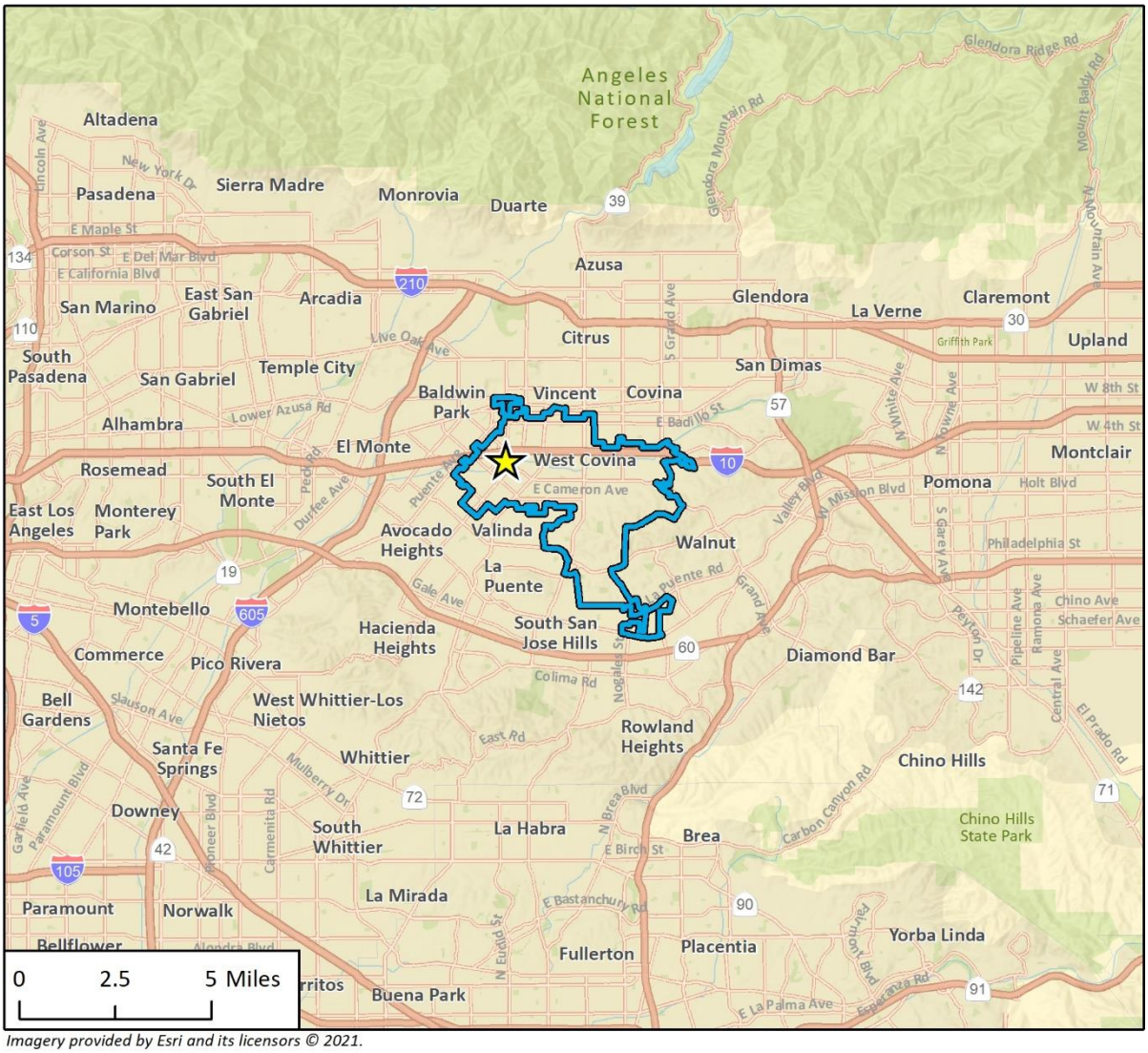
Located at 1600/1616 West Cameron Avenue in West Covina, California, 91790, the 3.25-acre (141,570 square feet) project site consists of two parcels: Assessor's Parcel numbers (APN) 8468-015-010 and APN 8468-015-024. The site is located along the south side of West Cameron Avenue, southwest of the terminus of Toluca Avenue and West Cameron Avenue, in the Civic Center neighborhood of the Downtown District, as described in the West Covina General Plan (PlanWC). The site can be accessed from West Cameron Avenue. Interstate 10 (I-10) is approximately 0.2-mile north and can be accessed by on- and off-ramps from West Covina Parkway and West Pacific Avenue. An off-ramp onto South Orange Avenue also provides access to West Cameron Avenue, west of the West Covina Medical Center.

Regionally, the site is served by freeways and other roadways in metropolitan Los Angeles and southern California, including I-10, I-605, I-210, State Route (SR) 60, and Azusa Avenue (SR 39). Figure 1 shows the location of the project site in its regional context, and Figure 2 shows the site in its neighborhood context.

5. Project Sponsor's Name and Address

MLC Holdings, Inc.
Contact: Matt Maehara
5 Peters Canyon Road, Suite 310
Irvine, California 92606

Figure 1 Regional Location



Imagery provided by Esri and its licensors © 2021.

Project Location

City of West Covina

N

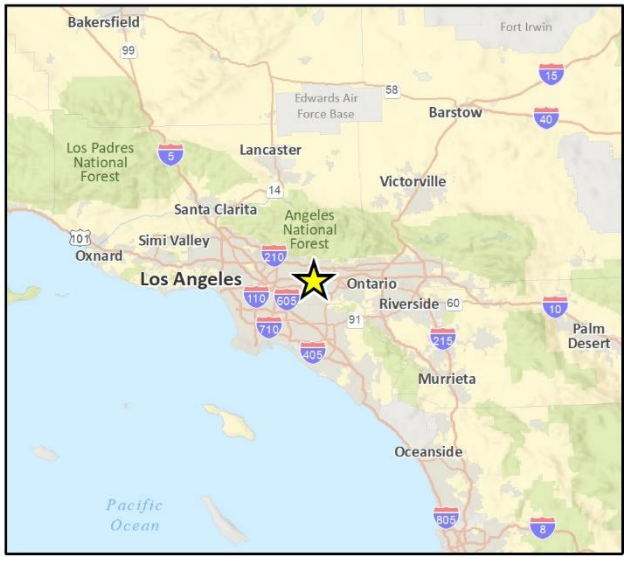
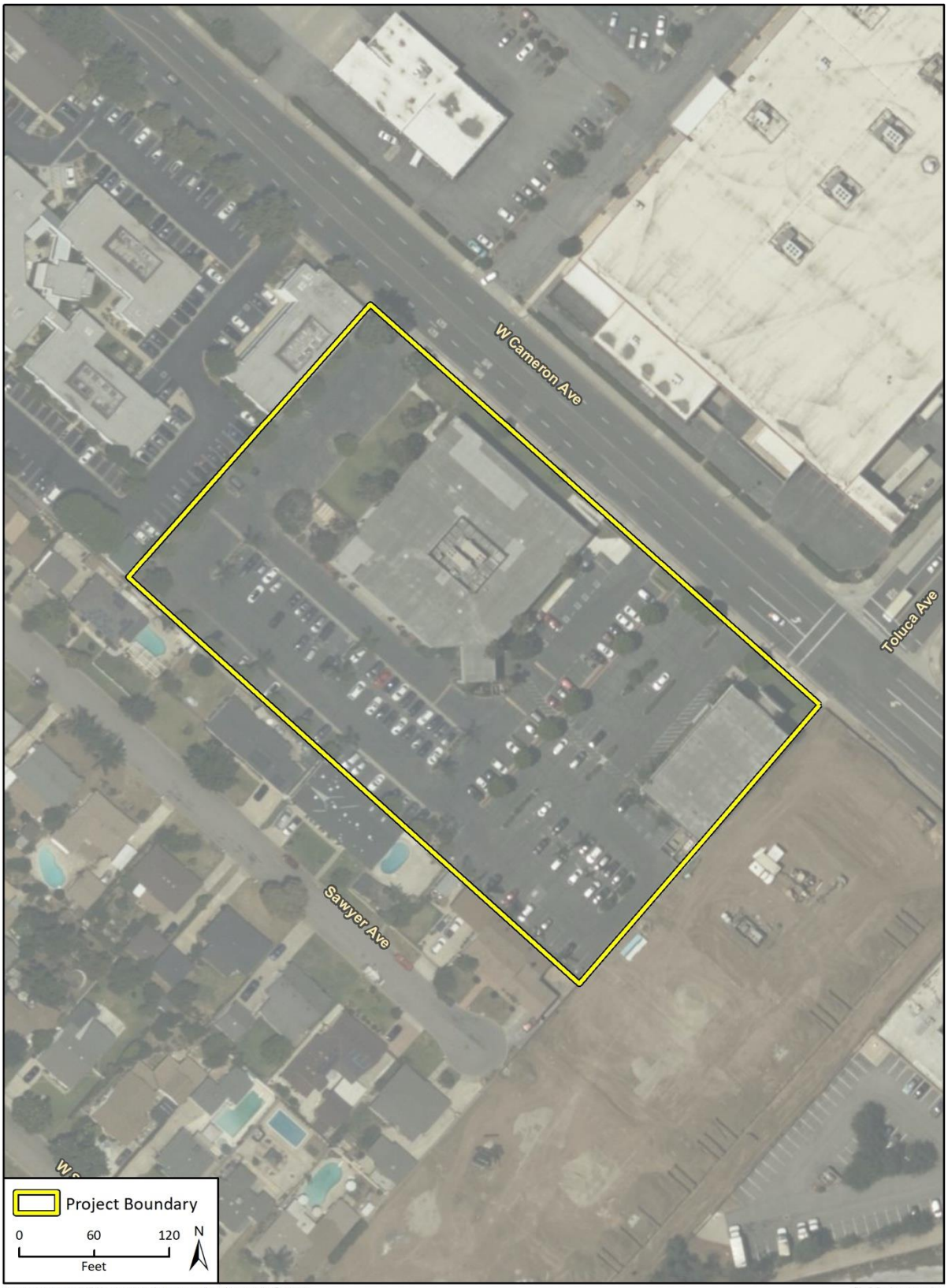


Figure 2 Project Location Map



Imagery provided by Microsoft Bing and its licensors © 2020.

Fig 2 Project Location

6. General Plan Designation

The project site has a General Plan land use designation of Neighborhood Medium, which allows a density of nine to 20 dwelling units per acre (City of West Covina 2016a). The Neighborhood Medium designation identifies areas that can accommodate a mix of detached and attached dwellings and higher building types. Mostly residential and small-scale commercial, the Neighborhood Medium areas occur primarily at intersections and adjacent to designated corridors.

The proposed project would require a General Plan amendment to accommodate a Neighborhood High designation on the project site.

7. Zoning

The site is currently zoned General Urban (G-U), T-4. According to the West Covina Downtown Plan and Code, areas zoned G-U are intended for community-serving retail, office, entertainment, and hospitality uses, in block-scale buildings up to three-stories high with ground-floor commercial activities on key streets. Section 4.2A of the Downtown Plan and Code states that uses in this zone include a mix of residential and commercial activities typically located along major streets. Table 4.2.1 of the Downtown Plan and Code states that this zone should feature active streetscapes providing continuity with adjacent areas; wide sidewalks; and street trees to encourage an interesting, safe, and comfortable walking environment (City of West Covina 2016c). According to the General Plan (PlanWC), the standards of this zone are intended to promote a walkable, diverse, and well-connected area (City of West Covina 2016b).

8. Project Description

The proposed project is for infill, residential development that involves the construction of a new 84-unit residential townhome development. A one-story, 13,329-square foot, medical office building and parking lot currently occupy one parcel (APN 8468-015-010). The other parcel that makes up the project site (APN 8468-015-024) is developed with a multi-story, 14,157-square-foot office building and parking lot. The project site is surrounded with wrought-iron fencing on three sides and has driveways at the westernmost end, on the east side of the existing one-story office building, and just west of the three-story office building.

The proposed residential units would be rowhouse-style, attached, single-family residences. The applicant is proposing to construct eight buildings: Building 1 and Building 2 would face West Cameron Avenue; Building 3 would be situated on the western boundary, next to the adjacent office uses; Buildings 4 through 7 would form an interior cluster; Building 8 would be situated along the eastern boundary, next to an adjacent existing townhome development. Figure 3 illustrates the conceptual site plan.

Building 1 and Building 2 would be three stories, front on West Cameron Avenue and include 12 attached townhomes each. The townhomes would be designed to create an urban street wall that defines the street edge and enhances the pedestrian experience. With a maximum 7-foot setback for these units, a “stoop” frontage would elevate windows and entry doors to establish a transition between the public and private spaces (Figure 4). The stoops would be a minimum 5 feet wide and 5 feet deep with an 18-inch minimum rise from the sidewalk. The remaining buildings would be three-story units, arranged as 10-plexes, with upper-story decks and patios providing private outdoor space (Figure 5). All units would have two-car garages situated in side-by-side or tandem configurations as

illustrated in Figure 6. Buildings would be set-back 50 feet from the southern boundary to maintain privacy for neighboring, single-family properties to the south. Private open space would occur in the form of balconies and patios, with a minimum combined area of 100 square feet.

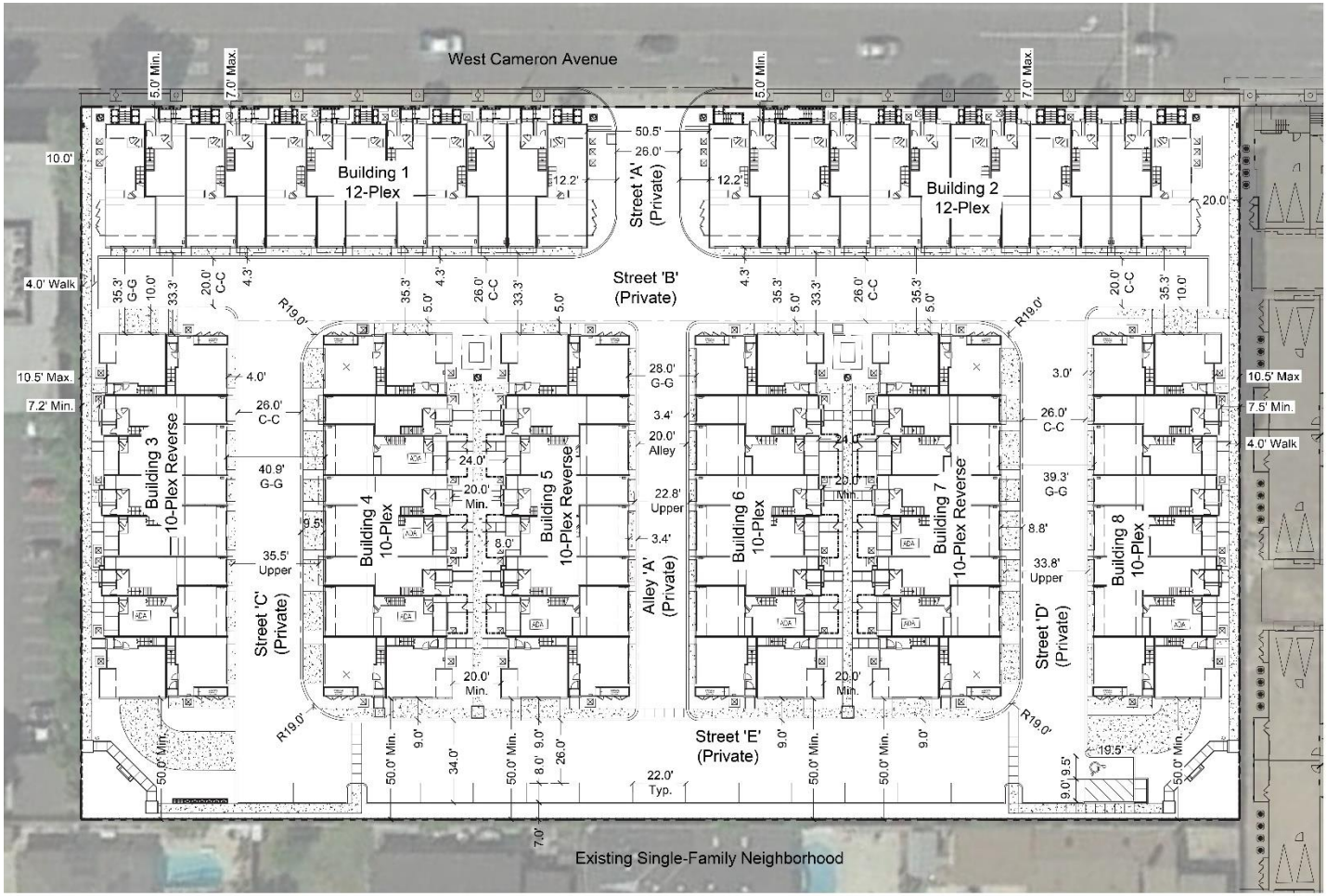
Buildings would be stucco with brick and siding accents, and painted in one of two schemes: (1) white, pale gray and dark gray with white trim and a coral-colored (a deep medium orange) door with gray roofing; and (2) white, light brown, and dark green with white trim and a harvest gold-colored door and pale brown roofing. Figure 7 shows color boards illustrating these schemes, which are also visible in the elevation views in Figure 4 and Figure 5. Landscaping would be a mix of tree species along West Cameron Avenue, at the corners of Building 3 and Building 8, and among the internal private spaces between Buildings 4 and 5 and Buildings 6 and 7 (Figure 8). Decorative and shade trees, including olive, magnolia, sycamore, willow, strawberry tree, crape myrtle, and tulip tree, would integrate with the streetscape of the adjacent townhome development to the east, along West Cameron Avenue.

A single private street ("A") from West Cameron Avenue, between Buildings 1 and 2, would provide entrance and egress, giving access to Private Streets B, C, E, D, and Alley A that would provide circulation within the site. The driveway from West Cameron Avenue would replace the two existing driveways and driveway aprons along the project frontage would be filled in, such that they match adjacent sections. Elsewhere, improvements include removal and replacement of broken and off-grade sidewalk, curb, and gutter along West Cameron in accordance with Standard Plans for Public Works. Surface parking would include 14 spaces at the southern edge of the site, along the boundary wall. An ADA stall would also be provided. These spaces would be added to the 168 garage and driveway parking spaces, for 183 total parking spaces. A homeowner's association would be formed to maintain the private driveway, alley, roads, and fire lanes, along with common areas and landscaping.

Wet utility connections would be made via standard lateral connections to existing facilities under West Cameron Avenue. The project would generally follow the existing drainage pattern of the site and discharge via storm drains. Off-site improvements are proposed for the existing driveway, sidewalks, curbs, and gutters on West Cameron Avenue. All utilities would be undergrounded.

All proposed project plans, including floor plans and conceptual building elevations are included in Appendix A.

Figure 3 Conceptual Site Plan



Source: MLC Holdings 2021

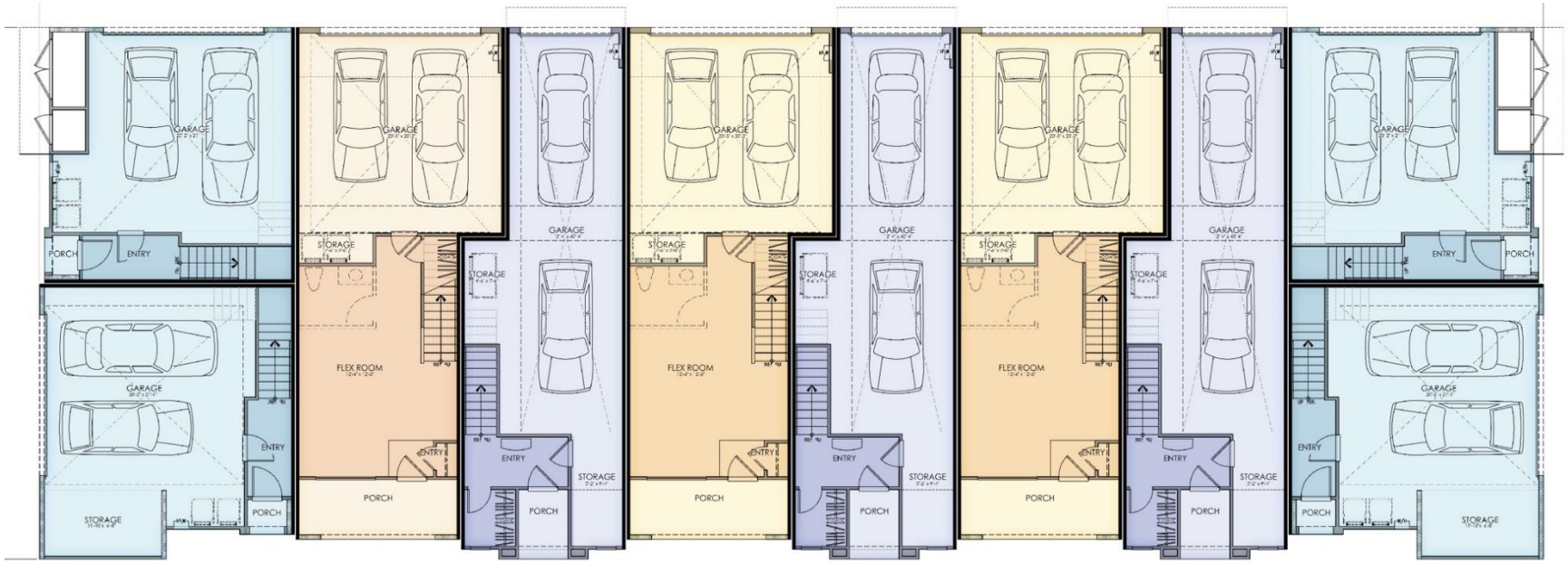
Figure 4 Conceptual Elevation for 12-Plex Units Facing West Cameron Avenue

Source: MLC Holdings 2021

Figure 5 Conceptual Elevation 10-Plex Units within the Project Site

Source: MLC Holdings 2021

Figure 6 Plan View of 10-Plex Showing Garage Configuration



Source: MLC Holdings 2020

Figure 7 Exterior Finish Schemes 1 and 2

Source: MLC Holdings 2020

Figure 8 Landscape Plan

Source: MLC Holdings 2021

Table 1 Project Summary

Buildings		
Townhomes/Rowhouse ▪ Plan 1 - 1,210 sf, 2 bedrooms ▪ Plan 2- 1,500 sf, 3 bedrooms ▪ Plan 3- 1,796 sf, 3 bedrooms	Units 24 units 30 units 30 units	Built Square Footage 29,040 sf 45,150 sf 54,060 sf
Unit and Square Footage Totals	**84 units**	**128,250 sf**
Density	25.8 homes/acre	
Building Coverage	68,676[1] sf (48.5 percent of 3.25-acre (141,570 sf) site)	
Building Heights and Setbacks		
Rowhouse Height	10-plex: 34'10" (35 feet max.)/ 3 stories 12-plex: 38'6" (40 feet max.) with stoop at frontage (facing Cameron Avenue)	
Setbacks	7 feet max. from Cameron Avenue (primary street) 15 feet from rear yard with alley	
Landscaping, Open Space, and Parking		
Landscape Area	109,237 sf (32 percent of site)	
Private Open Space	9,420 sf[2]	
Total Open Space	10,723 sf[3]	
Garage/Driveway Parking	168 spaces	
Parallel Parking (Workman Avenue)	14 spaces	
Americans with Disability Act (ADA) Parking	1 space	
Total Parking	**183 spaces**	

[1] Estimate provided by applicant, March 2021. Per Article II, Section 26-63 of the West Covina Municipal Code, building coverage is the area of a lot covered by buildings or other roofed structures, including any eaves extending more than two (2) feet beyond any support structure. Permeable roof materials (e.g., lattice-work) covering two hundred (200) square feet or less will not be included in the lot coverage calculation.

[2] Estimate provided by applicant, March 2021. Includes upper floor decks of buildings.

[3] Reflects estimated 1,303 square feet of landscaped areas on east boundary beside Building 2 and landscaped areas in southwest and southeast corners.

[4] All area and dimensions are approximate and may vary slightly at final

sf: square feet

9. Surrounding Land Uses and Setting

The project site includes two parcels that total 3.25 acres, currently developed with office buildings addressed as 1600 and 1616 West Cameron Avenue. Both parcels have surface parking lots, parking lot trees, and ornamental shrubs around the buildings. A small grassy knoll is located at the entrance to the building at 1616 West Cameron Avenue. The site is in an urban area that is developed on all sides.

The project site is bordered to the north across the intersection of West Cameron Avenue and Toluca Avenue by the Floor & Decor shopping center; by the single-family attached residential development named Cameron 56 Townhomes to the east; by single-family, detached residential properties on Sawyer Street to the south; and by office uses on the west. Photographs of the project site are shown in Figure 9, and photographs of neighboring uses are shown in Figure 10 and Figure 11.

Figure 9 Photographs of the Project Site

Photograph 9a. Existing office building at 1600 West Cameron Avenue

Photograph 9b. Existing office/commercial building at 1616 West Cameron Avenue

Figure 10 Photographs of Neighboring Uses (north and east)

Photograph 10a. Light industrial use along Cameron Avenue north of the project site

Photograph 10b. Commercial use along Cameron Avenue east of the project site.

Figure 11 Photographs of Neighboring Uses (south and west)

Photograph 11a. Office building and vacant lot[1] on Cameron Avenue southeast of project site

Photograph 11b. View from project site into residential neighborhood to west

1 The vacant lot in this picture is adjacent to the project site and is currently being developed with residential uses

10. Required Approvals

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

- General Plan Amendment (GPA) to change the land use designation from Neighborhood Medium Residential (up to 20 units per acre) to Neighborhood High Residential (up to 54 dwelling units per acre
- Approval of a Precise Plan for the site plan and architecture for the development
- Approval of a Tentative Tract Map (TTM) to subdivide the property

11. Other Public Agencies Whose Approval is Required

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

12. Native American Tribal Consultation

Three tribes have requested notification of projects in West Covina: the Soboba Band of Luiseño Indians, Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation), and Gabrieleño/Tongva Nation. Per Public Resources Code (PRC) Section 21080.3.1, the City mailed consultation letters to these three tribes on January 7, 2021 and January 21, 2021.[2] The City has since received a response from the Kizh Nation requesting consultation to discuss the proposed project in further detail. Following the request from the Kizh Nation, a consultation meeting between Kizh Nation representatives and City Staff was scheduled for March 3, 2021, but the Kizh Nation representatives later declined this invitation and submitted an undated letter requesting that the City include specific tribal cultural resources mitigation measures in this IS-MND. In this letter they stated that, after reviewing the project area, they felt there was no further need for consultation.

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

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

Environmental Factors Potentially Affected

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

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

Determination

Based on this initial evaluation:

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

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

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

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

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

Signature

5/18/2021

Date

Jo-Anne Burns

Printed Name

Planning Manager

Title

This page left intentionally blank

Environmental Checklist

1 Aesthetics

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

For purposes of determining significance under CEQA, scenic resources are the visible natural and cultural features of the landscape that contribute to public enjoyment of the environment. A scenic vista is defined as a public viewpoint that provides expansive views of a highly valued landscape for the benefit of the public, generally. Public views are those experienced from a publicly accessible vantage point, such as a roadway or public park. Scenic vistas can be officially designated by public agencies or informally designated by tourist guides.

The California Department of Transportation (Caltrans) manages the California State Scenic Highway Program and designates state scenic highways, which are in areas of natural beauty. A scenic highway becomes officially designated when the local governing body applies to and is approved by Caltrans for scenic highway designation and adopts a Corridor Protection Program that preserves the scenic quality of the land visible from the highway right of way.

The City is located in the relatively flat San Gabriel Valley, framed by the San Gabriel Mountains on the north, the San Rafael Hills on the west, the Puente Hills on the south, and the Chino Hills and San

Jose Hills on the east. Portions of the San Jose Hills occur in the eastern and southern area of West Covina. These mountains and hills provide background scenic views in West Covina, depending on the viewer's vantage point and orientation.

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

Scenic vistas are panoramic views available from publicly accessible vantage points, such as roadways or public parks, that are found to be locally or regionally attractive. According to the City's General Plan (PlanWC), the City of West Covina does not have any officially designated scenic vistas (City of West Covina 2016a). However, the Angeles National Forest and San Gabriel Mountains lie approximately seven miles north of the City and are visible throughout West Covina, forming an important aspect of the City's sense of place. From Cameron Avenue, existing development and mature street trees limit viewsheds that would give access to scenic vistas, even where the San Gabriel Mountains are visible in the background. Immediately north of the project site, existing commercial development either fully or partially block views of these mountains from Cameron Avenue, particularly looking north and northwest, where the closest mountain ranges lie, as shown in Figure 10. Looking south and southeast from West Cameron Avenue, across the project site, development and landscaping limit long range views, and there are no mountain ranges or other prominent visual features visible in the distance in this direction.

The proposed project would involve demolition of the two-story office buildings currently on the project site and construction of 84 single-family attached homes. Upon completion of the project, the site would have a density of 25.8 homes per acre. While the density would increase compared to existing conditions, there are no scenic public views across the site that would be substantially blocked by the proposed development and thus the proposed project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

West Covina does not contain any officially designated State Scenic Highways (Caltrans 2019). State Route (SR) 57 between SR 60 and SR 91 (9.9 miles southwest of the project site) and SR 39 between SR 2 and I-210 (6.1 miles from the project site) are eligible for State Scenic Highway designation, but both are too distant from the project site to be affected by project implementation.

The project site is in an urban area consisting of residential, office, and commercial uses, and does not contain scenic resources such as natural habitats or rock outcroppings, nor is it close to any such resources. As described in Section 5, *Cultural Resources*, the project site does contain a building of an age to be evaluated as an historic resource, but these were determined not to be eligible for designation. Therefore, changes on the project site would not affect historic scenic resources. The project site is not visible from SR 57 or SR 39, as the site is too distant from these roadways to be seen. Therefore, the project would not substantially degrade views of mature trees, rock outcroppings, historic buildings, or any other scenic resources along or visible from a scenic highway.

As discussed in the Arborist Report for the project (Appendix C), there are six trees on the project site that qualify as significant under the City's Tree Ordinance (West Covina Municipal Code [WCMC], Chapter 26, Article VI, Division 9, Section 26.288-295). These include five trees on the site and one tree adjacent to the site that overhangs the area of disturbance at the northwestern corner of the project site. Three little-leaf fig trees and two banyan fig trees that line West Cameron Avenue would

be removed as part of project implementation. The California sycamore on the adjacent property would be protected during construction by implementation of mitigation measures described in the Arborist Report and in Section 4, *Biological Resources* of this IS-MND.

New project landscaping would replace these trees and all other trees currently on the project site (69 total) with 111 new trees, an increase of 42 trees, or 61 percent more trees than currently exist on the site. Approval of the project landscape plan by the City would also require approval of the tree removal permit applications by the City. Along Cameron Avenue, 16 tulip trees (final selections per City of West Covina Standards) would be planted in the City parkway, and crape myrtle trees would be planted between the sidewalk and the townhomes that face West Cameron Avenue to add color and enhance the streetscape. Also visible from the roadway, date or queen palms and "Little Gem" magnolia trees would line either side of the entrance driveway.

While the project falls outside the viewshed of State Scenic Highways and City-designated scenic corridors, the removal of significant trees could result in an impact related to the loss of these trees as scenic resources if they were not replaced; however, compliance with City ordinances that specify replacement of removed trees[3] with those of comparable species, size, and condition, as indicated in the project landscape plans, would ensure that this potential impact would be reduced to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

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

The project site is in an urban area of West Covina, primarily developed with commercial office buildings with adjacent one- to two-story residential neighborhoods to the south. The project site is developed with one- and two-story office buildings and associated surface parking lots and landscaped with 70 mature trees and ornamental shrubs. The project involves construction of 84 two-story, attached townhomes and access roadways, and installation of perimeter and on-site landscaping. The Downtown Plan and Code for strategic infill development would inform the design and architecture of the proposed new residential community (City of West Covina 2016b).

Implementation of the project would add residential uses to the project site, which currently contains office uses. While some of the office buildings are two-story, the density is low, due to extensive surface parking lots. The project would increase massing of buildings throughout the site and would increase height where ground-level surface parking is currently in place. Currently, looking across the parking lots of the project site from West Cameron Avenue, only widely spaces landscaped trees and a 6-foot brick wall at the rear of the project site are visible between the on-site office buildings. The existing development is not architecturally notable and does not contribute to a distinctive sense of place or visual quality. Increased density of both structures and landscape materials would contribute to the Downtown Plan vision of making streets walkable and integrating a mix of commercial and residential uses along Cameron Avenue and in its vicinity (City of West Covina 2016b: 13). The variation in design, the subtle color palette, and the increased landscaping, including flowering trees, would be consistent with the visual environment envisioned in the Downtown Plan and Code and

[3] For more information on the City's ordinances regarding tree protection see Section 4, *Biological Resources* and Appendix C, Arborist Report of this IS-MND.

would thus help unify the visual environment on and near the project site, effectively creating a beneficial impact.

The proposed project 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. 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. This regulatory procedure provides the City with assurances for aesthetic review and an opportunity to incorporate additional conditions to increase the aesthetic value of the project relative to its site and surroundings. Thus, the project would not conflict with applicable zoning and other regulations governing scenic quality and would not substantially degrade the existing visual character of the site and its surroundings. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project lies in an urban area of West Covina primarily developed with commercial and office buildings and adjacent residential neighborhoods. Streetlights and exterior lighting associated with office and commercial buildings and the headlights of vehicles driving at night on nearby major roadways, such as West Cameron Avenue and I-10, comprise the main sources of light and glare in the project area. Implementation of the project would replace existing lighting on the project site with new outdoor lighting for the proposed residential buildings, internal access streets, landscaping, and other areas for safety.

All proposed lighting would be equipped with the appropriate shielding to minimize light spillage onto adjacent properties. Provisions of the WCMC would govern the placement and intensity of lighting on the project site, including that site lighting be evaluated as part of the design review process and that lighting plans follow standards based on the recommendations of the Dark Sky Society designed to minimize skyglow and reduce light trespass on to adjacent properties. The proposed project would increase outdoor lighting on the project site due to the added development intensity on the site compared to the existing office uses. However, light sources associated with the proposed project would not substantially increase the overall levels of day or nighttime lighting in the area because they would be comparable to existing light levels of the surrounding residential and commercial land uses. Furthermore, roadways adjacent to the project site, including West Cameron Avenue and Toluca Avenue, are already illuminated by street lighting. For these reasons, the proposed project would not create a substantial new source of light such that day or nighttime views in the area would be adversely affected. Rather, the proposed exterior lighting and building materials would be consistent with those of surrounding uses and would be an important aide to public safety.

As shown in Figure 7, the project design does not include highly reflective materials that could cause significant glare during the day, such as stainless-steel panels or expansive glass windows. The design of this project, including its finish, colors, and materials, would be reviewed for approval through the City's design review process to ensure final plans continue with this approach. This regulatory procedure provides the City with an additional layer of review for aesthetics including light and glare, and an opportunity to incorporate additional conditions to improve the project's building materials and lighting plans. Finally, as most parking spaces would be in covered garages, as illustrated in Figure 6 and Figure 3, glare from the sun shining on the windows of parked vehicles would be reduced

compared to current conditions where expansive parking lots exist. Thus, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page left intentionally blank

2 Agriculture and Forestry Resources

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

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

The project site is in an area of West Covina zoned General Urban (G-U). According to the West Covina Downtown Plan and Code, areas zoned G-U are intended for community-serving retail, office, entertainment, and hospitality uses, in block-scale buildings up to three-stories high with ground-floor commercial activities on key streets. There is no nearby Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance, according to the 2016 Los Angeles County Important Farmland Map provided by the Farmland Mapping and Monitoring Program [California Department of Conservation (DOC) 2017]. Therefore, the project would not have an impact on designated Farmland.

NO IMPACT

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

As discussed above, the project site is in an area of West Covina currently zoned General Urban (G-U). According to the General Plan (PlanWC), the standards of this zone are intended to promote a walkable, diverse, and well-connected area (City of West Covina 2016b). Furthermore, the project site does not include conversion of farmland to non-agricultural uses, and the project would not be in an area currently zoned for agricultural use or a Williamson Act contract (DOC 2017). Therefore, the proposed project would not conflict with agricultural zoning or a Williamson Act contract and no impact would occur.

NO IMPACT

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

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

As discussed above, the project site consists of commercial, community-serving retail, office, entertainment, and hospitality uses not zoned or designated for forest land or timberland (DOC 2017). Therefore, the project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

NO IMPACT

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

As discussed above, according to the General Plan (PlanWC), the proposed project is in an area of West Covina zoned for community-serving retail, office, entertainment, commercial and hospitality uses (City of West Covina 2016b). The project would not include the conversion of farmland to non-agricultural uses, forest land to non-forest uses, nor any other change in the existing environment that could result in impacts to farmland or forest land. No impact would occur.

NO IMPACT

3 Air Quality

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

Air Quality Standards and Attainment

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

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

Formatted:

Table 2 Health Effects Associated with Non-Attainment Criteria Pollutants

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

[1] For more detailed discussion on the health effects associated with exposure to suspended particulate matter see U.S. Environmental Protection Agency (USEPA) 2006.

Sources: USEPA 2020a, 2020b, 2020c

Air Quality Management

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

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

approaches taken in the 2012 AQMP for the attainment of federal PM and ozone standards and highlights the significant number of reductions to be achieved. It emphasizes the need for interagency planning to identify additional strategies to achieve reductions within the timeframes allowed under the federal Clean Air Act, especially concerning mobile sources. The 2016 AQMP also includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The Plan also demonstrates strategies for attainment of the new federal 8-hour ozone standard and vehicle miles traveled (VMT) emissions offsets, pursuant to recent USEPA requirements (SCAQMD 2017).

Air Emission Thresholds

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

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

Formatted:

Formatted:

Table 3 SCAQMD Regional Significance Thresholds

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

Localized Significance Thresholds

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

for emissions generated in construction areas up to 5 acres in size. However, LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008a). As such, LSTs are typically applied only to construction emissions because most operational emissions are associated with project-generated vehicle trips.

The project site is in Source Receptor Area 11 (SRA 11, South San Gabriel Valley). Sensitive receptors closest to the project site consist of single-family residences along the south west border of the project site (see Figure 2). *Final Localized Significant (LST) Thresholds Methodology* provides LSTs for receptors at a distance of 82 to 1,640 feet from the project site boundary (SCQAMD 2008). According to the SCAQMD, projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 feet. Table 4~~Table 4~~ summarizes the LSTs for a 3.25-acre site in SRA 11 with sensitive receptors at a distance of 82 feet.

Table 4 SCAQMD LSTs for Construction Emissions

Pollutant	Allowable Emissions from a 3.25-acre Site in SRA 11 for a Receptor 82 Feet Away
Gradual conversion of NO_x to NO_2	147
CO	1,357
PM_{10}	10
$PM_{2.5}$	7

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

Source: SCAQMD 2009

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

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

The proposed project involves construction of a new 84-unit residential townhome development on a site currently designated Neighborhood Medium, which allows a density of nine to 20 dwelling units per acre (du/acre) (City of West Covina 2016a). The Neighborhood Medium designation identifies areas that can accommodate a mix of detached and attached dwellings and higher building types. In that regard, the proposed project would be consistent with the site's current General Plan designation, but the 84 units proposed on the 3.25-acre project site would result in 25.84 du/acre, which exceeds the allowed maximum density of 20 du/acre for the Neighborhood Medium designation. The proposed project approvals include a General Plan amendment to accommodate a

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

Neighborhood High designation on the project site. The Neighborhood High land use designation allows up to 54 dwelling units per acre. With approval of the requested General Plan amendment, the proposed density of 25.84 du/acre would be consistent with the site's proposed Neighborhood High designation.

As discussed in Section 14, *Population and Housing*, according to the California Department of Finance (DOF), the City has an estimated population of 105,999, with 32,919 households with an average of 3.35 persons per household (DOF 2020). SCAG estimates that the City's population will increase to 118,900 by 2045, an increase of approximately 12,901 persons (SCAG 2020). The project would have a population of 281.4 residents based on the DOF's 2020 person-per-household rate for West Covina of 3.35 times the 84 proposed townhomes.

As discussed in Section 14, *Population and Housing*, the level of population growth associated with the project (281.4 residents) would not exceed SCAG's regional population projections (12,901 additional persons in West Covina by 2045), and the project would therefore not directly or indirectly induce substantial unplanned population growth. The project would account for approximately two percent of the City's projected population growth through year 2045. Therefore, the level of population growth associated with the proposed project would not exceed regional population projections. Furthermore, this analysis conservatively assumes that all project residents are new to West Covina, whereas the likely scenario is that some of the future project residents may already live in the City.

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

LESS THAN SIGNIFICANT IMPACT

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

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

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

The following analysis evaluates air pollutant emissions generated by project construction and operation compared to the regional significance thresholds established by the SCAQMD in the *CEQA Air Quality Handbook* (1993), as well as the SCAQMD LSTs. Construction and operational air pollutant

emissions were modeled using the California Emissions Estimator Model (CalEEMod), version 2016.3.2.

Construction Emissions

Project construction would generate temporary criteria pollutant emissions from construction equipment operation on-site, construction worker vehicle trips to and from the site, and from export of materials off-site. Construction input data for CalEEMod include but are not limited to the following applicant-provided information: (1) the schedule of construction activity; (2) areas to be excavated and graded; and (3) volumes of soil materials to be imported to the project site. The inventory of construction equipment to be used was based on CalEEMod default information. The analysis assessed maximum daily emissions from individual construction activities, including site preparation, grading, building construction, paving, and architectural coating. Grading, excavation, hauling, and site preparation would involve the greatest use of heavy equipment and generation of fugitive dust. Full modeling assumptions are included in Appendix B.

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

Formatted:

Table 5 Construction Emissions (pounds/day)

	Maximum Emissions (lbs/day)[1]					
	VOC	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Construction Year 2021	7	74	44	<1	15	9
Construction Year 2022	5	54	36	<1	14	8
Construction Year 2023	4	17	20	<1	2	1
Maximum Emissions	7	74	44	<1	15	9
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum On-site Emissions	**4**	**40**	**22**	**<1**	**10**	**6**
SCAQMD Localized Significance Thresholds (LSTs)[2]	N/A	147	1,357	N/A	10	7
Threshold Exceeded?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

[1] Emissions modeling was completed using CalEEMod. Some numbers may not add up precisely due to rounding. Maximum overall construction emissions from Table 2.1 were from winter calculations.

[2] For LST calculations, maximum on-site emissions are the highest emissions that would occur on the project site from on-site sources such as heavy construction equipment, and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips.

VOC: Volatile Organic Compounds; NO_x: nitrogen oxides; CO: carbon monoxide; SO_x: sulfur oxides; PM_{10}: small particulate matter which measures 10 microns or less in diameter; $PM_{2.5}$: fine particulate matter which measures 2.5 microns or less in diameter; lbs/day: pounds per day

Source: Appendix B

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

Formatted:

Operational Emissions

Development of the project would result in long-term air pollutant emissions over the course of operation. Emissions include area sources, energy sources, water, wastewater, and mobile emissions. Area sources include use of consumer products, use of gas-powered landscaping equipment, and re-application of architectural coating (re-painting). Energy sources include natural gas for uses such as space and water heating and appliances. Water and wastewater usage account for the amount of water used indoors and outdoors. Mobile emissions include vehicle trips from project residents. Weekday project specific trip generation rates provided by the traffic consultant were used for the residential development (Ganddini Group 2020; Appendix D). The default CalEEMod Saturday and Sunday rates were used in the model.

Several model inputs changes were made to account for new State building standards. Assumptions were made in the model to account for the 2019 Title 24 standards since CalEEMod is based on the older 2016 Title 24 standards. The CalEEMod energy usage from the project townhomes was reduced by seven percent to account for the requirements of 2019 Title 24 standards for low-rise residential developments (California Energy Commission 2019). Also, in accordance with Section 150.1(b)14 of the 2019 Building Energy Efficiency Standards, all new residential uses under three stories must install photovoltaic (PV) solar panels that generate an amount of electricity equal to expected electricity usage. Lastly, CalEEMod does not incorporate water use reductions achieved by CALGreen (Part 11 of Title 24). New development would be subject to CALGreen, which requires a 20 percent increase in indoor water use efficiency. Thus, to account for compliance with CALGreen, a 20 percent reduction in indoor water use was included in the water consumption calculations for new development. In addition, per information provided by the applicant, water-efficient irrigation systems and energy efficient appliances were assumed to be included in the project. Hearths would not be included in the project and were netted out of the model. Full modeling assumptions are included in Appendix B.

Table 6~~Table 6~~ summarizes the estimated maximum daily emissions of pollutants associated with project operation. Most project-related operational emissions would result from vehicle trips to and from the site. Existing uses on the project site include approximately 35,102 square feet of general office buildings that would be demolished under the proposed project. Therefore, emissions from this source were subtracted from those of the proposed project to obtain the overall net change in operational emissions.

Formatted:

Table 6 Project Operational Emissions

Emission Source	Maximum Daily Emissions (lbs./day)[1]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	3	<1	7	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile[2]	1	3	9	<1	3	1
Project Emissions	4	4	16	<1	3	1
Existing Annual Emissions	1	2	6	<1	2	1
Net Project Annual Emissions (Project – Existing)	3	2	10	<1	1	0
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

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

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

VOC: Volatile Organic Compounds; NO_x: nitrogen oxides; CO: carbon monoxide; SO_x: sulfur oxides; PM_{10}: small particulate matter which measures 10 microns or less in diameter; $PM_{2.5}$: fine particulate matter which measures 2.5 microns or less in diameter; lbs/day: pounds per day

Source: Appendix B

As shown in Table 6~~Table 6~~, project emissions (gross emissions) would not exceed the SCAQMD regional thresholds for criteria air pollutants. Net emissions (project minus emissions minus emissions from existing on-site uses) would be even further below these thresholds. Therefore, project operation would not result in a cumulatively considerable gross or net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard. Impacts would be less than significant.

Formatted:

LESS THAN SIGNIFICANT IMPACT

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

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

Local Carbon Monoxide (CO) Hotspots

A CO hotspot is a localized concentration of CO that exceeds the State 1-hour or 8-hour CO ambient air standards (SCAQMD 2008a). Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 ppm or the federal and State eight-hour standard of 9.0 ppm (CARB 2016).

The SCAQMD conducted a detailed CO analysis for the Basin during the preparation of the 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the Basin, which would be expected to experience the highest CO concentrations. The highest CO concentration was observed at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of the City of Los Angeles near Interstate 405, located approximately 29 miles west of the site, which has an ADT of approximately 100,000 vehicles per day. The concentration of CO at this intersection was 4.6 ppm, which is below the 35-ppm 1-hour CO federal standard and the State standard of 20 ppm. Furthermore, the Basin has been in attainment of federal CO standards since 2007 (SCAQMD 2016). No stations in the vicinity of the project site have monitored CO in the last eight years. The highest 8-hour CO average recorded at the nearest monitoring, the Azusa monitoring station located approximately 11 miles west of the project site, was 1.1 ppm in 2019 (United States Environmental Protection Agency 2020), which is below the 8-hour CO federal and State standard of 9 ppm (CARB 2020).

Maximum daily CO construction emissions would be approximately 44 pounds, and maximum on-site emissions would be approximately 22 pounds, which would not exceed the SCAQMD's regional threshold (550 pounds per day) or LST (664 pounds per day) for CO. Likewise, as shown in Table 6~~Table 6~~, net new operational emissions from area, energy, and mobile sources combined would be approximately 9 pounds of CO emissions per day, which is below the SCAQMD regional threshold of 550 pounds. Both the SCAQMD's regional thresholds and LSTs are designed to be protective of public health. Based on the low background level of CO in the project area, ever-improving vehicle emissions standards for new cars in accordance with federal and State regulations, and the project's low level of operational CO emissions, the project would not create new hotspots or contribute substantially to existing hotspots. Localized air quality impacts related to CO hot spots would be less than significant.

Toxic Air Contaminants

Toxic air contaminants (TAC) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the

net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer, typically based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) non-carcinogenic effects.

The greatest potential for TAC emissions associated with the proposed project would occur during construction from diesel particulate emissions associated with heavy equipment operations and heavy-duty trucks. Heavy-duty construction equipment is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. As shown in Table 5~~Table 5~~, total PM10 construction emissions, which includes exhaust PM10 (representative of diesel particulate matter) and fugitive dust PM10 (representative of airborne particulate matter) exposure would be below SCAQMD regional and local thresholds.

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

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

LESS THAN SIGNIFICANT IMPACT

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

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

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

With respect to operation, the SCAQMD's *CEQA Air Quality Handbook* (1993) identifies land uses associated with odor complaints as agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Residential uses

are not identified on this list as a use associated with odor complaints. In addition, solid waste generated by the project would be temporarily stored in on-site trash enclosures before collection by a contracted waste hauler, ensuring that on-site waste would be managed and disposed of in a manner preventing the proliferation of odors. Therefore, the project would not generate objectionable odors affecting a substantial number of people, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page left intentionally blank.

4 Biological Resources

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

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

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

The project site encompasses 3.25 acres of land mostly covered by building footprints and asphalt surfaces. The site is in a developed urban area approximately 3.8 miles northwest of the nearest open space, Galster Wilderness Park, a 40-acre site in West Covina. The nearest USFWS-designated Critical Habitat, approximately 2.5 miles to the northwest, is habitat for the Coastal California gnatcatcher (*Polioptila californica californica*), and 2.8 miles to the southeast, is habitat for the southwestern willow flycatcher (*Empidonax traillii extimus*). Both are threatened bird species (USFWS 2020a). Project implementation would not affect or modify these protected habitats or other wildlife habitats for this protected species in West Covina. Since the project site only contains ornamental trees, shrubs, and grass (see Appendix C), and because of its isolation from any other natural area, it does not contain suitable habitat for protected species.

Whether designated or not, migratory or other common nesting birds are protected by the California Fish and Game Code (CFGC) and Migratory Bird Treaty Act (MBTA) and may nest in any of the 69 ornamental trees currently on the project site. Therefore, construction of the project has the potential to directly impact (by destroying a nest) or indirectly impact (by creating construction noise, dust, and other human disturbances that may cause a nest to fail) nesting birds protected under the CFGC and MBTA. Implementation of Mitigation Measure BIO-1 would ensure compliance with the CFGC Section 3503 and the MBTA with respect to nesting birds by reducing the impact through pre-construction nesting bird surveys and avoidance of active nests. Given the absence of special-status species and incorporation of mitigation for nesting birds, no impacts to special-status species or nesting birds would occur and impacts would be less than significant.

Mitigation Measure

BIO-1 Nesting Bird Avoidance

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

- To avoid disturbance of nesting birds, including raptorial species protected by the MBTA and CFGC, construction activities related to the project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 31). If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of construction activities. The nesting bird pre-construction survey shall be conducted on foot inside the project site, including a 100-foot buffer, and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California.

- If nests are found, the 100-foot avoidance buffer shall be demarcated by a qualified biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No parking, storage of materials, or construction activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.
- A survey report by the qualified biologist documenting and verifying compliance with the mitigation and applicable State and federal regulations protecting birds shall be submitted to the City. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

Plant communities are considered sensitive biological resources if they have limited distributions, have high wildlife value, including sensitive species, or are particularly susceptible to disturbance. California Department of Fish and Wildlife (CDFW) ranks sensitive communities as "threatened" or "very threatened" and keeps records of their occurrences in the California Natural Diversity Database (CNDDB). The project is in a developed urban area that is neither vegetated nor an open space area. On-site vegetation, including ornamental shrubs and trees, does not constitute a sensitive natural community. Additionally, there is no riparian habitat on the project site. The channelized Walnut Creek occurs 0.2 mile west of the site, where it runs under West Cameron Avenue and is designated as riverine habitat (USFWS 2020b). Project construction grading would not result in indirect impacts to Walnut Creek due to sedimentation through compliance with State and local regulations concerning stormwater. Operation of the proposed project would not have a substantial adverse effect on riparian habitat or other sensitive natural communities as none exist on the site or in nearby areas and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

occur on or adjacent to the project site. Therefore, the proposed project would not directly or indirectly have a substantial adverse effect on State or federally protected wetlands or other jurisdictional waters. No impact would occur.

NO IMPACT

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

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

As discussed above, the project site is developed with office and parking uses in an urbanized area. The nearest open space area is isolated from regional wildlife corridors or linkages, and there are no riparian corridors, creeks or useful patches of stepping-stone habitat (natural areas) on or connecting the project site to any identified wildlife corridors or linkages. Thus, project implementation would not disrupt or have any adverse effects on migratory corridors or linkages in the area. The project would not affect movement of any native resident, migratory fish, or wildlife species with established native resident or migratory wildlife corridors, as the project site does not occur in these areas.

While the project site contains trees, these trees are not a part of larger habitat area; they are surrounded by development and do not form and are not part of a migratory wildlife corridor or native wildlife nursery site. Potential impacts to nesting birds are a separate issue analyzed in impact discussion 4a, which found that potential impacts to nesting birds would be less than significant with mitigation incorporated. Additionally, upon completion of construction and landscaping activities on the site, newly planted trees and landscaping would provide nesting habitat for migratory birds.

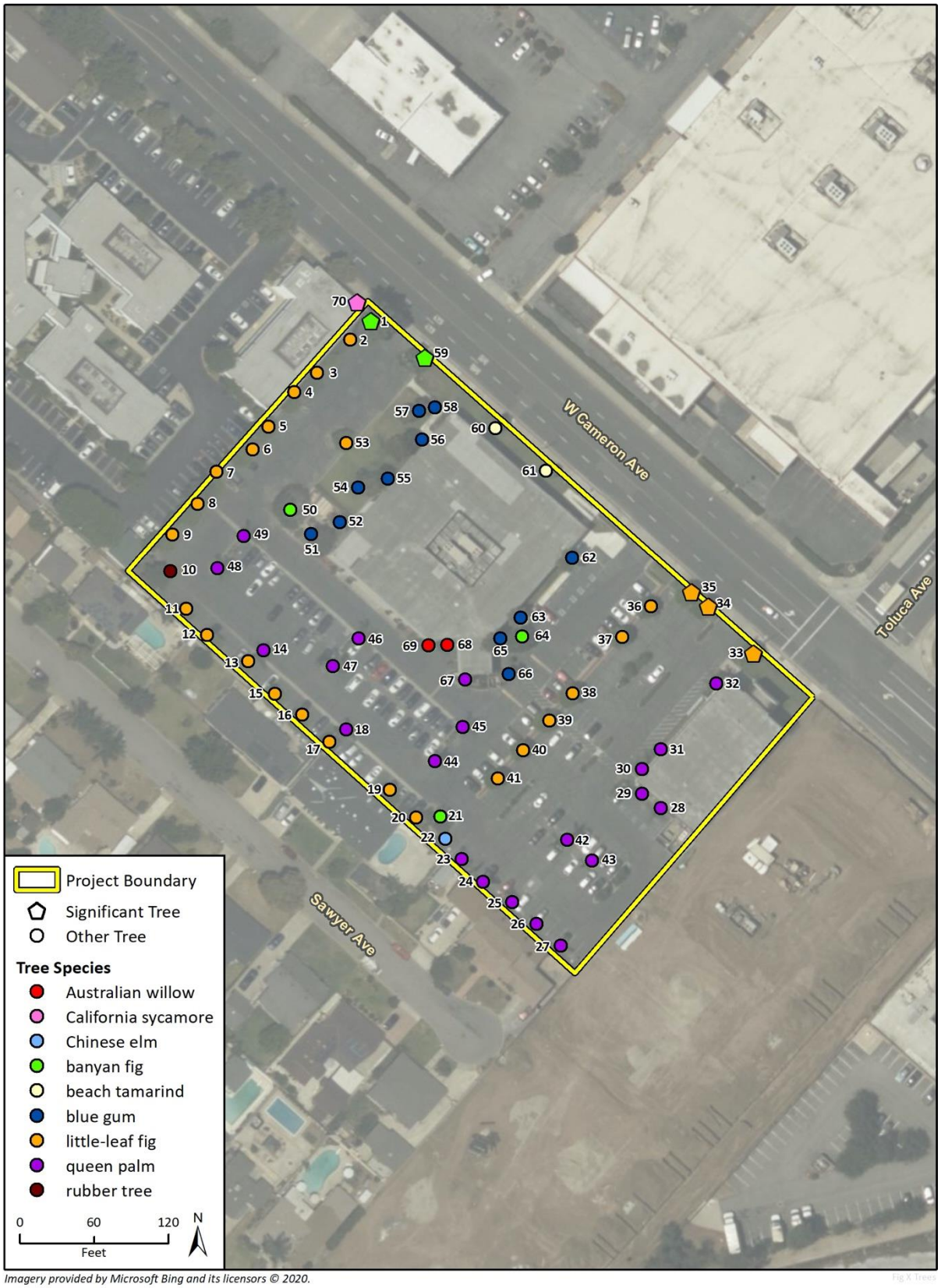
The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

On-site trees and vegetation would be removed and replaced with a variety of trees, shrubs, and groundcovers, illustrated in Figure 8. As shown in Figure 12, and discussed in detail in the Arborist Report (Appendix C), all 69 trees on the site would be removed, and one tree on an adjacent parcel could be affected by project construction.

Figure 12 Project Site Trees



Six of the trees are considered significant under the City's tree ordinance (Chapter 26, Article VI, Division 9, Section 26-288-295), which requires that a permit must be obtained prior to damaging or removing significant or heritage trees defined as follows:

- A heritage tree is any tree defined by the Planning Commission resolution as having historic or cultural value, representative of a significant period in the City's development, or designated for protection in a specific plan, and any of the southern California black walnut tree species in the San Jose Hills.
- A significant tree is a tree on public or private property that meets one or more of the following requirements:
  - Is located in the front yard of a lot or parcel and has a caliper of one foot or more
  - Is located in the street-side yard of a corner lot and has a caliper of one foot or more
  - Is located anywhere on a lot, has a caliper of six inches or more, and is either an oak tree species native to California, California Sycamore, or American Sycamore.

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

70 trees are located on or immediately adjacent to the project site, as depicted in Figure 3. The trees consist primarily of planted ornamental and landscape species as follows:

- 26 little-leaf fig (*Ficus microcarpa*)
- 21 queen palm (Syagrus romanzoffiana)
- 11 blue gum (Eucalyptus globulus)
- 5 banyan figs (Ficus benghalensis)
- 2 beach tamarind (Cupaniopsis anacardioides)
- 2 Australian willow (*Geijera parviflora*),
- 1 Chinese elm (*Ulmus parvifolia*),
- 1 rubber tree (*Ficus elastica*)
- 1 native California sycamore (*Platanus racemosa*) on adjacent property (Tree #70 in Figure 12)

Most of the surveyed trees were in good or fair condition showing only minor flaws or health issues. However, one blue gum eucalyptus was in poor condition due to excessive pruning.

Of the 70 trees, six are significant and 64 are non-significant per the Tree Ordinance. No heritage trees were identified. Of the six significant trees, five are on the project site and one is on the property immediately northwest, with its crown overhanging the project site. Appendix A of the Arborist Report (Appendix C) exhibits photographs of significant trees.

Removal of the significant trees would require a permit issued by the City that includes replacement, relocation mitigation, or payment of the proper restitution value of the trees. Upon completion of the proposed project, the project site would contain 111 trees, 42 more than currently exist on the site.

The California sycamore tree on the adjacent, northwest property line would be protected by implementation of Mitigation Measure BIO-2.

Mitigation Measure

BIO-2 Tree Protection Measures

The following measures are required to avoid and minimize impacts to the overhanging California sycamore, a significant tree not proposed for removal. The planning director may impose additional measures determined necessary to preserve and protect the health of trees not planned for removal.

- All personnel shall be educated by a certified arborist regarding tree protection measures prior to working adjacent to the California sycamore. The education shall include an explanation of the tree protection measures and the protocol for working within the tree's dripline.
- The California sycamore shall be shielded from damage during construction with an appropriate construction barrier, such as chain link and steel stake fence enclosing the entire dripline area. All exposed roots shall be inside the fence or barrier. The fence or barrier shall have a minimum height of 6 feet measured from the grade. The fence or barrier shall be installed prior to commencement of any development activity on the site and shall remain in place throughout all phases of construction. Fences may not be removed without obtaining written authorization from the Planning Director.
- Branches that interfere with the development activity may be pruned to the satisfaction of the Planning Director, superintendent of maintenance operations, or arborist.
- Compaction of the soil within the dripline of the California sycamore shall be minimized to the greatest extent feasible.
- Cutting of roots shall not occur within a distance equal to three and one-half times the trunk diameter, as measured at ground level. The trunk diameter of the California sycamore is 26 inches; accordingly, the appropriate root avoidance distance is at least 7.5 feet from the trunk. Any roots encountered within the dripline shall be cleanly cut with a sharp cutting tool such as a lopping shear or hand saw and not ripped by equipment.

With approval of any required tree removal permits and replacement as described in the conceptual landscape plan (Figure 8), loss of existing trees would not conflict with any local policies or ordinances protecting biological resources, and existing trees would be replaced in excess of the required 1:1 ratio, upon completion of the proposed landscaping plan. With implementation of Mitigation Measure BIO-2, the California sycamore would not experience significant impacts and overall impacts would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

No adopted Habitat Conservation or Natural Community Conservation Plans or other approved local, regional, or State habitat conservation plans apply to City of West Covina (CDFW 2019). Therefore, no impact would occur.

NO IMPACT

This page left intentionally blank.

5 Cultural Resources

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

Regulations

CEQA requires a lead agency determine whether a project may have a significant effect on historical resources (PRC Section 21084.1) and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). An historical resource is a one listed in, or determined to be eligible for listing, in the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources, or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CEQA Guidelines, Section 15064.5[a][1-3]).

A resource shall be considered historically significant if it:

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

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

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

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

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

Historical and Archaeological Resources Investigation

The project site comprises two parcels totaling 3.25 acres at 1600 and 1616 West Cameron Avenue in West Covina. The property at 1616 West Cameron Avenue (APN 8468-015-010) is fully paved and contains a commercial building dating to 1979. The property at 1600 West Cameron Avenue (APN 8468-015-024) is also fully paved and contains a commercial building dating to circa 1966.

Rincon Consultants prepared a cultural resources technical memo for the proposed project in January 2021 (Appendix E). This study included a records search, a pedestrian survey, a search of the Sacred Lands File, and a review of historic aerial maps.

A records search was conducted in December 2020 at the California Historical Resources Information System South Central Coastal Information Center located at the California State University, Fullerton. The purpose of the records search was to identify all previous cultural resources work and previously recorded cultural resources within a 0.5-mile radius of the project site. The search included a review of the National Register of Historic Places (NRHP), the CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The records search identified seven previous studies within a 0.5-mile radius of the project site, none of which were on the project site. The records search identified nine previously recorded cultural resources within a 0.5-mile radius of the project site, all of which were built environment resources. None of these were eligible historical resources or located on the project site.

On January 5, 2021, Rincon contacted the Native American Heritage Commission (NAHC) and requested a search of the Sacred Lands File. The NAHC emailed a response on January 14, 2021, stating the Sacred Lands File search returned negative results.

Rincon Architectural Historian/Archaeologist Alexandra Madsen, MA, RPA conducted a pedestrian field survey of the project site on December 15, 2020. The survey consisted of a visual inspection of all built environment features on the property to determine if they qualify as historical resources under CEQA. The suvery assessed the age, condition, and integrity of these features. The project site is entirely developed with buildings, paved surfaces, and small landscaped areas; therefore, a separate archaeological survey was not conducted.

A review of historic maps did not identify any known Gabrieleño village location on the project site, but several known villages are mapped in the greater vicinity and historic Mission Road is located approximately 0.1 mile to the north. The project site is east of Mission San Gabriel, with known Gabrieleño village sites to the north, southeast, and south. Additionally, Gaspar de Portolà's exploration route is to the southwest, with a known campsite used on July 30, 1769 and January 17, 1770. Several historic roads are in the immediate project site vicinity, including Mission Road, also called Old San Bernardino Road. Additionally, the project site is in an alluvial plain near an established water source (Walnut Creek). Therefore, the results of this study suggest the project site exhibits a moderate sensitivity for containing intact, subsurface archaeological deposits.

The property at 1600 West Cameron Avenue has served as a commercial building from its time of construction circa 1966 to present. As such, many individuals have worked in and visited the property

over the decades. In addition to individuals, several businesses have been associated with the property. The commercial building was not historically associated with a major corporation significant in the area. The property at 1600 West Cameron Avenue is designed in the Late Modern/Postmodern style of architecture but is a modest example of this style in the City of West Covina.

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

The field survey and archival research conducted for this study identified one property over 45 years of age on the part of the project site at 1600 West Cameron Avenue (APN 8468-015-024). This study determined, however, that the property at 1600 West Cameron Avenue is recommended ineligible for listing in the NRHP, CRHR, or as a City of West Covina Landmark (WCL) under any applicable significance criteria. The archival research conducted for this study failed to indicate the property is directly associated with any individuals important in the history of the City, region, state, or nation, making it ineligible for listing in the NRHP, CRHR, or as a WCL under Criteria B/2/B. The property does not possess a unique location or physical characteristic, nor does it represent an established and familiar visual feature or landmark of a neighborhood, community, or the City. The property is therefore ineligible for listing in the NRHP, CRHR, or as a WCL under Criteria C/3/C, D, and E. The records search and archival research conducted for this study failed to indicate that the property at 1600 West Cameron Avenue is likely to yield information important to history or prehistory, making it ineligible for listing in the NRHP and CRHR under Criteria D/4.

For the reasons above, the property also does not exemplify or reflect special elements of the City's cultural, social, economic, political, aesthetic, engineering, or architectural history and is ineligible for listing as a WCL under Criterion A. The property does not appear to constitute a historic district, nor does it appear to contribute to any known or potential historic district. Therefore, the property is not considered a historical resource for the purposes of CEQA (Rincon 2020; Appendix E), and the project's potential historical resources impacts are therefore less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The results of the cultural resources records search, NAHC, and pedestrian field survey concluded that no known archaeological resources exist on the project site. However, archival research identified historic roads in the immediate vicinity of the project site and known Gabrieleño village sites in the general vicinity. Due to the moderate sensitivity of the project site, mitigation is required to reduce potential impacts to archaeological resources to a less than significant level.

The following mitigation measures require a Worker's Environmental Awareness Program (WEAP) training prior to commencement of any ground-disturbing activities, and steps to take in the event of an unanticipated discovery during construction. These steps include evaluating whether the resource meets the definition of a historical and/or unique archaeological resource and is therefore significant under CEQA, and requiring treatment for any resources identified as significant.

Mitigation Measures

CR-1 Worker's Environmental Awareness Program

A qualified archaeologist who meets or exceeds the Secretary of Interior's Professional Qualifications Standards for archeology (National Park Service [NPS] 1983) should conduct WEAP training, prior to

the commencement of any ground-disturbing activities. The sensitivity training should include a description of the types of cultural material that may be encountered, cultural sensitivity issues, the regulatory environment, and the proper protocol for treatment and disposition of cultural materials in the event of a find. The training should be required for all earthmoving construction personnel and a sign-in-sheet also will be required.

CR-2 Archaeological Monitoring

Archaeological monitoring of all project-related ground disturbing activities by a qualified archaeologist as designated by the lead agency shall be performed under the guidance and direction of a Project Archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archeology (National Park Service 1983). Monitors shall have the authority to halt and redirect work should any archaeological resources be identified during monitoring. If archaeological resources are encountered during ground-disturbing activities, work in the immediate area must halt and the find evaluated for listing in the CRHR. Construction monitoring may be reduced or halted at the discretion of the Project Archaeologist, in consultation with the lead agency, as warranted by conditions that include, but are not limited to encountering bedrock, non-native sediments (infill), or negative findings. Should archaeological spot-checking be recommended by the Project Archaeologist, it shall only occur in areas of new construction, where ground disturbance will extend to depths not previously reached (unless those depths are within bedrock). Upon completion of project related ground disturbance and monitoring efforts, a monitoring report should be submitted to the City of West Covina for review and approval, and the final report shall be transmitted to the South Central Coastal Information Center housed at California State University, Fullerton.

CR-3 Unanticipated Discovery of Archaeological Resources

In the unlikely event archaeological resources are unexpectedly encountered during ground-disturbing activities after monitoring has been reduced, work in the immediate area including a 50-foot buffer shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the find is prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the find (see also Mitigation Measure TCR-1 of this IS-MND). If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the proposed project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to cultural resources to less than a significant level.

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

No known human remains have been documented on the project site or the immediate vicinity. While the project site is unlikely to contain human remains, the potential for the recovery of human remains during ground-disturbing activities cannot be ruled out. If human remains are found, existing regulations outlined in the State of California Health and Safety Code Section 7050.5 state that no further disturbance shall occur until the County Coroner has made a determination of origin and

disposition pursuant to PRC Section 5097.98. Both Section 7050.5 and Section 5097.98 relate to required procedures in the event of discovery of Native American human remains and include the following provisions. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric or Native American in origin, the coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access and provide recommendations as to the treatment of the remains to the landowner. Analysis of potential discovery of Native American human remains is contained in Section 18, *Tribal Cultural Resources* of this IS-MND.

Mitigation Measure

CR-4 Unanticipated Discovery of Human Remains

In the event of an unanticipated discovery of human remains, the Los Angeles County Coroner must be notified immediately and all work within the immediate area shall be halted and no further disturbance shall occur until the county coroner has made a determination of origin and disposition of the remains pursuant to PRC Section 5097.98 and to the State of California Health and Safety Code Section 7050.5. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site and make recommendations to the landowner within 48 hours of being granted access. The requirements of Mitigation Measure TCR-1 of this IS-MND shall also be carried out.

With adherence to existing regulations regarding the treatment of human remains, Mitigation Measure CR-4, and Mitigation Measure TCR-1, impacts to human remains under CEQA would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

This page left intentionally blank.

6 Energy

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

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

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

Construction Energy Demand

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. The project would require demolition, site preparation and grading, including hauling material off-site, installing pavement and asphalt, constructing buildings, applying architectural coating, and installing landscaping and hardscaping. As shown in Table 7~~Table 7~~, project construction would require approximately 19,475 gallons of gasoline and approximately 98,744 gallons of diesel fuel. These construction energy estimates are conservative, because they assume the equipment used operates every day of construction.

Table 7 Estimated Fuel Consumption during Construction

	Fuel Consumption (gallons)	
Source	Gasoline	Diesel
Construction Equipment and Hauling Trips	–	95,744
Construction Worker Vehicle Trips	19,475	–

See Appendix B for energy calculation sheets.

Energy use during construction would be temporary, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of California Code of Regulations (CCR) Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes, minimizing unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, per applicable regulatory requirements such as California's Green Building Standards Code ([CALGreen] CCR, Title 24, Part 11), the project would comply with construction waste management practices to divert a minimum of 75 percent of construction and demolition debris. These practices would result in efficient use of energy necessary to construct the project. In the interest of cost-efficiency, construction contractors also would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Operational Energy Demand

Operation of the project would contribute to area energy demand by consuming electricity, natural gas, and gasoline and diesel fuel. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, water use, and overall operation of the project. However, according to the project applicant, all homes would include rooftop solar panels and would be constructed to achieve net zero electricity use to meet 2019 Title 24 requirements. Gasoline and diesel consumption would result from trips generated by future residents.

Table 8~~Table 8~~ summarizes estimated operational energy consumption for the proposed project and existing commercial uses on the site. Project operation would require approximately 122,852 gallons of gasoline and 31,689 gallons of diesel for transportation fuel. Natural gas use for appliances and HVAC would require approximately 12,103 U.S. therms per year. The homes would be net zero electricity, with all electricity consumption being offset by the on-site solar panels. Transportation associated with residents, workers, and deliveries would represent the greatest operational use of energy associated with the proposed project. As illustrated in Table 8~~Table 8~~, the proposed project would result in reduced energy consumption compared to existing uses on the site due to the homes being net zero electricity.

The project would be required to comply with all standards set in CBC Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California's Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the California Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every 3 years, and each iteration is more energy efficient than the previous standards. Furthermore, the project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase to comply with State requirements through Senate Bill (SB) 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Table 8 Estimated Project Annual Operational Energy Consumption

Source	Energy Consumption[1]	
Transportation Fuels[2]		
Gasoline	122,852 gallons	13,487 MMBtu
Diesel	31,689 gallons	4,039 MMBtu
Electricity	0 GWh	0 MMBtu
Natural Gas Usage	12,103 U.S. therms	1,125 MMBtu
Total Energy Consumption		**18,651 MMBtu**
Existing Uses		
Transportation Fuels[2]		
Gasoline	72,315 gallons	7,939 MMBtu
Diesel	18,653 gallons	2,378 MMBtu
Electricity	0.46 GWh	1,556 MMBtu
Natural Gas Usage	3,930 U.S. therms	365 MMBtu
Total Existing Energy Consumption		**12,238 MMBtu**
Net Energy Consumption (Proposed-Existing)[3]		
Transportation Fuels		
Gasoline	50,537 gallons	5,548 MMBtu
Diesel	13,036 gallons	1,661 MMBtu
Electricity	(0.46) GWh	(1,556) MMBtu
Natural Gas Usage	8,173 U.S. therms	760 MMBtu
Project Net Energy Consumption		**6,413 MMBtu**

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

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

[2] The estimated number of average daily trips associated with the project is used to determine the energy consumption associated with fuel use from operation of the project. According to CalEEMod calculations (see Appendix B), the project would result in approximately 1,432,743 annual VMT, whereas existing uses result in approximately 843,365 annual VMT.

[3] Parentheses indicate negative values

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

To help achieve Title 24 reduction targets, the project applicant proposes to incorporate several energy efficient features into overall project design. Energy efficient design features include the installation of solar panels that would meet all energy needs for the residences, energy-efficient appliances and lighting, water-efficient indoor fixtures throughout the project site, and drought tolerant landscaping. Overall, construction of the project would be temporary and typical of similar projects, and would not result in the wasteful, inefficient, or unnecessary consumption of energy. Operation of the project would consume fuel; however, the project would conform to the latest version of California's Green Building Standards Code and Building Energy Efficiency Standards, and would therefore not lead to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The City adopted its Energy Action Plan (EAP) in 2011, which includes energy conservation goals and policies for municipal operations in West Covina, and outreach programs to encourage local businesses and residents to implement utility energy efficiency measures such as design features that achieve water and energy use reductions, including compliance with Title 24 (City of West Covina 2011). The goals and policies established by the EAP are geared towards municipal operations and the establishment of new local energy policies and, therefore, have limited applicability to residential projects in the City. However, the proposed project would be in accordance with the overall intent of the EAP. For example, the project would be designed to comply with the performance levels of the latest version of CALGreen, through adoption of the State building code as amended by the Los Angeles County Green Building Standards Code (Title 28). This would reduce energy consumption compared to standard building practices. The proposed project would be required to comply with the residential mandatory measures in the 2019 CALGreen, Title 24, Part 11. The proposed project would also be required to comply with the energy standards in the California Energy Code, CALGreen Part 6. Measures included in the proposed project to meet these energy standards include installation of rooftop solar panels, low-flow plumbing fixtures, water-efficient irrigation systems, and lighting conservation features. Compliance with these regulations would minimize potential conflicts with adopted energy conservation plans. There would be less than significant.

LESS THAN SIGNIFICANT IMPACT

7 Geology and Soils

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

GeoTek, Inc. prepared a Geotechnical and Infiltration Evaluation for the project site on June 30, 2020, (Appendix F). It included six geotechnical soil borings and two soil borings for infiltration testing, laboratory testing of soil samples, and review/evaluation of site seismicity. The report concluded that the proposed project is feasible from a geotechnical standpoint, provided the recommendations presented in the report are adhered to during planning and construction of the project, to the satisfaction of the City's Building Division.

The following analysis is based on the information contained in this project-specific Geotechnical and Infiltration Evaluation, and on information and maps provided from the California Geological Survey (CGS).

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

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

The project site is in a seismically active area of southern California, but according to the CGS, the project site is not in an Alquist-Priolo Fault Zone (CGS 2020). No faults are present on the project site and the nearest faults are the Sierra Madre Fault Zone approximately 5.2 miles north of the site and the Whittier section of the Elsinore fault zone, situated approximately 6.6 miles south of the project site (Geotek 2020, Appendix F). Implementation of the project would not exacerbate any existing risk of fault rupture, as the project would not include uses such as hydraulic fracturing or minerals extraction that can exacerbate earthquake risks. Though the project site is not on an Alquist-Priolo Fault Zone, strong ground shaking at the site may occur if a sufficiently large earthquake occurs on this or other nearby faults.

To reduce geologic and seismic impacts, the City regulates development based on CBC requirements. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare by ensuring structural strength, means of egress, and general stability through regulation and control of the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures under its jurisdiction. The CBC earthquake design requirements consider the occupancy category of the structure, site class, soil classifications, and various seismic coefficients. The CBC provides standards for various aspects of construction, including but not limited to excavation, grading, earthwork, construction, preparation of the site prior to fill placement, specification of fill materials, fill compaction and field testing, retaining wall design and construction, foundation design and construction, and seismic requirements. It includes provisions to address issues such as construction on expansive soils and soil strength loss, among other things.

In accordance with California law, project design and construction would be required to comply with provisions of the CBC. Because the project would comply with the CBC and recommendations of the Geotechnical Evaluation, and because the project would not exacerbate existing ground shaking hazards, impacts related to seismically induced ground shaking would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

Liquefaction is a process whereby soil is temporarily transformed to fluid form during intense and prolonged ground shaking or because of a sudden shock or strain. Liquefaction typically occurs in areas where the groundwater is less than 30 feet from the surface and where the soils are composed of poorly consolidated fine to medium sand. According to the CGS, the project site is not in a liquefaction zone (CGS 2020). Based on the findings in the Geotechnical Evaluation, groundwater was not encountered during boring activities within the project site, which reached depths of up to 50 feet below ground surface, and the site soils are not susceptible to liquefaction (Geotek 2020, Appendix F).

Design and construction of the proposed project would conform to the current seismic design provisions of the CBC. The 2016 CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program, to mitigate losses from an earthquake and provide for the latest in earthquake safety. While the project would be susceptible to seismic activity given its location within a seismically active area, the project site is not susceptible to liquefaction and would be required to minimize this risk, to the extent feasible, through the incorporation of applicable CBC standards. Therefore, the potential effects of differential settlement because of liquefaction would be less than significant.

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

LESS THAN SIGNIFICANT IMPACT

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

Construction activities would disturb soil on the project site, resulting in potential for soil erosion and loss of topsoil. The project site is underlain by alluvium consisting of gravels, sands and silts of valleys and floodplains. As noted in Section 3, *Air Quality*, the project would be required to comply with SCAQMD Rule 403 regarding incorporation of measures to reduce fugitive dust, which would reduce the potential for construction-related wind erosion (SCAQMD Rule 403(d)(2)). Rule 403 includes requirements for the application of water or stabilizing agents to prevent generation of dust plumes, pre-watering materials prior to the use of tarps to enclose haul trucks, stabilizing sloping surfaces using soil binders until vegetation or ground cover efficiently stabilize slopes, hydroseeding prior to rain, and washing mud and soils from equipment at the conclusion of trenching activities. Implementation of these measures pursuant to SCAQMD Rule 403 would reduce the potential for project construction to result in substantial wind erosion or loss of topsoil.

Because the project would disturb more than one acre of land, it would be subject to the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ [Construction General Permit]) adopted by the State Water Resources Control Board (SWRCB). Compliance with the permit requires the project applicant to file a Notice of Intent with the SWRCB. Permit conditions require preparation of a project-specific Stormwater Pollution Prevention Plan

(SWPPP), which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of construction sites before and after storms is also required to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary. Compliance with existing regulatory requirements, recommendations from the Geotechnical Evaluation, and implementation of applicable best management practices (BMP) related to wind and water erosion control would reduce potential soil loss and erosion from the site. Therefore, impacts related to erosion and loss of topsoil would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

As discussed in impact discussions 7a.1 through 7a.4, the project site is not in or adjacent to an Alquist-Priolo Fault Zone, and there are no known active or potentially active faults on the site. Furthermore, the project site is not in a liquefication hazard zone (DOC 2018). The Geotechnical Evaluation determined that, due to depth to groundwater, very low potential for liquefaction, and lack of nearby "free face" conditions, the potential for lateral spreading is also considered very low to remote (Geotek 2020, Appendix F).

Pursuant to Article II Chapter 17 of the WCMC, the project would comply with CBC requirements, which include foundation and structural design standards. Compliance with applicable CBC seismic standards would reduce impacts related to unstable soils. Therefore, the project would result in a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

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

Expansive soils are highly compressible, clay-based soils that tend to expand as they absorb water and shrink as water is drawn away. According to the Geotechnical Evaluation, alluvial soil was encountered in all borings taken beneath the existing pavement (Geotek 2020, Appendix F). The alluvium varies from a poorly graded sand, silty sand, to a sandy silt. The sandy soils ranged from loose to very dense and the silt soils possessed a medium stiff to very stiff consistency. Gravel layers were also encountered. The artificial fill is underlain by younger alluvial soils. The presence of groundwater in the project site is reported to exceed 50 feet below ground surface. Laboratory testing performed on representative samples of the near surface soils indicates the soils possess a "very low to low" expansion potential. Therefore, the proposed project would not create a substantial direct or indirect risk to life or property due to expansive soils and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

NO IMPACT

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

The project site is currently developed and in an urban region of the City. Due to the site being previously graded and developed, it is unlikely that unique paleontological resources exist on the project site. Although project implementation is not expected to uncover paleontological resources, the remote possibility for such resources to be uncovered during the over excavation and compaction process exists, and, therefore, the potential for impacts to previously undiscovered paleontological resources cannot be ruled out. Mitigation Measure GEO-1 is therefore required to avoid impacts to paleontological resources in case of unanticipated fossil discoveries.

Mitigation Measure

GEO-1 Unanticipated Discovery of Paleontological Resources

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

Implementation of Mitigation Measure GEO-1 would reduce project impacts to unanticipated paleontological resource discoveries to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

This page left intentionally blank

8 Greenhouse Gas Emissions

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

Overview of Climate Change and Greenhouse Gases

GHG absorb and re-emit infrared radiation in the atmosphere and are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N2O), fluorinated gases such as hydrofluorocarbons and perfluorocarbons, and sulfur hexafluoride. Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, and CH4 results from off-gassing associated with agricultural practices and landfills. Different types of GHGs have varying global warming potentials (GWP), which are the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the GHG emissions, referred to as carbon dioxide equivalent (CO_2e), and is the amount of a GHG emitted multiplied by its GWP. CO_2 has a 100 year GWP of one. By contrast, CH4 has a GWP of 28, meaning its global warming effect is 28 times greater than that of CO_2 on a molecule per molecule basis (International Panel on Climate Change 2014a).[5]

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

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

Greenhouse Gas Emissions Inventory

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

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

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

Regulatory Setting

California Regulations

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

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

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

The CARB approved the 2013 Scoping Plan update in May 2014. The update defined the CARB's climate change priorities for the next 5 years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the state's longer term GHG reduction strategies with other state policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

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

SENATE BILL 375

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

Regional Regulations

2020-2045 SCAG RTP/SCS

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

Local Regulations

ENERGY ACTION PLAN

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

GENERAL PLAN (PLANWC)

The City's General Plan (PlanWC) contains several sustainability policies that relate to GHG emissions. Relevant policies include the following:

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

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

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

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

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

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

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

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

Methodology

GHG emissions associated with the proposed project were calculated using CalEEMod version 2016.3.2 (see Appendix B for CalEEMod worksheets). Section 3, *Air Quality* provides more detail on the CalEEMod inputs and assumptions made for the project. In accordance with SCAQMD guidance, construction emissions were amortized over a period of 30 years (the assumed life of the project) and amortized construction emissions were added to operational emissions so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008b).

CalEEMod calculates operational emissions of CO_2, CH_4, and N_2O associated with energy use, area sources, waste generation, water use and conveyance, and CO_2 and CH_4 emissions associated with mobile sources. The first full year of operation was assumed to be 2024.

The project would be served by Southern California Edison (SCE). Therefore, SCE's energy intensity factors (i.e., the amount of CO_2, CH_4, and N_2O per kilowatt-hour) were used to calculate GHG emissions. The default SCE energy intensity factors included in CalEEMod are based on data from 2012. As of 2012, SCE procured 20.6 percent of its electricity from renewable sources (SCE 2012); however, per SB 100, the statewide RPS Program requires electricity providers to increase

procurement from eligible renewable energy sources to 33 percent by 2020 and 44 percent by 2024. To account for the continuing effects of the RPS, the energy intensity factors included in CalEEMod were reduced based on the percentage of renewables reported by SCE. SCE energy intensity factors that include this reduction are shown in Table 9.

Table 9 SCE Energy Intensity Factors

	2012 (lbs/MWh)	2024 (lbs/MWh)[2]
Percent procurement	20.6%[1]	40%
Carbon dioxide (CO_2)	702.4	495.1
Methane (CH_4)	0.029	0.020
Nitrous oxide (N_2O)	0.006	0.004

[1] Source: SCE 2012

[2] RPS goal established by SB 100

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

Mobile source emissions are generated by the increase in vehicle trips to and from the project site associated with operation of on-site development. Ganddini Group, Inc. (Ganddini) prepared a Focused Traffic Analysis for the proposed project that determined the project would result in a net increase of 115 daily trips (Ganddini 2020; Appendix D). The estimated trip generation for the proposed project were included in CalEEMod. The default CalEEMod trip percentages and trip lengths were used. CalEEMod calculates emissions of CO_2 and CH_4 generated by project-generated vehicle trips (i.e., mobile sources). However, CalEEMod does not calculate N_2O emissions from mobile sources; therefore, N_2O emissions were quantified separately using guidance from CARB (see Appendix B for calculations).

Because existing uses on the project site would be or have been demolished, existing operational emissions were subtracted from the proposed project's emissions to account for the net change in GHG emissions associated with the project. Existing emissions were calculated using CalEEMod defaults for the year 2030 and existing weekday trip generation rate estimated by Ganddini. Default Saturday and Sunday trip generation rates were used.

Significance Thresholds

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

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

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

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

(2) **Bright Line Thresholds.** There are two types of bright line thresholds:
   a. **Standalone Threshold.** Emissions exceeding standalone thresholds would be considered significant.
   b. **Screening Thresholds.** Emissions exceeding screening thresholds would require evaluation using a second-tier threshold, such as an efficiency threshold or other threshold concept, to determine whether project emissions would be considered significant. However, projects with a horizon year beyond 2020 should account for the type and amount of land use projects and their expected emissions out to year 2030.

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

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

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

Covina 2020a). As such, the project would result in a significant impact if project-generated emissions exceed the bright line threshold provided by the SCAQMD's GHG CEQA Significance Threshold Working Group in September 2010 (SCAQMD 2010).

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

Project construction would occur over approximately two years with full buildout and operation assumed to occurring in 2024 at the earliest. Based on CalEEMod modeling results, construction activities for the project would generate approximately 1,006 MT of CO_2e (Table 10~~Table 10~~). Amortized over a 30-year period (the assumed life of the project per SCAQMD guidance), project construction would generate about 34 MT of CO_2e per year.

Table 10 Estimated Construction GHG Emissions

Year	Project Emissions (MT of CO_2e)
2021	87
2022	509
2023	409
Total	1,005
Total Amortized over 30 Years	34

GHG: Greenhouse Gases; MT of CO_{2e}: Metric Tons of Carbon Dioxide Equivalent
See Appendix B for CalEEMod outputs

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

As shown in Table 11~~Table 11~~, the proposed project would result in a net increase in GHG emissions of approximately 202 MT of CO2e per year, which would not exceed the SCAQMD threshold of 3,000 MT of CO2e per year. Therefore, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

Table 11 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT of CO_2e per year)
Construction	34
Operational	
Area	1
Energy	60
Solid Waste	19
Water	27
Mobile	578
CO_2 and CH_4	566
N_2O	12
Project Annual Emissions	**720**
Existing Annual Emissions	**518**
Net Project Annual Emissions (Project – Existing)	**202**
SCAQMD Brightline Threshold	**3,000**
Exceeds Thresholds?	**No**

GHG: Greenhouse Gases; MT of CO_{2e}: Metric Tons of Carbon Dioxide Equivalent; CO_2: Carbon Dioxide; CH_4: Methane; N_2O Nitrous Oxide
See Appendix B for CalEEMod outputs

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

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

2017 Scoping Plan

The principal state plan and policy relating to GHG emissions is AB 32, the California Global Warming Solutions Act of 2006, and its follow up, SB 32. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020, and the goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. Pursuant to the SB 32 goal, the 2017 Scoping Plan was created to outline goals and measures for the state to achieve the reductions. The 2017 Scoping Plan's goals include reducing fossil fuel use and energy demand and maximizing recycling and diversion from landfills. The

project design would be consistent with these goals, which includes complying with the latest Title 24 Green Building Code and Building Efficiency Energy Standards, and installing energy-efficient LED lighting, water-efficient faucets and toilets, and water-efficient landscaping and irrigation. Therefore, the project would be consistent with the 2017 Scoping Plan.

SCAG 2020-2045 RTP/SCS

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

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

Reduction Strategy	Project Consistency
Focus Growth Near Destinations & Mobility Options. ▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations ▪ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets ▪ Plan for growth near transit investments and support implementation of first/last mile strategies. ▪ Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses ▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods ▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) ▪ Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	**Consistent.** The proposed project is an infill development that would replace the office developments on the project site with new residences in an urbanized area near existing local- and regional-serving commercial retail development such as the Sunset Parkway Mall and the Plaza West Covina mall, both of which are located less than ½ mile east of the project site. Existing public transit facilities are located near the project site, including bus stops for Foothill Transit Routes 178, 185, 272, and 281. Furthermore, Route 281 connects to the Covina Metrolink station five miles northeast of the project site, and the Baldwin Park Metrolink station approximately two miles northwest of the project site can be reached from the project site through a combination of Foothill Transit routes. The proposed project would be within walking and biking distance of existing residential, commercial, and recreational uses. Bicycles could be parked in private garages. Considering its location central to commercial, recreational, and employment locations, the proposed project would focus growth near destinations and mobility options.
Leverage Technology Innovations. ▪ Promote low emission technologies such as neighborhood electric vehicles (EV), shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space ▪ Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments	**Consistent**. The project would include solar panels on all building rooftops. In compliance with CALGreen Section 4.106.4.1, the garages associated with each townhome would be equipped with EV-ready wiring and infrastructure so that residents would have the ability to equip their individual garages with EV chargers, which would facilitate the use of EVs.

Reduction Strategy	Project Consistency
▪ Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage, and power generation	
Support Implementation of Sustainability Policies. ▪ Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions ▪ Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations ▪ Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space ▪ Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies ▪ Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region ▪ Continue to support long range planning efforts by local jurisdictions ▪ Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Consistent.** The project would be consistent with the City of West Covina EAP (see discussion in Section 5, *Energy*), Title 24, and the latest CALGreen requirements. Therefore, the project would support implementation of sustainability policies.
Promote a Green Region. ▪ Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards ▪ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration ▪ Integrate local food production into the regional landscape ▪ Promote more resource efficient development focused on conservation, recycling, and reclamation ▪ Preserve, enhance and restore regional wildlife connectivity ▪ Reduce consumption of resource areas, including agricultural land ▪ Identify ways to improve access to public park space	**Consistent.** The project is an infill development that would involve construction of commercial uses in an urbanized area and would therefore not interfere with regional wildlife connectivity or convert agricultural land. The project would comply with the applicable conservation policies such as the City's EAP (discussed in Section 6, *Energy*), Title 24, and CALGreen. The project would include solar panels on all building rooftops and would thus support renewable energy production. Therefore, the project would support development of a green region.

Source: SCAG 2020

Local Regulations

As further discussed in Section 6, *Energy*, the proposed project would be consistent with the provisions and intent of the City's EAP due to project design features that would conserve energy, such as the use of LED lighting. As shown in Table 13~~Table 13~~, the proposed project would be

consistent with applicable policies associated with GHG emission reductions in the City's General Plan (PlanWC).

Table 13 West Covina General Plan (PlanWC) Consistency Analysis

General Plan (PlanWC) Policy	Project Consistency
P1.1. Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular traffic.	**Consistent.** The project site is within 0.2 mile of bus stops that serve Foothill Transit Routes 178, 185, 272, and 281. Route 281 connects to the Covina Metrolink station five miles northeast of the project site, and the Baldwin Park Metrolink station approximately two miles northwest of the project site can be reached from the project site through a combination of Foothill Transit routes. The proposed project would be within walking and biking distance of existing residential, commercial, and recreational uses. Residents would be able to park bicycles and other alternative transportation modalities in their private garages. Therefore, the proposed project would be accessible by alternative transportation modes.
P1.2. Promote the use of energy-efficient vehicles.	**Consistent.** In compliance with CALGreen Section 4.106.4.1, the proposed project would include electrical infrastructure in all residential garages capable of supporting EV charging, reducing barriers to the adoption of EVs for residents.
P1.11. Plant to maximize the social, economic, and environmental benefits of trees.	**Consistent.** The existing site is mostly paved, but there are also 69 ornamental trees on the site. These would be removed, and the proposed project would install 111 trees, for a net increase of 42 trees.
P4.5. Work to eliminate barriers to pedestrian and bicycle travel.	**Consistent.** The proposed project would add street trees to West Cameron Avenue to provide additional shading for sidewalks adjacent to the project site and bicycles could be parked in private garages associated with each townhome.
P4.8. Implement "green" streetscape elements for purposes of beautification, carbon reduction, and stormwater runoff management.	**Consistent.** The proposed project would add new trees throughout the project site and street trees along its border with West Cameron Avenue.
P5.6. Continue existing beneficial energy conservation programs, including adhering to the California Energy Code in new construction & major renovations.	**Consistent.** The proposed project would be required to comply with the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24). According to the applicant, the project would include energy efficient design features such as energy-efficient lighting, drought tolerant landscaping, and water-efficient indoor fixtures throughout the project site.
P5.9. Provide adequate facilities & services for the collection, transfer, recycling, & disposal of refuse.	**Consistent.** The proposed project would include trash enclosures that provide for separate waste disposal and recycling containers and would be served by Athens Services, the existing waste hauler for the City.
P6.1. Promote and support transportation decisions that reduce driving and increase rates of transit use, walking, and biking.	**Consistent.** The project site is within 0.2 mile of bus stops that serve Foothill Transit Routes 178, 185, 272, and 281. Route 281 connects to the Covina Metrolink station located approximately vie miles northeast of the project site, and the Baldwin Park Metrolink station approximately two miles northwest of the project site can be reached from the project site through a combination of Foothill Transit routes. The proposed project would also

General Plan (PlanWC) Policy	Project Consistency
	be within walking and biking distance of existing residential, commercial, and recreational uses and bicycles could be parked in private garages associated with each townhome. Therefore, the proposed project would promote and support transportation decisions that reduce driving and increase rates of transit use, walking, and biking.

Source: City of West Covina 2016

As discussed above and illustrated in Table 12~~Table 12~~ and Table 13~~Table 13~~, the proposed project would be consistent with the 2017 Scoping Plan, 2020 RTP/SCS, and the City of West Covina General Plan (PlanWC). Therefore, the proposed project would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

9 Hazards and Hazardous Materials

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

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

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

Operation of the proposed project would likely involve the use of common materials used in the regular maintenance of buildings and landscaping, such as cleaning and degreasing solvents, fertilizers, and pesticides. However, maintenance activities would only require minor quantities of these products and would not involve the use of extremely hazardous substances. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. The transport, use, and storage of hazardous materials during construction of the project would be subject to all applicable State and federal laws, such as the Hazardous Materials Transportation Act (HMTA), Resource Conservation and Recovery Act (RCRA), the California Hazardous Material Management Act (CHMMA), and the CCR, Title 22.

Proposed residential uses would not emit or handle hazardous materials beyond typical household and landscaping maintenance waste and materials. Operation of the project would not create a hazard to the public through transportation of hazardous materials upon completion and residential occupancy. Therefore, the proposed project would not create a significant hazard to the public or the environmental through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Accidents during construction of the project could occur as a result of any of the following actions: direct dermal contact with hazardous materials, incidental ingestion of hazardous materials, or inhalation of airborne dust released from dried hazardous materials. The transportation of hazardous materials could result in accidental spills, leaks, toxic releases, fire, or explosion.

Compliance with federal, State, and local laws, regulations, and California Division of Occupational Safety and Health training programs would minimize or avoid potential impacts associated with the routine transport, use, or disposal of hazardous materials during construction. Appropriate documentation for all hazardous waste that is transported, stored, or used in connection with specific project-site activities would be provided as required for compliance with existing hazardous materials regulations codified in the CCR.

The Certified Unified Program Agency is an agency certified by the Department of Toxic Substances Control (DTSC) to regulate hazardous waste generators and on-site treatment programs; aboveground and underground storage tank programs; Hazardous Materials Management, Business Plans, and Inventory Statements; and the Risk Management and Prevention Program. The Los Angeles County Fire Department (LACFD), Health and Hazardous Materials Division (HHMD) is the Certified Unified Program Agency responsible for administering hazardous materials programs in Los Angeles

County. LACFD and HHMD personnel respond to hazardous materials incidents in West Covina. (LACFD 2019).

Construction activities on the project site would be required to comply with federal and State laws to eliminate or reduce the consequence of hazardous materials accidents. For example, employees who would work around hazardous materials would be required to wear appropriate protective equipment, and safety equipment is routinely available in all areas where hazardous materials are used. Adherence to the federal, State, and local regulations governing the transportation, use, and disposal of hazardous waste would reduce impacts associated with reasonably foreseeable upset and accident conditions during construction to less than significant.

Buildings built before about 1970 may contain asbestos-containing materials (ACMs). The building at 1616 West Cameron Avenue dates to 1979. The building at 1600 West Cameron Avenue dates to circa 1966. ACMs may therefore be present in the building at 1600 West Cameron Avenue. A Phase I Environmental Site Assessment (Phase I ESA) for the project site, completed by ENGEO Incorporated in June 2020 (Appendix G), made the following finding:

> *An asbestos, lead, and PCB-containing building material survey was not conducted as part of this assessment. Past documented disposal of asbestos-containing materials is associated with 1616 West Cameron Avenue. Given the age of the existing structures, it is conceivable that asbestos, lead, and PCB-containing materials may exist on site.*

Demolition of structures potentially containing ACMs, lead, and PCBs could pose a risk to construction workers and the public if not conducted according to applicable federal, state, and local regulations. Therefore, Mitigation Measure HAZ-1 is required to reduce these potential impacts to a less than significant level.

The proposed single-family residential uses are not typically associated with upset and accident conditions involving the release of hazardous materials. Maintenance and upkeep of facilities on-site, including cleaning of individual residences, play areas, open space areas, parking areas, and shared community spaces, would occasionally require the use of various solvents, cleaners, paints, oils/fuels, and pesticides/herbicides. However, maintenance activities would only require minor quantities of these products and would not involve the use of extremely hazardous substances. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. The transport, use, and storage of hazardous materials during construction of the project would be subject to all applicable State and federal laws such as the HMTA, RCRA, the CHMMA, and the California Code of Regulations, Title 22. Therefore, the proposed project would not create a significant hazard to the public or the environmental through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

While the site is not included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, the Phase I ESA states the following regarding potential soil contamination on or near the project site:

- The property was used for agricultural cultivation from at least the 1920s through at least the early 1950s. It is possible that residual concentrations of legacy agrichemicals may exist in near-surface soil. The soil may contain elevated levels of pesticides and pesticide-related metals such as arsenic and lead.
- Due to its proximity to several adjacent sites with environmental database records, such as a former dry cleaner, there is a potential for vapor intrusion on the subject property.

The Phase I ESA recommends the following to address these potential soil contamination hazards:

- Perform sampling of near-surface soil to determine if potential impacts from residual agricultural chemicals exist at the property.
- Perform a soil gas assessment to evaluate soil gas and potential vapor intrusion conditions at the property.
- Prepare a Site Management Plan for proper handling of any soil or groundwater that may be generated during redevelopment activities.

Mitigation Measure HAZ-2 is required to address these recommendations and mitigate potential impacts from potential release of in-soil contaminants at the project site.

Mitigation Measures

HAZ-1 Testing and Disposal for Building Materials Containing ACMs, Lead-Based Paint, and PCBs

Prior to issuance of a demolition permit for any building on the project site, the applicant shall obtain and submit to the City for review and approval a letter from a qualified consultant verifying that no ACMs, lead-based paint, or PCB-containing materials are present in the on-site buildings. If any of these materials are found to be present, they shall be abated in compliance with SCAQMD Rule 1403, as well as other applicable State and federal rules and regulations. Only asbestos trained and certified abatement personnel shall be allowed to perform asbestos abatement activities on-site. All such materials removed from any on-site structure shall be hauled and disposed off-site by a transportation company certified to handle these materials. If these abatement measures are necessary, the applicant shall submit documentation to the City demonstrating that they have been properly carried out prior to issuance of building permits for the project.

HAZ-2 Near-Surface Soil Testing, Soil Gas Assessment, and Soil Management Plan

Prior to issuance of grading permits, the applicant shall retain a qualified consult to carry out the following mitigation measures for potential soil contamination:

- Perform sampling of near-surface soil to determine if potential impacts from residual agricultural chemicals exist at the project site
- Perform a soil gas assessment to evaluate soil gas and potential vapor intrusion conditions at the project site
- Prepare a Site Management Plan for proper handling of any soil or groundwater that may be generated during project construction activities

The applicant shall submit the results of the near-surface soil testing and soil gas assessment, and the Site Management Plan, to the City for review and approval prior to issuance of grading permits.

With implementation of Mitigation Measure HAZ-1 and Mitigation Measure HAZ-2 the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

There are no schools within 0.25 mile of the project site. The nearest schools are the following:

- North West College-West Covina, approximately 0.45 mile northwest of the project site at 2121 West Garvey Avenue N. in West Covina
- Edgewood High School, approximately 0.5 mile southwest of the project site, at 1625 W. Durness Street in West Covina
- Edgewood Middle School, approximately 0.5 mile west of the project site, at 1039 S. Willow Avenue in West Covina
- Wescove Elementary School, approximately 0.75 mile south of the project site, at 1010 W. Vine Avenue in West Covina

During construction of the proposed project, hazardous and potentially hazardous materials would be utilized for the transport and operation of vehicles and machinery. As discussed above, the transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable State and federal laws, such as the HMTA, RCRA, the CHMMA, and the California Code of Regulations, Title 22. As discussed under impact discussion 9a, construction of the project, and associated air pollutant emissions, would be temporary and less than significant. Furthermore, operation and maintenance of the project would only involve the use of common cleaning and landscape maintenance materials comparable to those materials already in use in the project site vicinity. Because the nearest school is located over 0.25 mile from the project site and operation of the project would not include emissions or use of substantial quantities of hazardous materials, there would be no impact to nearby schools.

Potential uses of hazardous materials would be site-specific and limited to the physical boundaries of the project site, and therefore, the project would not emit or handle hazardous materials within 0.25-mile of an existing or proposed school. There would be no impact.

NO IMPACT

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

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

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

The SEMS database search did not produce any results associated with the project site, indicating that the site is free of known hazards and contaminants (USEPA 2019b). A search of the DTSC Envirostor database did not identify any hazardous or known contamination sites within a 0.25 mile of the site (DTSC 2020a). Furthermore, according to the DTSC Cortese list, the only hazardous materials release site in West Covina is the BKK Sanitary Landfill located approximately 3.4 miles southeast of the project site (DTSC 2020b). According to GeoTracker, the project site does not contain any LUST or

other cleanup sites. There are two LUST cleanup sites within a 0.25-mile radius of the project site. Both have been completed, and the cases are now closed (SWRCB 2020).

Therefore, impacts related to hazardous material sites would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is not located within two miles of a public airport or in an airport land use plan. The closest airport to project site is San Gabriel Valley Airport, approximately five miles east. Furthermore, no private airstrips are near the project site. Therefore, the project would not result in safety hazards or excessive noise related to airports for people residing or working at the project site and its vicinity. No impact would occur.

NO IMPACT

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

The project would modify site access to include one driveway along West Cameron Avenue, replacing the two existing driveways. This would not introduce a new geometric hazard. Additionally, the proposed residential development is consistent with adjacent land uses (refer to Section 11, *Land Use and Planning*), and would not introduce an incompatible use to local roadways. Internal roadways have been configured to allow for adequate turning radii throughout the site for passenger vehicle, garbage truck, and emergency vehicle access. Additionally, the West Covina Fire Department will review the project plans to confirm adequate emergency vehicle access is provided.

Furthermore, as discussed in Section 17, *Transportation*, development of the project would not impair roadways or conflict with planned pedestrian, bicycle, and transit facilities in the vicinity. The project would not have a significant impact on any area intersections that would be used for emergency access or evacuation. As such, implementation operation of the project would not interfere with existing emergency evacuation plans or emergency response plans in the area. Therefore, the project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

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

The project site is in an urban area of West Covina. Undeveloped wildland areas are not close to the project site. As detailed in Section 20, *Wildfire,* the project site is not in a “Fire Hazard Severity Zone” or “Very High Hazard Severity Zone” for wildland fires (CAL FIRE 2020). The nearest Very High Hazard Severity Zone is approximately 2.5 miles southeast of the project site. Therefore, the project would not directly expose people or structures to a significant risk of loss injury or death involving wildland fires. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

10 Hydrology and Water Quality

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

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

The project site is almost entirely developed and is surrounded by residential and commercial uses in an urban area. Under current conditions, drainage collects in existing paved parking lots and at downspouts on existing structures and is then directed to the City's existing stormwater system via curb gutters along West Cameron Avenue. Although construction of the proposed project would involve removal of ornamental trees and landscaping, the project would install new landscaping, as shown in Figure 8, including various new trees (111 total) and approximately 14,200 square feet of pervious surfaces. Additionally, the project includes two infiltration basins, which would provide a total storage volume of 10,083 cubic feet. Therefore, the proposed project would retain stormwater on-site and would not increase existing stormwater flows off-site or affect water quality.

The proposed project would be required to comply with all established regulations under the NPDES permitting program to control both construction and operation stormwater discharges. Under the permit, the project applicant would be required to eliminate or reduce non-stormwater discharges, develop and implement a SWPPP for project construction activities (as discussed in Section 7, *Geology and Soils*), and perform inspections of the stormwater pollution prevention measures and control practices to ensure conformance with the SWPPP. Furthermore, the applicant would be required to implement all applicable source control BMPs to reduce water quality impacts as listed under the NPDES permit. The project would also be required to comply with WCMC water quality regulations. Chapter 9, Article III, Section 9-36, Control of pollutants from new developments/redevelopment projects, requires that the project implement a standard urban stormwater mitigation plan that the City would review and approve prior to construction of the project. Additionally, as required by the WCMC and NPDES permit, construction activities on the project site would use a series of BMPs to reduce erosion and sedimentation and the construction contractor would be required to operate and maintain these controls for the duration of construction. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

The project site receives its water service from the Suburban Water Systems, a company governed by the Southwest Water Company (SWC). SWC uses local groundwater from the San Gabriel and Central groundwater basins for approximately 80 percent of its water supplies (SWC 2020). The San Gabriel Groundwater Basin is an adjudicated basin subject to a salt and nutrient groundwater management plan that ensures its sustainable management (Stetson Engineers, Inc. 2016).

As discussed in Section 19, *Utilities and Service Systems*, the proposed project's water demand would not substantially affect SWC's ability to meet water demands. Furthermore, while the proposed project would include landscaping and approximately 14,200 square feet of permeable area, most of the project site is covered in hardscaping. Additionally, the proposed on-site infiltration basins would facilitate infiltration and groundwater recharge and reduce the amount of surface runoff from the project site. Therefore, the proposed project would be served by available water supply and would not significantly deplete groundwater supplies or interfere with groundwater recharge.

The San Gabriel Groundwater Basin's Salt and Nutrient Groundwater Management Plan ensures the maintenance of water quality objectives for groundwater in the basin by encouraging the use of recycled water, maintaining groundwater recharge, and identifying safe yields from the basin. The residential uses on the project site would not be point source generators of water pollutants and would not interfere with the ability of the Groundwater Management Plan to maintain water quality standards. Furthermore, as discussed in impact discussion 10a, the proposed project would include permeable surfaces and infiltration basins on the project site. The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

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

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

The project site is generally flat and would remain flat under the proposed project. The project would not alter the course of a stream or river because the project site contains no water bodies and no off-site alteration of water bodies would occur. Walnut Creek is the nearest water body, 300 feet south of the site. The project would not modify this creek but would alter site drainage through the addition of impervious surfaces that could increase stormwater runoff volume and flow.

Compliance with the City's low-impact development ordinance and the Los Angeles County MS4 permit requires capture and treatment of the 85th percentile, 24-hour storm event. As part of the project's final design review, the project would be required to submit a Standard Urban Stormwater Mitigation Plan demonstrating adequate stormwater retention using infiltration basins, bioretention areas, capture and controlled release tanks, or another BMP. Such BMPs would slow the velocity of runoff and allow sediment and debris to settle out of the water column, thereby minimizing the potential for downstream flooding, erosion/siltation, or exceedances of stormwater drainage system capacity. The project includes two infiltration basins, sized to accommodate stormwater runoff required to be captured on-site. These basins would also ensure stormwater runoff does not carry pollutants off-site.

Additionally, as described in Section 7, *Geology and Soils*, the project would be subject to the NPDES General Permit, which requires preparation of a SWPPP and BMPs to ensure erosion and sediment

controls are implemented during construction. This would ensure no substantial erosion or siltation occurs off-site resulting from project construction.

According to the Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, the project site is in Zone X, indicating an area of minimal flood hazard (FEMA 2008). The project site is not located in a floodplain and would not divert or redirect flood flows. Given that the project site would remain generally flat and be required to implement BMPs to capture and retain stormwater on-site, potential impacts related to the alteration of the site's drainage pattern would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

As discussed above in impact discussion 10c, the project site is designated Zone X on the most recent FEMA Flood Insurance Rate Map, indicating an area of minimal flood hazard (FEMA 2008). The project site is approximately 60 miles from the Pacific Ocean and not subject to tsunami, and the nearest inland surface water body that may be subject to seiche is Santa Fe Reservoir, approximately 2.8 miles to the north. According to the City's Natural Hazard Mitigation Plan, the City could be impacted by flooding in the event of dam failure at the Puddingstone Dam or San Dimas Dam, located 4.6 and 8.8 miles from the project site, respectively. The Puddingstone Dam failed once in 1926, when it overtopped due to construction on the dam; however, there was no loss of life or significant damage. The San Dimas Dam has not experienced failure to date (City of West Covina 2020a). Dam failure at either of these dams is unlikely, and each dam has an Emergency Action Plan in place to guide emergency response in case of dam failure. Additionally, the project does not involve storage or processing of pollutants that would be released due to inundation should such an event occur. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

11 Land Use and Planning

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

a. Would the project physically divide an established community?

Existing development on the project site consists of office buildings, parking lots, and painted wrought iron fence on the western, eastern, and southern borders. The proposed project involves demolition of this existing development and construction of a new residential community. Primary vehicular access to the project site is and would continue to be provided from West Cameron Avenue. The project would also include internal streets and driveways that access private residential garages and allow circulation throughout the project site. The existing seven-foot metal fence would remain in place along the southern boundary. On the western and eastern boundaries, a six-foot-high split-face block wall would replace the metal fence, and along West Cameron Avenue, a 3-foot-6-inch stucco patio wall would separate the street-facing condos from the adjacent sidewalk. Between the West Cameron Avenue-facing condos, stucco walls ranging from 3 feet/6 inches to six feet high, would occur between the condo entry stairs and would delineate the boundaries of the community and individual properties within the community. As the project site is already fenced, the project would not alter access in and around the project site or divide an established community. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The proposed project involves the construction of a residential community in an area zoned General Urban (G-U), T-4 and having a General Plan designation of Neighborhood Medium. According to the West Covina Downtown Plan and Code, areas zoned G-U are intended for community-serving retail, office, entertainment, and hospitality uses, in block-scale buildings up to three-stories high with ground-floor commercial activities on key streets. Active streetscapes provide continuity with adjacent areas, and buildings have ground-floor commercial, retail, and office uses, with upper floors being available for office, civic, lodging, housing, or other commercial uses. According to the General Plan (PlanWC), the standards of this zone are intended to promote a walkable, diverse, and well-connected area (City of West Covina 2016b).

The current land use designation does not permit the proposed density of 25.8 dwelling units per acre, so the project would require a General Plan Amendment to Neighborhood High, which allows a density of 21 to 54 dwelling units per acre. Although the proposed project would require an amendment to the General Plan (PlanWC), the project would align with existing residential development adjacent to the site and would help meet the goals of the Downtown Plan and Code and the General Plan (PlanWC) to improve the neighborhood character and pedestrian environment. As the project would enhance the area's landscaping, street edges, and sidewalks and provide residential uses close to commercial uses, it would add to the walkable, mixed-use aspects of the neighborhood. According to the applicant, the proposed project would include sustainable development practices as well, including water and energy-efficient fixtures and appliances, rooftop solar panels, spray foam insulation rather than batt insulation, and low-impact development biofiltration BMPs for stormwater capture and treatment. These regulatory procedures provide the City with further assurances for review and opportunities to incorporate additional conditions to ensure that the project would improve the character and conditions of the project site. With City approval of the necessary entitlements, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

12 Mineral Resources

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

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

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

The California Surface Mining and Reclamation Act of 1975 was enacted to promote conservation and protection of significant mineral deposits. According to the California Department of Conservation Mineral Land Classification Maps, the project site is in an area with MRZ-2 designation, indicating that the area contains identified mineral resources in the form of concrete aggregate (DOC 2010). However, according to the EIR for the City's 2016 General Plan Update and Downtown Plan and Code (PlanWC), the city does not contain mineral resources appropriate for extraction (City of West Covina 2016b). The proposed project involves demolition of school buildings and construction of a new residential community in a residential area of the City. The project site and its vicinity are, therefore, not used for or compatible with mineral deposit recovery. Given the existing developed condition of the site and its surroundings and the consistency of the proposed project with the land use designation, zoning, and actual use of the project site and its surroundings, the loss of availability of a known mineral resource would not occur, and there would be no impact.

NO IMPACT

This page left intentionally blank

13 Noise

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

Noise

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

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

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

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

Descriptors

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

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

Propagation

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

Vibration

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

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

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

Descriptors

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

Response to Vibration

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

Table 14 Vibration Damage Potential

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

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

Source: Caltrans 2020c

Table 15 Vibration Annoyance Potential

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

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

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

Source: Caltrans 2020c

Propagation

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

Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Some land uses are considered more sensitive to ambient noise and groundborne vibration levels than others. For example, residences, hospitals, schools, guest lodging, libraries, and religious institutions are more sensitive to noise than commercial and industrial land uses (City of West Covina 2016a).

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

The sensitive receivers nearest to the site consist of single-family residences immediately to the southwest, and West Covina Medical Center approximately 520 feet to the northwest along Cameron Avenue.

Project Noise Setting

The predominant noise source on and around the project site is vehicular traffic on Cameron Avenue. Ambient noise levels are generally highest during the daytime and rush hour unless congestion substantially slows speeds. Two 15-minute noise level measurements were collected by Rincon on December 11, 2020 between 2:24 p.m. and 2:57 p.m. using an Extech (Model 407780A) ANSI Type 2 integrating sound level meter. Noise Measurement (NM) 1 was taken along the northeastern

boundary of the site along Cameron Avenue, while NM 2 was taken at the southwestern corner of the site. Because of restrictions associated with COVID-19 in effect at the time on-site measurements were taken, there was a decreased use of area roadways compared to pre-COVID conditions, and on-site noise measurements may not be fully representative of typical pre-COVID noise conditions. Nonetheless, on-site measurements were conducted for informational purposes.

Table 16~~Table 16~~ summarizes the noise measurement results and Figure 13~~Figure 13~~ shows the noise measurement locations. Measured noise levels are provided in L_{eq} for the measurement period; L_{min} and L_{max} are also provided. Detailed sound level measurement data are included in Appendix H.

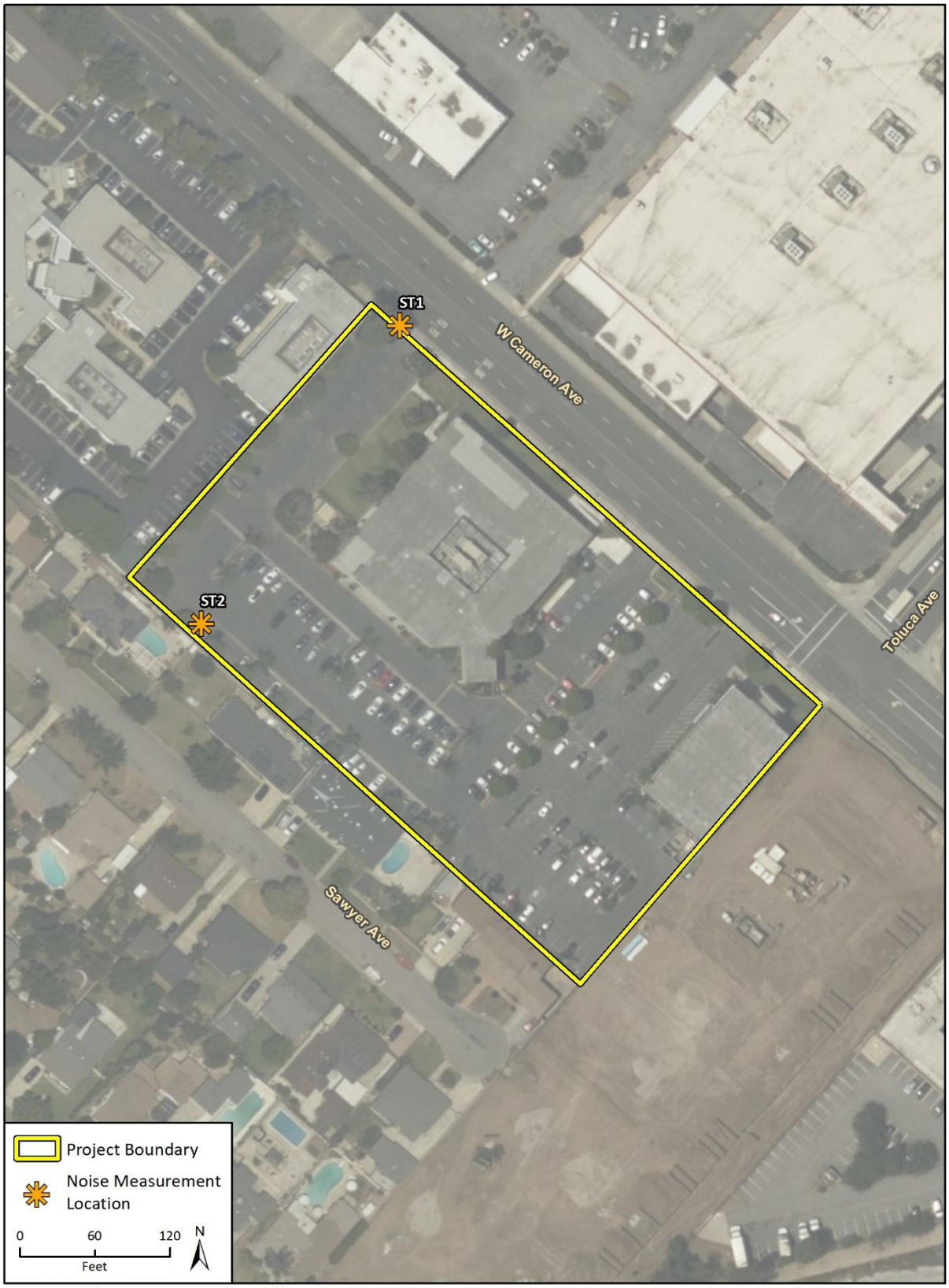
Formatted:

Table 16 Project Vicinity Sound Level Monitoring Results

#	Measurement Location	Sample Times	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
ST1	Northeastern boundary of site	2:24 p.m. – 2:39 p.m.	35 feet to centerline of Cameron Avenue; I-10 traffic noise and auto repair shop noise also audible	70.6	52.5	82.0
ST2	Southwestern bend of site	2:42 p.m. – 2:57 p.m.	315 feet to centerline of Cameron Avenue	49.9	44.8	65.0

See Appendix H for noise monitoring data.
Source: Rincon field visit on December 11, 2020.

Figure 13 Noise Measurement Locations



Imagery provided by Microsoft Bing and its licensors © 2020.

Fig 3 Noise Measurement Locations

Regulatory Setting

City of West Covina General Plan (PlanWC)

The City of West Covina adopted its current General Plan (PlanWC) in December 2016. The Our Healthy and Safe Community Chapter of PlanWC provides a description of existing noise levels and sources and incorporates comprehensive goals and policies, which focus on establishing and applying criteria for acceptable noise levels for different land uses to minimize the negative impacts of noise, especially at sensitive receivers. In support of these goals and policies, the City has adopted the State's noise and land use compatibility matrix into PlanWC, which determines the "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable" noise levels for various land uses.[6] According to the City's noise compatibility matrix in PlanWC, ambient noise up to 60 CNEL is normally acceptable, ambient noise between 60 CNEL and 70 CNEL conditionally acceptable and ambient noise above 70 CNEL normally unacceptable for multi-family residential commercial uses (City of West Covina 2016a).

PlanWC incorporates Title 24 of the California Health and Safety Code (the California Building Standards Code) for interior noise standards of multiple residential units. According to Title 24, an interior noise standard of 45 CNEL is established for multi-family residential units. Additionally, Title 24's energy conservation requirements include dual-pane windows, which will assist in the reduction of interior noise.

City of West Covina Municipal Code

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

Section 15-85 of the Noise Ordinance states that if noise is plainly audible at 50 feet from the property line of any property, unit, building, structure or vehicle in which it is located, it shall be presumed that the noise being created is in violation. The Noise Ordinance also contains provisions regulating nuisance noise sources, such as repairing, rebuilding, or testing of any motor vehicles on private property, and the operation of two- and four-stroke engines. Any noise from these sources that exceed ambient noise levels by 5 dB or more is considered a noise violation.

Section 15-95 of the Noise Ordinance prohibits any construction activities between the hours of 8:00 p.m. and 7:00 a.m. (or 6:00 a.m. for unloading and loading activities) within a residential zone, or within a radius of 500 feet therefrom, that causes the noise level at the property line to exceed the ambient noise level (defined as the all-encompassing noise associated with a given environment) by more than 5 dB, unless a permit to do so has been obtained from the City, or in the case of emergency work as defined in the Noise Ordinance.

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

Section 15-95 of the Noise Ordinance prohibits any construction activities between the hours of 8:00 p.m. and 7:00 a.m. (or 6:00 a.m. for unloading and loading activities) within a residential zone, or within a radius of 500 feet therefrom, that causes the noise level at the property line to exceed the ambient noise level (defined as the all-encompassing noise associated with a given environment) by more than 5 dB, unless a permit to do so has been obtained from the City, or in the case of emergency work as defined in the Noise Ordinance.

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

The proposed project involves the demolition of existing on-site commercial buildings and the construction of five new residential townhome complexes with 84 total residential units. Noise-sensitive receivers, consisting of residences and a hospital, may be subject to both temporary construction noise and long-term operational noise. The following discussions address construction and operational noise associated with the project.

Construction Noise

Construction activity would result in temporary increases in ambient noise in the project area on an intermittent basis and, as such, would expose surrounding noise-sensitive receivers to increased noise. The sensitive receivers consist of single-family residences immediately to the southwest and West Covina Medical Center approximately 520 feet to the northwest along Cameron Avenue.

As discussed under *Regulatory Setting* of this section, WCMC Section 15-95 prohibits any construction activities between the hours of 8:00 p.m. and 7:00 a.m. (or 6:00 a.m. for unloading and loading activities) within a residential zone, or within a radius of 500 feet therefrom, that causes the noise level at the property line to exceed the ambient noise level by more than 5 dBA. While the City does not have specific noise level criteria for assessing daytime construction impacts, the FTA has developed criteria for determining whether construction of a project would result in a substantial temporary increase in noise levels. Based on FTA guidance, a significant impact would occur if project-generated construction noise exceeds an eight-hour 80 dBA L_{eq} noise limit during the day at the nearest residences (FTA 2018). The construction noise limits used in this analysis are set at reasonable levels at which a substantial noise level increase as compared to ambient noise levels would occur. Because these noise limits are tailored to specific land uses, they account for typical ambient noise levels associated with each land use such that an increase in ambient noise levels that exceeds these limits would be considered a substantial increase above ambient noise levels.

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

Each phase of construction has a specific equipment mix, depending on the work during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some may have discontinuous high-impact noise levels. Project construction phases would include demolition, site preparation, grading, building construction, architectural coating, and paving of the project site. It is assumed that diesel engines would power all construction equipment. The construction equipment modeled in RCNM to analyze construction noise levels by phase are

consistent with CalEEMod defaults used for the air quality, GHG, and energy analyses. CalEEMod modeling results are available in Appendix B of this document.

Construction equipment would be continuously moving across the site, coming near and then moving further away from individual receivers. Over the course of a typical construction day, construction equipment could be as close as 30 feet to 50 feet from the nearest sensitive receiver. However, most project construction and heavy equipment use would occur at the center of the site, and, therefore, it is assumed that construction equipment would operate at an average distance of 150 feet from the project boundary over the course of a typical day. Using the FHWA RCNM, construction noise was modeled at these various distances from existing residences. Construction noise levels and distances to the nearest receivers are shown in Table 17. RCNM calculations are included in Appendix H.

Table 17 Construction Noise Levels at Receivers (Single-Family Residences)

	Distance from Noise Source, and dBA L_{eq}		
Construction Phase/Equipment	**30 Feet**	**50 Feet**	**150 Feet**
Demolition – Concrete/Industrial Saw, Excavator, Dozer	89	85	75
Site Preparation – Dozer, Tractor/Loader/Backhoe	88	83	74
Grading – Excavator, Grader, Dozer, Tractor/Loader/Backhoe	90	86	76
Building Construction – Crane, Forklift, Generator Set, Tractor/Loader/Backhoe, Welder	91	86	74
Paving – Cement/Mortar Mixer, Paver, Paving Equipment, Roller, Tractor/Loader/Backhoe	90	86	76
Architectural Coating – Air Compressor	78	74	64

See Appendix H for RCNM results.

As shown in Table 17, maximum noise levels during project construction (that would occur during the building construction phase) were calculated at 91 dBA L_{eq} at 30 feet and 86 dBA L_{eq} at 50 feet from the nearest noise-sensitive receivers. Construction would reach noise levels up to 76 dBA L_{eq} when calculated from the center of the project site (see Appendix H for RCNM results). Because construction noise levels would exceed the FTA daytime eight-hour noise criterion of 80 dBA L_{eq} in some cases, project construction would require implementation of sound attenuation features to reduce noise levels below 80 dBA L_{eq}.

WCMC Section 15-95 prohibits any construction activities between the hours of 8:00 p.m. and 7:00 a.m. (or 6:00 a.m. for unloading and loading activities) within a residential zone, or within a radius of 500 feet therefrom, that causes the noise level at the property line to exceed the ambient noise level by more than 5 dBA. While construction of the project would occur during the day outside of nighttime hours and would not exceed the standard described by WCMC Section 15-95, construction noise impacts would still exceed the FTA eight-hour daytime noise criterion of 80 dBA L_{eq} for

construction noise at the nearest residences southwest of the site. Therefore, Mitigation Measure N-1 is required to reduce daytime construction noise levels through implementation of noise barriers at the southwestern boundary adjacent to residential receivers.

Mitigation Measure

N-1 Construction Noise Reduction

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

- Schedule construction activities to avoid operating several pieces of equipment simultaneously, which can cause high noise levels
- Enclose stationary equipment with materials capable of reducing noise levels by at least 10 dBA (see Appendix H for barrier specifications)
- Locate all construction areas for staging and warming up as far as possible from adjacent residential buildings and sensitive receivers
- Erect temporary noise barriers with a minimum height of 10 feet along the southwestern boundary of the construction site when construction is performed within 50 feet of the residences at these boundaries. The noise barriers shall be constructed of material with a minimum weight of two pounds per square foot with no gaps or perforations. Noise barriers may be constructed of, but not limited to, 5/8-inch plywood, 5/8-inch oriented strand board, and hay bales. Per the specification in Appendix H, barriers would be able to reduce construction noise by 10 to 20 dBA.

According to the Housing and Urban Development's Barrier Performance Module, a ten-foot barrier would result in a noise reduction of approximately 10 dBA. Noise barrier performance calculations are included in Appendix H. A 10 dBA reduction would reduce the maximum construction noise level at the nearest sensitive receptor shown in Table 17~~Table 17~~ from 91 dBA to 81 dBA. Although construction noise may intermittently and temporarily exceed the FTA eight-hour daytime noise criterion of 80 dBA L_{eq}, other construction noise reduction measures included in Mitigation Measure N-1 (i.e., scheduling construction activities to avoid operating several pieces of equipment simultaneously, enclosing stationary equipment in noise barriers, and locating all construction areas for staging as far as possible from the nearest receivers) would further reduce construction noise levels. Implementation of Mitigation Measure N-1 and compliance with the construction hours requirements of the WCMC would reduce construction noise impacts to a less than significant level.

Land Use Compatibility

Operation of the proposed project would also expose future residents of the proposed project to ambient noise levels. According to the City's noise compatibility matrix shown in PlanWC, ambient noise up to 60 CNEL is normally acceptable, and noise up to 70 CNEL is conditionally acceptable. Based on existing noise levels described in Section 2.4, *Project Noise Setting*, the project's northeastern edge would be exposed to ambient noise levels of approximately 70 CNEL due to its proximity to Cameron Avenue and I-10. This would be the loudest noise exposure on the project site. The site's exterior use areas are located in the interior rather than on the periphery of the site and would be blocked from traffic noise by the project structures closer to the roadway. With distance attenuation and at least a 20 dB reduction from the building shielding, exterior project noise levels would not exceed the normally acceptable 60 CNEL noise standard.

The City's PlanWC has also incorporated Title 24's interior residential noise standard of 45 CNEL for any living space for multiple family residences. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows (FHWA 2011). Based on existing noise levels of up to 70 CNEL at the approximate area where project residences located next to Cameron Avenue would be located, and a noise attenuation of at least 20 dBA, the interior noise level at habitable rooms of residences directly adjacent to Cameron Avenue would be approximately 50 CNEL. As discussed above, residences located further within the site would receive substantial attenuation of approximately 20 dBA from the structures on Cameron Avenue, resulting in interior noise levels of 30 CNEL or less that would be consistent with City standards. Interior noise levels at living spaces with direct line-of-sight to Cameron Avenue would potentially exceed the City's interior noise standard of 45 CNEL. Therefore, implementation of Mitigation Measure N-2 requiring implementation of sound insulation to minimize exterior noise levels at interior habitable rooms is required to ensure that the project would be consistent with Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations.

Mitigation Measure

N-2 Sound Insulation

To comply with Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations, the applicant shall install exterior building materials with sufficient Sound Transmission Class (STC) ratings to reduce interior noise levels in habitable rooms to 45 CNEL or lower. To reduce potential noise impacts to future project residents, residential units fronting on West Cameron Avenue 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. This requirement shall be incorporated into the plans to be submitted by the applicant to the City of West Covina for review and approval prior to the issuance of building permits. Acoustical analysis shall be performed prior to the issuance of an occupancy permit to demonstrate that noise levels in the interior livable spaces do not exceed the interior noise standard of 45 CNEL in any habitable room as set forth by the City and California Code of Regulations, Title 24, Section 1206.4.

Implementation of Mitigation Measure N-2 would reduce exterior noise levels to a less than significant level meeting the interior noise standard of 45 CNEL.

On-Site Operational Noise

The proposed project involves the construction of eight new multi-family residential buildings on a site currently occupied by operational commercial uses. The primary on-site noise sources associated with operation of the project would include those typical of a residential project, such as noise from trash hauling trucks, vehicle parking, and ventilation and heating systems. According to WCMC Section 15-85, any noise source that is plainly audible at 50 feet from the property line of the property in which it is located would be in violation of the Noise Ordinance. However, the type of on-site noise sources associated with operation of the project noise already commonly occur in the project area due to existing residential, hospital, and commercial uses that occupy the surrounding urban development. In addition, as already discussed, the primary noise source in the project vicinity would be vehicular traffic on major roads, primarily Cameron Avenue, not on-site noise. Therefore, the project would not generate noise that is plainly audible at a distance of 50 feet from the site when compared to existing ambient noise levels in the urban area without the project. On-site operational

noise generated by the project would not exceed the City's noise standards and impacts would be less than significant.

Off-Site Traffic Noise

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

As discussed in Section 17, *Transportation*, the project is forecast to generate approximately 457 daily trips, including 30 trips during the AM peak hour and 37 trips during the PM peak hour (Ganddini 2020). According to the Focused Traffic Analysis (Appendix D), existing uses on the project site generates approximately 342 trips per day. If the project generated ADT of 457 vehicles, it would increase ADT by 115 compared to existing levels. When compared to existing traffic levels along Cameron Avenue estimated to be 10,800 ADT, the project would increase traffic by an estimated one percent at the site, which would generate a less than 1 CNEL increase in traffic noise.[7] Therefore, the project would not create a perceptible (3 dBA) increase in traffic noise from surrounding roadways. Noise impacts associated with off-site traffic generated by the proposed project would be less than significant.

With implementation of Mitigation Measure N-2 to reduce exterior noise levels to a less than significant level meeting the interior noise standard of 45 CNEL, the proposed project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. This impact would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

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

The City has not adopted specific standards for vibration impacts during construction. Therefore, the Caltrans *Transportation and Construction Vibration Guidance Manual* (2020) is used to evaluate potential construction vibration impacts related to both potential building damage and human annoyance. Based on the Caltrans criteria shown in Table 14~~Table 14~~ and Table 15~~Table 15~~, construction vibration impacts would be significant if vibration levels exceed 0.5 in./sec. PPV for residential structures and 2.0 in./sec. PPV for commercial structures, which is the limit where minor

[7] Existing traffic levels along Cameron Avenue were based on the traffic analysis and consistent with City of West Covina guidelines. The analysis uses the following input parameters: 1,800 vehicles per hour for through and turn lanes, 3,240 vehicles per hour for dual left turn lanes, and a total clearance time of 10 percent. A doubling of traffic is required for an audible 3 dB increase in traffic noise levels.

cosmetic, i.e., non-structural, damage may occur to these buildings. In addition, construction vibration impacts would cause human annoyance at nearby receivers if vibration levels exceed 0.24 in./sec. PPV, which is the limit above which temporary vibration activities become distinctly perceptible.

Because groundborne vibration could cause physical damage to structures, vibration impacts were modeled based on the distance from the location of vibration-intensive construction activities, conservatively assumed to be at edge of the project site, to the edge of nearby off-site structures. Therefore, the analysis of groundborne vibrations differs from the analysis of construction noise levels in that modeled distances for vibration impacts are those distances between the project site to nearest off-site structures (regardless of sensitivity) whereas modeled distances for construction noise impacts are based on the distance between the center of the project site and the property line of the nearest off-site sensitive receivers. Based on the distance from the project site to nearby structures, equipment was modeled at 30 feet from adjacent single-family residences to the southwest, and 520 feet from West Covina Medical Center to the north west along Cameron Avenue. Table 18~~Table 18~~ shows estimated groundborne vibration levels from project equipment. Vibration calculations are included in Appendix H.

The greatest anticipated source of vibration during general project construction activities would be from a bulldozer, which may be used within 20 feet of the nearest off-site single-family residences to the southwest when accounting for setbacks. A bulldozer would create approximately 0.089 in/sec PPV at a distance of 25 feet (Caltrans 2013b). As shown in Table 18~~Table 18~~, a bulldozer would generate peak vibration levels of approximately 0.073 in./sec. PPV at the nearest off-site structures to the southwest. Therefore, according to the Caltrans vibration criteria, groundborne vibration from typical construction equipment would not exceed the applicable threshold of 0.5 in/sec. PPV for building damage at nearby residences nor would it exceed the applicable threshold of 2.0 in./sec. PPV for building damage at these residences or the nearby commercial buildings. Furthermore, groundborne vibration would not exceed the threshold of 0.24 in./sec. PPV for human annoyance at any of the modeled distances. Project construction would not result in groundborne vibration that would cause building damage or human annoyance. Vibration impacts would be less than significant.

Table 18 Vibration Levels at Receivers

Equipment	in./sec. PPV	
	Single-Family Residences 30 Feet	West Covina Medical Center 520 Feet
Large Bulldozer	0.0728	0.0032
Loaded Truck	0.0622	0.0027
Small Bulldozer	0.0025	0.0025
Threshold for Building Damage[1]	**0.5**	**0.5**
Threshold for Human Annoyance[2]	**0.24**	**0.24**
Thresholds Exceeded?	No	No

[1] Caltrans 2020c. See Table 14~~Table 14~~.

[2] Caltrans 2020c. See Table 15~~Table 15~~.

See Appendix H for vibration analysis worksheets.

LESS THAN SIGNIFICANT IMPACT

Formatted:

Formatted:

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

As discussed in Section 9, *Hazards and Hazardous Materials*, the project site is not within two miles of a public airport. The airport nearest to the project site is the San Gabriel Airport, 5.2 miles to the east. According to the Los Angeles Airport Land Use Commission (ALUC) Airport Land Use Plan, the site is not located in either of the airports' noise contours (Los Angeles County ALUC 2004). Furthermore, there are no private airstrips in the vicinity of the project site. Therefore, the proposed project would not expose people working in the project area to excessive noise levels associated with airports or airstrips, and the project would not exacerbate existing noise conditions related to airports or airstrips. No impact would occur.

NO IMPACT

14 Population and Housing

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

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

Existing development on the project site consists of buildings and paved parking areas associated with the office uses on two parcels. The project involves demolition of these uses and construction of 84 residential units, parking, landscaping, and associated infrastructure. According to SCAG's 2020 RTP/SCS, West Covina is anticipated to have a population of 118,900 in 34,800 households by the year 2045 (SCAG 2020). According to the California DOF, the City currently has an estimated population of 105,999, with 32,919 households with an average of 3.35 persons per household (DOF 2020). Therefore, the City's population is anticipated to increase by 12,901 persons and 1,881 households over the next 25 years. The 84 housing units generated by the project would represent 282 new residents, or approximately 2.2 percent of the anticipated housing growth in the City, although it is possible that persons already living in West Covina would move into and occupy the new residential development the project would provide. Nonetheless, for this evaluation, a conservative approach assumes all occupants would be new to West Covina. If this were the case, and all the project's housing units were occupied by residents new to West Covina, the project would increase the City's existing population approximately 0.26 percent, bringing the number of people residing in West Covina to 106,398. This number is well within SCAG's 2045 population forecast of 118,900 residents. Therefore, population and housing growth generated by the proposed project would be within the forecasts for the City, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is developed with two office complexes and includes no residential development. The proposed project would not, therefore, remove existing housing nor displace people. Project implementation would not necessitate the construction of replacement housing elsewhere. No impact would occur.

NO IMPACT

15 Public Services

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

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

The West Covina Fire Department (WCFD) provides fire protection and paramedic emergency services to residents and businesses in West Covina. The project site is closest to Fire Station No. 1, at 819 South Sunset Avenue, approximately 0.3 mile southwest of the site. According to the City, the WCFD responds to the average emergency medical service (EMS) call with one fire engine and paramedic ambulance with a total of five personnel and the average fire emergency call with four fire engines, one fire ladder truck, two rescue ambulances, and one command unit with 22 personnel (City of West Covina 2020b).

The West Covina Fire Prevention Bureau is an aspect of WCFD that provides technical review of all building construction plans proposed in the City to ensure buildings meet the City's adopted 2019 California Fire Code, 2019 California Building Code, California Health and Safety Code, and WCMC standards prior to construction. As such, the WCFD would review the site and building plans for the project as part of the City's project approval process. The project would introduce new residential uses to the project site, and increase building area on the project site, which would incrementally increase demand for fire protection services compared to demand created by the existing uses on the

site. However, the project site is in an urbanized area the WCFD already serves, and the project would be required to adhere to all applicable fire code standards and requirements. Therefore, the project would not have a significant impact on fire response times nor create a substantially greater need for additional fire protection services above current capacity.

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

LESS THAN SIGNIFICANT IMPACT

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

The West Covina Police Department (WCPD) provides police protection services to residents and businesses in the city. The WCPD consists of a full-time workforce of 90 sworn officers and 66 civilian staff members, with approximately 67 percent of sworn officers being dedicated to the Patrol Division. The Patrol Division patrols city streets, answers calls for service, and identifies potential crime problems. Approximately 55 positions are part-time on the force; these include reserve officers and clerical staff (WCPD 2020a, 2020b). In cities with a population between 100,000 and 249,999, the national average is 1.6 officers per 1,000 residents (Governing.com 2019). With approximately 106,000 residents in West Covina and 90 sworn officers, the WCPD currently operates below this national average, with 0.85 officers per 1,000 residents. The WCPD would need an additional estimated 90 officers to reach the 180 total officers that would allow it to meet the national average.

The project site is in WCPD Service Area 3 (Central). The police station is located at 1444 West Garvey Avenue, approximately 0.5-mile northeast of the project site. The project would incrementally increase demand for police protection services compared to demand created by the existing uses on the site, but the project site is in a highly urbanized area the WCPD already serves. Because requests for police response are usually met by mobile officers, the project would not have a significant impact on police response times. Neither would it create a substantially greater need for police services above current capacity.

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

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

LESS THAN SIGNIFICANT IMPACT

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

West Covina Unified School District (WCUSD), Covina-Valley Unified School District (CVUSD), and Rowland Unified School District (RUSD) are all at least partially in West Covina and serve students who reside in the City. Based on available 2019-2020 enrollment data, the estimated number of students is 13,494 at WCUSD, 11,660 at CVUSD, and 13,854 at RUSD, for an estimated total of 39,008 students for the 2019-2020 academic school year (Ed Data 2020). Schools closest to the project site include the following:

- North West College-West Covina, approximately 0.45 mile northwest of the project site at 2121 West Garvey Avenue N. in West Covina
- Edgewood High School, approximately 0.5 mile southwest of the project site, at 1625 W. Durness Street in West Covina
- Edgewood Middle School, approximately 0.5 mile west of the project site, at 1039 S. Willow Avenue in West Covina
- Wescove Elementary School, approximately 0.75 mile south of the project site, at 1010 W. Vine Avenue in West Covina

New school facilities are typically associated with a population increase that generates a large enough increase in enrollment to require that new schools be constructed. The proposed project involves replacing the current office building uses on the project site with new residential uses. As discussed in Section 14, *Population and Housing*, the project would increase the City's existing population of by 282 new residents, approximately 0.26 percent over existing conditions, to 106,398 residents. Conservatively assuming the project would generate 282 students, the project would increase the combined current enrollment of 39,008 students to 39,290, an increase of approximately 0.7 percent.

The project applicant would be required to pay State-mandated school impact fees that would contribute to funds available for development of new school facilities in West Covina. 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, impact fees would offset increases in student population, and the project would not lead to substantial impacts that would not be met by these provisions. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The National Recreation and Park Association indicates that 10 acres per 1,000 residents is a good ratio of parks and open space lands to population. According to the California DOF, the City has an existing population of 105,999 (DOF 2020a). West Covina has 501.5 acres of existing parks and open space, which amounts to an estimated service ratio of 4.7 acres per 1,000 residents (City of West Covina 2016b). The City is urbanized and nearly built out, with limited open space available to meet the recreational needs of anticipated population growth. However, public schools have 287 acres of open space beyond that provided by parks, and this space offers potential recreational access for residents through joint use agreements between the City and school districts (City of West Covina 2016b). When these additional 287 acres of open space are added to the existing City park and open space in West Covina, the total acreage is increased to approximately 789 acres, resulting in a service ratio of 7.4 acres per 1,000 residents. This number is less than the national standard, but the City is committed to increasing access to open space within walking distance to neighborhoods through these joint use agreements and by encouraging the addition of open space to neighborhoods that accommodate active and passive activity (City of West Covina 2016).

Several parks are within easy walking distance of the project site while others are a short drive away. Regional parks also serve the area and offer hiking, bicycling, picnicking, and camping facilities. Park locations, amenities, and distance to the project site are summarized in Table 19~~Table 19~~.

Table 19 Summary of Park Amenities Near the Project Site

Park	Address	Distance to Project Site	Amenities
California Parkette	815 S. California Avenue	0.7 mile southeast	Play equipment, small lawn area, picnic table
Orangewood Park	1611 W. Merced Avenue	0.9 mile southwest	Hockey rink, skate park, baseball field, basketball court, soccer fields, play equipment, lawn areas, benches, and picnic areas
Del Norte Park	1500 W. Rowland Avenue	1.4 miles northeast	Tennis courts, pedestrian walkways, shaded lawn areas, baseball field, splash pad, picnic areas, restrooms
Walmerado Park	625 E. Merced Avenue	1.8 miles southeast	Basketball courts, baseball fields, children's play areas, restrooms
Galster Wilderness Park	1620 E. Aroma Drive	3.8 miles southeast	40-acre nature park with hiking trails and views of the City
Santa Fe Dam Recreation Area	15501 Arrow Highway, Irwindale (regional/county park)	3.5 miles north	Children's play areas, fitness areas, nature viewing, equestrian trails, camping sites, hiking, mountain biking, pedestrian facilities, fishing, swimming, and boating
Peter F. Schabarum Regional Park	17250 Colima Road, Rowlands Heights	7.4 miles south	Walking, hiking, picnic areas, camping, soccer, tennis

The project would generate an estimated 282 new residents, some of whom would use recreational facilities at these parks. Nonetheless, the estimated increase in residents would not substantially alter the existing service ratio of 7.4 acres of parkland per 1,000 residents. Additionally, the project would be required to pay the City's Quimby Fees for future park maintenance and development. The proposed project would therefore not create the need for new or expanded park facilities and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

The project site lies in an urban area already served by other commonly used public facilities, such as public libraries, including the West Covina Library, and medical facilities. As discussed in Section 14, *Population and Housing*, if all residents were new to the city, the project would increase the City's existing population of by 282 persons, an increase of approximately 2.2 percent to 106,218 residents, and would be within SCAG's 2045 population forecast of 118,900 residents. Therefore, the project would not generate an unforeseen population increase that would substantially affect existing public facilities or necessitate the provision of new public facilities. The West Covina Library is part of the Los Angeles County Public Library system, which is financed by property taxes from the service area, general county funds, parcel tax, grants, feeds, and funds raised by the Library Foundation. As a result, the proposed project would contribute to the financing of library services through property taxes, which would mitigate the need for new or physically altered government facilities that support library use. Therefore, the project would not substantially affect existing governmental facilities or require the need for new or altered governmental facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page left intentionally blank

16 Recreation

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

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

The National Recreation and Park Association indicates that 10 acres per 1,000 residents is a good ratio of parks and open space lands to population. According to the California DOF, the City has an existing population of 105,999 (DOF 2020a). West Covina has 501.5 acres of existing parks and open space, which amounts to an estimated service ratio of 4.7 acres per 1,000 residents (City of West Covina 2016b). The City is urbanized and nearly built out, with limited open space available to meet the recreational needs of anticipated population growth. However, public schools have 287 acres of open space beyond that provided by parks, and this space offers potential recreational access for residents through joint use agreements between the City and school districts (City of West Covina 2016b). When these additional 287 acres of open space are added to the existing City park and open space in West Covina, the total acreage is increased to approximately 789 acres, resulting in a service ratio of 7.4 acres per 1,000 residents. This number is less than the national standard, but the City is committed to increasing access to open space within walking distance to neighborhoods through these joint use agreements and by encouraging the addition of open space to neighborhoods that accommodate active and passive activity (City of West Covina 2016).

Several parks are within easy walking distance of the project site while others are a short drive away. Regional parks also serve the area and offer hiking, bicycling, picnicking, and camping facilities. Park locations, amenities, and distance to the project site are summarized in Table 19~~Table 19~~ and discussed in Section 19, *Public Services*. The project would generate an estimated 282 new residents, some of whom would use recreational facilities at these parks. Nonetheless, the estimated increase in residents would not substantially alter the existing service ratio of 7.4 acres of parkland per 1,000 residents. Project implementation would not increase use of existing City recreational facilities in a way that would substantially accelerate their deterioration. Furthermore, nearby regional recreational facilities also serve West Covina residents. While the project would introduce new residents to the area, their use of existing parks would not substantially increase rates of physical deterioration. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project does not propose new or expanded recreational facilities nor would it require that new or expanded recreational facilities be built, as discussed above. Additionally, the project will be required to pay the City's Quimby Fees for future park maintenance and development. There would be a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

17 Transportation

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

This analysis incorporates the findings of the Focused Traffic Analysis prepared by Ganddini Group, dated November 16, 2020 (Appendix D).

Project Trip Generation and Distribution

Existing traffic counts were collected during the AM and PM Peak Hours; however, due to modified behavior from COVID-19 and related stay-at-home orders, historic traffic counts from March 2018 were used to determine baseline traffic conditions in the vicinity of the site. A one percent per year growth rate was applied to the March 2018 counts, to reflect existing year 2020 conditions (prior to the issuance of stay-at-home orders). Traffic volumes were also manually adjusted to account for lane configuration modifications that have occurred since March 2018.

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

Trip generation for both existing and proposed uses is based upon standard rates obtained from the Institute of Transportation Engineers (ITE), Trip Generation Manual, 10th Edition, 2017. As shown in Table 20~~Table 20~~, existing site uses are estimated to currently generate approximately 342 daily trips, including 41 trips during the AM peak hour and 40 trips during the PM peak hour. Project trip generation is estimated to be 457 daily trips, including 30 trips during the AM peak hour and 37 trips

during the PM peak hour. The project would therefore result in an estimated 115 net new daily trips, as shown in Table 20, with a reduction of 11 trips during the weekday AM peak hour and 3 trips during the weekday PM peak hour compared to existing conditions.

Table 20 Estimated Project Vehicle Trip Generation

ITE Land Use	Weekday AM Peak Hour	Weekday PM Peak Hour	Total Daily Trips
710: General Office (Existing)	(41)	(40)	(342)
221: Multi-Family Housing, Mid-Rise (Proposed)	30	37	457
Net New Trips (Proposed minus Existing)	(11)	(3)	115

( ) denotes existing trips, subtracted from proposed trips.

Source: Focused Traffic Analysis prepared by Ganddini Group, dated November 16, 2020 (Appendix D)

Based on review of existing volume data, surrounding land uses, and the local and regional roadway facilities in the project vicinity, 45 percent of project traffic would use West Cameron Avenue north of the project site, 20 percent would use West Cameron Avenue south of the project site, and 35 percent would use Toluca Avenue east of the project site. While the project would create a net increase in daily trips on these roadway segments, it would lead to a net decrease in AM and PM peak hour trips on these segments.

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

Regional access to the project site is provided by I-10, approximately 0.2 mile north of the site. Local access is provided by West Cameron Avenue and Toluca Avenue. There are pedestrian sidewalks and crosswalks along West Cameron Avenue and Toluca Avenue adjacent to the project site. The project would continue to be served by, and would not interfere with, existing roadway or pedestrian facilities currently available to the project site.

There are currently no bicycle facilities along West Cameron Avenue or Toluca Avenue; however, a bike lane is proposed on West Cameron Avenue, and a bike route is proposed on Toluca Avenue. Foothill Transit provides transit service in the vicinity of the project site, including Route 272, which travels along West Cameron Avenue. Go West Shuttle also provides service to the site from Sunset Avenue south of the site, Orange Avenue north of the site, and West Covina Parkway east of the site.

The project would replace two existing driveways along West Cameron Avenue with a single driveway, reducing the number of driveways pedestrians traveling along West Cameron Avenue adjacent to the project site would need to cross. This would increase pedestrian safety by reducing potential pedestrian-vehicle conflicts at the site. Additionally, the project would leave existing pedestrian sidewalks in place along local roadways. Although no bicycle facilities are currently located on West Cameron Avenue, the reduction in driveways at the project site frontage would reduce potential bicycle-vehicle conflicts at driveways and increase safety. The project would not remove existing bicycle facilities. The project would not remove or alter existing transit stops or transit routes in the vicinity of the site. Impacts would be less than significant.

Development of the project would not impair roadways or conflict with planned pedestrian, bicycle, and transit facilities in the vicinity. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

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

The City of West Covina adopted its VMT guidelines in June 2020. Therefore, the project VMT impact has been assessed in accordance with the City's VMT guidelines and guidance from City staff. Consistent with recommendations in the OPR Technical Advisory, the City of West Covina adopted *City of West Covina Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (September 2020), which establishes screening criteria. According to the Focused Traffic Analysis, the project is screened out form a detailed VMT analysis per the City's VMT guidelines for the following reasons. Foothill Transit Route 272 provides service along West Cameron Avenue, which meets the definition of a Transit Priority Area (TPA): an area within 0.5 mile of a major transit stop that provides service every 15 minutes or less during morning and evening peak periods. Additionally, the project is located in a low VMT area per the City's VMT Evaluation Tool. Lastly, the project's residential land use is consistent with residential land uses in the vicinity of the project site. A residential project is currently being constructed on Cameron Avenue southeast of the project site, and residential uses are located west of the project site. Therefore, the proposed project is reasonably expected to generate similar VMT as the existing land uses in this low VMT area.

Because the project site is in a TPA and in a low VMT area, and the project would propose a residential use similar to nearby residential land uses, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and would therefore have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

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

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

Construction Traffic

Construction trips to the project site would be limited to the construction phase and would not introduce a substantial number of new temporary trips to project area roadways. To further lessen the impact of construction traffic, the project would be required to comply with all standard conditions pertaining to construction including work hours, traffic control plan, haul route, access, oversized-vehicle transportation permit, site security, noise, vehicle emissions, and dust control. The City would also require that all construction trips would be restricted to off-peak hours, whenever possible, and construction vehicles would be stored on-site during the workday. Additionally, the applicant or construction contractor would be required to submit a construction work site traffic control plan to the City for review and approval prior to issuance of a grading permit or start of construction, which would identify any necessary roadway, sidewalk, bike route, or bus stop closures and detours, as well as haul routes and hours of operation. Lastly, site development would require the use of haul trucks during site clearing, demolition, remediation, and excavation and the use of a variety of other construction vehicles throughout construction. Transportation of heavy construction equipment and or materials, which requires the use of oversized vehicles, would therefore require the appropriate transportation permit.

These measures would ensure no impacts due to construction trips or from temporary road modifications would occur.

Project Design Features

The project would modify site access to include one driveway along West Cameron Avenue, replacing the two existing driveways. The Focused Traffic Analysis recommends that the project be required to construct the following improvements to provide project site access:

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

The 95th percentile queue length for the northbound left turn lane (two-way left turn median) for Existing Plus Project conditions during the AM peak hour is 0.47 feet and is 1.68 feet during the PM peak hour. Therefore, the Focused Traffic Analysis also recommends that 25 feet of storage length be provided. The two-way left turn median currently provides over 25 feet of storage length and is sufficient as currently constructed to accommodate northbound left turns into the project site.

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

- All on-site and off-site roadway design, traffic signing and striping, and traffic control improvements relating to the proposed project shall be constructed in accordance with applicable State/Federal engineering standards and to the satisfaction of the City
- Site-adjacent roadways shall be constructed or repaired at their ultimate half-section width, including landscaping and parkway improvements in conjunction with development, or as otherwise required by the City
- Adequate off-street parking shall be provided to the satisfaction of the City
- Adequate emergency vehicle access shall be provided to the satisfaction of the WCFD

The final grading, landscaping, and street improvement plans shall demonstrate that sight distance requirements are met in accordance with applicable City of West Covina/California Department of Transportation sight distance standards

The proposed residential development is consistent with adjacent land uses (see Section 11, *Land Use and Planning*), and would not introduce an incompatible use to local roadways. Internal roadways would be configured to allow for adequate turning radius throughout the site for passenger vehicle, garbage truck, and emergency vehicle access. To ensure that these and all other necessary recommendations and Conditions of Approval related to traffic safety and control are implemented, Mitigation Measure TRAN-1 is required.

TRAN-1 Traffic Safety and Control

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

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

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

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

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project result in inadequate emergency access?

During construction, temporary and occasional lane closures may be required, however two-way traffic would still be maintained at construction entry points as required by the City of West Covina's Application for Encroachment Permit (City of West Covina 2021). At operation, vehicles, including emergency response vehicles, would be able to access the project site via the main entrance off West Cameron Avenue. The proposed project would not modify existing roadways in the vicinity, other than the required improvements discussed in impact discussion 17c. In addition, the project would not result in inadequate emergency access because it would be subject to WCFD review of site plans, site construction, and the actual structures prior to occupancy to ensure that required fire protection safety features, including building sprinklers and emergency access, are implemented. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

18 Tribal Cultural Resources

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

Assembly Bill 52 of 2014

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

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

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

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

Senate Bill 18 of 2004

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

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

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

Three tribes have requested notification of projects that occur in West Covina: the Soboba Band of Luiseño Indians, Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation), and Gabrieleño/Tongva Nation. Pursuant to PRC Section 21080.3.1, the City mailed consultation letters to these three tribes on January 7, 2021 and January 21, 2021. The City received a response from the Kizh Nation on February 1, 2021 requesting consultation with the City regarding the project. A consultation meeting between Kizh Nation representatives and City Staff was scheduled for March 3, 2021. On March 3, 2021, several hours before the meeting, the Kizh Nation representatives sent an email stating in part, "[a]fter Mr. Salas reviewed the project area, he felt there was no further need for consultation however we would like to provide mitigation measures if Tribal cultural resources are discovered. No evidence of any kind was presented that there were tribal cultural resources that needed to be protected.

Given the developed nature of the site and the Kizh Nation's representation that the site did not warrant a consultation, excavation and grading activities required for project construction are not expected to uncover tribal cultural resources. Although no tribal cultural resources are expected to

be present on-site, the possibility of encountering undisturbed subsurface tribal cultural resources cannot be ruled out. The proposed excavation of the project site could potentially result in adverse effects to unanticipated tribal cultural resources. However, impacts from the unanticipated discovery of tribal cultural resources during construction would be reduced to a less than significant level with the requirement to follow what is set forth in Public Resources Code § 5097.98 and Health & Safety Code § 7050.5; and implementation of Mitigation Measure TCR-1 below as well as Mitigation Measure CR-1 through CR-4 listed in Section 5, *Cultural Resources* of this IS-MND.

Mitigation Measures

TCR-1 Unanticipated Discovery of Tribal Cultural Resources

In the event that cultural resources of Native American origin are identified during construction, all earth disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find and an appropriate Native American representative, based on the nature of the find, is consulted. If the City determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native American groups. The plan would include avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the resource in coordination with the archeologist and the appropriate Native American tribal representative.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

This page left intentionally blank

19 Utilities and Service Systems

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

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

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

All existing utility infrastructure on the project site would be demolished and removed. New on-site infrastructure for water, wastewater transport, storm water drainage, electric power, natural gas, and telecommunications facilities would be constructed as part of project implementation. Existing easements will accommodate connections for electricity and gas lines. New easements are proposed for water and sewer (see Appendix A).

Water infrastructure would be adequate and no new or expanded water facilities would be required to serve the project. Each residential unit would have its own water meter and the project would install backflow devices, low-flow fixtures, water efficient irrigation systems, and connect new water to all existing services and laterals to the new water main. These upgrades would ensure that the proposed project would have no impacts to potable water service in the area.

The City's Public Works Department provides local wastewater service, and the project would connect to the public conveyance. Wastewater from the City's system is treated at and disposed of by the San Jose Creek Water Reclamation Plant (SJCWRP) or the Whittier Narrows Reclamation Plant (WNRP), operated by the Sanitation Districts of Los Angeles County (LACSD). The two have a combined design capacity of 165.7 million gallons per day (mgd). The average daily flow into the two plants is approximately 73 mgd, leaving 42 mgd in available capacity to accommodate new development. The project site is in the SJCWRP tributary area (City of West Covina 2016b). The average daily flow to the SJCWRP is approximately 66 mgd, leaving approximately 34 mgd in available capacity (City of West Covina 2016b). According to a letter from the LACSD dated June 8, 2021 (see Appendix J), the expected increase in average wastewater flow from the proposed project is 9,549 gallons per day (gpd) after the current structures on the project site are demolished. According to Table 1 and Table 2 of the Preliminary Sewer Study for the proposed project (Appendix I), the net increase in wastewater flow compared to existing conditions would be about 16,200 gpd. Either way, average daily flows would be well within the capacities of the SJCWRP or the WNRP.

The City's existing sewer system consists of interceptors and lift stations for conveyance of wastewater within the city, including over 227 miles of gravity sewer and three pump stations, and implementation actions in the PlanWC require the City to pursue enlargement or extension of sewage collection systems where necessary to serve new development, with development fees supporting this expansion (City of West Covina 2016a). A Preliminary Sewer Study for the proposed project (Appendix I) by Kimley Horn, dated February 12, 2021, found that the existing 8-inch sewer line on Cameron Avenue currently serving the project site would not be adequate to serve the estimated sewer flows from the proposed project. In fact, the Preliminary Sewer Study found that the existing line does not have adequate capacity for existing sewer flows contributing to this line, and the proposed project would increase sewer flows to the line, exacerbating this inadequacy.

To address the inadequacy in the 8-inch sewer line in the sewer line serving the project site under both existing and proposed conditions, the Preliminary Sewer Study states that this line will need to be replaced with a 12-inch sewer line connecting to the existing downstream 12-inch sewer line in Orange Avenue. It also states that "the intent would be for the proposed pipe to be installed in the same alignment as the existing line matching the slope of the existing pipe." Replacing the existing 8-inch line with the proposed 12-inch line would create adequate capacity and all downstream lines to serve the proposed project and other existing development. Mitigation Measure U-1 is therefore required to avoid potentially significant impacts related to the increased inadequacy in the existing 8-inch sewer line serving the project site. Because the required 12-inch line could be constructed in the same location as the existing 8-inch line and within the public right-of-way, no significant environmental impacts would result from its construction.

CalEEMod is a statewide emissions computer model and comprehensive tool for quantifying emissions associated with both construction and operations from a variety of land use projects, including project water demand. Conservatively assuming that wastewater generation would be approximately 100 percent of water demand,[8] which is based on CalEEMod results (see Appendix B), the proposed project would generate approximately 11,040,000 gallons of wastewater per year, or 30,247 gallons of wastewater per day. By comparison, the existing commercial uses on the site demand an estimated 7,500,000 gallons of wastewater per year, or 20,548 gallons of wastewater per day. Therefore, the project would demand a net increase of 9,699 gallons of wastewater per day. The project's estimated daily wastewater generation accounts for approximately 0.03 percent of the remaining available daily capacity of the SJCWRP of approximately 34 mgd. Therefore, the SJCWRP would have sufficient capacity to accommodate additional wastewater flows generated by the proposed project. The proposed project would not require the construction of new or expanded treatment facilities.

When developed, the project on-site drainage system would be maintained by the project homeowners' association and would connect to the existing City storm drain system. According to the site plans, project implementation would result in more efficient drainage patterns than under existing conditions, with a proposed 10 percent impervious surface to allow rainwater to percolate back into the groundwater table. The stormwater conveyance system would consist of perforated and pervious filtration devices that would connect to the existing storm drains on Cameron Avenue. Flows from the project site to this storm drain would be designed in compliance with LACSD criteria, guidelines, policies, and procedures. The project would not necessitate the construction of new stormwater drainage facilities or expansion of existing facilities.

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

With implementation of Mitigation Measure U-1, the project would not result in significant environmental impacts due to the construction of new utility facilities, and the project would be served by a wastewater treatment plant with adequate capacity. Impacts would be less than significant.

Mitigation Measures

U-1 Replacement of Existing Sewer Line

Before issuance of building permits, the City shall determine the applicant's fair-share payment towards replacement of the existing 8-inch sewer line in West Cameron Avenue currently serving the project site. The applicant shall then make this payment, after which this improvement shall be carried out prior to issuance of building permits. The existing sewer line shall be replaced from manhole 103 to manhole 65 at which point it connects to the existing 12-inch sewer line in Orange Avenue.

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

Implementation of Mitigation Measures U-1 would reduce potential impacts to the sewer system to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The project site is in an urbanized area served by existing utilities infrastructure. Suburban Water Systems services the site with potable water within the San Jose Hills Service Area (Suburban Water Systems 2015). Groundwater pumped from local wells provides 80 percent of the water supply for the entire service district, of which areas of West Covina are a part (SWC 2021). The remaining 20 percent comes from surface water (lakes, rivers, streams) imported from northern California and the Colorado River, among others.

As discussed in Section 10, *Hydrology and Water Quality*, the project site receives its water service from Suburban Water Systems, a subsidiary of SWC. Suburban is a retail water supplier that serves approximately 75,000 service connections within its 41.7-square mile service area.[9] These include customers in Glendora, Covina, West Covina, La Puente, Walnut, and unincorporated areas of Los Angeles County in its San Jose Hills Service Area (Suburban Water Systems 2015). Suburban relies upon three water supply sources: (1) groundwater from Main Basin and Central Basin; (2) imported water from three water districts; and (3) purchased water from various agencies. Suburban does not use supplier-produced surface water, stormwater, recycled water, or desalinated water.

According to its 2015 Urban Water Management Plan, Suburban would have an adequate supply of water, with normal conservation efforts, to meet projected demand through 2040 in average year, single-dry year, and multiple-dry year scenarios (ALW 2016). Table 21~~Table 21~~ shows projected water supply and demand under normal year, single-dry year, and multiple-dry year conditions. These numbers reflect demand and supply for Suburban's entire service area.

Table 21 Normal Year and Multiple Dry Year Water Supply and Demand Comparison

	2020	2025	2030	2035	2040
Estimated Demand[1]	40,850	40,850	40,850	40,850	119,200
Water Supply Normal Year[1]	60,751	60,751	60,751	60,751	60,751
Water Supply Single-Dry Year[1]	44,174	44,174	44,174	44,174	44,174
Water Supply Multiple-Dry Year[1]	44,174	44,174	44,174	44,174	44,174

[1] Water supply and demand totals are reported in acre-feet per year (AFY) and are for Suburban's entire service area.

Source: Suburban Water Company 2015

The project would be constructed to all applicable CBC standards, including those that mandate water-efficient fixtures and features, and would be required to adhere to applicable water conservation measures for landscaping, specified in the City's Municipal Code Section 26-750.1300. According to CalEEMod results (see Appendix B), the project would generate a net demand of 11,990 gallons of water per day for indoor use and 8,876 gallons of water per day for outdoor use.

[9] The Suburban UMWD estimates a service population in its San Jose Hills District to be 170,283 and 299,502 for its entire service area, if the entire service area were built out during the 2020 to 2040 planning period (Suburban Water Systems 2015).

This equates to approximately 23.37 acre-feet per year of water. The additional 84 units and site landscape water consumption would fit within the projected usage in the Suburban Water System district, and the existing water supply under all scenarios would be sufficient to accommodate increased use presented by project operation. Therefore, existing water supply, as projected, would be adequate to serve the anticipated residents and other users of the proposed project. The project's impact on water supply would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

The City contracts with Athens Services to provide trash, recycling, and special pickup services for residents. After collection, waste is conveyed to the Athens Services Materials Recovery Facility in the City of Industry, which can process 5,000 tons of mixed material each day (City of West Covina 2016b). Diversion of solid waste from the project site into the recycling stream would substantially reduce the project's impact on landfill capacity. Solid waste materials are transported to the Athens Services Materials Recovery Facility where recyclable materials are separated from disposable materials. This process and other waste reduction programs have increased the City's diversion rate to 58 percent, higher than the State-mandated 50 percent. After waste is sorted, materials that cannot be recycled are sent to the Victorville Sanitary Landfill, which has a permitted maximum capacity of 3,000 tons per day and a current estimated remaining daily capacity of 81,510,000 tons (CalRecycle 2019). The estimated cease operation year would be 2047.

The project plans indicate two 96-gallon trash carts could be available for each unit, where one cart is for combined recycling and trash that would be sorted as indicated above, and one would be for green waste if needed. The current diversion rate (58 percent) combined with West Covina's incentives to reuse and recycle would continue to exceed the State-mandated 50 percent diversion rate. According to the CalEEMod results (see Appendix B), existing uses on the project site generate approximately 33 tons of solid waste per year and operation of the proposed project would generate approximately 39 tons of solid waste per year. Therefore, the project would generate a net increase of six tons of solid waste per year, or 0.02 ton per day. Conservatively assuming none of this waste could be diverted for recycling, the estimated 0.02 ton per day would not exceed the current estimated remaining daily capacity of 1,875 tons at Victorville Sanitary Landfill. Therefore, the project's impacts on solid waste would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page left intentionally blank

20 Wildfire

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

The entire southern California region is prone to large wildfires due to its hot, dry climate and expansive coverage of ignitable vegetation. During the autumn and winter months, strong offshore Santa Ana wind events carry dry, desert air and can fan fast-moving fires that spread rapidly from heavily vegetated wilderness and mountainous areas into developed communities. The City of West Covina lies in a highly urbanized area of Los Angeles County, which limits the spread of large, uncontrolled wildfires. However, the area is prone to regular brush fires, particularly during summer heat waves, which can pose a safety risk.

While a natural ecological process in coastal chaparral and forest systems, wildfire return intervals have decreased throughout southern California, resulting in more frequent ecological disturbance, loss of biodiversity, and colonization by non-native grass species (U.S. Forest Service 2018). Furthermore, post-fire conditions leave exposed mountain slopes and hillsides vulnerable to surface erosion and runoff. Debris flows during post-fire rainy seasons can pose a risk to life and property and

occur with little warning. In southern California, as little as 0.3 inch of rain in 30 minutes can produce debris flows on post-fire landscapes (U.S. Geological Survey 2018).

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

The project site is not located in a designated Very High FHSZ or a State Responsibility Area. The nearest Very High FHSZ is a Local Responsibility Area south of I-10, approximately 2.5 miles southeast of the project site. The nearest State Responsibility Area is a Very High FHSZ approximately 4.3 miles east of the project site (California State Geoportal 2020).

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

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

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

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

The project site is in an urban area of West Covina surrounded by roads, including I-10, and structures (i.e., residential, office, and commercial buildings). According to the California Fire Hazard Severity Zone Viewer, the project site is not located in a FHSZ or VHFHSZ for wildland fires. The nearest VHFHSZ is located approximately 2.5 miles southeast of the site (CAL FIRE 2020). The VHFHSZ is separated from the project site by residential development with minimal vegetation south of Sunset Avenue and I-10, a ten-lane divided freeway. The project would construct residences on a lot currently occupied by office/commercial buildings and surrounded by residential and commercial development. The project would be served by existing water utilities, including fire hydrants along West Cameron Avenue.

As discussed in Section 15, *Public Services*, the project site is closest to Fire Station No. 1, at 819 South Sunset Avenue approximately 0.3 mile southwest of the site. The WCFD provides technical review of building construction plans to ensure proposed buildings meet the City's adopted 2019

California Fire Code prior to construction. As such, the WCFD would review the site and building plans for the project as part of the City's review process. The project would increase the total building area on the project site, which would incrementally increase demand for fire protection services. However, the project site is in an urbanized area already served by the WCFD and would not have a significant impact on fire response times nor create a substantially greater need for additional fire protection services above current capacity. Construction of the proposed project would maintain emergency access to the site and on area roadways and would not interfere with an emergency response plan or evacuation route.

As described in Section 17, *Transportation*, the project would not result in significant traffic impacts with the potential to impede emergency response or evacuation. The project site is within a relatively flat portion of West Covina and not located near a landslide hazard area or floodplain, minimizing the potential for impacts related to post-fire flooding, landslides, or slope instability. Given the project site's urbanized location and distance from fire hazard severity zones, project impacts related to wildfire would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page left intentionally blank

21 Mandatory Findings of Significance

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

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

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

construction nesting bird survey and other measures should construction occur during the breeding season to avoid potential impacts to on-site nesting birds.

Of the 70 trees affected by implementation of the project, six are significant and 64 are non-significant per the City's Tree Ordinance. No heritage trees were identified. Of the six significant trees, five are on the project site and one is on the property immediately northwest, with its crown overhanging the project site. While removal of the significant trees on the project site would require an approved permit from the City that includes replacement, relocation mitigation, or payment of the proper restitution value of the trees, potential loss of the one significant off-site tree requires implementation of Mitigation Measure BIO-2 to mitigate this impact to a less than significant level.

As discussed in Section 5, *Cultural Resources*, Section 7, *Geology and Soils*, Section 9, *Hazards and Hazardous Materials,* and Section 18, *Tribal Cultural Resources*, the proposed project would have a less than significant impact on or from unanticipated archaeological resources, paleontological resources, human remains, and tribal cultural resources with implementation of Mitigation Measures CR-1, CR-2, CR-3, CR-4, GEO-1, HAZ-1, HAZ-2, and TCR-1. Implementation of these mitigation measures, as well as adherence to existing local, State, and federal regulations and specific monitoring procedures related to the discovery of any unanticipated cultural resources, hazardous materials, paleontological resources, tribal cultural resources, and human remains during construction activity, would reduce these potential impacts to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

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

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

As discussed in Section 19, *Utilities and Service Systems*, potential impacts to the City's sewer system related to the project's contribution to the existing inadequacy in the 8-inch sewer line currently serving the project site would be reduced to a less than significant level by Mitigation Measure U-1.

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

This page left intentionally blank

References

Bibliography

Airport Land Use Commission (ALUC). 1991. Los Angeles County Airport Land Use Plan. Accessed February 2020 at: http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf.

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

California Air Resources Board (CARB). 2008. Climate Change Scoping Plan. December. https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/document/adopted_scoping_plan.pdf (accessed March 2020).

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

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

_____. 2017. California's 2017 Climate Change Scoping Plan. November. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf (accessed March 2020).

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

_____. 2019. "California Greenhouse Gas Emission Inventory – 2019 Edition. Last modified: November 6, 2019. https://ww2.arb.ca.gov/ghg-inventory-data (accessed September 2020).

California Department of Conservation (DOC). 1998. Seismic Hazard Zone Report for the San Dimas 7.5-Minute Quadrangle, Los Angeles County, California. Report 032. http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/SHZR/SHZR_032_San_Dimas.pdf

_____. 2016. Farmland Mapping and Monitoring Program. Map published July 2017. Scale: 1:120,000. https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx

_____. 2018. Los Angeles County Tsunami Inundation Maps. https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles (accessed November 2020).

_____. 2019. California Earthquake Hazards Zone Application (EQ Zapp). https://www.conservation.ca.gov/cgs/geohazards/eq-zapp (accessed November 2020).

California Department of Finance (DOF). 2020. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2019 with 2010 Census Benchmark. http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/ (accessed November 2020).

_____. 2020a. E-1 Cities, Counties, and the State Population Estimates with Annual Percent Change – January 1, 2019 and 2020. http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1 (accessed December 2020).

_____. 2020b. E-5 Population and Housing Estimates for Cities, Counties and the State – January 1, 2011-2020. May. http://dof.ca.gov/Forecasting/Demographics/Estimates/E-5 (accessed December 2020).

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

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

_____. 2020b. Cortese list. https://dtsc.ca.gov/dtscs-cortese-list/ (accessed July 2020). Ed-Data. 2020. Home Page. https://www.ed-data.org (accessed September 2020).

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

_____. 2019. Officially Designated State Scenic Highways. [tabular data set]. Sacramento, CA. August 2019.

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

California Energy Commission. 2019. “2019 Building Energy Efficiency Standards.” March 2018. https://ww2.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf (accessed December 2020).

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

California Department of Forestry and Fire (CAL FIRE). 2020. California Fire Hazard Severity Zone Viewer. https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414 (accessed November 2020).

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

Centers for Disease Control and Prevention (CDC). 2019. Air Pollutants. https://www.cdc.gov/air/pollutants.htm#:~:text= (accessed November 2020).

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

Federal Highway Administration (FHWA). 2006. *FHWA Highway Construction Noise Handbook*. (FHWAHEP-06-015; DOT-VNTSC-FHWA-06-02).

http://www.fhwa.dot.gov/environment/construction_noise/handbook. Accessed November 2018.

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

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

Ganddini Group, 2020. 1600 & 1616 West Cameron Residential Project Focused Traffic Analysis Memorandum. November 2020.

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

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

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

Los Angeles County Fire Department. 2019. Heath Hazardous Materials Division Hazardous Waste Program. https://www.fire.lacounty.gov/hhmd-2/hazardous-waste-program-4-24-17

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

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

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

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

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

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

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

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

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

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

_____. 2020a. Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. September. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176 (accessed December 2020).

_____.2020b. Current Context: Demographics and Growth Forecast. September. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579 (accessed December 2020).

U.S. Geological Survey. 2018. Post-Fire Flooding and Debris Flow. Last modified: October 31, 2018. https://ca.water.usgs.gov/wildfires/wildfires-debris-flow.html (accessed December 2020).

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

United States Environmental Protection Agency (USEPA). 2006. Air Quality Criteria for Particulate Matter. Washington, DC. Last updated July 12, 2006.

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

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

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

U.S. Forest Service. 2018. Fire in chaparral ecosystems. Last modified November 30, 2018. https://www.fs.fed.us/psw/topics/fire_science/ecosystems/chaparral.shtml (accessed December 2020).

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

West Covina, City of. 2016a. West Covina General Plan (PlanWC). https://www.westcovina.org/home/showdocument?id=18138 (accessed November 2020).

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

_____.2016c. West Covina Downtown Plan and Code. https://www.westcovina.org/home/showdocument?id=18142 (accessed March 2021).

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

_____. 2020b. "Services." West Covina Police Department website. https://www.wcpd.org/services/?open=patrol. (accessed December 2020).

United States Environmental Protection Agency (U.S. EPA). 2020. "Outdoor Air Quality Data Monitor Values Report". Available at https://www.epa.gov/outdoor-air-quality-data/monitor-values-report (accessed December 2020)

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

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

List of Preparers

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

RINCON CONSULTANTS, INC.

Deanna Hansen, Principal
Greg Martin, Senior Planner, Project Manager
April Durham, PhD, Environmental Planner
Destiny Timms, Environmental Planner
Mimi McNamara, Environmental Planner
Jacob Cisneros, Sustainability Associate
Dario Campos, Technical Editor, Production Associate