

Responses to Comments on Draft Initial Study/Mitigated Negative Declaration

Amazon Delivery Station DAX9 Project SCH No. 20201070230

Prepared for | City of West Covina
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September 2021

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1.0 INTRODUCTION AND SUMMARY

1.1 INTRODUCTION

The purpose of this document is to present public comments and responses to those comments received on the Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Amazon Delivery Station DAX9 Project (State Clearinghouse Number 20201070230). The City of West Covina, as the Lead Agency, has evaluated all substantive comments and has prepared written responses. In accordance with the California Environmental Quality Act (CEQA) Guidelines (Title 14 California Code of Regulations [CCR] Section 15074[b]), the decision-making body of the Lead Agency must consider the IS/MND and comments received before approving the Project. This document, which will be provided to the City Council, as the decision-making body, has been prepared in accordance with CEQA and represents the independent judgment of the Lead Agency.

The approximate 21.22-acre Project site is in the City of West Covina, in Los Angeles County, California. The site is located at 1211 East Badillo Street (current address), north of Badillo Road and south of East San Bernardino Road. The Project Applicant is proposing to change the building address to 1200 West San Bernardino Road. Surrounding uses include single family residences to the south of Badillo Road; multi-family residences (Lark Ellen Village) immediately to the east of the site; and multi-family residences to the north of East San Bernardino Road within the City of Covina. Various commercial, retail, and industrial uses are situated to the west of the site.

Amazon Inc., through its development partner, Greenlaw Partners, is seeking to locate in the City of West Covina and repurpose the Project site for a last mile delivery station. Delivery stations power the last mile of the order fulfillment process and help to speed up deliveries for customers. Packages are transported to delivery stations via trailer trucks from Amazon fulfillment and sortation centers and are sorted, picked, and loaded into delivery vehicles. The packages would (1) enter the facility through the loading dock positions; (2) be sorted from a conveyor area; (3) be stored on mobile “Baker Racks”; and (4) be rolled to the delivery van loading area.

The proposed Project involves the revitalization and modernization of the existing on-site building but would not change the building footprint. The proposed building improvements on-site include demolition of portions of the tilt up walls for proposed dock door openings, as well as existing non-load bearing walls, plumbing, electrical, an existing mezzanine, and existing storefront for new roll up drive in/drive out doors. Eight new loading dock spaces/doors (at a higher height than existing doors and six new exterior overhead van doors (north and south elevations) would be installed. Construction work would include structural improvements, electrical, mechanical, plumbing, and overall site work. Two 12-foot high screen walls would be constructed, one south of the approach driveway and adjacent to the loading dock area and one north of the loading dock area. The material for the 12-foot high walls includes a standard Concrete Masonry Unit, which is to be painted a matching color to the main building.

Interior modifications would include demolition of interior walls. Exterior property work would include removal of the playground area, pavement restriping, new directional striping and reconfiguration of the parking layouts, new smoker shelter at the north/east corner of the building, a new rideshare shelter, standard site directional and operational signage, and building mounted signage.

Other proposed modifications/improvements include relocation of existing on-site fire hydrants, and installation of platforms that are to be constructed at the truck court. New site fencing and gates would be located around the employee parking area on the west side of the building and no new fencing or gates would be installed around the perimeter of the site. Curb repair is also proposed, as well regrading for the van exit location at East San Bernardino Road in order to fix existing drainage low spots. This would include construction of new low impact development (LID) Stormwater Treatment Best Management Practices (BMPs) on the north side of the existing building. Additionally, all existing light poles would be removed and new fixtures, pole bases, light poles, and building mounted lighting would be installed in accordance with City lighting requirements and illumination standards.

The landscape design is proposed to bring the site into closer conformance with the State's Water Efficient Landscape Ordinance (WELO). Renovation of the site would include removal of high-water use, trees, and shrubs. The proposed new landscape plant pallet includes a mix of drought tolerant shrubs, grasses, and ground cover, as well as a variety of shade trees to be used throughout the parking area and around the perimeter of the site. The new irrigation would adhere to the requirements found in WELO and the City's landscape and irrigation guidelines for commercial and industrial properties.

Existing parking areas would be restriped, and barriers would be erected to separate truck traffic from passenger traffic beyond the westernmost driveway to East San Bernardino Road. A total of 811 parking spaces would be provided, 185 for passenger vehicles and 626 for vans. The site is accessed from Badillo Street, via four driveways. The two westernmost driveways on Badillo Street have full access with left turn lanes carved from the landscape median. The other two are restricted to right turns. All three driveways on San Bernardino Road currently have full access, but none feature a left turn lane from San Bernardino Road. The easternmost of these driveways would be restricted to right turns. The middle driveway on East San Bernardino Road would be relocated to the west to operate as an exclusive exit only for delivery vehicles. Exiting delivery vehicles could make a left- or right-turn on San Bernardino Road. The westerly most driveway, on San Bernardino Road, is to be relocated to align with Cutter Way and a new left turn pocket and a traffic light would be installed on San Bernardino Road. In addition, all trucks would access the site traveling westbound and would make a left turn into the westerly most driveway.

In accordance with the State CEQA Guidelines, Section 15073, the Draft IS/MND was circulated for a 30-day public review and comment period beginning on July 13, 2021 and ending on August 11, 2021. Additionally, the Draft IS/MND was available at the City of West Covina website. During the public review period, the City received a total of ten comment letters from State agencies, local agencies, organizations, and individuals on the Draft IS/MND. Written responses have been prepared to all comments received during the comment period and are included in Section 3.0 of this document.

The Final IS/MND consists of three documents: (1) the Draft IS/MND; (2) the Technical Appendices; and (3) the Responses to Comments document. The Responses to Comments document includes three sections: Section 1.0, provides the introduction; Section 2.0 provides a list of commenters on the Draft IS/MND; and Section 3.0 provides responses to environmental comments received on the environmental document. The responses to comments does not include a subsection for the errata to the Draft IS/MND, as none of the comments resulted in revisions or modifications to the text of the IS/MND.

2.0 LIST OF COMMENTERS

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

No.	Commenter	Date of Correspondence	Page Number
<i>State Agencies</i>			
1	Department of Transportation, District 7 (DOT)	August 10, 2021	3-4
<i>Regional and Local Agencies</i>			
2	City of Covina (CC)	August 11, 2021	3-9
<i>Organizations</i>			
3	Woodlane Village Homeowners Association (WVHOA)	August 9, 2021	3-18
4	Teamsters Local Union No. 1932 (TLU 1932)	August 11, 2021	3-22
<i>Individuals</i>			
5	Diana Glover (DG)	July 15, 2021	3-32
6	Judith Barrioz (JB) – Sent by Louie Mota	July 18, 2021	3-35
7	Patricia Hernandez (PH)	July 27, 2021	3-37
8	Sherie G. (SG)	July 27, 2021	3-40
9	Charlotte Stewart (CS)	August 4, 2021	3-43
10	Elisa Paster (EP)	September 10, 2021	3-44

3.0 RESPONSES TO COMMENTS

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

3.1 STATE AGENCIES

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

- Department of Transportation, District 7 (DOT)—August 10, 2021

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 269-1124
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Letter 1
GAVIN NEWSOM, Governor



*Making Conservation
a California Way of Life*

August 10, 2021

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

RE: Amazon Delivery Station DAX9 Project
SCH # 2021070230
Vic. LA-10/PM 36.49
GTS # LA-2021-03655-MND

Dear Ms. Burns:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. Amazon Inc. is seeking to locate in the City of West Covina in Los Angeles County and repurpose the proposed Project site for a last mile delivery station. The proposed Project involves the repurposing of a former 177,440 square foot industrial building on a 21.22-acre site, that has recently been utilized by Faith Church. The Amazon Delivery Station would operate as a light warehousing and distribution operation with approximately 250 employees.

DOT-1

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

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

DOT-2

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

For future reference, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review these resources at the following links:

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Ms. Jo-Anne Burns
August 10, 2021
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<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>

Caltrans encourages lead agencies to prepare traffic safety impact analysis at the State facilities for future development in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

DOT-2
cont.

The proposed Project generates the most trips outside the typical peak hour commute periods. The 10 AM to 11:00 AM and 8 PM to 9 PM are the peak hours of the generator. Therefore, the project would not contribute a traffic safety impact to the State facilities.

SGVCOG VMT Evaluation

The City of West Covina has adopted a 15 percent below baseline VMT per Service Population for all land uses. That baseline is 35.02 and the threshold is 29.77. The evaluation tool indicates the site would have a VMT/Service Population of 31.82 without the Project.

The proposed tenant offers all employees the option of setting aside up to \$270/month of their before tax pay to be used to subsidize alternative transportation expenses. The tenant also offers preferential parking for car/vanpools close to the building entrance with the number of available spaces varying by demand. In addition, as normal practice the tenant provides kiosks/bulletin boards where transit and ridesharing options are posted, provides a ride-matching platform such as Waze, and assigns an employee transportation coordinator to encourage the use of alternative transportation options. Application of these measures qualify as TP11 Alternative Transportation Benefits and are expected to reduce the VMT per service population to 29.72, below the significance threshold.

DOT-3

Pre-tax benefits are offered through Edenred Commuter Benefits Solutions. Information about these benefits is provided to new employees during their orientation and is documented in the employee handbook. These benefits are applicable to:

- Transit expenses
- Parking expenses for Park & Ride lots/transit stations
- Vanpool and qualified ridesharing (such as Uber pool & Lyft Shared) expenses

With at least 15 percent of the tenant's employees being eligible for Alternative Transportation Benefits, the proposed Project would have a less than significant VMT impact.

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ACTIVE TRANSPORTATION AND PUBLIC TRANSIT ANALYSIS

The proposed Project is consistent with adopted policies, plans, and programs to provide infrastructure for active transportation and public transit facilities. It would not conflict with existing or proposed facilities supporting these travel modes. Specifically, the West Covina Active Transportation Plan proposes the addition of bike lanes along Badillo Street. Conversion of the site to the proposed delivery station does not require any changes to Badillo Street that would prevent the installation of these bike lanes. The delivery station does not require any on-street parking along its frontage, freeing up pavement adjacent to the north curb for striping as a bike lane. In addition, while the Plan does not call for any pedestrian improvements along either Badillo Street or San Bernardino Road, the sidewalk along the site's frontage on San Bernardino Road would be replaced as part of the site's conversion to a delivery station. The Project would also provide signalized crosswalks across San Bernardino Road reducing the spacing of such crossing from a half to a quarter mile. Foothills Transit Route 190 provides fixed-route bus service with stops on San Bernardino Road at Vincent Avenue and Lark Ellen Avenue.

DOT-4

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

DOT-5

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-03655AL-MND.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Letter 1: Department of Transportation, District 7

Comment Letter Dated August 10, 2020

- DOT-1 The comment reiterates the Project description. No response is required.
- DOT-2 The comment regarding the mission of Caltrans and the use of Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts is noted and will be forwarded to the decision makers.
- The resources pertaining to VMT guidance provided by the commenter are appreciated, and the comment regarding lead agencies preparing traffic safety impact analysis at the State facilities for future development is noted and will be forwarded to the decision makers.
- The comment also indicates that the Project primarily generates trips outside the typical peak hour commute period; thus, the Project would not result a traffic safety impact to the State facilities. The comment is noted and will be forwarded to the decision makers.
- No further responses to the above comments are warranted.
- DOT-3 **SGVCOG VMT Evaluation.** The comment indicates that per the VMT baseline and threshold established, the site would result in a VMT/Service Population of 31.82 without the Project. The comment further reiterates the Project's measures and determines that application of the said measures qualify as TP11 Alternative Transportation Benefits and are anticipated to reduce the VMT per service population to 29.72, which is below the significance threshold. With at least 15 percent of the tenant's employees being eligible for Alternative Transportation Benefits, the Project has a less than significant VMT impact. The comment is noted and will be forwarded to the decision makers. No further response is warranted.
- DOT-4 **Active Transportation and Public Transit Analysis.** The comment identifies that the proposed Project is consistent with adopted policies, plans, or programs regarding active transportation and public transit facilities. The comment further discusses addition of bike lanes, signalized crosswalks proposed by the Project, and transit service. The comments are noted and will be forwarded to the decision makers. No further response is warranted.
- DOT-5 The comment points out that transportation of heavy construction equipment and/or materials, which would require use of oversized-transport vehicles on State highways would need a Caltrans transportation permit. The comment also recommends that large size truck trips be limited to off-peak commute periods. The comments are noted and will be forwarded to the decision makers. No further response is required.

3.2 REGIONAL/LOCAL AGENCIES

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

- City of Covina (CC)—August 11, 2021

Letter 2



CITY OF COVINA

www.covinaca.gov

125 East College Street • Covina, CA 91723-2199

(626) 384-5400

August 11, 2021

Ms. Jo-Anne Burns
Planning Manager
1444 West Garvey Avenue South
2nd Floor, Room208
West Covina, CA 91790

SUBJECT: Notice of Intent to Adopt A Mitigated Negative Declaration for the Proposed Amazon Delivery Station DAX9 Project located at 1211 East Badillo Street

Dear Ms Burns,

Thank you for the opportunity to comment on the Draft Mitigated Negative Declaration (MND) for the proposed Amazon Delivery Station located at 1211 East Badillo Street. The proposed project is to repurpose the existing 177,144 square feet church facility to be utilized as a last-mile delivery facility for Amazon, Inc. Based on reviewing the content of the Draft MND and the Technical Appendices, the City of Covina has the following concerns and comments:

CC-1

Transportation

1. The Traffic Impact Study (TIS) outlines a 24 hours a day and 7 days a week operational plan for the delivery facility with peak traffic movements (employee arrivals/departures, delivery shifts) outside of the typical commuting peak periods. Therefore, most of the traffic generated by Amazon facility could have minimal impact on the surrounding streets during the typical commuting peak hours.

However, the increased vehicle traffic will be generated by heavy vehicles, such as tractor/trailer trucks and delivery vans. The increased vehicle traffic will heavily use West San Bernardino Road, West Badillo Street, and other streets within the City of Covina. Although the City of Covina may have a Pavement Management Plan (PMP), the PMP does not consider 24 hours a day and 7 days a week increase in traffic for those streets within the City. The proposed Amazon facility directly causes the increase in traffic within the City of Covina streets, which will result in accelerated degradation to the streets, the timing for pavement management, and the associated cost. As mitigation, Amazon must reimburse the City of Covina to conduct a pavement analysis and share the accelerated increased cost of street maintenance.

CC-2

2. The project proposes shifting Driveway #7 (the westernmost driveway) easterly to align with Cutter Way on the north side of San Bernardino Road. The City of Covina concurs.
3. Existing traffic volumes were derived by taking new intersection traffic counts and adjusting them based on historic turning movement counts, which were gathered in 2019 (Pre-Covid).

Adjustments were then made, and a growth factor was added to account for the last 2 years since the original counts. The estimated amount of traffic to be generated by the project was obtained utilizing tenant supplied trip data for the intended operation of the site. Employee and van driver trips are based on 10% using transit or other ride-sharing opportunities, walking, or biking to work. The City of Covina agrees with the methodology.

4. The TIS performed a traffic signal warrant analysis at the two intersections requested, San Bernardino Road/Driveway #7, and San Bernardino Road/Driveway #6 and neither of the intersections met any of the required warrants. However, the applicant has elected to install full traffic signal improvements at the intersection of San Bernardino Rd/Cutter Way (DW #7) to facilitate pedestrian movements. The City of Covina concurs.
5. Driveway #6 has proposed to be an exit-only driveway, providing the only exit for the delivery vans once they have been fully loaded. The vans will exit onto WB and EB San Bernardino Road, beginning at 10:00 AM, during the off-peak time for the surrounding streets. The City of Covina concurs.
6. The project is not proposing a raised center median on San Bernardino Road. However, the control of traffic at Driveway #6 and Driveway #5 is being addressed through striping, signage, and driver training. The City of Covina concurs.
7. Driveway #5 will be a right-in and right-out only access, so no further analysis was provided. The City of Covina concurs.
8. Driveway queuing analysis was performed for all the driveways along Badillo Street. Since these driveways will be utilized by employees and flex drivers during off-peak hours for the surrounding roadways, there is never more than a single vehicle estimated to be queued at any of the driveways; and, the longest delay indicated was 9 seconds. The City of Covina concurs. CC-2 cont.
9. All signal-controlled intersections identified during the scoping document review were analyzed as part of the TIS. The only signal-controlled intersection which diminished in operation was the intersection of Badillo Street/Azusa Avenue for the AM Peak period. It is expected to operate at LOS E, under both conditions for the cumulative projects analysis. The increase in the V/C ratio is only 0.001, well below the significance threshold of 0.02. The City of Covian concurs.
10. The proposal for the new traffic signal at San Bernardino/Cutter Way is to provide striped left-turn pockets for both approaches by shifting the current EB lanes to the south. Since on-street parking will not be required for the project, parking restrictions will be implemented along the south side of San Bernardino Road. The shifting of the EB lanes southerly will enable the existing on-street parking to remain along the north side of San Bernardino Road. The City of Covina concurs.
11. There was a discussion in the TIS regarding "Peak Season Operations" (such as the seasonal increase in package deliveries between Thanksgiving and the end of the calendar year) resulted in the opinion that *"the additional traffic is not expected to exceed the storage distances provided by left-turn lanes into the site or to spill out onto the adjacent roadways"*. Additional traffic may not be "expected" to exceed the turn pockets, but what if it does? What mitigation measures will be imposed and what monitoring will be implemented to determine if mitigation measures are necessary?

12. The applicant will be replacing the sidewalk along San Bernardino Road, including additional walkway connections to the building to provide the required ADA access from adjacent streets. The City of Covina concurs.
13. Foothill Transit Route 190 runs along San Bernardino Road and provides bus access to the project. The City of Covina recommends that the applicant consults with Foothill Transit to add new bus stops at the San Bernardino/Cutter Way intersection as part of the project.
14. The VMT analysis took advantage of the screening tool developed for the San Gabriel Valley Council of Governments. The project does not screen-out on its own merit; however, a VMT reduction was taken for Alternative Transportation Benefits (Transit expense reimbursement, parking expense reimbursement, vanpool opportunities), which reduced the project's VMT to a value slightly below the significance threshold. The City of Covina concurs.
15. It is important to note that in order for the traffic generated by this project to operate in conformance with this TIS, all employees and drivers must adhere to the facility's operational plan and the trip distribution outlined in this TIS. It will be the responsibility of the City of West Covina to ensure that these traffic and driveway patterns remain enforced during the lifespan of the project. What protocols will be implemented to enable Covina to insist upon updated mitigation measures if voluntary behavioral traffic policy fails?
16. Amazon is proposing to move to a full-electric van fleet within the next 2 to 3 years. As such, the van parking area should be configured to provide adequate room for charging stations for all of the delivery vans. The applicant should also verify with Southern California Edison that this area of its electrical grid can handle the anticipated demand of multiple van charging stations.

CC-3

Noise

1. The proposed Amazon facility is surrounded on three sides by the City of Covina. To the south are single-family residences and to the north and east are multi-family residences. They are sensitive receptors of noise. On page 4-72, it states, "... due to the location of the site between two busy roadways and a hospital located east of Lark Ellen Village, which has an ambulance entrance just east of Lark Ellen Village residences, it is expected that a higher number of impulsive noise events already exist as part of the ambient noise and the sensitive receptors near the site (north, east and south) would not be disturbed by the site activities during the daytime and in the evening." The City of Covina disagreed that the residences to the north, south and east (sensitive receptors) of the site are subjected to a higher number of impulse noise events from ambulance vehicles because of the nearby hospital. Kindred Hospital is at the northeast corner of Lark Ellen Avenue and West Badillo Street. Kindred Hospital is a medical facility for acute long-term care of patients for recovery and wellness. There are no Emergency Room (ER) services. However, there could be a low number of medical transit ambulance vehicles needed to take a patient back to a traditional hospital. Therefore, the City disagrees with the conclusion that the sensitive receptors are used to a higher number of impulse noise events. The noise analysis does not discuss the potential noise generated by increased truck traffic, idling trucks waiting in que, etc. Also, the potential for on-site OSHA beepers of trucks backing into loading docks, etc. We disagree that the noise generated within the project site parking lots is not expected to cause a disturbance for the residents to the north, east and south of the site.

CC-4

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2. Concerning the off-site traffic noise impact, the analysis indicated that the noise level increase is only 0.4 dB (Page 4.74 and 75 of Draft MND). It further stated that the increased traffic noise would be less than significant, and no mitigation is required. The City of Covina has reservations with the conclusion of the noise impact analysis, specifically the period between evening and nighttime hours of 7 pm to 7 am. According to the noise sources on Page 4-65 of the Draft MND, there will be a total of 19 diesel truck trips and 381 vehicle trips (vans and cars) between this period every night of the year. Although the increase of 0.4 dB is minuscule, it exacerbates the already higher noise level for the residences. The City of Covina recommends that Amazon accelerate the timing to replace gasoline vans with EV vans and diesel trucks with EV trucks.
- CC-5
-

Air Quality

The air quality impact did not evaluate health risks from diesel particulate matter emissions, since diesel trucks are used for the facility. There could be a "fair Argument" that the project could have a health risk impact from its indoor air quality impacts. However, replacing the diesel trucks with EV trucks will address this issue.

CC-6


Other Comments

Does the Draft MND evaluate the potential growth of the facility in regards to ongoing increase in Amazon business? How will future impacts resulting from increased operations be mitigated once an entitlement is approved?

CC-7

Thank you again for allowing us to comments on the Draft MND. If you have any questions about our comments, please feel free to contact me at 626-384-5458, blee@covinaca.gov or Nancy Fong at 626-384-5463, nfong@covinaca.gov.

Sincerely,

CITY OF COVINA

Brian K. Lee, AICP
Director of Community Development

- cc: Chris Marcarello, City Manager
Angel Carrillo, Assistant to City Manager
Andy Bullington, Director of Public Works
Rafael Fajardo, City Engineer
David Gilbertson, Contract Engineer
Mercy Lugo, Senior Planner
Nancy Fong, AICP, Community Development Consultant

Letter 2: City of Covina

Comment Letter Dated August 9, 2021

CC-1 The comment reiterates description of the proposed Project. No response is required.

Transportation

CC-2

1. The comment identifies the operational plan as outlined in the Traffic Impact Study (TIS) and indicates that during commuting hours, the proposed Project traffic may have minimal impact on surrounding streets. However, the comment adds, the traffic would be associated with heavy vehicles (e.g., tractor/trailer trucks and delivery vans) on Covina streets, which would result in accelerated degradation of the streets. The comment requests that Amazon reimburse the City of Covina to conduct a pavement analysis and share the cost of street maintenance. The comment is noted and will be forwarded to the decision makers. The comment does not identify a CEQA issue, and as such, no further response is required.
2. The comment identifies that the City of Covina concurs with the proposal to shift Driveway #7 easterly to align with Cutter Way on the north side of San Bernardino Road. The comment is noted and will be forwarded to the decision makers. No further responses is warranted.
3. The comment identifies that the City of Covina agrees with the methodology in the TIS pertaining to existing traffic volumes and the Project generated traffic. The comment is noted and will be forwarded to the decision makers. No further responses is warranted.
4. The comment indicates that the City of Covina concurs with installing full traffic signal improvements at the intersection of San Bernardino Road/Cutter Way (DW #7) to facilitate pedestrian movement, even though the traffic signal warrant analysis at two intersections did not meet the required warrant. The comment is noted and will be forwarded to the decision makers. No further responses is required.
5. The comment identifies that the City of Covina concurs with Driveway #6 being an exit-only driveway and that the vans will exit on San Bernardino Road at 10:00am during the off-peak time. The comment is noted and will be forwarded to the decision makers. No further responses is required.
6. The City concurs with the proposed striping, signage, and driver training for control of traffic at Driveway # 5 and #6 even though a raised center median on San Bernardino Road is not proposed. The comment is noted and will be forwarded to the decision makers. No further responses is required.
7. The City concurs with Driveway #5 being a right-in and right-out only access. The comment is noted and will be forwarded to the decision makers. No further responses is required.

8. The comment indicates that driveway queuing analysis was conducted for all driveways along Badillo Street. There is never more than a single vehicle estimated to be queued, and the longest delay is nine minutes, the comment adds. The City concurs. The comment is noted and will be forwarded to the decision makers. No further response is required.
9. The City concurs with the finding of the TIS that the intersection of Badillo Street/Azusa Avenue for the AM peak hour would operate at LOS E and that the increase in V/C ratio is only 0.001, which is below the significance threshold of 0.02. The comment is noted and will be forwarded to the decision makers. No further response is required.
10. The City concurs with the proposal for the new signal at San Bernardino Road/Cutter Way. Since on-street parking will not be required, parking restriction would be implemented along the south side of San Bernardino Road. Consequently, the on-street parking will remain along the north side of San Bernardino Road. The comment is noted and will be forwarded to the decision makers. No further response is required.
11. The City questions what mitigation measures will be proposed and how will they be monitored if it is determined that mitigation is necessary in case additional traffic associated with “Peak Season Operations” exceeds the turn pockets. The comment is noted and will be forwarded to the decision makers. However, the comment is speculative and references a hypothetical scenario in the future. The detailed analysis contained in Section 4.17, Transportation, of the IS/MND indicates that given the result of the level of service and queuing analyses conducted, the additional traffic is not anticipated to exceed the storage distances provided by left-turn lanes into the site or to spill out onto the adjacent roadways. In light of this, no further response is required.
12. The City concurs with replacement of the sidewalk along San Bernardino Road and additional connections to the building to provide the required Americans with Disabilities Act (ADA) access from adjacent streets. The comment is noted and will be forwarded to the decision makers. No further response is required.
13. The comment recommends that the Applicant consult with Foothill Transit to add new bus stops at the San Bernardino Road/Cutter Way intersection as part of the Project. The comment is noted and will be forwarded to the decision makers. No further response is required.
14. The City concurs with the approach for VMT analysis, which used the screening tools developed for the San Gabriel Valley Council of Governments. The comment is noted and will be forwarded to the decision makers. No further response is required.
15. The comment asserts that the City of West Covina will be responsible for ensuring that the traffic and driveway patterns remain enforced during the life of the Project. The comment further questions the protocols according to which updated mitigation measures will be enforced if voluntary behavioral traffic policy fails. The comment is noted and will be forwarded to the decision makers. However, the comment is speculative and references a hypothetical scenario in the future if and when the “voluntary behavioral traffic policy fail.” Addressing a speculative future scenario is above and beyond the scope of this IS/MND. No further response is required.

16. The comment asserts that in light of Amazon's goal of full-electric van fleet within the next two to three years, the van parking area should be configured to provide adequate room for charging stations. The comment indicates that the Applicant should verify with the Southern California Edison if the demand of multiple van charging stations can be accommodated. The comment is noted and will be forwarded to the decision makers. It is noted that this is not a CEQA issue, is speculative, and is above and beyond the scope of the IS/MND. As such, no further response is required.

CC-3

Noise

1. The comment disagrees with the conclusion that the sensitive receptors (to north, east, and south of the site) are used to a higher number of "impulse" noise event. The comment adds that the noise analysis does not discuss noise from truck traffic, idling trucks, trucks waiting in queue, and OSHA truck beepers. Additionally, the comment does not agree with the conclusion that there is already an elevated ambient noise level in the area. The comments are noted and will be forwarded to the decision makers.

It should be recognized that Section 4.13, Noise, of the IS/MND provided a full and detailed analysis of the Project's potential impacts pertaining to noise and identifies multiple sources of noise, including all sources mentioned above. The noise analysis evaluated the acoustical impact of the proposed facility on the adjacent sensitive receptors and compared it to the ambient noise levels and local noise standards to assess if any mitigation measure would be necessary to reduce the noise exposure to the community. Future community noise impacts from the onsite operations were modeled using SoundPlan Essentials 5.1 acoustical modeling software. Starting on page 4-65, the analysis discusses in detail the sources and the times when noise-producing activities would occur. Based on the analysis and modeling prepared, it was determined that the impacts would not be significant requiring mitigation.

2. The comment does not agree with the conclusions of the noise impact analysis regarding the noise level increase of 0.4 dB and the determination that the increased traffic noise would be less than significant. The comment adds that while the increase of 0.4 dB is minuscule, it exacerbates the already higher noise level for the existing residences. The comment recommends accelerating the timing to replace gasoline vans and diesel trucks with EV vans and trucks. The comment is noted and will be forwarded to the decision makers. No further response is required.

CC-4

Air Quality

The comment notes that health risks from diesel particulate matter emissions were not evaluated in the air quality analysis. While it may be argued that the Project could have a health risk impact from indoor air quality, the commenter indicates that replacing the diesel trucks with EV trucks will address this issue. The comment is noted and will be forwarded to the decision makers. No further responses is required.

CC-5

Other Comments

The comment expresses concern over future growth and increased operations of the facility and how impacts would be evaluated once an entitlement is approved. The comment is noted and will be forwarded to the decision makers. The increase in Amazon business and growth of the facility is not a CEQA issue and is above and beyond the scope of the analysis in the IS/MND. As such no further response is required.

3.3 ORGANIZATIONS

A total of two comment letters/emails were received from the organizations. The comment letters/emails are listed below:

- Woodlane Village Homeowners Associations (WVHOA)—August 9, 2021
- Teamsters Local Union No. 1932 (TLU 1932)—August 11, 2021

Letter 3

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

Project Title: Amazon Delivery Station DAX9 Project

<p>We are the Board of Directors and we represent Woodlane Village Condominium homeowners behind the subject property. We are located in the 1400 block on the north side of San Bernardino Road. We have 68 units with many young families with small children. We are writing to you today let you know how dangerous this Amazon project will be to our neighborhood and ask you to re-consider your proposal.</p>	WVHOA-1
<p>(1) This re-location would be dangerous because there are many children in our neighborhood. These children ride their bicycles on the street all the time and allowing heavy trailer trucks on the street will make the situation much more dangerous. Trailer trucks are bigger and take more time to stop, for a small child, for example.</p>	WVHOA-2
<p>(2) The back entrance to Las Palmas Middle School is located within 100 yards of your building. Many children cross San Bernardino Road to Cutter Street and use the back entrance of the school. They use this route in the morning and again in the afternoon. What will you do to make their trip to and from school safely?</p>	WVHOA-3
<p>(3) This location will be dangerous for people who park on the south side of San Bernardino and have to run across the street to get their vehicle. There are no crosswalks so people run, which I know is illegal, but they do it all the time anyway. Just look at the parked vehicles on the south side of San Bernardino Road at any given time. People are constantly running across the street.</p>	WVHOA-4
<p>(4) The north side of the 1400 block of San Bernardino Road has five apartment buildings as well as our condominiums. That is a lot of people/children living in these residential complexes. Have you considered their safety? I think not. The City of Covina has designated it as residential zoning. I am sure the City of Covina would not approve your proposal.</p>	WVHOA-5

-
- (5) Trucks coming and going on San Bernardino Road during both the daytime and night will create much more traffic noise. This will affect our homeowners who are trying to sleep at night. When they purchased their unit many years ago, they purchased their home based on a quiet street during the night. Are you planning to build a sound wall or barrier to reduce the noise? The increased noise will have a negative impact on our home values also. WVHOA-6
-

We recommend that the entrance/exit to your building with large trailer trucks be located on the *south* side on Badillo Street where there is not any residential traffic. Using Badillo Street entrance/exit will be a preferred solution because it is much safer (not residential) and there is an existing wall to act as a sound barrier for the neighborhood. WVHOA-7

Thank you for the opportunity to comment on this important project. We would like you to respond to our five concerns and also we would like to be informed of any changes as the project goes along.

Kind regards,

Woodlane Village Homeowners Association

Board of Directors

Jeannie Harrell (harrellolanray09@gmail.com)
Becky Morales
Michael Brown
Genea Anderson

Mailing Address

Woodlane Village HOA
c/o So Cal Property Enterprise, Inc.
1855 Sampson Avenue
Corona, CA 92879

Letter 3: Woodlane Village Homeowners Association

Comment Letter Dated August 9, 2021

- WVHOA-1 The comment introduces the Woodlane Village HOA, identifies the location, and asserts that the Project would be dangerous to the neighborhood and be reconsidered. The comment is noted and will be forwarded to the decision makers. No specific CEQA issue is identified, and as such no further response is required.
- WVHOA-2 The comment asserts that the delivery trucks would be dangerous for many kids who live in the neighborhood and who rides their bicycles. The comment is noted and will be forwarded to the decision makers. This is not a CEQA issue, and as such no response is required. However, it should be noted that a number of improvements are proposed (e.g., signal, striping plan, etc.—identified in MM TRA-4 and MM TRA-5) that would address the issue of safety and improve traffic safety along San Bernardino Road. With these measures in place, no adverse impacts are anticipated.
- WVHOA-3 The comment refers to Las Palmas Middle School within 100 yards of the proposed Project and asserts that school children cross San Bernardino Road to Cutter Street on their way to school. The comment is noted and will be forwarded to the decision makers. Please refer to Response WVHOA-2, above, regarding the issue of safety.
- WVHOA-4 The commenter identifies the danger of people running across the street to get their vehicles parked on the south side of San Bernardino. The comment is noted and will be forwarded to the decision makers. Please refer to Response WVHOA-2, above, regarding the issue of safety. However, it should also be noted that the comment is speculative and does not identify a CEQA issue. As such no further response is warranted.
- WVHOA-5 The comment again identifies the issue of safety in light of existing apartment buildings on San Bernardino Road. Please Refer to Response WVHOA-2, above, regarding the issue of safety. Additionally, it should be recognized that the comment is speculative and does not identify a CEQA issue. As such no further response is warranted.
- WVHOA-6 The comment identifies traffic noise as an impact during the night and also states that the homeowners purchased their properties in a quiet street. The commenter questions if a sounds wall would be built to reduce noise. The increased noise would impact their home values. The issue of property values is not a CEQA topics, and as such no response is required.

Regarding traffic noise and a barrier, Section 4.13, Noise, of the IS/MND provided a detailed analysis of traffic noise and overall noise from the proposed Project. The analysis identifies the noise sources, including operational and traffic noise,

and determined that due to the distance and a noise barrier, potential impacts to sensitive receptors to the north, east, and south would not be significant.

Two 12-foot high screen walls would be constructed, one south of the approach driveway and adjacent to the loading dock area (525 feet including a 26-foot wide gate) and one north of the loading dock area (271.9 feet including a 26-foot wide gate). The material for the 12-foot high walls includes a standard Concrete Masonry Unit. The 12-foot high wall located south of the loading docks would provide approximately 5 dB attenuation to the residences south of the site.

WVHOA-7 The commenter recommends that the entrance/exit to the building with large trailer trucks be located on the south side on Badillo Street. The comment is noted and will be forwarded to the decision makers. No further response is required.



TEAMSTERS LOCAL UNION NO. 1932

Affiliated with the INTERNATIONAL BROTHERHOOD OF TEAMSTERS

EXECUTIVE BOARD
RANDY KORGAN
SECRETARY-TREASURER
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TRUSTEE
MARTIN ROMERO
TRUSTEE

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

Ms. Burns:

I am writing to you on behalf of the 19 members of Teamsters Local 1932 who live in the City of West Covina, as well as our 14,000 members throughout the region. As community members and workers in this beloved City, our union is strongly opposed to the proposed Amazon Delivery Station on 1211 East Badillo Street. The mitigation measures outlined for the proposed facility will not correct the cumulative impacts posed by its operations as currently planned. These cumulative impacts, especially in regards to public safety, will be corrosive to the well-being of residents in West Covina. The City of West Covina must proceed with caution as it relates to this project in order to produce the best possible outcome for residents and workers in the City.

TLU1932-1

The Proposed Entitlements are Not Supported by the Current Application

The proposed facility at 1211 East Badillo Street requires further significant analysis and planning. The situation is even more pressing because the proposed facility comes with a potential re-zoning of the site's Civic/Public Institution land use designation. The public good that comes with this current designation is obvious. Any modification of this designation should be prepared only when a proposed project goes above and beyond the bare minimum and is ready to meet community standards. In West Covina, those community standards look like well-paying and safe jobs, as well as safe streets and clean air. Cumulatively, the Amazon-Greenlaw Partners project does not help our City meet these standards.

TLU1932-2

433 N. Sierra Way | San Bernardino, CA 92410 | Mailing Address: P.O. Box 432 | San Bernardino, CA 92402
Office: (909) 889-8377 | Fax: (909) 888-7429 | Website: www.teamsters1932.org



<p>When the City prepared its General Plan, the subject property was slated for civic use--public institutions. The current zoning is for an SP-11 use, a faith community church. The departure to an intensive use like the proposed Amazon facility represents a significant leap-frogging of intensity of uses that are not fully accounted for. Representative of this is the fact that the satellite image including in the MND documentation shows the areas north and northwest of the site but cuts off the neighborhood to the south--which is a dense residential area. The area to the east features a hospital and a school--both land uses that have sensitive receptors and present unique land use issues that need to be particularly addressed if the City is to piggyback on work done for the General Plan to so radically alter the existing general plan designation.</p>	TLU1932-3
<p>A mitigated negative declaration is appropriate where a proposed project builds on environmental study already conducted (e.g., for a general plan or specific plan prepared for an area in which the property is located) and/or where mitigations incorporated into a proposed project are sufficiently specific and enforceable that anticipated impacts fall below thresholds of significance.</p>	TLU1932-4
<p>The former situation--relying on a previously-prepared environmental study--is plainly not applicable to this subject property, which was slated for civic use in the General Plan. Therefore this mitigated negative declaration must rest on sufficiently specific and enforceable mitigation measures to account for likely significant impacts.</p>	TLU1932-5
<p>The impact study incorporated in the MND does not seem to satisfy these requirements. As just one example, under CEQA, likely or foreseeable impacts should be studied so far as they are not speculative. The growth in Amazon's parcel delivery service over the past few years, much less over the past decade, has increased exponentially, not linearly. As of May 2020, Amazon was the fourth-largest parcel delivery service in the United States; not five years ago, they were not at all a parcel-delivery service. The company itself has touted parcel-delivery service increases of 155% or more year-on-year between 2018 and 2020. That represents a more than doubling of their parcel delivery volume. With sensitive land uses like hospitals and schools so nearby--not to mention the residential neighborhood to the south--such an increase in volume must be studied. The traffic analysis incorporated into the MDN does not do so but instead relies on past performance solely.</p>	TLU1932-6
<p>The level of service (LOS) and vehicle miles traveled (VMT) analysis does not incorporate these foreseeable and likely increases in vehicular traffic emanating to and from the site. The mitigation measures are calibrated to these sanguine projects and incorporate no monitoring and enforcement mechanism to deal with vehicular traffic that not only may but is likely to exceed these projections.</p>	TLU1932-7
<p>Attendant to this issue is the impacts from noise and greenhouse gas emissions (particularly from queuing vehicles), as well as potential light impacts. The fact is that the site is transitioning from a particularly low-intensity use to an extremely high-intensity use that will keep the site operating twenty-four hours a day seven days a week, and which predictably will not only immediately become a site of constant truck traffic, but which will increase steadily in intensity over the immediate future. The City should ask the applicant to provide its internal projections of increased intensity of use as its parcel-delivery service grows and incorporate those findings into mitigation measures that will allow the City to intervene in the future should traffic, noise, and greenhouse gas emissions impacts grow at a significant rate.</p>	TLU1932-8
<p>Consider this statement from urban planner Daniel Flaming, president of the Economic Roundtable, a Los Angeles-based research non-profit that provides transparent, data-driven policy analysis, who said that last-mile facilities like the one proposed for West Covina have several negative impacts when situated near residential areas: "It would be horrific if you owned a home next to one of these distribution centers," Flaming said. "All those loaded trucks have significant road wear issues as well as congestion issues, noise issues, and pollution issues."</p>	TLU1932-9

We would also request that these projections be used to study the potential impact of particulate matter discharge attendant to stormwater. This is because with an ever-increasing (and potentially rapidly increasing) number of parcel trucks queuing, parking, and driving through and on the property, the likelihood of stormwater gathering toxic particulates (oil, automotive fluid, etc.) will foreseeably increase significantly. These particulates being gathered by stormwater and discharged into the City's green space as well as the stormwater system could have local and regional impacts. If nothing else, the City can and should request that the applicant provide information on the particulates found in other similar facilities and how and if these particulates are comingled with stormwater and discharged locally. TLU1932-10

Because the mitigation measures currently outlined do not correct the cumulative impacts posed by the proposed facility, it is crucial that the City of West Covina commit to the highest possible quality of social, economic, and environmental analysis before moving forward with any proposal by Amazon-Greenlaw Partners. Additionally, because of the company's high profile and track record, it is key that the City also commit to dynamic public outreach regarding the project before it moves along the development phase. TLU1932-11

Amazon Will Contribute to Knock-On Effects of Worker and Resident Safety

According to an analysis of OSHA reporting data provided to the state of California by Amazon, the recordable injury rate for Amazon's network of fulfillment centers was high at 6.3 injuries per 100 workers. This rate is already more than double the warehousing industry's injury rate. Remarkably, Amazon's last-mile logistics chain — which the facility proposed for 1211 East Badillo Street will fit into — has injury rates higher than in Amazon's fulfillment centers. The same year the injury rate among the company's network of delivery stations was 51 percent higher at 9.5 injuries per 100 workers. The work inside the proposed facility, if in line with Amazon's standards, will produce intensive, strenuous work, with little in return when compared to the company's vast resources. Investigative reporting by Jeff Bezos' own Washington Post reveals a Human Resource department that does the bare minimum for its broken workforce, leaving stuck in a maze with little recourse but automated help. TLU1932-12

Moreover, because Amazon does not treat the drivers that deliver packages to customers' homes as employees, the company does not report injury rates among drivers. Analysis conducted by the Strategic Organizing Center, a coalition of four labor unions representing more than 4 million workers, found that many of Amazon's delivery partners have not complied with the requirement to submit injury data to OSHA. However, in 2019 and 2020, at least 129 Amazon delivery partners did submit injury records covering more than six thousand workers. Across all DSPs reporting injury data in 2020, the recordable injury rate was 13.3 injuries per 100 workers. Amazon DSP drivers were injured at a similar rate in 2019 and 2020, but the nature of these injuries changed. The rate of severe injuries that required employees to take time off of work in order to recover (lost time) increased by 25 percent. TLU1932-13

These are properly areas of environmental study because they foreseeably will have impacts on public services, including police and public safety response time to accidents on the roads, demand on local health care services, and demands on emergency services. These issues were not studied for purposes of the MND, which represent a critical defect. TLU1932-14

As a union with more than one hundred years of representing workers in the transportation and logistics industry, we know firsthand that these injuries take place when work is cut-throat, and employees need to rush to the next stop. Amazon delivery vans, without higher standards that meet the community's needs for public safety, will wreak havoc on West Covina's streets, especially schoolchildren in the facility's vicinity. Dozens of schools, daycare centers, and parks are located less than a couple of miles from the proposed facility. The waves of delivery vans exiting the facility in the morning would likely coincide with school drop-offs. Although the current plans call for 142 daily morning delivery van trips, this should only be the beginning. The cascading public safety issues TLU1932-15

that will arise in surrounding streets are clearly problematic for the City of West Covina. The City should expect more from Amazon and its delivery service partners because the status quo does not bode well for our City's neighborhoods. TLU1932-15
cont.

Conclusion

For the foregoing reasons, we are asking that you deny the permit applications or, in the alternative, send the applications back for further study and incorporation of more appropriate mitigation measures. TLU1932-16

Sincerely,

Sheri Orellana

Sheri Orellana
Business Agent & Recording Secretary
Teamsters Local 1932
sorellana@teamsters1932.org

Letter 4: Teamsters Local Union No. 1932

Comment Letter Dated August 11, 2021

TLU1932-1 The comment asserts that the Teamsters Local 1932 is opposed to the proposed Project. The mitigation measures will not “correct” the impacts, especially to public safety. The comment is noted and will be forwarded to the decision makers. No specific CEQA issue is identified, and no further response is required.

TLU1932-2 The comment indicates that further analysis is required and expresses opposition to rezoning of the site. Modification to the designation should only occur when a project goes above and beyond and meets community standards (well-paid and safe jobs and safe streets and clean air). The comment is noted and will be forwarded to the decision makers. The IS/MND provided a detailed analysis of all CEQA topics in compliance with CEQA and CEQA Guidelines as well as the City of West Covina standards and requirements. No specific issue is identified, and as such no further response is required.

TLU1932-3 The comment incorrectly identifies rezoning and General Plan amendment as “significant leap-frogging of intensity of uses that are not fully accounted for.” While the commenter considers the change in designation “radical”, it should be noted that prior to Faith Church, Honeywell Corporation and Hughes Aircraft/Electronics operated an industrial manufacturing operation in the existing building. Further, the Project site is located within an established built environment of the City and is surrounded by a mix of uses including residential, retail, warehouse, commercial office, commercial, and light industrial, and it is not within a predominantly residential neighborhood. The Project proposes to reintroduce the previous General Plan land use designation onsite and is requesting a General Plan Amendment to Industrial and a Zone Change to Manufacturing (M-1). The land use designation of Industrial permits intensive manufacturing, processing, warehousing and similar uses, as well as light, clean industries, and support offices.

TLU1932-4 The comment describes the purpose of a Mitigated Negative Declaration (MND) and that it is appropriate as a subsequent environmental document that is tiered off a previously prepared CEQA document. The comment adds that an MND would be appropriate if the mitigation measures proposed are specific enough to reduce the impacts. The comment is noted and will be forwarded to the decision makers. It should be stated that an MND can be prepared for a component of a large-scale project for which a program EIR may have been prepared, or it can be prepared as a stand-alone CEQA document for a project with potential impacts that can be mitigated.

In accordance with CEQA and the State CEQA Guidelines, an Initial Study (IS) was prepared for the proposed Project and its associated discretionary approvals. With extensive analyses conducted, the IS correctly determined that the potentially significant impacts of the Project can be reduced to less than significant levels with implementation of mitigation measures, and therefore, the Project

required preparation of an Initial Study/Mitigated Negative Declaration (IS/MND). It is noted that the purpose of an MND is not to solely serve as a subsequent CEQA document for a previously prepared environmental document. An MND can be a stand-alone CEQA document prepared to disclose the potentially significant environmental impacts of a project. Section 21064.5 of the California Public Resources Code states that MNDs may be used,

“when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.”

In compliance with CEQA and CEQA Guidelines, the IS/MND accurately analyzed the potential impacts of the proposed Project and made determination based on substantiation as provided for under CEQA regulations. Additionally, mitigation measure are included to address the potential impacts that may occur as a result of Project implementation.

Furthermore, the purpose of a mitigation measure, in accordance with CEQA Guidelines Section 15126.4, is to avoid or substantially reduce the significant impacts of a Project, identified through the analysis, to less than significant levels. These impacts may occur onsite or offsite; therefore, regardless of the type of impact and where it occurs, the Project is required to propose mitigation measures. As such, the IS/MND only identifies mitigation measures that would meet that objective and address and offset the potentially significant impacts of the Project.

TLU1932-5 The comment reiterates that the MND must propose specific and enforceable mitigation measures to address significant impacts. As identified above, in Response TLU1932-4, the mitigation measures proposed in the IS/MND meet the standard of adequacy. They appropriately offset the potentially significant impacts of the Project.

TLU1932-6 The comment identifies the growth and expansion of Amazon’s delivery service. The comment asserts that such an increase in volume must be further studied and that the traffic study does not follow this approach and just relies on past performance.

The traffic analysis in Section 4.17, of the MND correctly and adequately studied, assessed, and projected the potential impacts of the Project in compliance with CEQA and the State CEQA Guidelines. Additionally, it should be noted that growth in Amazon’s parcel delivery is not a CEQA issue and is above and beyond the scope of the analysis in the IS/MND. As such, no further response is required.

- TLU1932-7 The comment asserts that the level of service (LOS) and vehicle miles traveled (VMT) analysis does not incorporate the likely increases in vehicular traffic and that the mitigation measures do not incorporate monitoring and enforcement mechanism to deal with vehicular traffic that will likely to exceed these projections. The comment is noted and will be forwarded to the decision makers. However, the comment again speculates about a future condition when traffic will exceed the projections made in the IS/MND. In the absence of justifications, no further response is required. Regarding mitigation measures, as identified above, in Response TLU1932-4, the mitigation measures proposed in the IS/MND meet the standard of adequacy. They appropriately offset the potentially significant impacts of the Project.
- TLU1932-8 The comment identifies the impacts from noise and greenhouse gas emissions, as well as potential light impacts. The comment adds given that the site will change from low intensity to high intensity of use, the City should ask the Applicant to provide projections of increased intensity of growth, which should be incorporated into mitigation measures. The comment is noted and will be forwarded to the decision makers. The IS/MND is an adequate document prepared in compliance with State CEQA Guidelines. The IS/MND analyzed the potential impacts of the Project and proposed adequate and feasible mitigation measures for the potentially significant impacts. The issue of future growth in Amazon's delivery is speculative and not a CEQA issue. As such, no further response is required.
- TLU1932-9 The comment references Daniel Flaming, an urban planner and president of the Economic Roundtable, a Los Angeles-based research non-profit who said that last mile facilities like the one proposed for West Covina have several negative impacts when situated near residential areas. The comment is noted and will be forwarded to the decision makers. The quote does not specifically refer to the Project, and as such no further response is required.
- TLU1932-10 The comment expresses concern over the potential impact of particulate matter gathered by stormwater and discharged into the City's green space and stormwater system resulting in local and regional impacts. The comment asks that the City requests that the Applicant provide information on the particulates and if these particulates are comingled with stormwater and discharged locally. The comment is noted and will be forwarded to the decision makers.

Section 4.10, Hydrology and Water Quality, of the IS/MND provided a detailed analysis of potential impacts to storm water from both short-term construction and long-term operation of the proposed Project. The analysis identifies storm water pollutants that would be generated by the Project in the long-term; these include sediment, trash and debris, oil and grease, bacterial indicators, nutrients, and pesticides that would come from landscaped areas, drive aisles, and parking areas. In light of this and in accordance with the National Pollutant Discharge Elimination System (NPDES) and Section 9.36, Control of Pollutants from New Developments/Redevelopment Projects, of the West Covina Municipal Code, the Project is required to prepare and implement a standard urban stormwater mitigation plan (SUSMP), which is incorporated as a regulatory requirement (RR

HYD-2) in the Hydrology and Water Quality section. The City would review and approve the SUSMP prior to construction and operation of the Project. The SUSMP would include low impact development (LID), structural and non-structural best management practices (BMPs), and source control BMPs including construction of new LID Stormwater Treatment BMPs on the north side of the existing building on the Project site to address the drainage low spots on the East San Bernardino Road.

Thus, compliance with RR HYD-1 and RR HYD-2 would reduce the risk of water degradation from soil erosion and other pollutants and potential violations of water quality standards would be minimized through required BMPs.

TLU1932-11 The comment requests that that the City of West Covina commit to the highest possible quality of social, economic, and environmental analysis, as the mitigation measures do not “correct” the impacts of the Project. The comment adds that the City also commit to dynamic public outreach regarding the project before it moves along the development phase. The comment is noted and will be forwarded to the decision makers.

However, it should be recognized that the IS/MND for the proposed Amazon Delivery Station DAX9 Project has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations (CCR) Section 15000 et seq. The IS/MND provides an objective, factually supported, full disclosure analysis of the environmental consequences associated with the proposed Project. City staff has reviewed all submitted drafts, technical studies, and consistency with City regulations and policies. The IS/MND prepared for the Project has adequately and sufficiently analyzed the potential impacts of the Project. As such the document identifies impacts and proposes mitigation to address the impacts. No further response regarding additional studies and public outreach are warranted.

TLU1932-12 The comment points out Amazon’s injury rate being more than double the warehousing industry’s injury rate. The comment provides additional background information. The comment is noted and will be forwarded to the decision makers. No specific CEQA issue is identified, and no further response is warranted.

TLU1932-13 The comment alleges that Amazon does not treat the drivers that deliver packages to customers’ homes as employees, the company does not report injury rates among drivers. Also, the comment adds, most of Amazon’s delivery partners have not complied with the requirement to submit injury data to OSHA. The comment additionally provides statics regarding injury rates background information. The comment is noted and will be forwarded to the decision makers. No specific CEQA issue is identified, and no further response is warranted.

TLU1932-14 The comment alleges that the MND is flawed because the issue of demand on public services, police and public safety response time to accidents on the roads, demand on local health care services, and demands on emergency services were not studied. The comment is noted and will be forwarded to the decision makers.

Per CEQA Guidelines and standard practice, the public services section of the IS/MND analyzed the Project's demand pertaining to services such as fire and police protection, parks, schools, and libraries. Overall, the Project, not being a residential project, would not result in increased demands for public services such that significant impacts would result requiring mitigation.

In terms of police protection services, the proposed Project would comply with all applicable codes, ordinances, and requirements related to safety and payment of Development Impact Fees (DIFs). In accordance with Chapter 17, Article IV, Development Impact Fees of the City's Municipal Code, the Project Applicant would pay the applicable police facility fee (provided as RR PS-2). Compliance with City regulations and payment of DIF's would reduce Project impacts on police protection services. Similar to police protection, other public services also require payment of fees, which would offset the increased demand that may occur.

- TLU1932-15 The comment asserts that as a union they know firsthand that injuries take place when work is cut-throat, and employees need to rush to the next stop. Dozens of schools, daycare centers, and parks are located less than a couple of miles from the proposed facility. The City should expect more from Amazon and its delivery service partners because the status quo does not bode well for our City's neighborhoods. The comment is noted and will be forwarded to the decision makers. Please refer to the Response TLU1932-14, above, regarding the issue of safety. No further response is required.

Conclusions

- TLU1932-16 The comment asks that the application be denied or send back for further study. The comment is noted and will be forwarded to the decision makers. No further response is required.

3.4 INDIVIDUALS

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

- Diana Glover (DG)—July 15, 2021
- Judith Barrioz (JB) - Sent by Louie Mota—July 18, 2021
- Patricia Hernandez (PH)—July 27, 2021
- Sherie G. (SG)—July 27, 2021
- Charlotte Steward (CS)—August 4, 2021
- Elisa Paster (EP)—September 11, 2021

From: DIANA GLOVER
Sent: Thursday, July 15, 2021 8:20 AM
To: Jo-Anne Burns <JBurns@westcovina.org>
Subject: Amazon Delivery Station DAX9 Project

Letter 5

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To: Ms. Jo-Anne Burns, Planning Manager

Good Morning. My name is Diana Glover I am an owner of 1 of the Condos on San Bernardino Rd, Covina directly across the street from this site.	DG-1
I have a few concerns as follows: 1. Traffic, these Amazon trucks are heavy and make a lot of noise how will that be minimized? 2. Time of trucks coming and going is this a 24 hour Facility. People are sleeping and I do not want to be disturbed during late night and early morning hours. This is a relatively quiet street. 3. Dust, dirt and exhaust from these trucks how will this be handled? 4. If a block wall is built around the complex who will be handling the graffiti and how fast will it be taken care of?	DG-2
Maybe all incoming and outgoing trucks should enter and exit from Badillo to alleviate the disruption of the Covina residents since the money paid by Amazon benefits West Covina.	DG-3
Hopefully this does not reduce the value of my property. I did not purchase my home to live in an industrial area.	DG-4

Thank You,

Diana Glover

Sent from my T-Mobile 5G Device
Get [Outlook for Android](#)

Letter 5: Diana Glover

Comment Letter Dated July 15, 2021

- DG-1 The comment identifies the location of the commenters' home in relation to the Project. The comment is noted, and no further response is required.
- DG-2 The comment expresses concern regarding traffic; hours of operation in relation to the trucks; dust and dirt from the trucks; and a potential block wall. The comments are noted and will be forwarded to the decision makers. The stated concerns are addressed below:

1. The commenter notes that truck are heavy and generate noise and asks how that would be minimized. The comment is noted and forwarded to the decision makers. It should be noted that Section 4.13, Noise, of the IS/MND included a detailed analysis of operation noise, including noise from the delivery trucks. Long-term operational noise levels are anticipated to range between 46.9-55.6 dBA during the daytime, 45.9-55.5 dBA during the evening, and between 44.7-55.5 dBA at nighttime at the nearest sensitive receivers without any noise mitigation. The ambient noise levels are not expected to be raised by more than 5dB; therefore, it was concluded that the activities on the proposed site are not expected to cause a significant impact during the daytime, evening, and nighttime. The City of West Covina General Plan (PlanWC) requires evaluations of the outdoor noise impact; however, indoor noise impact was also evaluated in this analysis to assess the risk of possible noise disturbance due to night activities at the site. The main activity at night would be trucks entering the site and driving to the loading docks. Truck arrival would be staggered so not more than one truck would be driving at once on the property. Based on the 20dB reduction from windows closed mentioned in the General Plan, the indoor noise levels from truck path would be between 17.9 dBA and 33.1 dBA at the nearest sensitive receptors. The noise from trucks driving on site would be limited to about 5 minutes per hour and is not expected to exceed 33.1 dBA at the residences located north, east, and south of the site. In addition, the ambient noise levels are expected to be higher throughout the night than the operational noise levels. Accordingly, it is not expected that residents would be disturbed by the truck activities. Therefore, based on the analysis conducted and the discussion above, the site's operational noise impacts were determined to be less than significant.

Regarding dust and dirt from trucks, it should be noted that South Coast Air Quality Management District's Rules 402 and 403 are required to address a Project's potential construction and operational impacts. Rule 402 prohibits any discharge from source of air contaminants or other material which would cause injury, detriment, nuisance, or annoyance to people or the public. Additionally, all construction activities would be conducted in compliance with Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. Contractor compliance with Rule 403 requirements would be mandated in the contractor's specifications. These are included in the IS/MND as RR AQ-1 and RR AQ-2.

2. The comment related to 24-hour facility and trucks disturbing the quiet neighborhood at night is noted and will be forwarded to the decision makers. For additional discussion, please refer to Response 1, above.
 3. The comment asks how dust, dirt, and exhaust from the trucks will be handled. The comment is noted and will be forwarded to the decision makers. Section 4.3, Air Quality, of the IS/MND included detailed analysis and discussion of air quality emission and exhaust from trucks. Uses similar to the proposed facility generate emissions associated with diesel exhaust from trucks accessing the site. The Project is anticipated to result in 14 (28 one-way truck trips) per day. The California Air Resources Board has published the *Air Quality and Land Use Handbook: A Community Health Perspective* which recommends that residential uses be sited at least 1,000 feet from a warehouse distribution center that accommodates 100 trucks per day. Because the Project would accommodate less than 100 trucks per day, the Project would be below the California Air Resources Board's (CARB's) siting recommendation for sensitive land uses and not expose local residents to excessive toxic emissions. Regarding dust and dirt from trucks, please refer to Response 1, above.
 4. The commenter asks if a block wall is built around the facility who will address the issue of graffiti. The comment is noted and will be forwarded to the decision makers. As identified in the IS/MND, two 12-foot high screen walls would be constructed, one south of the approach driveway and adjacent to the loading dock area and one north of the loading dock area. The comment regarding graffiti, who will address it and how fast it will be addressed is noted and will be forwarded to the decision makers. However, the comment is speculative and not a CEQA issue, as such no further response is required.
- DG-3 The commenter asserts that the trucks should enter and exit from Badillo Street to avoid disruption of the Covina residents, as the Project will benefit the City of West Covina. The comment is noted and will be forwarded to the decision makers. However, it should be recognized that San Bernardino Road is a City-designated truck route, while Badillo Street is not. As such, the trucks will not be able to enter and exit from Badillo Street.
- DG-4 Lastly, the commenter hopes the Project would not reduce the value of her property. The comment is noted and will be forwarded to the decision makers. Property value is not a CEQA issue, and as such no further response is warranted.

From: LOUIE MOTA
Sent: Sunday, July 18, 2021 12:38 PM
To: Jo-Anne Burns <JBurns@westcovina.org>
Subject: Mitigated Negative Declaration

Letter 6

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Mitigated Negative Declaration
Occupant Judith Barrioz

On behalf of Judith Barrioz she wishes to declare that she does not like, accept or approve of the new project titled Amazon Delivery Station DAX9 in West Covina. Judith Barrioz does not have email or knowledge of how to work email and as a friend I am sending this email on her behalf as she has stated to do so.

JB-1

Thank you
Louie Mota
On behalf of Judith Barrioz

Letter 6: Judith Barrioz (sent by Louie Mota)

Comment Letter Dated July 18, 2021

- JB-1 Mr. Mota on behalf of the commenter identifies that the commenter does not like, accept, or approve of the proposed Project. The comment is noted and will be forwarded to the decision makers. No specific CEQA issue is identified, and as such no further response is required.

Letter 7

Dear Ms. Jo-Anne Burns, Planning Manager

City of West Covina
1444 West Garvey Avenue
West Covina, Ca 91790

I am writing in regards to the letter sent out about Amazon adopt a mitigated negative declaration from the city of West Covina. Please excuse my lengthy explanation but in order for you to understand my situation I need to give you details. My name is Patricia Hernandez I am 59- year- old I am a resident at Lark Ellen Village 1350 E San Bernardino Rd #170 West Covina for 23 years. We are adjacent to the proposed project Amazon deliver station. PH-1

Per our conversation, I mention I have medical conditions and this was the reason why I moved to the west side of this building complex because it was quieter. By proposing to put Amazon delivery station next door would be detrimental to my health. PH-2

Please allow me to explain; When I lived on the east side of Lark Ellen village there's a Kindred hospital next door adjacent every night an oxygen truck would come at 3:00 am in the morning and fill-up the hospital tanks. The noise was medal against medal the banging and banging was opening the fixture to insert the oxygen. This resulted was disturbing my sleep keeping me awake until the next day. There was also the loud speaker outside the hospital for paging Doctors and nurse. My manager was able to stop that but not the truck coming in at 3:00 am in the morning. At night when the employee would come out for their break they would talk and of course because it was after 10:00pm and the residents were asleep you can hear a pin drop their conversation were loud and again interrupting my sleep. Along with the parking lot doors open and closing, people talking I can hear everything this includes the property where I lived. **Throughout the years I develop anxiety, stress, depression, difficulty sleeping, fatigue and asthma therefore I had to seek medical attention.** I spoke to my manage about the noise and requested to move to a quieter apartment. At the time there was one available apartment on the west side of the building which is adjacent and faces directly to the proposed Amazon deliver station building. PH-3

Since I have moved 6 years ago from the noise pollution coming from the hospital, car doors opening and closing, truck banging medal against medal and people talking. My sleep has improved therefore it has caused my fatigue to get better I can now exercise regularly; my depression is healthier as well as my stress and anxiety levels. As, I was looking at the floor plans and per our conformation the proposed project Amazon deliver station Is requesting a 24- hour destitution center with 18- wheeler trucks on the west side of the building and smaller delivery truck on the East side along with a route that run right smack in front of my front door, my living room and bed room faces the West about 10 to 15 feet away on going until 10:00 pm at night. **I say NO to this project it will be detrimental to my health.** It will set me back 6 years it will have negative affect mentally and emotionally. It was will cause sleep deprivation, fatigue, depression, stress and anxiety all over again. This noise pollution will also impact my six -year- old grandson sleep. He will not get the proper rest for school again effecting his school work because of the daily noise he will not be able to concentration. Also, with the extra air pollution from the truck and vans this will cause me more frequent asthma attacks. PH-4

Thank you

Patricia Hernandez contact info

Letter 7: Patricia Hernandez

Comment Letter Dated July 27, 2021

- PH-1 The comment identifies the location of the commenter’s home in relation to the Project and indicates that she has lived there for 23 years. The comment is noted, and no further response is required.
- PH-2 The commenter indicates that due to her medical conditions, she moved to the west side the building (where she currently resides), as it was quieter. She expresses concern over locating the proposed Project in the vicinity, as it would be detrimental to her health. The comment is noted and will be forwarded to the decision makers. No further response is required.
- PH-3 The comment explains the situation when the commenter lived on the east side of Lark Ellen village adjacent to the Kindred Hospital. The noise from the facility would disrupt her sleep on a regular basis. As a result, she developed multiple medical conditions and had to seek medical attention. The apartment where she currently resides faces the proposed Amazon building. The comment is noted and will be forwarded to the decision makers. No further response is required.
- PH-4 The commenter indicates that since she moved to the west side of the building, her health condition has improved. However, she expresses concern over the proposed 24-hour facility and delivery trucks and vans. She reiterates that the proposed Project would be detrimental to her health. Additionally, she indicates that the noise would affect her grandson’s sleep, and the air pollution from the truck and vans would cause her to have asthma attacks. The comment is noted and will be forwarded to the decision makers.

Section 4.13, Noise, of the IS/MND included a detailed analysis of operational noise, including noise from the delivery trucks. Long-term operational noise levels are anticipated to range between 46.9 – 55.6 dBA during the daytime, 45.9 – 55.5 dBA during the evening, and between 44.7 – 55.5 dBA at nighttime at the nearest sensitive receivers without any noise mitigation. The ambient noise levels are not expected to be raised by more than 5dB; therefore, it was concluded that the activities on the proposed site are not expected to cause a significant impact during the daytime, evening, and nighttime. The City of West Covina General Plan (PlanWC) requires evaluations of the outdoor noise impact; however, indoor noise impact was also evaluated in this analysis to assess the risk of possible noise disturbance due to night activities at the site. The main activity at night would be trucks entering the site and driving to the loading docks. Truck arrival would be staggered so not more than one truck would be driving at once on the property. Based on the 20dB reduction from windows closed mentioned in the General Plan, the indoor noise levels from truck path would be between 17.9 dBA and 33.1 dBA at the nearest sensitive receptors. The noise from trucks driving on site would be limited to about 5 minutes per hour and is not expected to exceed 33.1 dBA at the residences located north, east, and south of the site. In addition, the ambient noise levels are expected to be higher throughout the night than the operational noise levels. Accordingly, it

is not expected that residents would be disturbed by the truck activities. Therefore, based on the analysis conducted and the discussion above, the site's operational noise impacts were determined to be less than significant.

The analysis for Air Quality determined that the construction of the Project would involve some exterior site work and use of diesel-powered construction equipment. Both interior and exterior work would also require the import of materials, the export of debris, and worker commute. However, based on the analysis conducted, it was concluded that all emissions would be below the South Coast Air Quality Management District's significance thresholds, and no impacts would result (Table 4-5 on page 4-15 of the IS/MND). Similarly, the operational air quality impacts of the Project were determined to be less than significant, as Project related emissions would be less than the significance thresholds. Additionally, it should be noted that the California Air Resources Board has published the *Air Quality and Land Use Handbook: A Community Health Perspective* which recommends that residential uses be sited at least 1,000 feet from a warehouse distribution center that accommodates 100 trucks per day. Because the Project would accommodate less than 100 trucks per day (14 or 28 one-way truck trips per day), the Project would be below the California Air Resources Board's (CARB's) siting recommendation for sensitive land uses and not expose local residents to excessive toxic emissions.

From: Sherie
Sent: Tuesday, July 27, 2021 10:33 AM
To: Jo-Anne Burns <JBurns@westcovina.org>
Subject: Comments re Amazon Delivery station

Letter 8

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

Hello,

Please see the following comments and concerns regarding the proposed project.

1. We are concerned with additional pollution and noise from diesel trucks pulling in and out of facility.
(Our Backyard faces Badillo)

2. Is this going to be a 24 hr hub?

3. Concerned about home value decreasing, due to additional traffic.

4. Will the city of West Covina build retaining wall to block noise for homes that align with Badillo Ave?

SG-1

5. Will there be two entrances to facility? San Bernardino rd and Badillo Ave?

6. Are they considering other locations for this facility ??

Such as City of Industry, Baldwin Park, as these cities already have industrial sections allocated for similar facilities.

As West Covina homeowner of 25 years , we are not for this project. I am definitely on board with more jobs being created in the city and for residents , but not in the middle of a residential community.

We appreciate and look forward to your response and future communication re: this project.

Have a great day,

Sherie

Letter 8: Sherie G.

Comment Letter Dated July 27, 2021

SG-1 The commenter identifies a number of issues. They are addressed below:

1. The commenter expresses concern about pollution and noise from diesel trucks. The comment is noted and will be forwarded to the decision makers. It should be noted that the IS/MND provided detailed analysis of these issues in Section 4.3, Air Quality and Section 4.13, Noise, of the IS/MND.

The analysis for Air Quality determined that the construction of the Project would involve some exterior site work and use of diesel-powered construction equipment. Both interior and exterior work would also require the import of materials, the export of debris, and worker commute. However, based on the analysis conducted, it was concluded that all emissions would be below the South Coast Air Quality Management District's significance thresholds, and no impacts would result (Table 4-5 on page 4-15 of the IS/MND). Similarly, the operational air quality impacts of the Project were determined to be less than significant, as Project related emissions would be less than the significance thresholds. Additionally, it should be noted that the California Air Resources Board has published the *Air Quality and Land Use Handbook: A Community Health Perspective* which recommends that residential uses be sited at least 1,000 feet from a warehouse distribution center that accommodates 100 trucks per day. Because the Project would accommodate less than 100 trucks per day (14 or 28 one-way truck trips per day), the Project would be below the California Air Resources Board's (CARB's) siting recommendation for sensitive land uses and not expose local residents to excessive toxic emissions.

2. The commenter asks if the proposed facility will be 24 hours. The comment is noted. As the IS/MND for the Amazon Delivery Station DAX9 identifies, the proposed Project would operate as package delivery center, operating seven days a week, 24 hours a day.
3. The commenter expresses concern about home values due to additional traffic. The comment is noted and will be forwarded to the decision makers. It should be noted that home values is not a CEQA issue, and as such no further response is required.
4. The commenter asks if the City of West Covina will build a retaining wall to block noise for the existing homes along Badillo Avenue. The comment is noted and will be forwarded to the decision makers. As identified in the IS/MND, two 12-foot high screen walls would be constructed, one south of the approach driveway and adjacent to the loading dock area (525 feet including a 26-foot wide gate) and one north of the loading dock area (271.9 feet including a 26-foot wide gate). The material for the 12-foot high walls includes a standard Concrete Masonry Unit.

In order to break the line of sight, walls between a noise source and a receiver are often used for noise attenuation to reduce the noise levels at the receiver. The 12-foot high wall located south of the loading docks would provide approximately 5 dB

additional attenuation to the residences south of the site. Residences north of the site would be partially shielded by the building.

5. The commenter asks if two entrances (from San Bernardino Road and Badillo Avenue) will be provided to the facility. As identified in the IS/MND document, site access would be provided from Badillo Road via four existing driveways; the two westernmost driveways on Badillo Street have full access with left turn lanes carved from the landscape median, and the other two are restricted to right turns. Additionally, three driveways would be provided from East San Bernardino Road. All three driveways on San Bernardino Road currently have full access, but none features a left turn lane from San Bernardino Road. The easternmost of these driveways would be restricted to right turns. . The middle driveway on East San Bernardino Road would be relocated to the west to operate as an exclusive exit only for delivery vehicles. Exiting delivery vehicles could make a left- or right-turn on San Bernardino Road. The westerly most driveway, on San Bernardino Road, is to be relocated to align with Cutter Way, and a new left turn pocket and a traffic light would be installed on San Bernardino Road.
6. The commenter asks if other locations have been considered for the proposed facility. The comment is noted and will be forwarded to the decision makers. The comment does not identify a CEQA issue, and as such no further response is warranted.
7. The commenter notes that she is not against creating new jobs for the residents; however, she is against the facility proposed in a residential community. The comment is noted and will be forwarded to the decision makers. No further response is warranted.

Letter 9

TRANSCRIBED FROM HAND WRITTEN LETTER

August 4, 2021

To: Ms. Jo-Anne Burns

Dear Ms. Burns,

I live at Lark Ellen Village, next door to where they want to put Amazon. I am a senior and live here for sometime.	CS-1
Please understand, the traffic is already horrindus (sic) on San Bernardino Rd. always has been since before Covid.	CS-2
That would be a terrible tragic thing to do – I for one do not want that here but some seniors don't even open their mail, so I have been bringing it to their attention.	CS-3
Some care, some don't	
What you need to do is conduct a meeting outside to make these people understand what we are up against!!	CS-4

Sincerely,
Charlotte Stewart
(personal information removed)

Received

AUG 10 2021

Planning Division

aug 4, 2021

To: Ms. Jo-Anne Burns

Dear Ms. Burns,

I live at Lark Ellen Village, next door to where ~~you~~ ^{they} want to put ~~an~~ Amazon. I am a senior and live here for sometime.

Please understand, the traffic is already horrid ^{on} San Bernardino Rd. always has been since before Covid.

That would be a terrible tragic thing to do. I for one do not want that here but some seniors don't even open their mail, so I have been bringing it to their attention.

Some care, some don't

What you need to do is conduct a meeting outside to make these people understand what we are up against!!

Sincerely,
Charlotte Stewart

phone

Letter 9: Charlotte Stewart

Comment Letter Dated August 4, 2021

- CS-1 The commenter identifies the location where she resides and that it is next door to the proposed Project. She indicates that she is a senior and has lived in the current location for sometimes. The comment is noted and will be forwarded to the decision makers. No further response is warranted.
- CS-2 The commenter expresses concern about traffic and indicates that traffic on San Bernardino Road has always been an issue. The comment is noted and will be forwarded to the decision makers. The comment does not identify a CEQA issue related to the Project. A detailed analysis of traffic based on findings of the Traffic Impact Study, is provided in Section 4.17, Transportation, of the IS/MND. No further response can be provided.
- CS-3 The commenter states that it would be a “terrible tragic thing” to locate the proposed Project there. The commenter further adds that she tries to let other seniors know about the Project, as some of them do not open their mail. The comment is noted and will be forwarded to the decision makers. The comment does not identify a CEQA issue related to the Project or the analysis in the IS/MND. No further comment is required.
- CS-4 Lastly the commenter identifies that a meeting should be organized to let the residents know about the Project. The comment is noted and will be forwarded to the decision makers. No further response is required.



September 10, 2021

VIA E-MAIL

City of West Covina
Planning Division
Attention: Jo-Anne Burns
Planning Manager
1444 West Garvey Avenue South
West Covina, California 91790
JBurns@westcovina.org

Re: Amazon Delivery Station DAX9 Project

Dear Ms. Burns

I am writing on behalf of the owners of Lark Ellen Village (“Owners”) regarding the Mitigated Negative Declaration (“MND”) prepared for the Project known as the Amazon Delivery Station DAX9 Project, including all actions related or referring to the proposed delivery station located at 1211 East Badillo Street (current address) in the West Covina (“Project”).

EP-1

After reviewing the MND, we conclude that it is deficient an informational document and that it must be revised to impose all feasible mitigation measures to reduce the Project’s impacts. In particular, we are concerned about noise, traffic, air quality, aesthetics (lighting), and greenhouse gas impacts. Owner requests that the City address these shortcomings in a revised draft MND and recirculate the revised MND prior to considering approvals for the Project. We reserve the right to supplement these comments during review of forthcoming materials for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

EP-2

We also request that the City include the undersigned in all mailed or emailed notice of hearings, study sessions, community meetings, certification of the MND (or recirculation thereof), and approval of any Project entitlements. This request includes notices of any City actions, hearing or other proceedings related to the Project or any additional documents released pursuant to the California Environmental Quality Act.

EP-3

 MERITAS LAW FIRMS WORLDWIDE

Letter 10

10250 Constellation Blvd.
19th Floor
Los Angeles, CA 90067
310.553.3000 TEL
310.556.2920 FAX

Elisa L. Paster

Direct Dial

310.556.7855

Direct Fax

310.843.2655

Email

epaster@glaserweil.com

September 10, 2021
Page 2

Thank you in advance, and we appreciate your cooperation.

Sincerely yours,

Elisa Paster

ELISA L. PASTER
of GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP

ELP:ep

2054244.1

Letter 10: Elisa Paster

Comment Letter Dated September 10, 2021

The City of West Covina is in receipt of this comment letter by Ms. Elisa Paster of Glaser Weil Fink Howard Avchen & Shapiro LLC. It is noted that the review period for the IS/MND for the Amazon Delivery station DAX9 Project began on July 13 and ended on August 11, 2021. Although the comment is late by 30 days, the City is considering the comment letter in this Responses to Comments document.

- EP-1 The commenter identifies that the comment is on behalf the owners of Lark Ellen Village and references the location of the proposed Project. The comment is noted. No further response is necessary.
- EP-2 The commenter alleges that the IS/MND is deficient, and that they are concerned about noise, traffic, air quality, aesthetics (lighting), and greenhouse gas impacts. The document must be revised, adds the commenter, to include feasible mitigation measures and be recirculated. The comment is noted and will be forwarded to the decision makers.

It should be noted that in accordance with CEQA and the State CEQA Guidelines, an Initial Study (IS) was prepared for the proposed Project and its associated discretionary approvals. The IS indicated that the potentially significant impacts of the Project could be reduced to less than significant levels with implementation of mitigation measures, and therefore, the Project required preparation of an Initial Study/Mitigated Negative Declaration. Thus, the IS/MND serves as the environmental document that presents the analysis of Project impacts on each of the environmental issue areas in the CEQA Environmental Checklist, including noise, traffic, air quality, aesthetics (lighting), and greenhouse gas. The IS/MND serve to inform City decision makers, representatives of affected trustee and responsible agencies, and other interested parties of the potential environmental effects associated with implementation of the proposed Project.

Furthermore, the purpose of a mitigation measure, in accordance with CEQA Guidelines Section 15126.4, is to avoid or substantially reduce the significant impacts of a Project, identified through the analysis, to less than significant levels. These impacts may occur onsite or offsite; therefore, regardless of the type of impact and where it occurs, the Project is required to propose mitigation measures. As such, the IS/MND only identifies mitigation measures that meet that objective and address and offset the potentially significant impacts of the Project.

No further response is required.

- EP-3 The comment requests that they receive all notifications pertaining to the proposed Project. The comment is noted and will be forwarded to the decision makers. No further response is necessary.