

# Appendix A: Initial Study, Notice of Preparation, and Responses to NOP

## Part 1: Initial Study



**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7- OFFICE OF REGIONAL PLANNING  
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*Making Conservation  
a California Way of Life.*

Governor's Office of Planning & Research

January 14, 2020

**JAN 14 2020**

**STATE CLEARINGHOUSE**

Lisette Sanchez-Mendoza  
Covina, City of  
125 East College Street  
Covina, CA 91723

RE: 1000 North Azusa Avenue Mixed Use  
Development – Notice of Preparation (NOP)  
SCH# 2019120104  
GTS# 07-LA-2019-02948  
Vic. LA-210/PM 39.645 & LA-10/PM 36.571

Dear Lisette Sanchez-Mendoza:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project a retail shop and three drive through/fast food service businesses on the western 2.92 acres along the Azusa Avenue frontage and 61 single-family detached homes on the eastern and southern 4.99 acres. The retail component of the proposed project would consist of four buildings, totaling 14,000 square feet of floor area, arranged in three distinct building sites. Two sites would contain fast food restaurants with drive-thru service, while the third would contain a fast food restaurant and general retail space. Vehicular access to these commercial uses would be from three drive approaches along the Azusa Avenue frontage, and from an existing driveway along Cypress Street that serves existing fast food businesses on adjacent properties. A total of 158 surface parking spaces would be provided within the three commercial sites. The residential component would consist of 61 single family homes with 122 attached garage parking spaces, 12 driveway spaces, 23 "head-in" spaces along internal driveways, and 7 parallel spaces along the entrance drive. Vehicular access to the 61 homes would be from Cypress Avenue, via a private, gated driveway located between Los Angeles County Fire Station 152 and an existing restaurant site.

The nearest State facility to the proposed project is I-210 and I-10. After reviewing the NOP, Caltrans has the following comments:

Caltrans acknowledges and supports development that ultimately helps California to meet its climate, transportation, and livability goals. However, due to the amount of parking, number of drive throughs, and vehicle-centric site plan, the 1000 North Azusa Avenue Mixed Use Development Project is designed in a way that potentially induces demand for additional vehicle trips. For California to achieve its goals, this demand should be addressed with appropriate design and management principles. Caltrans recommends the following:

- Reducing the amount of parking whenever possible, as research on parking suggests that abundant car parking enables and encourages driving. Research looking at the

relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled (VMT), we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building an unnecessary amount of parking.

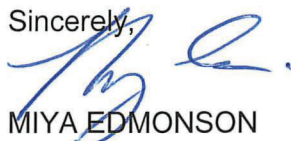
- If surface parking must be built, it is recommended that it not face the street directly. By shifting the parking to the rear or interior of the project site, a more inviting streetscape can be created. A more active frontage, against the sidewalk, can encourage both recreational and transportation walking. These urban design principles can affect mode choice and help the State of California achieve its goals to improve health and reduce Green House Gas (GHG) emissions.
- While the project will contain multiple uses when completed, the lack of connectivity between them means that the goal of "mixing uses" is not achieved. The commercial and residential portions of the project are separated by a six-foot-tall wrought iron fence. It is recommended that a pedestrian pathway be included to connect the residential homes to the goods and services located on the commercial portion of the project site.

When the traffic study is conducted, please include the Azusa Avenue on- and off-ramps to both the I-210 and I-10. The study should include an analysis of potential impacts to existing State transportation facilities, if any. Additionally, Caltrans is replacing Level of Service (LOS) with Vehicle Miles Traveled (VMT) when evaluating traffic impacts. By July 1, 2020, VMT will be the standard transportation metric for land use projects and new Transportation Impact Study guidelines will be used to analyze and address transportation impacts on the State Transportation System. For any future project we encourage the Lead Agency to integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. As required by SB 743, Caltrans recommends the Lead Agency develop a verifiable performance-based VMT criteria.

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.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2019-02948.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



*California Environmental Quality Act*  
INITIAL STUDY

# **Cypress Village Mixed Use Development Project**

*Lead  
Agency:*



*City of Covina  
125 E. College Street  
Covina, CA 91723  
(626) 384-5400  
Contact: Lisette Sanchez-  
Mendoza  
(626) 384-5451  
LSanchez-  
Mendoza@covinaca.gov*

*Prepared  
by:*

**Michael Baker**  
**I N T E R N A T I O N A L**

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Long Beach, CA 90806  
Office: (562) 200-7165  
Fax: (562) 200-7166  
Contact: Randy Nichols  
randy.nichols@mbakerintl.com  
JN 173379*

*California Environmental Quality Act*  
INITIAL STUDY

**Cypress Village**  
**Mixed Use Development Project**

Submitted to:

City of Covina  
125 E. College Street  
Covina, CA 91723  
(626) 384-5400

Contact: Lisette Sanchez-Mendoza  
(626) 384-5451  
LSanchez-Mendoza@covinaca.gov

Submitted by:

3760 Kilroy Airport Way, #270  
Long Beach, CA 90806  
Office: (562) 200-7168  
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Contact: Randy Nichols  
randy.nichols@mbakerintl.com  
JN 173379

December 2019

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## SECTION A. ENVIRONMENTAL CHECKLIST FORM

1. Project Title: Cypress Village
2. Lead Agency Name and Address: City of Covina
3. Contact Person and Phone Number: Lisette Sanchez-Mendoza, 626-384-5451
4. Project Location:

As shown in *Figure 1 – Regional Location Map*, Covina is in the central San Gabriel Valley area, in the eastern perimeter of Los Angeles County. As shown in *Figure 2 – Project Location Map*, the project site is located on the east side of Azusa Avenue, between Cypress Street and Covina Boulevard and west of N. Conwell Avenue.

The subject property consists of Los Angeles County Assessor's Parcel Numbers 8421-001-016 and 8421-001-061. It is assigned two street addresses: 1000 N. Azusa Avenue and 845 W. Cypress Street.
5. Project Sponsor's Name and Address: PKL Investments, LLC  
2863 Maricopa Street  
Torrance, CA 90503
6. General Plan Designation: General Commercial
7. Zoning: C-4: Highway Commercial
8. Description of Project:

Development of a mixture of retail shops and drive through/fast food service businesses on the western 2.92 acres along the Azusa Avenue frontage and development of 61 single-family detached homes on the eastern and southern 4.99 acres. *Figure 3 – Site Plan*, illustrates the proposed development plan.

The retail component would consist of four buildings, totaling 14,000 square feet of floor area, arranged in three distinct building sites. Two of the sites would be designed with a drive-thru circulation pattern to accommodate fast-food and beverage businesses with drive-thru service. Vehicular access to these commercial uses would be from three existing drive approaches along the Azusa Avenue frontage, and from an existing driveway along Cypress Street that serves existing fast food businesses on adjacent properties. A total of 158 surface parking spaces would be provided within the three commercial sites.

The residential component would consist of 61 single family homes, in two-story and three-story structures, with floor plans ranging from approximately 1,700 square feet to approximately 2,600 square feet. Homes would have three-four bedrooms, with optional bonus areas and loft spaces. The proposed density is 12.25 homes per acre. Vehicle parking would include 122 spaces within attached garages, along with 12 spaces located in driveways, 23 "head-in" spaces located along internal driveways, and 7 parallel spaces along the entrance





drive. Vehicular access to the 61 homes would be from Cypress Avenue, via a private, gated driveway located between Los Angeles County Fire Station 152 and an existing restaurant site.

The commercial and residential areas would be developed independently and may be constructed concurrently or at different time frames, in response to market demand. For purposes of analysis, both areas are anticipated to be completed and fully occupied by 2021.

The project will require the following City approvals:

General Plan Amendment (GPA) 19-001: To redesignate the eastern 5.31 acres from General Commercial to Medium-Density Residential, to allow for development of single-family homes at densities of 7-14 units per acre.

Zone Change (ZCH) 19-001: To rezone the eastern 5.31 acres from C-4, Highway Commercial to RD, Multi-Family Zone, and to approve a Specific Plan to establish custom development standards corresponding to the proposed residential development plan, and to provide guidance for a unified design program to aesthetically integrate the commercial and residential components.

Tentative Tract Map (TTM) 82315: To reconfigure the existing parcels to create a subdivision of private residential lots and common areas for the residential component, and three individual lots for the commercial component.

Site Plan Review (SPR) 19-002: To approve the layout of the overall development plan

Conditional Use Permit (CUP) 19-002: To allow for development of drive-through facilities in the commercial side of the project

## 9. Surrounding Land Uses and Setting:

The project site consists of 7.99 acres of developed land, with remnant improvements from a former Albertsons grocery store that was constructed in 1991 and vacated in November 2012. The former grocery store is 81,333 square feet in total floor area, in a box-shaped structure reaching a height of 44 feet. A large surface parking lot with numerous small landscape planters and several pole-mounted lighting clusters is located between the building and the Azusa Avenue frontage, while paved drives abut the northern and eastern sides of the building. There are numerous mature trees within the parking area planters. Masonry walls separate the project site from a townhome community to the north and a single-family neighborhood to the east. The property shows signs of deterioration due to years of vacancy and decline in maintenance. The southern 'leg' of the site that connects to Cypress Avenue is maintained with low grass cover. Vehicular access to the site is currently available via two drive approaches along the Azusa Avenue frontage and from another driveway that connects to Cypress Avenue. The Azusa Avenue frontage is improved with sidewalk, curb, gutter, and two street lights, and there is a strip of grass between the sidewalk and the parking lot. There are no overhead power poles along this frontage. The Cypress Avenue frontage of the project site is improved with sidewalk, curb and gutter, and there is a single street light at the southeast corner. Overhead power poles and lines are in the sidewalk area, just to the east, starting at the County Fire Station site.

Site topography is relatively level, with a gentle slope to the west. The site is not within a flood hazard zone. Water, sewer, storm drainage, energy and telecommunications infrastructure occur in the adjacent streets.

This is a fully urbanized part of the City of Covina, where the built environment consists of a mixture of low-rise residential and commercial land uses, along with a high school campus.



Azusa Avenue is a four-lane, north/south Primary Arterial street with a raised median and is also State Highway 39. On-street parking is generally permitted. The local segment of this street is maintained by the City of Azusa, who also has authority over physical improvements and traffic controls along Azusa Avenue. Cypress Street is a four-lane, east/west Collector Street with a two-way left turn lane in the project vicinity. On-street parking is generally permitted. There is a bus stop for Foothill Transit Route 280, at the Azusa Avenue/Cypress Street intersection. There are no bike lanes along either street frontages.

*Figure 4 – Aerial View of Site and Surroundings* provides a view of the local land use pattern in the project vicinity. Surrounding land uses are described below.

North: U-Haul truck rental center and two-story townhomes community

South: Fast-food restaurants at the northeast corner of Cypress Street and Azusa Avenue, Los Angeles County Fire Station 152 at the northwest corner of Cypress Street and N. Conwell Street, and single-family homes on the south side of Cypress Street.

East: A neighborhood of one-story, single family homes, within unincorporated territory governed by the County of Los Angeles

West: A mixtures of commercial uses and mobile home communities on the west side of Azusa Avenue. To the southwest is the Northview High School.

10. Other Public Agencies Whose Approval is Required:

Los Angeles Regional Water Quality Control Board – National Pollutant Discharge Elimination System General Construction Permit

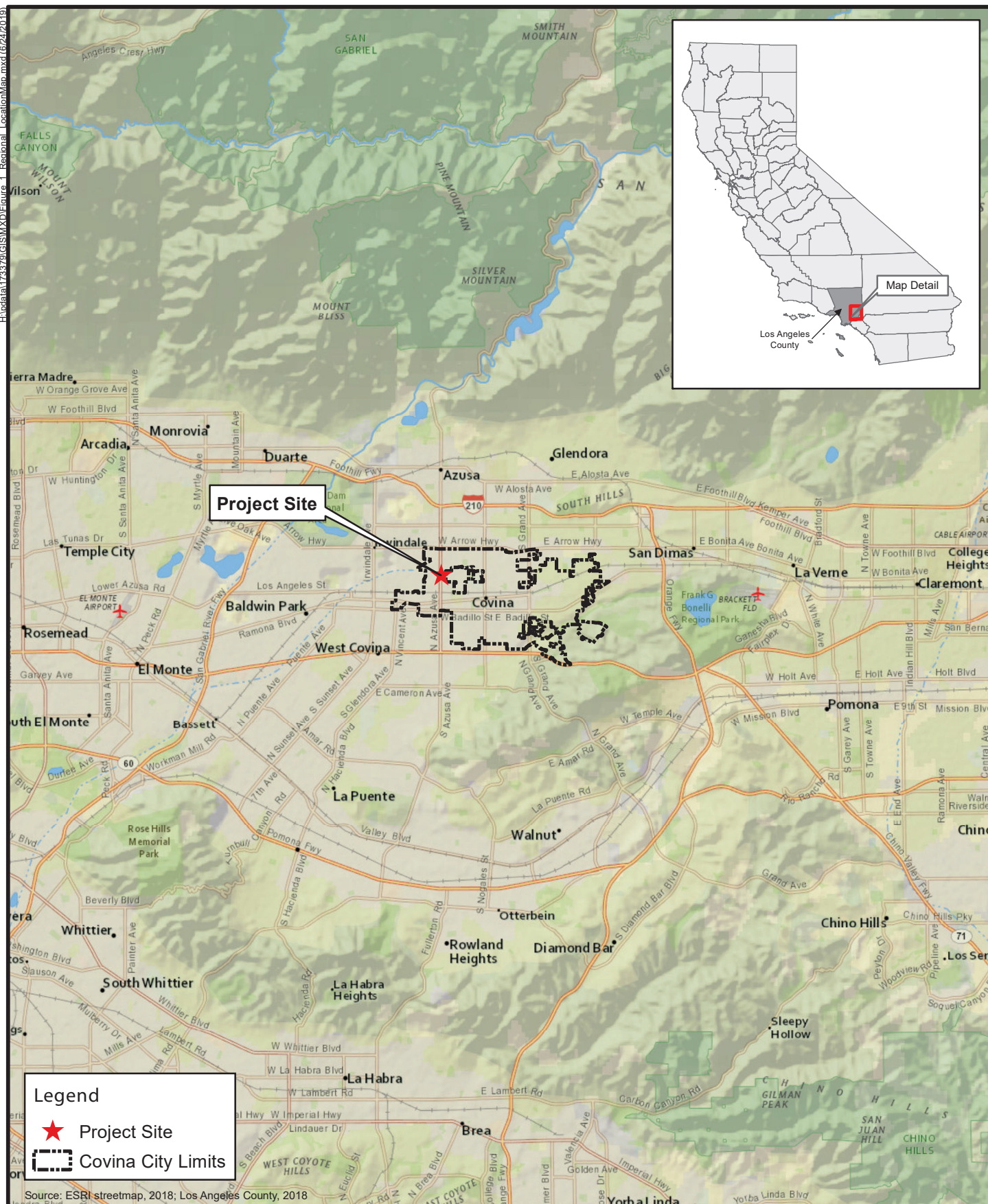
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Notification of the project proposal and commencement of the CEQA process was provided by certified mail to the following Native American tribal entities:

- Gabrielino-Tongva Nation
- Gabrielino Band of Mission Indians – Kizh Nation
- Gabrielino-Tongva Indians of California Tribal Council
- Gabrielino-Tongva San Gabriel Band of Mission Indians
- San Fernando Band of Mission Indians
- Torres Martinez Desert Cahuilla Indians

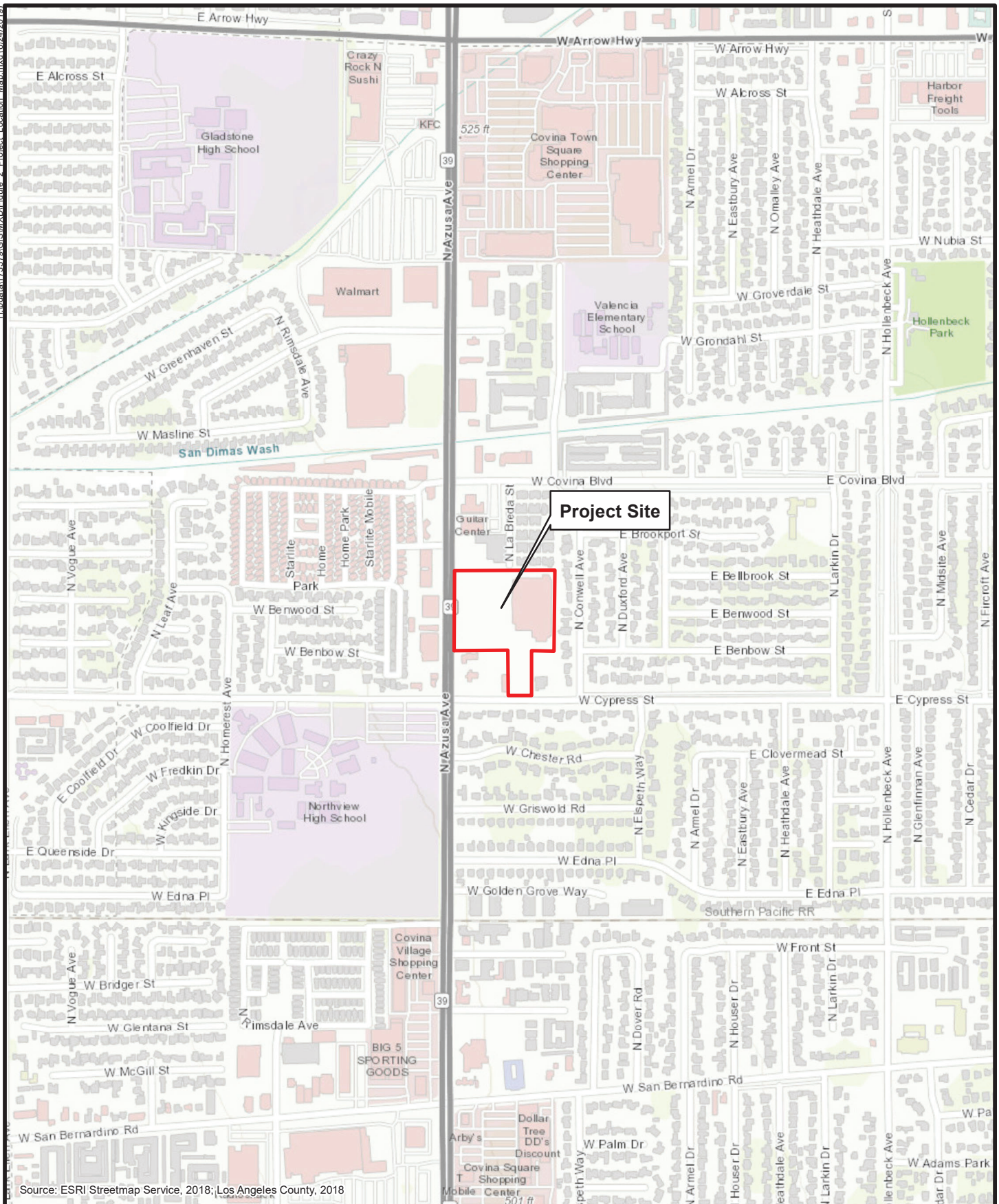
A request for consultation was received from the Gabrielino Band of Mission Indians – Kizh Nation on July 9, 2019. A consultation meeting was held with City staff and the project applicant on July 25, 2019. Further discussion regarding that consultation is provided in the response to Section D.XVIII, later in this Initial Study.





**FIGURE 1**  
Regional Location Map

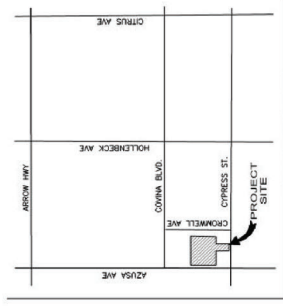




0 400 800  
Feet

**FIGURE 2**  
Project Location Map





# **LOCATION MAP** (NO SCALE)

## **PROJECT SUMMARY**

### **APPLICANT/OWNER:**

PRJ INVESTMENTS, LLC  
2885 MARICOPA STREET  
SUITE 200  
AZUSA, CA 91702  
(714) 735-0825

### **ENGINEERS:**

LAND DEVELOPMENT CONSULTANTS  
1550 BROOKHOLM DRIVE, SUITE 23  
AZUSA, CA 91702  
(714) 557-7700

### **ARCHITECT:**

WILLIAM HEMMELHACH ARCHITECTS  
14428 HANLIN STREET, SUITE 200  
SANTA ANA, CA 92705  
(949) 250-8807

### **SANITARY ENGINEER:**

14428 HANLIN STREET, #200  
SANTA ANA, CA 92705  
(949) 250-8807

### **PROJECT LOCATION:**

1000 NORTH AZUSA AVENUE  
AZUSA, CA 91702  
(918) 991-3888

### **APN:**

8451-001-016 & 8451-001-081  
ZONE "X" (FLOOD INSURANCE RATE MAP)  
COMMUNITY PANEL NO. 06037C1700F

### **PROJECT SITE AREA:**

344,165 SF = 7.933 ACRES

### **STREET DEDICATION:**

3,375 SF = 0.076 ACRES

### **NET SITE AREA:**

344,786 SF = 7.915 ACRES

### **RESIDENTIAL SITE AREA (LOT 1):**

217,218 SF = 4.986 ACRES

### **COMMON AREA "A":**

6,722 SF = 0.154 ACRES

### **COMMON AREA "B":**

2,708 SF = 0.062 ACRES

### **COMMON AREA "C":**

2,708 SF = 0.062 ACRES

### **COMMON AREA "D":**

13,108 SF = 3.103 ACRES

### **CONDOMINIUM AREA:**

61,144 SF = 1.401 ACRES

### **TOTAL UNITS:**

114 UNITS  
• PLAN 1: 41,761 SF (2-STORY)  
• PLAN 2: 22,228 SF (1-STORY)  
• PLAN 3: 2,708 SF (1-STORY)  
• PLAN 4: 2,708 SF (1-STORY)

### **DENSITY:**

12.25 UNITS PER ACRE

### **PARKING:**

164 SPACES (269 SPACES PER HOME)  
• GARAGE: 122 SPACES (LOTS 1-6)  
• HEAD IN: 23 SPACES (8'x19')  
• PARALLEL: 7 SPACES (8'x22')

### **BUILDING COVERAGE:**

3. 65,263 SF (18.9% OF SITE)

### **RETAIL SITE AREA (LOTS 2-4):**

127,568 SF = 2.929 ACRES

### **TOTAL SF:**

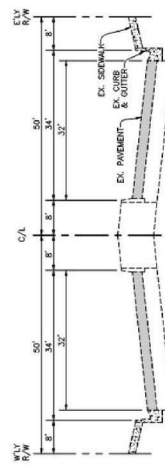
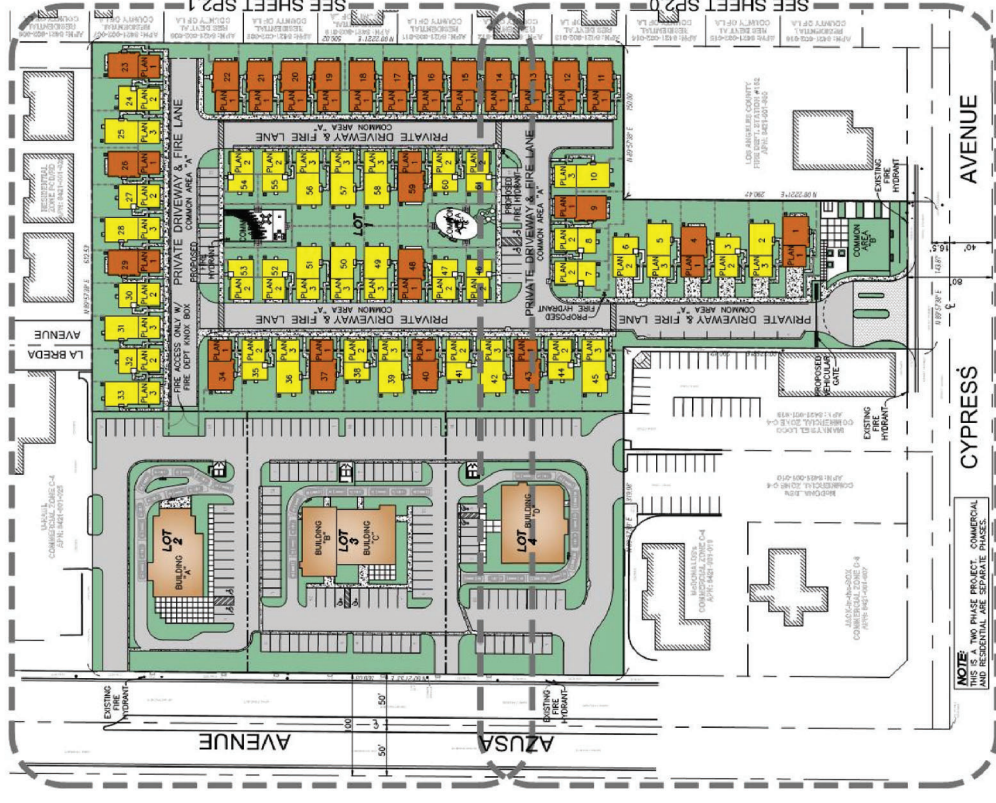
14,144 SF  
• BUILDING A: 4,000 SF  
• BUILDING B: 2,000 SF  
• BUILDING C: 2,000 SF  
• BUILDING D: 1,500 SF

### **PARKING:**

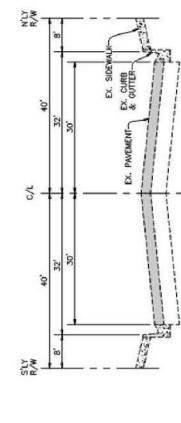
164 SPACES (269 SPACES PER HOME)  
• GARAGE: 122 SPACES (LOTS 1-6)  
• HEAD IN: 23 SPACES (8'x19')  
• PARALLEL: 7 SPACES (8'x22')

### **UTILITIES:**

50. CALIFORNIA Edison  
AZUSA LIGHT & WATER  
(626) 871-5053  
SANTA ANA GAS COMPANY  
(800) 437-2200  
CABLE: TIME WARNER  
(800) 368-5400  
TELEPHONE: (800) 483-4000

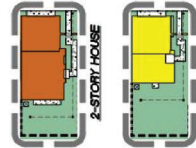


## **AZUSA AVENUE TYPICAL SECTION** (NO SCALE)



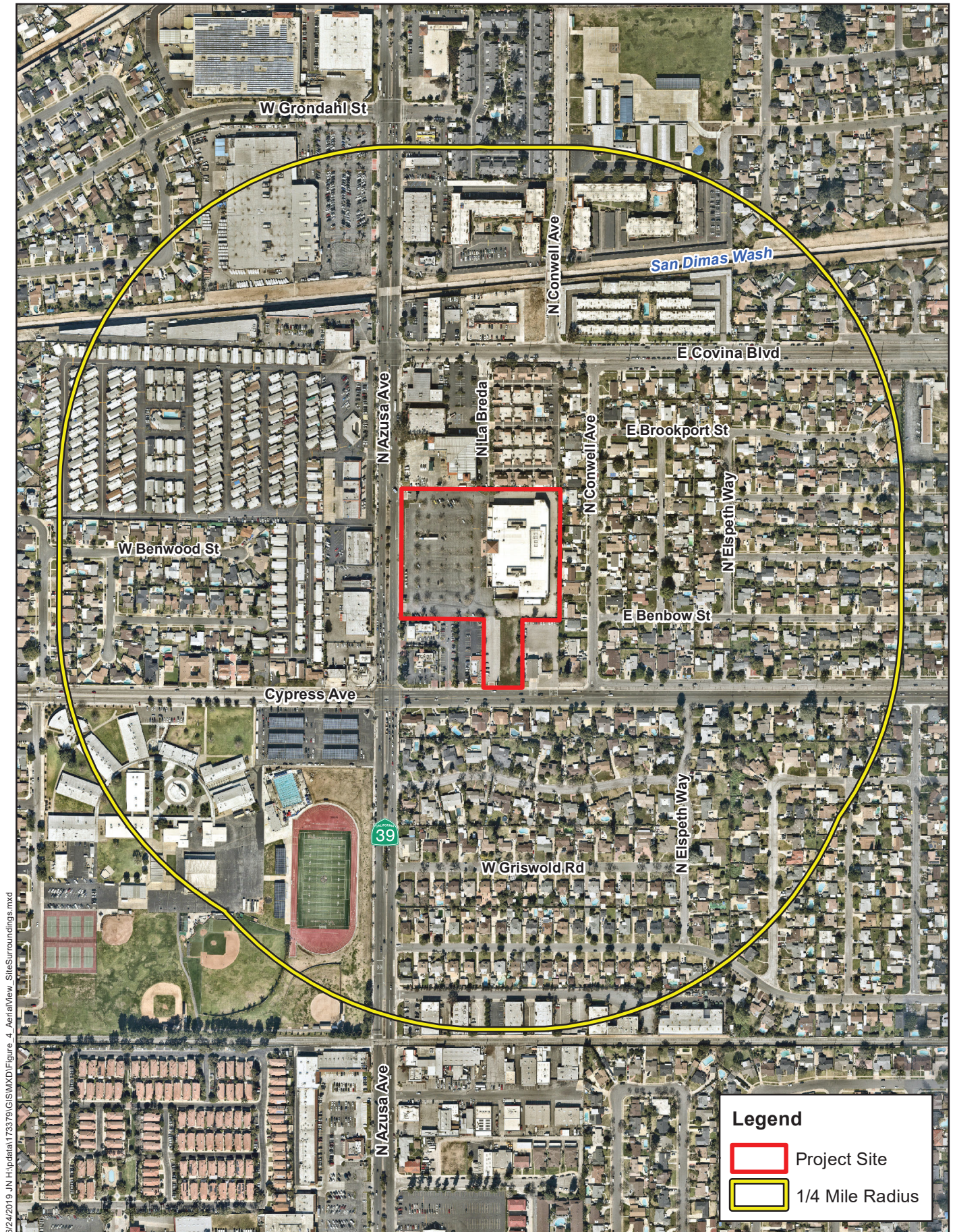
## **CYPRESS STREET TYPICAL SECTION** (NO SCALE)

- OB - CATCH BASIN
- EPB - ELECTRICAL PULLBOX
- EX - EXISTING
- FR - FIRE HYDRANT
- GR - GRASS
- HR - HATCH
- MR - MANHOLE
- PP - POWERPOLE
- S - SIGN
- SD - STORM DRAIN
- SKH - SKID HOLE
- SMH - SERIES MANHOLE
- T/A - TRASH AREA
- WM - WATER METER
- WV - WATER VALVE
- - - - - PROPOSED SEWER
- - - - - PROPOSED WATER
- - - - - 6 FEET HIGH CMU WALL
- - - - - 6 FEET HIGH VINYL FENCE
- - - - - 6' HIGH WROUGHT IRON FENCE
- - - - - 3 FEET HIGH CMU WALL
- - - - - GATE
- - - - - PROPOSED LOT LINE
- - - - - ADA PATH OF TRAVEL
- - - - - HARDSCAPE
- - - - - FORDUS PARKERS
- - - - - ASPHALT PAVING



Source: Land Development Consultants, June 2018





6/24/2019 JN H:\pdata\173379\GIS\MXD\Figure 4. AerialView\_SiteSurroundings.mxd







## SECTION B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture and Forestry Resources  | <input checked="" type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources                 | <input type="checkbox"/> Cultural Resources                  | <input type="checkbox"/> Energy  |
| <input type="checkbox"/> Geology/Soils                        | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials                 |
| <input type="checkbox"/> Hydrology/Water Quality              | <input type="checkbox"/> Land Use/Planning                   | <input type="checkbox"/> Mineral Resources                             |
| <input checked="" type="checkbox"/> Noise                     | <input checked="" type="checkbox"/> Population/Housing       | <input checked="" type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                           | <input checked="" type="checkbox"/> Transportation/Traffic   | <input type="checkbox"/> Tribal Cultural Resources                     |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                            | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the project. To each question, there are four possible responses:

- **No Impact.** The project would not have any measurable environmental impact on the environment.
- **Less Than Significant Impact.** The project would have the potential for impacting the environment, although this impact would be below established thresholds that are considered to be significant.
- **Less Than Significant Impact With Measures Incorporated.** The project would have the potential to generate impacts which may be considered a significant effect on the environment, although measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.
- **Potentially Significant Impact.** The project would have impacts which are considered significant, and additional analysis is required to identify measures that could reduce these impacts to less than significant levels.



## SECTION C. DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date



## SECTION D. EVALUATION OF ENVIRONMENTAL IMPACTS

### I. Aesthetics

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

#### Discussion

The proposed project is not classified as a “transit-oriented infill project” as set forth in Section 21099 of the Public Resources Code, and thus the provisions of that section do not apply to this project.

**a) *Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?***

Less Than Significant Impact. As discussed in the project description of this Initial Study, the project site is located in a highly urbanized area, dominated by features of a built environment. Development surrounding the project site includes a mixture of building sizes and forms, including low-rise and two-level commercial buildings with varying architectural styles along Azusa Avenue, the low-rise Northview High School campus southwest of the Azusa Avenue and Cypress Street intersection, and one- and two-story, detached single-family homes across Cypress Street and east of the project site, along Conwell Avenue.

Many of the of the main arterial roads in the City of Covina that are oriented north and south provide distant views of the San Gabriel mountains on clear days to motorists traveling north. As such, motorists traveling north on Conwell Avenue and Azusa Avenue have distant views of the San Gabriel mountains, which begin approximately 5 miles north of the project site and extend further north. Views of these mountains are partially obstructed by their distance from the project site, as well as mature trees, overhead powerlines, and existing development along Conwell and Azusa Avenues. The existing mountain views motorists have while traveling north on Azusa Avenue are available only straight ahead, because utility poles, mature trees, and business signage obstruct views to the northeast



and northwest. Therefore, low-rise commercial buildings set back from Azusa Avenue do not substantially impact the existing, limited mountain views available to motorists. Motorists traveling north on Conwell Avenue have a view of the existing grocery store building on the project site, with the San Gabriel mountains visible above the building's roofline. This grocery store building is approximately 25 feet high, with a portion of the building's roofline extending to approximately 44 feet. As the proposed homes would range between 25.5 and 35.5 feet in height and the proposed commercial structures would be single-story, with heights ranging between 20.5 and 25 feet, the proposed project would not result in an increase in building height over current conditions and would not obstruct views of the San Gabriel mountains in the distance.

A scenic vista is defined as a publicly accessible, prominent vantage point that provides expansive views of highly valued landscapes or prominent visual elements composed of manmade or natural features. Conwell and Azusa Avenues, with their mountain views described above, could be considered public vantage points that provide a view of a highly valued landscape (i.e., the San Gabriel mountains); however, the mountain views are distant, not expansive, and extensively obstructed by existing development, utilities, and landscaping. Further, because the majority of the City is relatively flat, including the area surrounding the project site, the City of Covina General Plan Natural Resources and Open Space element does not identify any prominent vantage points through which the public can view an expansive scenic vista within or beyond the City (Covina 2000). Effects of this project on scenic vistas would be negligible and less than significant. No further analysis of this threshold is warranted.

***b) Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?***

**No Impact.** The closest officially designated state scenic highway is part of the Angeles Crest State Scenic Highway, State Route (SR) 2, from near La Cañada-Flintridge north to the San Bernardino County line. This state scenic highway is approximately 18 miles northwest of the project site. SR 110, Arroyo Seco Historic Parkway, between mileposts 25.7 and 31.9 in Los Angeles, is approximately 14 miles west of the project site (Caltrans 2018). The distance between the project site and these officially designated scenic highways indicate that the proposed project would not be visible from a state scenic highway. As such, the proposed project would not adversely affect the viewshed from a state scenic highway. While SR 39 between Interstate 210 and SR 2 is listed as an eligible scenic highway by Caltrans, it is not officially designated as a state scenic highway. Nevertheless, this eligible scenic highway begins 1.5 miles north of the project site and continues north; therefore, the project site would not be visible from this eligible scenic highway.

The project site is currently characterized by an existing large, rectangular grocery store building constructed in 1991 with nondescript architecture. The Azusa Avenue frontage of the project site is characterized by a surface parking lot, which served the former grocery store, and sporadic placement of decorative trees (which are not protected tree species), shrubs, and ground cover. In general, the existing landscaping in front of the building, along Azusa Avenue, and along the Cypress Street access driveway varies in size, species, and health/condition. The area east of the access driveway on Cypress Street is characterized by ruderal plant species and bare soil. Other characteristics of the site include overhead lights in the parking area, currently blank signs at the Cypress Street and Azusa Avenue entrances that are approximately 25 feet tall, and unattended landscaping and bare soil along the Azusa Avenue frontage. Therefore, no historic buildings, rock outcroppings, or other scenic resources, such





as protected trees, streams, or slopes, currently exist on the project site. Because of the project site's distance from the nearest officially designated scenic highway, and the lack of scenic resources on the project site, the proposed project would have no impact on scenic resources such as trees, rock outcroppings, or historic buildings within a state scenic highway.

- c) *Except as provided in Public Resources Code Section 21099, would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

**Potentially Significant Impact.** The proposed project would be located in a fully urbanized area, where there is a variety of nonresidential and residential land uses and extensive urban infrastructure improvements. For purposes of determining impact significance for projects within urbanized areas, a project is evaluated for whether it would conflict with applicable zoning or other regulations governing "scenic quality." The term "scenic quality" is not specifically defined in the threshold language of Appendix G of the CEQA Guidelines; however, for assessment of impacts involving changes in visual character and quality, this is interpreted as pertaining to zoning standards involving building height and bulk, design character, landscape elements, and consistency with the scale, massing and character of surrounding development. The City of Covina's municipal code regulations for areas zoned C-4 (Commercial Zone Highway) do not pertain to protection of existing scenic qualities.

The proposed project would include a mixture of retail and drive-through/fast food service businesses on the western portion of the project site, with 61 single-family homes on the eastern and southern portion of the project. The City of Covina municipal code prohibits development of single-family residential homes in areas zoned C-4.<sup>1</sup> As such, the project conflicts with current zoning designations for the site. Therefore, the project is proposing a specific plan to establish custom development standards corresponding to the proposed residential development plan, a general plan amendment to redesignate the eastern portion of the project site from General Commercial to Medium-Density Residential, and a zone change to redesignate the eastern portion of the project site from Commercial Zone Highway to Multi-Family Zone.

The proposed lots supporting commercial development would remain designated as C-4, separated from the proposed residential development on the eastern portion of the project site by a proposed 6-foot-high masonry wall. The proposed commercial buildings, which would range between 20.6 and 25 feet in height, would not exceed the building height restrictions for C-4 zones that abut residential zoned lands (35-foot maximum), nor would they conflict with standards for yards (a minimum of 10 feet of landscaping abutting the street), or lot dimensions (a minimum 150-foot lot depth). However, further analysis is required to determine if the proposed commercial buildings would conflict with regulations and design guidelines governing signage in commercial zones and whether this signage would degrade the aesthetic character and quality of the area. This analysis will be provided in the EIR to be prepared for this project.

The 61 proposed single-family homes would be located along the eastern and northeastern boundaries of the project site, adjacent to existing single-family, detached homes along Conwell Avenue to the east and multi-family homes on West Covina Boulevard to the north. The proposed two- and three-

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<sup>1</sup> City of Covina municipal code 17.44.040



story single-family homes would be located closer to the eastern (15 feet) and northeastern (12 feet) project site boundaries than the existing grocery store building (which is approximately 35 feet from the eastern and northern boundaries). Therefore, there is the potential for adverse aesthetic impacts along the project's interface with existing homes to the north and east, specifically related to the proximity of the proposed homes to the project site boundary, the proposed building heights, and proposed privacy and screening features. As such, further analysis is required to evaluate the proposed building height, bulk, coverage, setbacks, landscaping, and screening features to determine if the project would degrade the visual character and quality of the site and surroundings. This analysis will be provided in the EIR to be prepared for this project.

**d) *Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

**Potentially Significant Impact.** The proposed project is primarily vacant, with an unoccupied grocery store building, a surface parking lot, and ornamental landscaping areas spread throughout the site, all of which are in disrepair. Existing sources of light on the project site include building security lights on the grocery store building and pole-mounted parking lot lights. The area is highly urbanized and therefore already impacted by night lighting from streetlights along Azusa Avenue and Cypress Street, traffic signals at the corner of Azusa Avenue and Cypress Street, vehicle headlights, and existing overhead parking area lights and building security lights located at the restaurants on the northeast corner of Azusa Avenue and Cypress Street. Further, homes in the residential neighborhood east of the project site emit nighttime light via accent lights and security lights. Finally, the Los Angeles County Fire Department building immediately adjacent to the project site emits light via building security lights and the occasional departure of emergency vehicles.

The proposed project would contain multiple new sources of night light, such as security lighting on internal walkways, residential common areas, and building exteriors; accent lighting on residential and commercial buildings and in landscaped areas; lighting at the gated entry to the residential area; and potential lighted signs in commercial building drive-throughs. Given the proximity of these light sources to existing homes north, east, and south of the project site, further analysis of the specific type and placement of lighting is required to determine whether the proposed project would create substantial light or glare that could adversely affect day or nighttime views. This further analysis will be provided in the EIR to be prepared for this project.



## II. Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>AGRICULTURE AND FORESTRY RESOURCES:</b> <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

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

**No Impact.** According to the City of Covina's Zoning Map (2015), there are only two zones designated as agriculture and residential zones (A-1 and A-2) in the City of Covina. The two parcels in the City with either A-1 or A-2 zoning designations are located near the Walnut Creek Regional Park, along East Puente Street, on the east side of the City. These two parcels are approximately 3 miles southeast of the project site and are currently not used for agricultural purposes. Further, the City's General Plan Land Use Element does not identify any agricultural areas within the City (Covina



2000). The proposed project is in a fully urbanized area and is surrounded by commercial and residential land uses. The project site is currently developed, with a grocery store building (currently vacant), a surface parking lot, decorative landscaping, and driveways. While the City of Covina has not been surveyed as part of the California Department of Conservation's Important Farmland Finder, the County Assessor shows that the grocery store building was constructed in 1991 (LA County 2019). As such, there are no natural, undisturbed areas on the project site and the land does not support any agricultural activities. Therefore, the project would not convert prime farmland, unique farmland, or farmland of statewide importance to non-agriculture use, and there would be no impact.

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

**No Impact.** The only parcels in the City with either A-1 or A-2 zoning designations are located near the Walnut Creek Regional Park, along East Puente Street, on the east side of the City. These two parcels are approximately 3 miles southeast of the project site and are currently not used for agricultural purposes. Further, the City's General Plan Land Use Element does not identify any agricultural areas within the City (Covina 2000). The project site is zoned as Commercial (Highway) (C-4), a zone that does not support agricultural uses other than community gardens and plant nurseries. Additionally, the project site does not have a land use restriction, such as a Williamson Act contract, that serves to preserve farmland or agricultural uses. As such, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and there would be no impact.

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

**No Impact.** The project site is developed land, containing a former grocery store building, a surface parking lot, and decorative landscaping in various conditions. The project site does not contain any forest land or timberland and is not zoned for timberland production. Therefore, the project would not conflict with existing zoning for, or cause the rezoning of, forest land, timberland, or timberland production areas, and there would be no impact.

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

**No Impact.** The project site has been fully developed for decades and does not contain any forest resources. Because the project site does not contain any forest land, the project would not result in the loss of forest land. There would be no impact.

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

**No Impact.** The project site is in an urbanized area and has been developed for decades. As such, there is no farmland or forest land on or adjacent to the project site that could be converted to non-agricultural or non-forest land uses as a result of the proposed project. Therefore, the project would have no impact.



### III. Air Quality

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>AIR QUALITY:</b> <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Discussion

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

**Potentially Significant Impact.** The Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have both established ambient air quality standards for certain pollutants. These standards define the maximum amount of a certain pollutant that can be present in outdoor air without harm to the public's health. Areas that meet these ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as non-attainment areas.

The project site is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Currently, the SCAB is considered to have non-attainment for several criteria pollutants, including ozone, particulate matter (PM<sub>10</sub>), and fine particulate matter (PM<sub>2.5</sub>) for California Ambient Air Quality Standards (CAAQS); and ozone, fine particulate matter (PM<sub>2.5</sub>), and lead for Federal Ambient Air Quality Standards (FAAQS) (CARB, 2018). Because of the violations of ambient air quality standards, SCAB is required to create an Air Quality Management Plan (AQMP), which analyzes air quality on a regional level. In partnership with other entities, SCAB sets goals for reductions in criteria pollutants, greenhouse gases, and toxic risks; as well as goals for efficiencies in energy use, transportation, and goods movement. The latter goals are included because the AQMP states that the principle contributor to air quality challenges are mobile sources, such as vehicles and equipment traveling along transportation corridors and goods movement facilities. The current AQMP was adopted in 2016.

The proposed project would produce emissions during both short-term construction (through site preparation, grading, and construction) and long-term operation (through vehicle emissions from residents and users of the commercial facilities, and maintenance activities using combustion-powered equipment). Such emissions could generate criteria pollutants which could contribute to the SCAB's





existing non-attainment status and could contribute to adverse air quality impacts in the immediate area. Therefore, these emissions could conflict with the ACMP. As such, further analysis is required to quantify the proposed project's emissions of criteria pollutants and to determine if the project's emissions would conflict with the goals and strategies outlined in the AQMP (2016). This analysis will be included in the EIR to be prepared for this project. If it is determined that the project would conflict with the AQMP, mitigations measures will be developed to reduce air quality impacts to less than significant levels, if possible.

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

**Potentially Significant Impact.** The project is located within the SCAB, which is in non-attainment for ozone, particulate matter (PM<sub>10</sub>), and fine particulate matter (PM<sub>2.5</sub>) under CAAQS, and for ozone, fine particulate matter (PM<sub>2.5</sub>), and lead under FAAQS (CARB, 2018). Further analysis is required to quantify the proposed project's emissions of the above pollutants and to determine whether the project's emissions of these pollutants would result in a cumulatively considerable net increase. This analysis, as well as mitigation measures, if necessary, will be included in the EIR to be prepared for this project.

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

**Potentially Significant Impact.** As stated in the response to air quality threshold 3a), state and federal ambient air quality standards define the maximum amount of a certain pollutant that can be present in outdoor air without harm to the public's health. These standards are designed specifically to protect those who are most severely impacted by air pollution, such as the elderly, those with cardiovascular or respiratory diseases, and children. Therefore, most sensitive receptors are located in schools, residential areas, and hospitals and treatment centers.

Sensitive receptors that could be impacted by the air quality impacts associated with the proposed project include residential neighborhoods north, east, and south of the project site, employees of the Los Angeles County fire station south of the project site, and employees and students at Northview High School, southwest of the Cypress Street and Azusa Avenue intersection.

Because the proposed project would produce emissions during both construction and operation, the project has the potential to generate both short-term and long-term air emissions that could impact nearby sensitive receptors. Therefore, further analysis is required to quantify the proposed project's emissions of pollutants and to determine if such emissions would expose nearby sensitive receptors to substantial pollutant concentrations. This analysis, as well as mitigation measures, if necessary, will be included in the EIR to be prepared for this project.

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

**Less Than Significant Impact.** During the construction phase of the proposed project, established requirements addressing construction equipment operations and construction material use, storage, and disposal act to minimize odors that may result from construction activities. Further, odors resulting from construction vehicle emissions would be localized and short-term in nature and would



not result in persistent impacts that would substantially affect neighboring residential and commercial uses. As such, the odors resulting from project construction would be less than significant.

The SCAQMD CEQA Air Quality Handbook (1993) identifies certain land uses as sources of odors: agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The proposed project would not include any of the land uses identified by the SCAQMD as odor sources. While restaurants are not included on this list of land uses identified by SCAQMD as odor sources, the District regulates emissions from restaurant operations through SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations, 1997). This rule requires the use of catalytic oxidizers in restaurants, to reduce particulate matter and volatile organic compounds, which contribute to odors.

The proposed residential development would generate emissions, including those leading to odors, on an occasional and temporary basis, through activities such as the use of outdoor barbeques and combustion-powered landscaping machinery. Each home would have covered or enclosed trash receptacles. This method of trash storage would limit rain intrusion and direct air exposure, and thus minimize the release of trash odors into the atmosphere. This practice is also regulated by SCAQMD's Rule 402 (Nuisance), which restricts the discharge of any source of air contaminants which cause nuisance or annoyance to any considerable numbers of persons or to the public. As such, odors associated with daily residential activities would be less than significant.

The proposed commercial buildings could generate odors from restaurant exhaust and occasionally from sources such as combustion-powered landscaping machinery and truck deliveries to the restaurant and retail buildings. Because emissions from restaurants operations are specifically regulated by SCAQMD's Rule 1138, and because fast-food restaurants are not identified by SCAQMD as an odor source in the CEQA Air Quality Handbook, the odors resulting from occupation of the proposed commercial buildings (including restaurant operations) would not adversely affect a significant number of people, and the impacts would be less than significant.



#### IV. Biological Resources

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

#### Discussion

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

**No Impact.** The project site is within a fully urbanized area, where there is no natural habitat of any kind, or any kind of water resources that could support sensitive fish or wildlife species. A majority of the site is dominated by impervious surfaces. The only vegetation on the site consists of non-native, ornamental trees and groundcover, and a strip of non-native grass east of the site's Cypress Avenue



driveway There is no natural habitat or contiguous vegetative community on the project site. The U.S. Fish and Wildlife Service (USFWS) states that the following special-status species have been observed in the general area of this part of the San Gabriel Valley: the Coastal California Gnatcatcher (*Poliophtila californica californica*, threatened), the Least Bell's Vireo (*Vireo bellii pusillus*, endangered), and the Southwestern Willow Flycatcher (*Empidonax traillii extimus*, endangered) (USFWS 2019a). Given the urban characteristics of the project site and surrounding area, these avian species have not been reported in the vicinity of the project site. (They would likely be found in natural areas outside of the city limits.) Further, the Covina General Plan Natural Resource and Open Space Element states that the City does not contain any "significant, endangered wildlife" due to the "long-term urbanization" of the City and subsequent lack of natural wildlife habitat (Covina 2000, page D-3). The presence of these endangered and threatened species on the project site is also unlikely considering that these species prefer to breed and forage in low-elevation riparian woodland and shrub habitat and coastal sage scrub, none of which occur on or adjacent to the project site (USFWS 2019b). Since there would not be a substantial adverse effect on any species identified as a candidate, sensitive, or special status species, the project would have no impact in this regard.

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

**No Impact.** The project site is complete disturbed and is almost covered in impervious surfaces except for a patch of grass and bare earth east of the Cypress Avenue driveway and sporadically placed decorative landscaping. There is no riparian habitat, wetlands, or other sensitive natural community on or adjacent to the project site. The project site contains no critical habitat designated by the USFWS or sensitive natural community designated by the California Department of Fish and Wildlife (CDFW) (USFWS 2019a; CDFW 2018). As the project site was cleared of natural vegetation decades ago, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community, and there would be no impact.

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

**No Impact.** Section 404 of the Clean Water Act defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." The project site does not contain any wetlands, rivers, streams, or riparian habitat, nor are such features present immediately surrounding the project site. Therefore, the project would no effect on state or federally protected wetlands.

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

**Less Than Significant Impact.** There are no waters or streams on the site. Thus, the project would not impact or interfere with the movement of any native resident or migratory fish. Wildlife corridors are typically made up of undeveloped wildlife habitat and open space linkages between larger patches of wildlife habitat. Habitat linkages may also include more tenuous linkages, like narrow vegetated



pathways or islands of habitat that act as stepping stones between larger habitat areas for some species. The project site has been highly disturbed for decades and is surrounded by urban land uses where there is little or no opportunity for overland movement of land-based wildlife species. There is a small patch of land, characterized by non-native grass cover and bare earth, between the Cypress Avenue driveway and the Los Angeles County Fire Department building immediately east of the project site; however, there is no natural habitat available on this small patch of land.

The project site currently contains trees and shrubs placed sporadically throughout the site that may provide suitable nesting habitat for bird species. All of these trees and shrubs are ornamental in nature and would be removed by the proposed project. It is possible that during the site clearance phase of construction, removal of one or more trees might result in damage or destruction to an active bird nest, which may be occupied by a type of bird species protected under the federal Migratory Bird Treaty Act or California Fish and Game Code Section 3503. The Migratory Bird Treaty Act prohibits the take, possession, import or export, transport, sale, or purchase of any migratory bird, including the parts, nests, or eggs of such a migratory bird, unless permitted. Further, California Fish and Game Code Section 3503 states that "it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." The project developer is obligated to comply with the Migratory Bird Treaty Act and the California Fish and Game Code, which typically involves compliance actions such as pre-construction surveys of existing trees on the project site to check for nesting migratory birds and avoidance measures, such as timing construction activities to avoid nesting seasons or monitoring by a qualified biologist during construction activities. Therefore, compliance with existing state and federal laws pertaining to the protection of nesting birds through avoidance measures would result in less than significant impacts to migratory avian wildlife.

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

**No Impact.** The City of Covina has a tree preservation chapter of its municipal code (Chapter 17.83) that seeks to preserve large, mature, native trees, specifically oak trees and trees designated as heritage trees by City Council. Heritage trees are defined in the Covina municipal code (Section 17.83.020) as protected trees that are either species of oak with a diameter at standard height of 10 inches or greater, or individual trees or groups of trees that are designated as a heritage tree(s) by City Council. There are only ornamental species of trees and shrubs located on the project site, as well as low, ruderal plant species on the south side of the project site, east of the Cypress Avenue driveway. Because the only trees on the project site are ornamental species, not oak trees, and no heritage trees exist on the project site, the project would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur.

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

**No Impact.** The project site is located in an urbanized area that does not contain any natural, undisturbed habitat. Further, the project site itself has been previously disturbed and contains no natural habitat resources. The project is not located within a Habitat Conservation Plan or Natural Community Conservation Plan area, or in an area covered by another local, regional or state habitat conservation plan. As such, the project would not conflict with such plans or other approved local, regional, or state habitat conservation plans, and there would be no impact.





## V. Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>CULTURAL RESOURCES:</b>				
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

- a) ***Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?***
- b) ***Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?***

**Less Than Significant With Mitigation Incorporated.** A historical assessment of the community and the existing grocery store building within the project limits was conducted to determine whether the existing grocery store structure and/or site improvements contains features that constitute or contribute to a historic resource, as defined in CEQA Guidelines Section 15064. Because the existing grocery store and related site improvements were developed in 1991, replacing previous urban uses, these improvements are much less than 50 years old, which is a key criteria in determining whether a site or structure could be a historic resource, as defined in the National Register and California Register. The South Central Coastal Information Center (SCCIC), as part of the California Historical Resources Information System, California State University, Fullerton, an affiliate of the California Office of Historic Preservation (OHP), is the official state repository of cultural resources records and reports for Los Angeles County. At Michael Baker International's request, SCCIC staff conducted a records search on July 19, 2019. As part of the records search, the following federal and California inventories were reviewed:

- California Inventory of Historic Resources (OHP 1976).
- California Points of Historical Interest (OHP 1992 and updates).
- California Historical Landmarks (OHP 1996).
- Directory of Properties in the Historic Property Data File (OHP 2012). The directory includes the listings of the National Register of Historic Places (National Register), National Historic Landmarks, California Register of Historical Resources (California Register), California Historical Landmarks, and California Points of Historical Interest.



The SCCIC search determined that there have been two prior cultural resources investigations for properties within ¼ mile of the project site, but there are no cultural resources identified within the project site or within a quarter-mile search radius.

Given the extensive ground disturbances throughout the site from past development projects and the current site improvements, it is considered unlikely that archaeological materials remain within the near surface soils where soil disturbance has occurred. While shallow excavations (generally less than 10 feet deep) would be required to prepare building foundations and install site infrastructure, past disturbance from construction of a large grocery store, a parking lot, and associated site infrastructure makes the potential to uncover previously unidentified archaeological resources unlikely. The excavation work could extend into previously undisturbed alluvial soils. Therefore, in the event of an accidental discovery of an archaeological resource, construction would cease until a qualified archaeologist can review the artifact and determine next steps for removal and or preservation if necessary, pursuant to Mitigation Measure V-1. As such, the project would not result in a substantial adverse change in the significance of a historical resource or an archaeological resource and project impacts would be less than significant.

Please refer to Section XVIII of this Initial Study, for a discussion of concerns regarding potential impacts to tribal cultural resources, as defined in Section 21074 of the California Public Resources Code.

### **Mitigation Measure V-1**

If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within 25 feet of the discovery shall be redirected and a Secretary of the Interior Professional Qualified archaeologist and/or Registered Professional Archaeologist shall assess the situation and make recommendations regarding the treatment of the discovery. Impacts to significant archaeological deposits should be avoided if feasible, but if such impacts cannot be avoided, the deposits should be evaluated for their eligibility for the California Register of Historical Resources. If the deposits are not California Register eligible, no further protection of the find is necessary. If the deposits are California Register eligible, impacts shall be avoided or mitigated. Acceptable mitigation may consist of but is not necessarily limited to systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility.

#### ***c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?***

**Less Than Significant Impact.** The project would not likely disturb any human remains, including those interred outside of dedicated cemeteries. The research conducted at the SCCIC found no indications of any past human burial activities on or near the project site. Shallow excavations of approximately five feet deep are proposed beneath and for a distance of approximately five feet beyond proposed building foundations, as described in the preliminary geotechnical report prepared for this project (GeoConcepts, Inc. 2015) and additional shallow grading would be required to install underground infrastructure such as sewer lines and drainage basins. The excavation work could extend into previously undisturbed alluvial soils. However, given the extent of past disturbance on the project site from the construction of the existing grocery store building, parking areas, and related site infrastructure, the likelihood of disturbing subsurface human remains in predevelopment, native soil



is estimated to be very low. Further, the research conducted by the SCCIC, as described above, and the information included in the Phase I Environmental Site Assessment conducted by Partner Engineering and Science did not identify any known instances of human remains or human burial grounds (SCCIC, 2019; Partner, 2014).

Nonetheless, in the event of an accidental discovery of human remains during project excavation, construction contractor compliance with Section 7050.5 of the California Health and Safety Code would ensure that such remains are properly identified and treated. Compliance would start with ensuring that there is no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Los Angeles County Coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. Project personnel/construction workers shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will immediately identify a Native American most likely descendant to inspect the site and provide recommendations within 48 hours for the proper treatment of the remains and associated grave goods. With compliance with existing California Health and Safety Code regulations, the proposed project would have less than significant impacts related to disturbing human remains.





## VI. Energy

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>ENERGY:</b> <i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

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

**Less Than Significant Impact.** The main forms of available energy resources are electricity, natural gas, and oil. A description of the California Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen), with which the proposed project would be required to comply, as well as discussions regarding the proposed project's potential effects related to energy demand during construction and operations are provided below.

### California Building Energy Efficiency Standards (Title 24, Parts 6 and 11)

The 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6s and 11), commonly referred to as "Title 24," became effective on January 1, 2017. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2016 Title 24 standards are 28 percent more efficient than previous standards for residential development.<sup>2</sup> The standards offer developers better windows, insulation, lighting, ventilation systems, and other features to reduce energy consumption in homes and businesses. Further, the 2019 Building Energy Efficiency Standards, which take effect on January 1, 2020, will require photovoltaic (PV) systems in newly constructed low-rise residential buildings such as the two- and three-story homes in the proposed project. These systems are required to generate at least the dwelling's annual electrical usage, unless there is substantial existing shading that would obstruct solar panels or if battery storage is also provided. With PV systems, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards.<sup>3</sup>

<sup>2</sup> California Energy Commission, *2016 Energy Standards Overview*, <https://www.lgc.org/wordpress/wp-content/uploads/2016/02/2016-Energy-Standards-Overview-California-Energy-Commission.pdf>, accessed April July 3, 2019.

<sup>3</sup> California Energy Commission, *2019 Building Energy Efficiency Standards*, [https://www.energy.ca.gov/title24/2019standards/documents/2018\\_Title\\_24\\_2019\\_Building\\_Standards\\_FAQ.pdf](https://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf), accessed July 3, 2019.



## California Green Building Standards Code

The 2016 California Green Building Standards Code, otherwise known as the CALGreen Code (CCR Title 24, Part 11), is a portion of the California Building Standards Code (CBSC or Title 24), which became effective with the rest of the CBSC on January 1, 2017. The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The provisions of the code apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout California. Requirements of the CALGreen Code are intended to address a variety of aspects of sustainable building practices involving water and energy conservation, solid waste reduction, pollution reduction, etc. Those provisions pertaining to energy conservation include:

- Compliance with relevant regulations related to future installation of Electric Vehicle charging infrastructure in residential and non-residential structures;
- For some single-family and low-rise residential development developed after January 1, 2020, mandatory on-site solar energy systems capable of producing 100 percent of the electricity demand created by the residence(s). Certain residential developments, including those developments that are subject to substantial shading, rendering the use of on-site solar photovoltaic systems infeasible, are exempted from the foregoing requirement.

## Construction Energy Use

Construction of the proposed project would involve on-site energy demand and consumption related to use of oil in the form of gasoline and diesel fuel. These would be used for vehicle trips by construction workers, truck trips for hauling and delivering materials, and the operation of off-road construction equipment. In addition, diesel-fueled portable generators may be necessary to provide additional electricity for temporary on-site lighting, for welding, and for supplying energy to areas of the sites where the energy supply cannot be met via a hookup to the existing electricity grid. Project construction would not involve the use of natural gas appliances or equipment. Construction methods used to build the proposed project would be typical of current construction practices and would not require use of more energy-intensive machinery or higher than normal volumes of trucks and passenger vehicle trips.

Even during the most intense period of construction, due to the different types of construction activities (e.g., site preparation, grading, building construction), only portions of the project site would be disturbed at a time, with construction equipment being operated at different locations on the project site, rather than at a single location. All construction equipment and operation thereof would be regulated per the In-Use Off-Road Diesel Vehicle Regulation administered by the California Air Resources Board (CARB). The In-Use Off-Road Diesel Vehicle Regulation is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines or installing exhaust retrofits. As another benefit of these restrictions, off-road diesel-powered vehicles would consume less fuel and combust the fuel more efficiently. The project would also be subject to mandates on portable diesel generators and the Environmental Protection Agency's (EPA's) strict on-road emissions standards for heavy-duty engines. These regulations contain strict air emissions



standards that result in efficient engine fuel consumption (compared to the previous standards) rates during operations. In addition, technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help reduce demand on the oil and emissions associated with construction in California over the next few years. As such, temporary energy use during construction of the proposed project would not result in a significant increase in peak or base demands on regional energy supplies or require additional capacity from local or regional energy supplies, and it would not result in a wasteful, inefficient, or unnecessary consumption of energy resources during project construction.

### **Operational Energy Use**

After the proposed project is completed, Southern California Edison (SCE) would provide electricity and Southern California Gas Company (SoCal Gas) would provide natural gas to the project site. Energy use associated with operation of the proposed project would be typical of residential uses, retail shops, and drive-through/fast food restaurants. The project does not include any unusual project characteristics or require special equipment that would be more energy intensive than typical residential and commercial uses. The commercial and residential project components would be required to include ENERGY STAR-rated appliances, energy-efficient boilers and heating, ventilation, and air conditioning (HVAC) systems, water-efficient landscaping and irrigation systems. Also, the new homes would be installed with solar photovoltaic panels in compliance with the most current Title 24 energy efficiency standards. Maintenance activities during operations, such as landscape maintenance, would involve the use of electric or gas-powered equipment. In addition to on-site energy use, the proposed project would result in consumption of oil-based fuels associated with vehicle trips generated by the proposed residential, retail, and drive-through/fast food restaurants. With regard to transportation fuel use, the proposed project would not have control over fuel consumption factors such as vehicle type(s), engine efficiency, vehicle miles traveled, etc., for residents, employees, and patrons accessing the project site. However, due to CARB's increasing vehicle efficiency standards, it is assumed the long-term transportation fuel consumption from project operations would steadily decline over time and ensure that vehicle fuel consumption is not wasteful or inefficient.

The proposed project would be subject to all relevant provisions of the most recent update of the California Building Energy Efficiency Standards (Title 24) and CALGreen Code. Compliance with the Title 24 and the CALGreen Code energy efficiency standards would ensure that the building energy use associated with the proposed project would not be wasteful, inefficient, or unnecessary.

Based on the discussion above regarding construction and operational energy use, the project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. Project impacts would be less than significant.

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

**No Impact.** As noted in the preceding response, the California Code of Regulations Title 24, Part 6—Energy Efficiency Standards, and the California Code of Regulations Title 24, Part 11—the CALGreen Code—mandate a variety of energy conservation and efficiency standards to be implemented through building design and construction. The City of Covina enforces these standards through their local building code, plan check and permit procedures. In addition, electricity supplied to the project by



Southern California Edison (SCE) would comply with the State's Renewables Portfolio Standard, which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 60 percent by 2030.

At the local level, Covina has approved the 2019 Energy Action Plan (EAP) Update<sup>4</sup>, which was prepared by the San Gabriel Valley Energy Wise Partnership (SGVEWP) between 30 member cities, SCE, and Southern California Gas Company. The 2019 EAP, an update to the 2012 EAP<sup>5</sup>, revised the City's energy reduction goals. Through the SGVEWP, member cities are able to participate in the SCE Energy Leader Model, which recognizes cities for increasing their energy efficiency in municipal facilities and communities, and participating in demand response programs and long-term strategic planning. Implementation of the EAP has allowed Covina to reach the highest level of energy efficiency, Platinum, under the Energy Leader Model.

The 2019 Covina EAP builds on the community goals and policies in the 2012 EAP and adds additional goals and policies for City-owned properties. *Table VI-1, Covina Energy Action Plan Consistency*, discusses project consistency with several energy policies outlined in the City's EAP.

**Table VI-1 – Covina Energy Action Plan Consistency**

Policy	Project Compliance
<b>Policy 2.2:</b> Encourage the use of innovative energy-efficient appliances and equipment in businesses that will reduce operational expenditures and improve the efficiencies of business operations.	<b>Consistent.</b> The project would comply with the State's Building Energy Efficiency Standards and CALGreen, which require the use of energy-efficient appliances, mechanical equipment, HVAC systems, and/or solar PV panels per the most current Title 24 standards. The proposed commercial and residential buildings will include energy-efficient appliances, lighting, and mechanical equipment in their design. In addition, the proposed residences will be required to incorporate PV solar systems into their design to reduce the building's energy demand on the local grid, as required under 2019 Title 24 standards.
<b>Policy 3.1:</b> Maximize the energy-efficient design and orientation of new, remodeled, and renovated buildings through voluntary sustainable building standards.	
<b>Policy 3.2:</b> Encourage the use of energy-efficient appliances and equipment in new buildings.	
<b>Policy 5.1:</b> Maximize the cooling of buildings through strategic tree planting and shading to reduce building electricity demands.	<b>Consistent.</b> The project would include landscaping throughout the project site that would help shade the proposed commercial and residential buildings, which could result in some cooling of the interior of these structures and a corresponding reduction in the energy consumption/demand for HVAC systems.
<b>Policy 6.2:</b> Support water-efficient landscaping practices to reduce electricity demand for water transport and treatment.	<b>Consistent.</b> The project would be required to comply with the State's Model Water Efficient Landscape Ordinance (Title 23, Chapter 2.7 of the California Code of Regulations) to reduce the water demand from the proposed landscaping at the project site. Compliance with the State's Model Water Efficient Landscape Ordinance would help reduce electricity demand for water transport and treatment to supply the project's irrigation water.

Source: City of Covina, Energy Action Plan Update, 2019.

As discussed above in Table VI-1 and in Section VI(a), the proposed project would include energy-efficient appliances, heaters, and HVAC systems; water-efficient landscaping and irrigation systems;

<sup>4</sup> City of Covina, 2019 Energy Action Plan Update, 2019.

<sup>5</sup> City of Covina, City of Covina Energy Action Plan, December 2012.





and solar photovoltaic electrical power generating systems for the new homes,<sup>6</sup> and these features would comply with applicable State and local energy regulating policies. The project's energy consumption would be typical of these types of commercial and residential development projects in Southern California and would not result in an increased energy demand beyond the capacity of SCE or Southern California Gas Company. As such, the project would not conflict with or obstruct any plans for renewable energy or energy efficiency.

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<sup>6</sup> As required under 2019 Title 24 standards.



## VII. Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>GEOLOGY AND SOILS:</b>				
<i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The responses to the following thresholds are based, in part, on a preliminary geotechnical engineering investigation of the project site conducted by Geo Concepts Inc. (GCI) in December 2015, which is provided in Appendix B of this Initial Study.



## Discussion

- a)i) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**No Impact.** The State Mining and Geology Board defines an active fault as one that has had surface displacement within the Holocene Epoch (roughly the last 11,000 years) and defines a potentially active fault as any fault that has been active during the Quaternary Period (approximately the last 1,600,000 years). These definitions are used in delineating Earthquake Fault Zones as mandated by the Alquist-Priolo Geologic Hazard Zones Act of 1972 and as revised in 1994 as the Alquist-Priolo Geologic Hazard Zoning Act and Earthquake Fault Zones Act. GCI's report identifies the following active faults as those capable of producing seismic waves / ground shaking on the project site: the San Andreas fault zone, the Whittier-Elsinore fault zone, the San Fernando fault zone, the eastern portion of the Santa Susana fault, the Newport-Inglewood fault zone, the Hollywood fault zone, the Raymond fault, the Sierra Madre fault zone, and the San Gabriel fault. The nearest of these is the Clamshell fault (a segment of the Sierra Madre fault zone), which is approximately 6 miles northwest of the project site.

GCI's review of geological maps and field exploration of the site determined that the project is not located within an Alquist-Priolo Earthquake Fault Zone and that there is no indication of any faults underneath the project site. Further, the project site is flat and is already disturbed. Grading would extend to roughly 5 feet below the proposed building foundations, which is not expected to be substantial enough to trigger a rupture along any of the faults noted earlier. As such, the project would have no direct or indirect impact associated with fault rupture. Potential ground shaking effects that could occur during movement along one or more of the active faults identified earlier are addressed in the next response (threshold 7a)ii).

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

**Less Than Significant Impact.** As stated in response to threshold 7a)i), several active faults in the region may result in strong seismic ground shaking on the project site; however, strong ground shaking during a seismic event is a hazard risk that affects all of southern California, given the number of active faults in the region. The California Building Code (CBC) addresses this hazard by defining specifications for structural design to address and mitigate the anticipated levels of ground shaking affecting a site, given its location and geologic conditions. The City of Covina has incorporated by reference the CBC into the City's building code (Chapter 14 of the City's Municipal Code). Further, GCI offers a series of recommendations to reduce the risks posed by seismic ground shaking hazards, such as removing existing fill to the top layer of competent alluvial materials (removal to a depth of at least 5 feet below proposed foundations) and replacing with compacted fill to provide a stable support for building foundations. This would also prevent problems due to liquefaction and settlement. The proposed project is required to comply with these recommendations as part of the grading permit approval process with the City of Covina. Further, the project is required to comply with all applicable seismic design criteria set forth in the CBC. Thus, with the required adherence to the City of Covina Building Code, potential impacts involving strong seismic ground shaking would be less than significant.



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

***including liquefaction?***

**Less Than Significant Impact.** Liquefaction is a seismic phenomenon in which loose, saturated, fine-grained granular soils behave similarly to fluid when subjected to high-intensity ground shaking. Liquefaction occurs when there is the presence of shallow groundwater, low-density fine, clean, sandy soils, and high-intensity ground motion. Effects of liquefaction can include sand boils, settlement, and load-bearing capacity failures below foundations.

The State of California has prepared Seismic Hazard Zone Reports to map areas where groundwater and geological conditions create the conditions for liquefaction, as well as areas with historic occurrence of liquefaction. As stated in the GCI geotechnical report, the project site is not within a liquefaction hazard zone on the State of California Seismic Hazard Zone Map. Further, ground rupture is not likely on the project site because, as stated in the GCI geotechnical report, ground rupture is the result of the movement of an active fault, and no active fault is mapped on the project site. Further, the City of Covina General Plan states that liquefaction has not historically posed a risk to structures in the City because the water table is generally more than 50 feet deep and there are no areas of loose, cohesionless soils (Covina 2000). These conditions are confirmed by the GCI geotechnical report, which shows the project site is primarily underlain with alluvium soil, and groundwater resources are 150-200 feet below the project site. Therefore, because the project is outside of a liquefaction hazard zone, is away from known active faults, and the groundwater table is more than 150 feet below the site, the project would not directly or indirectly cause substantial adverse effects involving seismic-related ground failure.

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

**No Impact.** The State of California has prepared Seismic Hazard Zone Reports to map areas with increased risks from earthquake-induced landslides. The project site is not located within an earthquake-induced landslide hazard zone on the State of California Hazard Map. The project site is relatively flat and does not have any topography that would create the potential for landslides. As such, the project would not directly or indirectly cause potential substantial adverse effects related to landslides.

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

**Less Than Significant Impact.** During demolition and removal of existing site improvements, such as the grocery store and the parking lot, grading and demolition activities would temporarily expose soil to the risk of erosion resulting from wind or rainfall. The City of Covina requires that projects greater than 1 acre submit an erosion and sediment control plan prior to receiving a grading permit, which details erosion control measures to be used during project construction and demolition. Further, the project applicant must submit grading plans to the Los Angeles Regional Water Quality Control Board in order to comply with its General Construction Permit standards, showing best management practices for preventing erosion during construction. The grading plan, as well as the required stormwater pollution prevention plan, are required to demonstrate that stormwater runoff containing sediment is reduced to the maximum practical extent and that best management practices are being applied from the commencement of demolition and construction through project





completion. Compliance with these existing regulatory standards would generally avoid or reduce potential erosion impacts during construction to less than significant.

Once completed, the majority of the project site would be covered by impervious surfaces, such as pavement and buildings, which would prevent soil erosion. Pervious areas of the project site would occur within landscape planters in the commercial site and within landscaped private yards and common areas in the residential site. The combination of impervious surfaces and landscaped pervious areas would almost eliminate any potential erosion impacts. As such, potential erosion impacts during project occupation would be less than significant.

The project site has been fully disturbed by past development, with artificial fill covering much of the site. As such, very little or no native topsoil remains on the project site. As such, the project would not result in any significant impacts involving loss of topsoil.

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

**Less Than Significant Impact.** As stated in the response to threshold 7a)iii) above, the project site is not within a liquefaction hazard zone on the State of California Seismic Hazard Zone Map and there are no active faults mapped on the project site. Because ground rupture is the result of the movement of an active fault, ground rupture is not likely on the project site. Further, the risks of lateral spreading, subsidence/settlements, liquefaction, or collapse are greatly increased in saturated soils, areas with poor drainage or near bodies of water, or areas with a high water table. As stated in the GCI geotechnical report, groundwater levels are approximately 150 to 200 feet below the project site, and the soils encountered at the site consist of dense sand with silt to silty sand. In some areas of the project site, soil borings found that the top 1.5 feet of soil consisted of 2 inches of asphalt and 1.3 feet of artificial fill. The GCI report recommends that this artificial fill be removed and replaced by compacted fill, upon which the proposed structures should be founded. The proposed project must show compliance with these recommendations as part of City of Covina's grading plan and permit approval process. The GCI report did not identify conditions prone to lateral spreading, subsidence or collapse. No project-related earthwork would occur outside of the project's development footprint, except for minor trenching for off-site underground utility connections. This would not affect geologic stability on any surrounding properties. Therefore, project impacts would be less than significant.

***d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

**No Impact.** Expansive soils can cause issues with proposed development as a variation in soil moisture content will cause a volume change in the soil, resulting in contraction when soils are dry and expansion when soils are moist. GCI conducted soil testing as part of their geotechnical report for the project site and did not encounter any expansive soils. As such, no direct or indirect impacts are anticipated as a result of expansive soils.



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

**No Impact.** All structures associated with the proposed project would be connected to the sanitary storm sewer system. As such, there would be no septic tanks or alternative wastewater disposal systems associated with the proposed project and there would be no impact.

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

**Less Than Significant Impact.** A vertebrate paleontology collection records search for locality and specimen data was completed by the NHMLAC on July 11, 2019 (McLeod 2019: **Attachment 2**). The records search identified no previously identified vertebrate fossil localities within the project site. The project site was identified as having younger Quaternary alluvial soil deposits—deposits which are not typically sensitive for paleontological resources. Within the project site, older Quaternary alluvial deposits sensitive for paleontological resources underlie the younger alluvial soils. The older Quaternary deposits are known in the region to produce fossil specimens.

As stated above, shallow excavations of up to 5 feet below and extending about 5 feet beyond the proposed building foundations would be required to prepare building foundations and additional, possibly deeper soil disturbance would occur during construction of underground utilities such as sewer lines and drainage treatment mechanisms that could potentially affect native soil materials. Therefore, the earthwork would minimally extend into previously undisturbed soils. The NHMLAC stated that shallow excavations in the younger Quaternary alluvium are unlikely to uncover significant vertebrate fossil remains; however, deeper excavations, more than 15 feet, into older Quaternary deposits have a higher potential to uncover significant fossil vertebrate specimens. If an accidental discovery is made on the project site, Mitigation Measure VII-1 will require that the project must cease construction until a qualified paleontologist examines the unearthed materials and determines if the materials could be a significant resource that warrants further preservation. Compliance with this measure would ensure that the project would not directly or indirectly destroy a unique paleontological resource or unique geologic feature, and impacts would be less than significant.

**Mitigation Measure VII-1**

In the event of a fossil discovery during excavation, the construction contractor shall notify the City and immediately cease work in the area of the find. The contractor shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan for immediate implementation, including field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the City to be necessary and feasible will be implemented before construction activities resume in the area where the paleontological resources were discovered.



## VIII. Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>GREENHOUSE GAS EMISSIONS:</b> <i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

**a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Potentially Significant Impact.** Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). Based on numerous studies by climate scientists around the world (such as the National Climate Assessment, and studies by the International Panel on Climate Change), global temperatures have been rising as a result of more heat being trapped by GHGs near the earth's surface. GHGs produced from human sources are widely seen as an important contributor to human-induced climate change. According to the California Environmental Protection Agency's Climate Change Research Plan for California (2015), potential impacts of climate change in California may include worsened air quality, decreased snowpack and water supplies, sea level rise, an increase in extreme heat days per year, large forest fires, and drought.

Both natural processes and human activities emit GHGs, including the combustion of fossil fuels, agricultural practices, and landfills. The major sources of GHGs in California are transportation and industrial (i.e., manufacturing and production processes) sources.

The proposed project would directly result in GHG emissions during both short-term construction work (through operation of construction equipment during site preparation, grading, and construction) and long-term operations (through operation of vehicles by residents and users of the commercial facilities, and through use of combustion-powered equipment during maintenance activities). Other long-term sources of GHGs include combustion of natural gas from heating and cooking at residential and commercial land uses and combustion of fossil fuels at electrical power-generating plants that supply electricity to the project site.

Further analysis is required to quantify the project's direct and indirect generation of GHG emissions and to determine whether such emissions would have a significant impact on the environment. This analysis will be included in the EIR to be prepared for this project. If potentially significant impacts are identified, mitigation measures will be developed to reduce impacts to less than significant levels, if possible.



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

**Potentially Significant Impact.** In December 2012, the City of Covina adopted an Energy Action Plan (EAP), which identifies the amount and source of GHGs emitted in Covina. The EAP establishes a baseline year of 2006 and outlines strategies to reduce the amount of GHGs produced in Covina to a level that is consistent with the reduction goals identified by Assembly Bill 32 (the California Global Warming Solutions Act, 2006). The EAP's target is a 15% reduction in baseline GHG emissions by 2020. Although the project would be occupied after 2020, it is appropriate to evaluate the project's characteristics relative to the applicable goals and strategies in the City's EAP.

Other reduction plans and programs that may be considered to determine whether the project's GHG emissions could be significant include the 2016 Regional Transportation Plan/Sustainable Communities Strategy, prepared by the Southern California Association of Governments, which contains regional targets for reducing GHGs as directed by Senate Bill 375, and the California Air Resources Board's most recent Climate Change Scoping Plan (2017).

Further analysis is required to determine the project's total GHG emissions and to evaluate such emissions in relation to applicable plans, policies, and regulations adopted with the intent to reduce GHG emissions. This analysis will be conducted in the EIR prepared for this project. If potentially significant impacts are identified, measures to avoid or mitigate those impacts will be developed, if possible.



**IX. Hazards and Hazardous Materials**

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

**Discussion**

Responses to the following threshold questions are based, in part, on site investigations and assessments of prior land use activities regarding potential environmental contaminants provided in Phase I and Phase II Environmental Site Assessments (ESAs). The Phase I ESA was completed by Partner Engineering and Science on May 29, 2014. The Phase II ESA was completed by RSA Associates, Incorporated on October 31, 1990, with an addendum prepared on May 28, 1991. These documents are included as Appendix C of this Initial Study.



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

**Less Than Significant Impact.** Materials are generally considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). The term “hazardous material” is defined in California Health and Safety Code as any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment (Section 25501(n)(1)). The code additionally states that a hazardous material becomes a hazardous waste once it is abandoned, discarded, or recycled.

The transportation, use, and disposal of hazardous materials, as well as the potential release of hazardous materials to the environment, are closely regulated through state and federal laws. Such laws include those incorporated into the California Health and Safety Code, such as the California Hazardous Materials Release Response Plans and Inventory law and the California Hazardous Waste Control law, as well as other regulations governing hazardous waste promulgated by state and federal agencies, such as the Los Angeles County Department of Public Works, California Department of Toxic Substances Control (DTSC), California Division of Occupational Safety and Health, the Regional Water Quality Control Board, and the U.S. Environmental Protection Agency.

The proposed project would include residential and commercial uses. The residential uses involve the routine transport, use, and disposal of minor quantities of typical household hazardous materials, such as cleaning products, solvents, adhesives, other chemical materials used in building maintenance and interior improvements, small amounts of oil and fuels from internal combustion engines, pesticides and herbicides, sharp or used needles, and electronic waste. This level of hazardous materials use is typical for residential areas and has not been identified as a significant threat to the environment. Residents can dispose of household hazardous materials for free at any of the Los Angeles County Sanitation Districts’ permanent disposal centers, and electronics can be disposed of at several private locations. Los Angeles County, in partnership with several cities, including Covina, hosts household hazardous waste and electronic waste recycling events at various locations in the Covina region. In July 2019, three such events were held in La Puente, Glendora, and Baldwin Park (Covina 2019); they were open to Los Angeles County residents.

Proposed commercial uses would also involve the routine transport, use, and disposal of minor quantities of hazardous materials associated with commercial uses and restaurants, such as cleaning products, solvents, lubricants, adhesives, refrigerants, sealants, other chemical materials used in building maintenance and interior improvements, and paints. This level of hazardous materials use is typical for commercial areas and has not been identified as a significant threat to the environment. Further, laws such as those mentioned above strictly regulate the use, transportation, and disposal of hazardous waste; they include training for employees in how to properly handle and dispose of hazardous materials, as well as filing floor plans with the Los Angeles County Fire Department showing locations of hazardous material storage.

Based on the types of land uses proposed; the relatively minor anticipated level of use, storage, and disposal of hazardous materials; and the requirement to comply with various state and federal laws regulating hazardous materials, the project would not result in a significant impact involving the routine transport, use, or disposal of hazardous materials.



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

**Less Than Significant Impact.** The history of development on the project site includes agricultural uses between 1928 and 1950, residential uses between 1964 and 1972, vacant and unimproved between 1975 and 1990, and developed with the existing grocery store building and asphalt parking lots from 1991 to present (Partner 2014). Because the site was previously used for agriculture, agriculture-related chemicals, such as pesticides, herbicides, and fertilizers, could potentially be present in the soil; however, previous site development in 1991 generally mixed surface soils with fill material or other disturbed soils during grading. Further, the Phase I ESA states that agriculture-related hazardous chemicals would have degraded since the site was last used for agriculture uses.

Per the Phase I ESA, the Los Angeles County Department of Public Works (LACDPW) records database shows that two underground storage tanks (USTs) were discovered during the grading and excavation of the existing grocery store building in 1991. The USTs, located on the northwest portion of the project site, were made of concrete, and each had an approximate capacity of 6,000 gallons. The USTs were removed in spring 1991, and impacted soils were removed and exported to a treatment facility. The LACDPW issued a “no further action” letter for the project site in 1997. Per the State Water Resources Control Board’s GeoTracker database, a leaking underground storage tank (diesel fuel) was also associated with the fire station adjacent to the project site, located at 807 Cypress Street; however, the cleanup has been completed and the case was closed in November 1992 (WRCB 2019).

The Phase I ESA did not identify any recognized environmental conditions (RECs, defined as the presence or likely presence of any hazardous substances) or controlled recognized environmental conditions (defined as an REC that has been addressed by a regulatory agency with hazardous substances remaining in place subject to implementation of required controls) on the project site. Further, the Phase I ESA did not identify any environmental issues other than a collapsed ceiling within the existing grocery store building and some ponding of water in the building interior. While the building shows signs of structural issues (i.e., roof leaks), no evidence of mold growth was observed during the site visit by Phase I ESA preparers. Since this building and all site improvements would be demolished and removed, these conditions would be eliminated by this project.

A Phase II ESA was prepared in 1990 for the construction of the existing grocery store building. It included soil borings and soil testing for the presence of Benzene, Toluene, Xylene, and Ethyl-Benzene. Toluene was found within soil samples taken from the project site; however, as described in the Phase II ESA, results of laboratory tests indicated that levels were within acceptable levels identified by California DTSC. An addendum to the Phase II ESA evaluated soil samples taken from five additional soil borings. The Phase II ESA addendum testing for volatile organic vapors showed non-detectable levels of contaminants in each of the additional soil borings. Neither the Phase II ESA or the addendum encountered groundwater during soil boring. Therefore, disturbance of the site by construction activities would not create a significant hazard to the public through the foreseeable upset of hazardous materials.

Construction activities may also include refueling and minor maintenance of construction equipment on site, which could lead to minor fuel and oil spills; however, as described in the response to threshold question a) in Section X, Hydrology and Water Quality, a variety of routine construction control measures would be incorporated, including spill prevention/containment, sedimentation and erosion



controls, and irrigation controls to prevent conditions that would release hazardous materials into the environment.

As stated in the response to threshold question a) of this section, Hazards and Hazardous Materials, occupation of the commercial and residential facilities would not result in substantial use, transport, or disposal of hazardous materials. Further, any such use, transport, and disposal of hazardous materials is strictly regulated by state and federal laws. Therefore, there would not be a significant hazard to the public involving the accidental release of hazardous materials into the environment associated with project operations.

For the proposed project, therefore, any reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would not result in a significant hazard to the public.

**c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

**Less Than Significant Impact.** Northview High School is located at the southwest corner of Azusa Avenue and Covina Street, approximately 400 feet (0.076 mile) from the project site. As stated in responses IXa) and IXb), the results of the Phase I and Phase II ESAs conducted on the project site and the review of regulations governing hazardous material determined that project construction and operation is not expected to release any hazardous substances that could endanger the public or the environment. Further, as noted in the response to IXa, the proposed commercial and residential land uses would not emit hazardous emissions or involve the use of acutely hazardous materials and would routinely involve only minor quantities of typical household and small business hazardous materials that are not known to represent a significant threat to the environment.

The project would result in limited emissions associated with delivery and trash trucks, personal vehicles, and combustion-powered maintenance equipment. The small amount of diesel exhaust from delivery trucks and trash collection trucks would not represent a substantial increase over current conditions, which includes truck traffic along North Azusa Avenue and Cypress Street, as well as the presence of delivery trucks and trash trucks serving area commercial businesses, restaurants, and homes. Therefore, as the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes, it would not affect local schools in that regard. Impacts would be less than significant.

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

**No Impact.** The project site is not included on the Cortese list, which is the list of sites compiled by California DTSC under Government Code Section 65962.5. As such, the project is not included on DTSC's list of: (65962.5(a)(1)) hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code; (65962.5(a)(2)) land designated as hazardous waste property or border zone property pursuant to Article 11; (65962.5(a)(3)) information received regarding waste disposals on public land; (65962.5(a)(4)) all sites listed pursuant to section 25356 of the Health and Safety Code; or (65962.5(a)(5)) all sites included in the Abandoned Site Assessment





program (CalEPA 2019; DTSC 2019). Because the project site is not included on these lists, the project would not create a significant hazard to the public or the environment, and there would be no impact.

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

**No Impact.** The nearest airports to the project site are the El Monte Airport, located 7.25 miles west of the project site in El Monte, California, and the Brackett Field Airport, located approximately 7 miles east of the project site in La Verne, California. Therefore, the project is not within 2 miles of a public airport and would not result in a safety hazard or excessive noise for people residing or working in the project area, and there would be no impact.

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

**Less Than Significant.** Both City and County emergency plans describe responsibilities and outline procedures for an emergency response. The County has adopted an Operational Area Emergency Response Plan (2012), which describes the planned responses to emergencies associated with natural and man-made disasters and technological incidents. The City's Emergency Plan also outlines procedures to be followed during emergencies, such as who is in charge under different scenarios, what should be done, and by whom it should be done. As stated in the General Plan Safety Element (2000), the City's Emergency Plan was designed to meet all applicable legislative mandates and to achieve consistency with all local, County, and State emergency response documents. The project site is not used by any emergency response agencies and supports no emergency response facilities.

Regarding evacuation routes, the City's General Plan Safety Element indicates that major public streets serve as principal evacuation routes, including the San Bernardino Freeway, located 1.6 miles south of the project site, and arterial roadways, such as Cypress Street and Azusa Avenue. As stated in the Safety Element, the exact emergency routes used during an emergency would depend on a number of variables, including the type, scope, and location of the incident. It would be the responsibility of public officials to adequately assess the situation so that safe and efficient evacuation routes are selected and clearly identified by temporary signage for motorists. Development of the proposed project would have no effect on decisions and actions associated with emergency response procedures and little or no effect on selection of evacuation routes.

Therefore, the project would have less than significant impacts related to implementation of or interfere with an adopted emergency response plan or evacuation plan.

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

**No Impact.** Wildlands are defined in the General Plan Safety Element as areas characterized by low density, hillside areas with large quantities of uncultivated, combustible plants (such as chaparral and riparian communities), brush, and grasslands. The project site is in a fully urbanized area with an urban street network, a fully pressurized local water system, and an adjacent fire station. Its vegetation is limited to decorative trees and shrubs, and a grass lot on the south side of the project site. The low-density decorative landscaping materials on site do not include uncultivated, combustible plants. Further, the project is 3 miles west of the Covina Hills neighborhood, which is the nearest area



characterized by development on hilly terrain, where wildland fires are more likely to occur. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

**X. Hydrology and Water Quality**

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

**Discussion**

The following discussion references a hydrology and hydraulic study, prepared by JLC Engineering and Consulting in 2019 (referred to in the following analysis as “hydrology study”), and a Low Impact Development Plan, prepared by Land Development Consultants in 2019 (referred to in the following analysis as “LID plan”). The hydrology study and LID plan are available as Appendix D of this Initial Study.



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

**Less Than Significant Impact.** The existing site is characterized by a currently vacant grocery store building, an asphalt parking lot with sporadically placed decorative vegetation in a variety of health conditions, and a small patch of grass and bare earth on the south side of the project site, east of the driveway access point to Cypress Street. Currently, the majority of site runoff flows west to storm drains within Azusa Avenue. As stated in the LID Plan, the existing project site is approximately 85% covered with impervious materials. With site alterations under the proposed project, the site would be approximately 67% covered with impervious materials.

During the construction phase of the project, there is potential for generation of water pollutants that might be carried off-site during a rain storm. These pollutants might include loose soils, liquid and solid construction materials and wastes, and accidental spills of concrete, fuels, and other materials. Such construction-related sources of stormwater pollution would be mitigated through required permits and a required erosion and sediment control plan (such as a stormwater pollution prevention plan), as described in the City of Covina Municipal Code (section 8.50.100). Specifically, the municipal code states that prior to obtaining a grading or building permit, applicants must submit applicable water quality control permits, such as the General Construction Permit from the Los Angeles Regional Water Quality Control Board (LARWQCB) and, if warranted when there are alterations to Waters of the U.S., the State Water Board 401 Water Quality Certification. There are no Waters of the U.S. within or adjacent to the project site; therefore, no 401 Water Quality Certification would be required.

Per the City of Covina Municipal Code, each applicant must submit and implement an Erosion and Sediment Control Plan, which can be substituted with a Stormwater Pollution Prevention Plan (SWPPP) prepared in accordance with the LARWQCB's General Construction Permit, which would include sediment and erosion control measures to ensure that discharges of pollutants are effectively prohibited and that construction site runoff will be contained so as not to cause or contribute to an exceedance of water quality standards. The Erosion and Sediment Control Plan / SWPPP is listed as a minimum Best Management Practice (BMP) for all construction sites by the City of Covina and helps meet the requirements of the County of Los Angeles's Municipal Separate Storm Sewer System (MS4) permit (R4-2012-0175) (Covina, undated).

The LARWQCB has adopted and administers a Basin Plan, which designates beneficial uses for surface and ground waters; sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy; and describes implementation programs to protect all waters in the Region. The project is governed by this Basin Plan, and the proposed water quality control measures are required to satisfy the water quality objectives set forth in the Plan.

Once completed, the project could generate non-point sources of water pollution typical of residential and commercial development, including runoff from impervious surfaces such as streets, sidewalks, parking lots, driveways, and common area patios, and also landscaped areas. Such water pollutants would typically include oils, grease, metals, trash, fertilizers, pesticides, and herbicides. Under existing conditions, non-point sources of pollution include typical runoff from commercial parking areas, such as brake dust and vehicle oil, as well as landscape wastes and materials fallen from unmanaged trees, sediment runoff from areas of bare soil on the south side of the project site, and trash from illegal





dumping. Under current conditions, project site runoff is not treated before discharging into Azusa Avenue.

The proposed project would be directly connected to the City of Covina's sanitary sewer system; therefore, there would be no point source discharge of sewer waste or any other point source discharge of pollution. The project site would collect the onsite non-point source flows via curb and gutters, catch basins, and subsurface storm drains. The onsite flows would be conveyed to three proposed subsurface basins within the project site, one located in the proposed commercial development south of Building D, and two located in the residential area, one underneath the driveway entrance off of Cypress Street and one under the head-in parking stalls south of common area C. The subsurface basins have been designed to retain and store the required volume necessary to mitigate for increased runoff associated with the 25-year storm event to be equal to the allowable flow rate provided by Los Angeles County Department of Public Works (0.77 cubic feet per second per acre) to the existing storm sewer infrastructure (Line A storm drain managed by Los Angeles County Department of Public Works) located within Cypress Street. See the LID Site Plan (Appendix D) for a visual representation of where the subsurface systems would be placed within the project site. The subsurface stormwater basins would be constructed with 96-inch, perforated corrugated metal piping (CMP), would be approximately 100 feet long, and would have sufficient volume to store site-generated stormwater and allow it to infiltrate into underlying soils. Stormwater that does not infiltrate into surrounding soils would be released to the Line A storm drain at an allowable flow rate specified by the County of Los Angeles. Infiltration would effectively remove pollutants of concern, by allowing stormwater to slowly infiltrate into underlying soils, which removes solid contaminants at the surface through physical straining and removes dissolved contaminants through soil absorption. In addition to this structural design feature, the LID plan also identifies non-structural practices to be implemented by the proposed project, including landscaping and litter control in common areas; education for property owners, tenants, and occupants; common area catch basin inspections; and street sweeping of the parking lots and private residential streets.

Per the hydrology study, the nearest water body is the fully channelized, below-grade San Dimas wash, approximately 750 feet north of the project site. As described above, the proposed project would convey all stormwater from the project site into the three subsurface detention basins, which would allow for a metered release of stormwater into Los Angeles County's stormwater sewer system and/or infiltration of the water into the surrounding soils. As such, there would be no surface runoff directly associated with the proposed project to the San Dimas wash, or any other natural water body.

Further, as stated in the Geology and Soils section, the groundwater table is located between 150 and 200 feet below the project site. Given the depth to groundwater, the required BMPs in the LID plan that would limit pollutants in site runoff and provide soil filtration for runoff not released to the municipal storm drainage system, and the fact that typical pollutants found in residential and commercial runoff would not contain hazardous contaminants, the project would not substantially degrade ground water quality.

Compliance with the permits described above and implementation of the BMPs outlined in the LID plan prepared for this project would result in impacts regarding surface or groundwater quality and compliance with existing water quality standards that would be less than significant.



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

**No Impact.** The proposed project would be connected to the municipal and county sewer system and potable water system. As such, the project would not include any operating water wells and would not result in any direct withdrawal of groundwater for residents or occupants of the proposed project. Further, there are no existing groundwater extraction wells or evidence of past groundwater extraction wells within the currently developed project site. As stated in the response to threshold 10a), the proposed project would convert the project site from approximately 85% impervious surfaces to approximately 67% impervious surfaces, allowing for more infiltration of rainwater than under current conditions. Further, the proposed storm drainage facilities would include three subsurface stormwater detention basins, which would capture and detain site runoff and allow for controlled releases into the subsurface soil materials. Given the decrease in total impervious surfaces on the project site, and that the project proposes subsurface catchment and infiltration of stormwater, the proposed project would represent an increase in stormwater infiltration and therefore would not decrease groundwater supplies or interfere with groundwater recharge and there would be no negative impact.

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

**No Impact.** As described above, the proposed project would alter the existing drainage patterns of the project site by removing all existing site improvements, changing grades, constructing new buildings and pavement areas, and installing a new stormwater collection and discharge system. These changes would be minor and would not affect drainage patterns outside of the project site. There would be no alteration of a stream or river associated with the proposed project, as no such watercourse exists on the project site, and the San Dimas wash is 750 feet north of the site.

The existing site has approximately 85% impervious surfaces, such as the grocery store building and the paved surface parking areas and driveways, which collect and convey stormwater to Azusa Avenue. The proposed development plan would result in approximately 67% impervious surfaces, including parking areas, driveways, walkways, and common area patios. No soil erosion could occur in such surfaces. The rest of the developed site would include landscaped pervious surfaces, which would essentially prevent soil erosion in those small portions of the site. The project site would collect stormwater via curb and gutters, and catch basins, with the stormwater collecting in three proposed subsurface basins within the project site that would detain, meter the release of stormwater into an existing County storm sewer infrastructure in Cypress Street, and allow for infiltration in the soil. The proposed storm drainage system would thus not discharge to other properties or overland and would not result in alterations to downstream water courses. There would be no impacts involving alteration of a stream or river or other type of watercourse, and no impacts involving increased erosion and sedimentation of such watercourses.



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

**Less Than Significant.** As described in the preceding response, the proposed project would alter the existing drainage patterns of the project site by removing all existing site improvements, changing grades, constructing new buildings and pavement areas, and installing a new stormwater collection and discharge system, which includes three subsurface detention basins. The proposed project would convert the project site from approximately 85% impervious surfaces to approximately 67% impervious surfaces, allowing for more infiltration of rainwater than under current conditions.

The hydrology study shows that the proposed drainage facilities would adequately convey stormwater flows associated with 25-year rainfalls to the subsurface basins through gutter and catchment basins and would prevent flooding on-site. The hydrology study also states that the three subsurface basins have sufficient volume to store and treat site runoff through infiltration. Los Angeles County Department of Public Works is allowing a discharge rate of 0.77 cubic feet per second (cfs) per acre. With a total project area of 7.83 acres, the proposed project must discharge less than 6.0 cubic feet per second into the County's Line A system, within Cypress Street. The subsurface detention and infiltration basins are designed to result in a maximum outflow rate of 5.7 cfs. Therefore, the designed outflow rate is less than the flow rate allowable by the County, which would limit the likelihood of ponding or flooding on-site during a 25-year storm event with adequate maintenance of the subsurface stormwater basins. Further, with project designs complying with Los Angeles County Department of Public Works requirements, stormwater runoff associated with the proposed project would be collected on-site, transmitted to subsurface detention and infiltration basins, and either discharged at an appropriate rate to the County's storm sewer line within Cypress Street or allowed to infiltrate into the ground, limiting the possibility of off-site flooding. Therefore, the project would reduce the rate and amount of surface runoff compared with existing conditions and would not induce on- or off-site flooding. Impacts from site runoff would be less than significant.

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

**No Impact.** As described in the responses to threshold 10c)i) and 10c)ii), the Los Angeles County Public Works Department provided a maximum allowable discharge of 0.77 cfs per acre, or a total of 6.0 cfs into the County's existing stormwater infrastructure within Cypress Street. This maximum allowable discharge is greater than the 5.7 cfs maximum discharge of the proposed project's stormwater infrastructure.

Further, the project would result in typical stormwater runoff pollutants for residential and commercial land uses, such as oil and brake dust from parking areas and streets, dust and other atmospheric deposition from rooftops and pavement areas, litter and trash, and biodegradable materials from landscaping wastes and fallen materials from trees. Any other kind of polluted runoff is prohibited by City of Covina municipal code (section 8.50.030, Illicit Discharges). The proposed project would not result in a substantial increase of such pollutants over current conditions, as the existing parking lot is



still used by some vehicles, landscaped areas are not maintained, bare earth along the driveway from Cypress Street can lead to sediment runoff, and the site is currently used for some illegal dumping of trash, all of which could be carried in site runoff during rainstorms.

Therefore, as the proposed project would neither exceed the capacity of existing stormwater drainage systems operated by Los Angeles County nor generate substantial additional sources of polluted runoff compared to current conditions, there would be no impacts.

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

**No Impact.** The project site is not within a Special Flood Hazard Area as designated by the Federal Emergency Management Agency (FEMA). Flood hazards are present in the Walnut Creek area of the City of Covina; however, that area is on the far east side of the City, in the Covina Hills neighborhood, and is not close enough to affect the project site. Therefore, because the project site is within an “Area of Minimal Flood Hazard,” as designated by FEMA, and because on-site or off-site flooding would be prevented by the proposed storm drainage system, as discussed in response to threshold 10c)ii), the proposed project would not impede or redirect flood flows, and there would be no impact.

***d) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?***

**No Impact.** As stated in the preceding response, the project site is within an Area of Minimal Flood Hazard, as designated by FEMA. The City of Covina General Plan Safety Element states that since Covina is an inland community, tsunami hazards would not affect the City. Further, earthquake-prompted seiche events would not impact the project site or the project site’s immediate vicinity, as there are no large bodies of water (such as a reservoir) that could be severely shaken and release flood waters during a seismic event (Covina 2000). Therefore, there would be no impact regarding the release of pollutants due to project inundation resulting from flooding, tsunami, or seiche.

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

**Less Than Significant Impact.** The City of Covina obtains water primarily from the Covina Irrigating Company (CIC), which sources water from the Main San Gabriel Groundwater Basin and the San Gabriel River. Backup water supplies are provided by the Three Valleys Municipal Water District, which sources water from the Colorado River and Northern California (Covina 2019). The City has not drawn water from groundwater wells within the City since the 1990s, citing groundwater quality issues (Covina 2015). As discussed in response to threshold 10b), the proposed project would be connected to existing sewer and potable water systems. As such, the project would not include any operating water wells and would not result in any direct withdrawal of groundwater for residents or occupants of the proposed project. Further, the project site is located a considerable distance from the nearest managed groundwater resources, located near the San Gabriel River. Therefore, the project would not conflict with or obstruct plans such as the Five-Year Water Quality and Supply Plan for the Main San Gabriel Groundwater Basin (2018).

As discussed in response to threshold 10a), the City of Covina municipal code (Section 8.50.100) states that prior to obtaining a grading or building permit, applicants must demonstrate compliance with the





requirements set forth in the General Construction Permit (GCP), administered by the LARWQCB, pursuant to the National Pollutant Discharge Elimination System. Compliance with the terms of the GCP would ensure that the project's construction activities would be consistent with the Basin Plan adopted by the LARWQCB. Further, the developer(s) must also submit and implement an Erosion and Sediment Control Plan, which can be substituted with a SWPPP prepared in accordance with the GCP. The Erosion and Sediment Control Plan/SWPPP is listed as a required BMP for all construction sites by the City of Covina and helps meet the requirements of the County of Los Angeles's Municipal Separate Storm Sewer System (MS4) permit (R4-2012-0175), which requires sediment control, erosion control, and construction materials control on the project site (Covina, undated). The proposed project must comply with such permitting requirements prior to obtaining a grading or building permit from the City. Further, the City of Covina prohibits illicit dumping of pollutants into stormwater systems, as stated in its municipal code (Section 08.50.030, Illicit Discharges). Therefore, compliance with the above-mentioned permits and regulations would ensure that the project would not conflict with or obstruct implementation of water quality control plans such as the Three Valleys Municipal Water District's Urban Water Management Plan (2015) or the City of Covina's Urban Water Management Plan (2015).



## XI. Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>LAND USE AND PLANNING:</b>				
<i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

#### a) ***Would the project physically divide an established community?***

**No Impact.** The project site is located in a fully urbanized part of the City of Covina, where the built environment consists of a mixture of low-rise residential and commercial land uses, along with a high school campus. The physical arrangement of the surrounding private lots, streets, and utility infrastructure systems has been established for many years. The proposed project would use existing public streets for access to the commercial and residential components and would connect to existing utility mainline facilities in adjacent streets. The proposed project would not result in construction of a linear feature, such as railroad tracks, a flood control channel, or a major roadway, or the removal of a means of access that would result in a physical division of an established community. No physical alterations to any land use or the physical structure of this part of Covina are proposed for outside the project footprint. As such, the proposed project would not physically divide an established community, and further analysis of this issue is not necessary in the EIR.

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

**No Impact.** The existing General Plan land use designation for the project site is General Commercial, with a corresponding zoning of C-4, Highway Commercial. Based on the existing designations and zoning, no homes could be built on the project site. Therefore, the project applicant has requested approval of a General Plan Amendment to re-designate the eastern 5.31 acres from General Commercial to Medium-Density Residential, to allow for development of single-family homes at densities of 7-14 units per acre.

The project applicant has also requested approval of a Zone Change to correspond to the new General Plan land use designation and to rezone the eastern 5.31 acres from C-4, Highway Commercial to RD, Multi-Family Zone, and to approve the Cypress Village Specific Plan to establish custom development standards corresponding to the proposed residential development plan, and to provide guidance for a unified design program to aesthetically integrate the commercial and residential components. The residential component would consist of 61 single-family detached homes, in two-story and three-story structures, with floor plans ranging from approximately 1,700 square feet to approximately 2,600 square feet. The proposed density is 12.25 homes per acre, consistent with the proposed Medium-Density Residential general plan land use designation.



The Covina General Plan Natural Resources and Open Spaces Element does not identify any land use restrictions for the project site that would require conservation of the site for purposes of protecting wildlife habitat or other natural resources. There are no policies in the General Plan Safety Element that establish land use restrictions for this site pertaining to avoidance of environmental hazards on or near the project site. The project site is not within an area where special land use policies or zoning standards have been created for the purpose of avoiding or mitigating environmental effects, nor is it within a local coastal program. As such, the project would not conflict with an applicable land use plan, policy, or regulation established for the purpose of avoiding or mitigating an environmental effect. No further analysis of this threshold is warranted in the EIR.

Other issues related to the proposed changes in the site's land use designation and zoning standards will be addressed in the EIR, concerning effects on public services and utilities, traffic, public parkland, noise, air quality and greenhouse gas emissions. Please refer to the discussions of those topics elsewhere in this Initial Study.



## XII. Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>MINERAL RESOURCES:</b>				
<i>Would the project:</i>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

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

**No Impact.** Mineral resources are commonly defined as a concentration or occurrence of natural, solid, inorganic, or fossilized organic material in or on the earth's crust in such form and quantity and of such a grade or quality that it has reasonable prospects for economic extraction. Mineral resources can be categorized into three classes: fuel, metallic, and non-metallic. Fuel resources include coal, oil, and natural gas. Metals include such resources as gold, silver, iron, and copper. Lastly, non-metal resources include industrial minerals and construction aggregate. Industrial minerals include boron compounds, rare-earth elements, clays, limestone, gypsum, salt, and dimension stone. Construction aggregate includes sand and gravel, and crushed stone.

There has been no mineral resource extraction on this site or surrounding properties in the recent past, and such activities are not known to have occurred in the distant past (Covina 2000, Page D-9). There are no oil wells on site according to the Phase I Environmental Assessment that was prepared for the project site in 2014 (Partner 2014, p.15). According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, there are no significant energy-producing minerals or oil, gas, or geothermal fields in the City (Covina 2000). Therefore, the proposed project would not result in the loss of availability of a known mineral resource or resource recovery site, and no further study of this issue is required in the EIR.

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

**No Impact.** As discussed in the preceding response, no mineral resource recovery sites are located on or in the immediate vicinity of the project site.

The Surface Mining and Reclamation Act of 1975 (SMARA) is the primary regulator for surface mining in the state. The act requires the State Geologist (California Geological Survey) to identify all mineral deposits in the state and to classify them based on their significance. SMARA defines a mineral deposit as a naturally occurring concentration of minerals in amounts or arrangement that under certain conditions may constitute a mineral resource. The concentration may be of value for its chemical or physical characteristics. The classification of these mineral resources is a joint effort of





the state and local governments. It is based on geologic factors and requires that the State Geologist classify the mineral resources area as a Mineral Resource Zone (MRZ), Scientific Resource Zone (SZ), or Identified Resource Area (IRA), described below:

- MRZ-1: A Mineral Resource Zone where adequate information indicates that no significant mineral deposits are present or likely to be present.
- MRZ-2: A Mineral Resource Zone where adequate information indicates that significant mineral deposits are present, or a likelihood of their presence, and development should be controlled.
- MRZ-3: A Mineral Resource Zone where mineral resource significance is undetermined.
- MRZ-4: A Mineral Resource Zone where there is insufficient data to assign any other MRZ designation.
- SZ Areas: A zone that contains unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance.
- IRA Areas: County or State Division of Mines and Geology Identified Areas where adequate production and information indicate that significant minerals are present.

A review of the City's General Plan Natural Resources and Open Space Element did not identify this area as having significant mineral deposits of any kind, or show it in an area delineated as a mineral resource recovery site, pursuant to SMARA (Covina 2000, Page D-9). Therefore, since there are no known significant mineral resources and the project site is not a designated mineral resource recovery site as identified by SMARA or in the City's General Plan, the project would have no impact upon the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

No further study of this issue is required in the EIR.

**XIII. Noise**

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

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

**Potentially Significant Impact.** Construction of the proposed project would temporarily increase noise levels on and in the vicinity of the project site. Stationary and mobile noise sources would be generated by the completed/fully occupied and operational project that could result in a substantial permanent increase in ambient noise levels affecting sensitive receptors around the project site. Such noise sources would include vehicle traffic that would increase roadway noise, noise from building mechanical equipment, possibly noise from outdoor speaker systems associated with proposed drive-thru businesses, movements of cars in parking areas, and outdoor recreation activities by people in their back yards and in the common outdoor spaces within the residential area.

The nearest noise-sensitive land uses that could be impacted by construction noise include the adjacent residential properties to the north and east sides of the project site and the Northview High School campus, 0.4 miles to the southwest of the project site. Adjacent and nearby commercial uses would also be affected by the project's short-term construction noise, but these are considered less sensitive to noise intrusion than homes or schools.

According to Chapter 9.40 of the City of Covina Municipal Code, construction and operation of equipment within any residential land use category or within a radius of 500 feet therefrom are only permitted between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday, and no construction is permitted at any time on a Sunday or any public holiday. In addition, the Municipal Code specifies the maximum exterior noise levels for various land uses in the following table:



Receiving Land Use Category	Time	Sound Level (A-Weighted) Decibels
Residential estate or agricultural	7:00 a.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	40
Residential low density	7:00 a.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	45
Residential medium and high density	7:00 a.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	50
Commercial	7:00 a.m. to 10:00 p.m.	65
	10:00 p.m. to 7:00 a.m.	55
Industrial	7:00 a.m. to 10:00 p.m.	70
	10:00 p.m. to 7:00 a.m.	60

The City's General Plan Noise Element goal is "An environment in which potential adverse impacts of noise on the City's residents and workers are identified and prevented and mitigated" (Covina 2000).

Further evaluation of potential noise levels generated during the various construction phases and over the long term due to activities occurring regularly on the fully developed site is required to determine if neighboring land uses could be exposed to excessive noise levels or otherwise conflict with the limitations imposed by the City's Municipal Code regulations and the goals and policies set forth in the City's General Plan Noise Element. Therefore, a noise analysis will be prepared as part of the project EIR, to evaluate potential impacts and to develop mitigation measures (if necessary) to avoid significant short-term or long-term impacts that may be identified.

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

**Potentially Significant Impact.** Construction of improvements under the proposed project would create periodic and short-term noise, including ground-borne vibration and ground-borne noise, which could exceed established noise standards. Temporary ground-borne vibration would likely be generated by various types of machinery during the grading and site preparation construction phases. The vibration levels would vary by type of machinery and distance to sensitive receptors near the construction activity, as well as soil materials. Typical types of machinery that could generate noticeable vibration off-site include jack hammers, loaded trucks, large bulldozers, and vibratory rollers.

However, development of the proposed project would support typical indoor and outdoor activities associated with single-family residences and commercial use; completed, the project would not generate ground-borne noise or vibration.

Further analysis of the proposed construction activities and the types of machinery is required to determine whether there could be any significant vibration sources that could adversely affect the nearest structures in terms of structural damage or human comfort. A noise analysis will be prepared as part of the project EIR, to assess construction impacts involving ground-borne vibration and ground-borne noise and to develop mitigation measures (if necessary) to prevent potentially significant impacts that may be identified.



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

***No Impact.*** The project site is not located within the vicinity of a private airstrip or an airport land use plan or within 2 miles of a public airport or public use airport. The closest public airport, Brackett Field Airport, at 1615 McKinley Avenue, La Verne, California, is approximately 5 miles from the project site. The closest private airstrip, Cable Airport, at 1749 W. 13<sup>th</sup> Street, Upland, California, is approximately 10 miles from the project site (AirNav LLC 2019). Therefore, the project would not expose people residing or working in the project area to excessive noise levels from such airport uses. As such, this issue is not required to be further analyzed in the EIR.





#### XIV. Population and Housing

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>POPULATION AND HOUSING:</b>				
<i>Would the project:</i>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Discussion

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

**Potentially Significant Impact.** The project site is currently designated in the Covina General Plan Land Use Element as General Commercial, with a corresponding zoning classification of Commercial Highway (C-4). The proposed project would require a change in the General Plan land use designation and zoning classification for construction of the proposed 61 residential homes on a portion of the project site. This change in land use would result in unplanned population growth. Further evaluation of this project's increment of growth with respect to adopted growth forecasts is required to determine whether this would represent a substantial level of unplanned growth that could result in impacts related to accommodation of this many new homes and its resident population in this area. For example, the new residential land use onsite would result in different levels of demand for public services than a commercial land use. Utility and infrastructure needs would also differ. Those types of impacts are discussed elsewhere in this Initial Study and will also require further analysis. The proposed change from commercial to residential land use would not result in a need to extend or build any new roads or other transportation infrastructure, nor would it require construction of any new mainline infrastructure facilities, since all such facilities are present in the project area. Further evaluation of the project's implications involving unplanned residential growth and growth-inducing effects will be addressed in the EIR to be prepared for this project.

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

**No Impact.** The proposed project would result in demolition of an existing abandoned grocery store and parking lot and development of new commercial buildings and residential units. Since no housing units or any type of shelter for people are currently in this area, and there are no onsite residents, this project would not displace any people or housing and there would be no impact.

**XV. Public Services**

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>PUBLIC SERVICES:</b>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion**

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

**Less Than Significant Impact.** The proposed project site is located in a fully urbanized part of the City. The City's fire protection services are provided through a contract with the Los Angeles County Fire Department (LACFD). The City is served by three existing LACFD Fire Stations: 152, 153, and 154. Fire Station 152, at 807 W. Cypress Street, is situated immediately adjacent to the project site on Cypress Street. It is presumed to be the primary station serving the project vicinity (Google Maps 2019). Redevelopment of the site with the proposed mix of commercial and residential development would not introduce unique land uses or construction materials to this area and would not represent a different set of circumstances to respond to in the event of a fire or medical emergency at the developed site. No new or different firefighting resources would be required to address potential response needs associated with the proposed project. Given the existence of an adjacent fire station and two additional stations not far away, this project would not result in adverse impacts involving response times for the LACFD. No new or expanded fire stations or other Fire Department facilities would be required to maintain adequate levels of service after this project is built. The project would result in less than significant impacts involving Fire Department resources, and no further analysis is required.



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

**Less Than Significant Impact.** The project site is located in a fully urbanized part of Covina that is adequately served by the Covina Police Department's existing resources. The Police Department headquarters is 1.4 miles northeast of the project site, at 11333 Valley Boulevard (City of Covina 2011, p. 5.11-5). No new or different police resources would be required to address potential response needs associated with the proposed project. This project would not result in adverse impacts involving response times for the CVPD. No new or expanded police stations or other police department facilities would be required to maintain adequate levels of service after this project is built. The project would result in less than significant impacts involving Police Department resources, and no further analysis is required in the EIR.

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

**Potentially Significant Impact.** Public education services in Covina are provided by the Covina Valley Unified School District (CVUSD). The proposed project would include new residential development that would directly increase the City's population. The associated increase in demand generated by the project for public school resources will require further evaluation to determine whether the additional students residing in the project site could result in a need to construct new educational facilities within the CVUSD, which could result in environmental impacts. Therefore, this issue will be further analyzed in the EIR to be prepared for this project.

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

**Potentially Significant Impact.** The proposed project would include new residential development that would directly increase the City's population. According to the City's General Plan, Natural Resources and Open Space Element, City parkland includes nine parks and two ballparks. The City owns seven of the nine parks. The other two parks are leased from the CVUSD (General Plan 2000).

The current size of the City parkland is approximately 62 acres, and the City has an estimated population of 48,876 residents (DOF 2019); thus, the City has 1.26 acres of open space per 1,000 residents. This ratio is significantly below the generally accepted, national guideline (established by the National Recreation and Park Association, or NRPA) of 2.5 to 4.0 acres of parkland for every 1,000 population. According to the City's General Plan Natural Resources and Open Space Element, "this deficiency has hampered the City for many years and, unless corrective policies and measures are adopted and followed, the shortfall would be exacerbated in the future because of various



demographic, socio-economic, and housing development trends” (General Plan 2000). A target of 2.0 acres of local parkland per 1,000 city residents is identified in the Natural Resources and Open Space Element.

This project, with 61 new homes, would further exacerbate that problem. Further analysis of the project’s implications with respect to the City’s supply of parkland resources is required to determine if the project could contribute to any adverse environmental effects due to worsening an existing deficiency of public parkland. This analysis will be provided in the EIR to be prepared for this project.

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

**Less Than Significant Impact.** Future residents of the developed project site (61 new residential units) may occasionally visit public facilities such as libraries, senior centers, pools, and hospitals. All of these facilities are intended to serve residents throughout Covina. Currently, there are no adopted performance standards for “other” types of public facilities that can be applied to a particular land use proposal, and these other facilities are designed and planned to respond to community-wide needs, over time. The proposed project would be required to pay the City’s development impact fees, which are allocated, in part, toward improvements to the local library system and various general government services and facilities. Payment of these fees would sufficiently offset the project’s incremental effect on these other public facilities. Therefore, the project would result in less than significant impacts involving an increased demand generated by the project for other public facilities, and no further analysis is required in the EIR.



**XVI. Recreation**

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>RECREATION:</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion**

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

**Less Than Significant Impact.** Future residents of the proposed 61 single-family homes may occasionally visit one or more of the public parks found in Covina, and possibly in neighboring areas, for a variety of active and passive recreational activities. Hollenbeck Park, located at 1250 North Hollenbeck Avenue, is the nearest City park, approximately 0.8 miles from the project site. This community park is 10 acres in size and provides a playground for 5- to 12-year-olds, sports fields, basketball courts, picnic tables, and a parking lot (Covina 2019). Given the size of this park and the scope of activities available there, occasional visits by future project site residents are not likely to result in physical deterioration of those park facilities. Generally, a new neighborhood of homes does not generate an intensive increase in the use of local park facilities, or in activities that result in a physical deterioration of the park. Those types of impacts are sometimes associated with special events conducted at existing parks, which involve exceptionally intensive levels of use due to high volumes of people concentrated in the same area at the same time. These uses can result in damage to turf, excessive littering, noise, traffic congestion, etc. The proposed project would not result in those types of impacts. As such, the proposed project is not expected to result in substantial physical deterioration of existing parks, and no further analysis is required.

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

**Less Than Significant Impact.** The proposed project does not include and would not require the construction or expansion of any off-site recreational facilities. The proposed project would provide common open spaces comprising landscaping and walkways, along with private yards and pocket parks to provide passive recreation opportunities exclusively for the residential portion of the project site. There would be no unique or extreme effects attributable to the proposed recreational functions, as the on-site recreation areas would be limited to passive activities by on-site residents and their occasional visitors. Potential adverse effects associated with any proposed night lighting of the onsite common outdoor recreation areas will be addressed under the topic of Aesthetics, as noted in the



response to item 1)d). No other adverse physical effects on the environment are anticipated, and no further analysis of this issue is required in the EIR.



## XVII. Transportation/Traffic

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>TRANSPORTATION:</b>				
<i>Would the project:</i>				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

- a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, taking into account all modes of transportation including transit, roadways, bicycle and pedestrian facilities??**

**Potentially Significant Impact.** The proposed project, which consists of the redevelopment of the former Albertson's site at the northeast corner of the Azusa Avenue/Cypress Street intersection, may have potentially significant impacts to City's existing roadways and the planned bicycle network.

### Roadways

#### Cypress Street

Cypress Street provides local and direct access to the commercial portion of the project site. Cypress Street is a four-lane, east-west Collector Street with a two-way left-turn lane (TWLTL) in the study area. On-street parking is generally permitted on Cypress Street, and the posted speed limit in the study area is 35 miles per hour.

#### Azusa Avenue

Azusa Avenue provides local and direct access to the residential portion of the project site. Azusa Avenue is a four-lane, north-south, Primary Arterial Street with a raised median. On-street parking is generally permitted on Azusa Avenue, and the posted speed limit is 40 miles per hour.

The City's performance standard for the local street network is based on the level of service (LOS), calculated on the basis of traffic volumes as a percentage of the capacity of the street or intersection. LOS is commonly used to describe the quality of flow on roadways and at intersections, using a range of LOS from LOS A (free flow with little congestion) to LOS F (severely congested conditions).



The City of Covina has established LOS D or better as the acceptable LOS for intersections within the City. Currently, the intersection of Cypress Street and Azusa Avenue operates at LOS C. Because the proposed project would result in an increase in peak hour and daily traffic compared to the existing, undeveloped conditions, further evaluation is needed to calculate the project's traffic impact on the LOS of the affected portions of the surrounding street network, to determine if the City's performance objectives would be maintained or degraded. Therefore, a quantitative traffic impact analysis will be prepared as part of the EIR for this project.

### **Transit Service**

Transit services in the project vicinity are provided by Foothill Transit and Metrolink. Foothill Transit provides bus service within the City of Covina, along Azusa Avenue (Route 280) between Azusa and the Puente Hills Mall (Foothill Transit 2019). The northbound 280 bus line/stop is located on Azusa Avenue, approximately 200 feet south of the commercial portion of the project site, and the southbound 280 bus line/stop is across the street on the southwest corner of Azusa Avenue, approximately 700 feet southwest of the project site (Google Earth 2019).

Metrolink also provides regional and local rail service near the project area. The Covina Metrolink Station is approximately 1.5 miles east of the project site at 600 N. Citrus Avenue. This Metrolink station originates at Los Angeles Union Station and ends at the San Bernardino Metrolink Station.

The proposed project would not physically affect the nearby bus stop or any Metrolink stops. There could be additional transit riders among the future project residents, job holders, and customers of the proposed commercial businesses, but an increase in transit ridership would be considered beneficial.

### **Pedestrian and Bicycle Facilities**

#### **Sidewalks**

There are sidewalks on all adjacent roadway segments surrounding the project site (Cypress Street and Azusa Avenue). The existing sidewalks along the project would be retained. In addition, there are crosswalks at the intersections adjacent to the project site, across the stopped approach of the intersection. No new sidewalks would be constructed for the proposed project. The proposed project would not affect any pedestrian paths.

#### **City of Covina Bicycle Network**

##### City of Covina Bicycle Master Plan

The Bicycle Master Plan refers to bikeways using California Department of Transportation (Caltrans) standard designations. Three types of bikeways identified by the Streets and Highways Code and by Chapter 1000 of the Highway Design Manual (HDM) are as follows:

- **Class I Bikeway:** Typically called a "bike path," a Class I Bikeway provides bicycle travel on a paved right-of-way completely separated from any street or highway.
- **Class II Bikeway:** Often referred to as a "bike lane," a Class II Bikeway provides a striped, signed, and stenciled lane for one-way travel on a street or highway.





- **Class III Bikeway:** Generally referred to as a “bike route,” a Class III Bikeway provides for shared use with bicycle or motor vehicle traffic and uses only signage identification (BMP 2011)

The City’s planned bicycle network identifies Class II bike lanes on both Azusa Avenue and Cypress Street. Class II bikeways are located along the edge of a street, with a striped lane denoting this bike lane. Caltrans bike lane standards mandate that a Class II facility must be a minimum of 5 feet wide (when including the gutter) and that parking is prohibited in the bike lane at all times.

Implementation of the City’s bicycle master plan occurs through any of the five processes listed below:

1. Add Bike Lanes to existing roadway lane geometry.

Sufficient curb-to-curb roadway width exists to stripe a bike lane. Some existing vehicle lanes may require narrowing to 10 feet. This minimum vehicle lane width has been used at numerous locations within the City.

2. Add Bike Lanes, reduce to one travel lane in each direction, add a center turn lane, and maintain or restore curbside parking on both sides.

Sometimes referred to as a “road diet,” this strategy for accommodating bike lanes takes advantage of excess roadway capacity, based upon relatively low Average Daily Traffic (ADT) volumes. A typical “road diet” conversion will involve restriping four through lanes as two through lanes with a center turn lane and two bike lanes.

3. Add Bike Lanes and prohibit curbside parking on one side only.

If traffic volumes are higher and a lane reduction as above is not feasible, removal of parking on one side of the street can provide enough space to stripe two bike lanes. This involves reducing travel lane widths to 10 or 11 feet where appropriate. Adjacent land uses and their demand for on-street parking generally determine the side of the street from which to remove parking.

4. Add Bike Lanes and prohibit curbside parking on both sides.

Similar to the third method, four travel lanes are maintained, but enough roadway width is still not available to stripe bike lanes. In this case, parking will be prohibited on each side of the street.

5. Add Bike Lanes where street widening and railroad crossing improvements would be required.

There is only one location where street widening is required to implement bike lanes: Barranca Avenue at the railroad crossing.

Neither of the two Class II bike lanes planned along Azusa Avenue and Cypress Street have been installed. The proposed project would have no effect on future City actions to install those lanes, as it would not encroach into the existing street right-of-way and thus would not eliminate space to provide a future bike lane. Further analysis of impacts to bike paths is not warranted.



**b) Would the project conflict with CEQA Guidelines Section 15064.3, subdivision (b)?**

**Less Than Significant Impact.** As of July 1, 2020, transportation impact assessments prepared in accordance with CEQA will be required to determine if a proposed project would conflict with CEQA Guidelines Section 15064.3(b). This section outlines criteria for analyzing transportation impacts using vehicle miles traveled (VMT) as the primary measure of transportation impact, which is generally defined as the amount and the distance of automobile travel associated with a project. The City has not developed local methods and procedures to analyze a project's using VMT as a measure. As such, the traffic analysis to be prepared for this project will not include an analysis of VMT-based impacts related to CEQA Guidelines Section 15064.3(b).

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

**Potentially Significant Impact.** Site access for the three new commercial buildings would be provided via separate driveway approaches fronting Azusa Avenue. The commercial lots on the north (lot 2) and south (Lot 4) of the proposed project site would utilize existing driveways serving the former Albertson's building on the site. The building in the center (Lot 3) would require a new driveway approach (See Project Description Figure 3, Site Plan). Site access for the residential portion of the proposed project will be separate from commercial access and will consist of one full access driveway on Cypress Street via a private, gated driveway located between Los Angeles County Fire Station 152 and an existing restaurant site. Analysis of the geometric configuration of the proposed new drive approach on Azusa Avenue is required to confirm that the turning movements there can be safely accommodated without adverse impacts to traffic movements along Azusa Avenue. Because of the proximity of the Cypress Street driveway to Azusa Avenue, an analysis of turn movements and queuing effects is also required to confirm that vehicular movements in and out of that drive would not result in safety hazards or impede traffic flow.

The intersection at Azusa Avenue and Cypress Street is signalized and provides pedestrian crossing on all four corners. As such, the proposed project would not require the construction of new roadways and intersections. All project-related vehicle traffic would consist of passenger vehicles and light-duty trucks that comprise the vast majority of traffic found on the street network. This traffic would not result in any types of vehicular movements that would be incompatible with existing traffic patterns or with the mixture of vehicles that occurs in this area. Therefore, impacts to road design and incompatible uses would be less than significant in this regard, and no further analysis of these issues in an EIR is required.

**d) Would the project result in inadequate emergency access?**

**Less Than Significant.** The proposed project would not require the construction of new roadways and intersections. Existing driveway access to the commercial and residential components of the project would provide adequate emergency access throughout the site.

Furthermore, the proposed project would have no effect on emergency access to any surrounding properties and would not impair access by emergency vehicles traveling along adjacent and nearby streets. As such, impacts to emergency access would be less than significant, and no further analysis of this issue in an EIR is required.

**XVIII. Tribal Cultural Resources**

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

**Discussion**

**a)i) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

**No Impact.** The project site is currently developed with a commercial structure built in 1991 along with a paved surface parking and vehicle driveways and loading areas. Given the recent age of the commercial structure, it would not be listed or eligible for listing in the California Register or in a local register of historical resources. Further, a records search at the South Central Coastal Information Center (SCCIC) determined that there are no documented historic or prehistoric cultural resources on or within a 1/4-mile radius of the project site.

Based on the results of the SCCIC search this project would have no effect on any listed or potentially eligible historic resources that consist of tribal cultural resources. Therefore, no impacts to tribal cultural resources associated with known historic resources would occur.



**a)ii) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**Potentially Significant Impact.** Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native Tribes to identify potential significant impacts to Tribal Cultural Resources as defined in the Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project and the lead agency must begin consultation within 30 days of receiving the request for consultation.

In compliance with AB 52, on July 2, 2019, the City of Covina notified the following tribes: Gabrielano-Tongva Nation, Gabrielino Band of Mission Indians-Kizh Nation, Gabrielino-Tongva San Gabriel Band of Mission Indians, Gabrielino-Tongva Tribe, San Fernando Band of Mission Indians and Torres Martinez Desert Cahuilla Indians of the proposed project and requested a response if the tribes had a desire to consult. The Gabrieleño Band of Mission Indians-Kizh Nation responded to City staff with a written request for consultation dated July 9, 2019, and consultation was initiated on July 25, 2019. The Kizh Nation advised that the project site lies within ancestral tribal territory and requested that information provided as part of the written consultation remain confidential. Although the tribal representatives did not identify tribal cultural resources within the project site and there are no known resources recorded by others on the project site, there is a potential for inadvertent impact during excavation work to such resources that may still be present within native soils on-site. The Kizh Nation requested that the City impose mitigation measures focused on monitoring of grading activities to avoid impacting or destroying tribal cultural resources that may be inadvertently unearthed during the project's ground disturbing activities. The mitigation specifications are under discussion at this time and once agreed upon, will be incorporated into the Final Initial Study and EIR scoping determination.

The Gabrielino-Tongva Tribe also responded on July 21, 2019 with a request for further information concerning the proposed development plan and extent of soil disturbance during construction, which was provided. No further request for consultation was received.

**XIX. Utilities and Service Systems**

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

**Discussion**

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

**Potentially Significant Impact.** Implementation of the proposed project would convert a vacant, former grocery store site to a mix of fast food services, retail space, and 61 single-family homes. The project would connect to nearby water, sewer, storm drainage, and energy and telecommunications infrastructure, all of which exist in the immediate area. Further analysis is required to determine if the project's utility demands could require upgrades to existing utility infrastructure and, if so, if that could result in significant environmental impacts during or following construction of those upgrades. This additional analysis will be provided as part of the EIR to be prepared for the project.





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

**Potentially Significant Impact.** Implementation of the proposed project would convert a commercial land use to a mix of commercial and residential uses. Further analysis is required to determine whether the proposed project could result in a substantial increase in water demand, compared to the range of commercial uses that could be developed under the existing C-4 zoning. Any potentially substantial increase would need to be examined with respect to the current Urban Water Management Plan (UWMP) forecasts for the City of Covina, to determine whether the project's water demand and the existing water supplies could contribute to a need for additional water supplies not currently anticipated in the UWMP. This analysis will be provided as part of the EIR to be prepared for this project.

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

**Potentially Significant Impact.** Implementation of the proposed project would convert commercial land to a mix of commercial and residential land uses. Further analysis is required to determine whether the project's wastewater loads would exceed potential loads associated with the commercial uses permitted under the current C-4 zoning. If so, the project's estimated wastewater loads will be evaluated with respect to the capacities of the wastewater collection and treatment system serving this area. This additional analysis will be provided as part of the EIR to be prepared for the project.

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

**Less Than Significant Impact.** The solid waste generated by the proposed development would be typical of the types of wastes generated by single-family residential land and commercial uses throughout the City of Covina. Nothing inherent in the project design or in the type or intensity of land uses would indicate that this project would generate a higher than normal level of typical municipal solid wastes, or that it would generate any unique or problematic types of wastes requiring unusual disposal methods. The City administers trash and recycling programs, such as free disposal of bulky items, bulky item pickup, electronic waste disposal, and assistance with disposal of household hazardous waste (e.g., paint, pool chemicals, medication, batteries, household cleaners). The proposed project would be required to participate in solid waste recycling and the waste reduction program administered by the City of Covina. These programs include free disposal of bulky items, bulky item pickup, electronic waste disposal, and assistance with disposal of household hazardous waste.

**Residential Refuse Service**

Basic residential refuse service consists of three 90-gallon containers: a black trash container, a blue or gray recycling container, and a green container for green waste. All are collected weekly.

**Bulky, Large Item Collection**

Residential customers are entitled to free bulky item pickup. Materials accepted include furniture, mattresses, bicycles, and appliances. Bulky item pick up is available to commercial and industrial customers for a nominal charge.



### Household Hazardous Waste, Electronic Waste and Universal Waste

Household hazardous waste is any item to be disposed that is labeled toxic, poisonous, corrosive, flammable, combustible or an irritant. Electronic waste (E-Waste) refers to consumer electronic equipment that is no longer wanted. E-waste can include computers, printers, televisions, VCRs, cell phones, fax machines, stereos, and electronic games. Universal wastes are also toxic and include batteries, fluorescent lamps, and mercury thermostats. These items may not be disposed of in the regular trash. Properly dispose of toxic materials by taking them to a hazardous waste collection event. Collection events are held every Saturday throughout Los Angeles County (Covina 2019).

### Commercial Refuse Service

Commercial customers may choose from a variety of bin sizes and varying frequency of collection.

### Commercial Recycling

Commercial and industrial facilities and multi-family complexes using bins (dumpsters) also participate in recycling. Contents from bins are taken to a Materials Recovery Facility (MRF), where the material is sorted and recyclables are separated and processed.

### Business Assistance - Recycling Market Development Zone Program

Covina is one of 19 cities in the Los Angeles County Recycling Market Development Zone (RMDZ) (CalRecycle 2019). The RMDZ program combines recycling with economic development to fuel new business, expand existing business, create jobs, and divert waste from landfills. The Los Angeles County RMDZ is administered by Los Angeles County Public Works, Environmental Programs Division. It administers programs that assist residents and businesses throughout the county to recycle traditional (metals, paper, and plastic) and non-traditional (construction and demolition debris, home-generated sharps waste, and electronic waste) materials (Covina 2019c).

In 2015, the target disposal rate for Covina was 6.10 pounds per person per day (ppd), and the actual disposal rate was 4.9 ppd; the target disposal rate per employee was 13.4 ppd, and the actual rate was 11.5 ppd per employee (CalRecycle 2015). Thus, Covina was meeting AB 939 goals in 2015.

Pursuant to the mandatory provisions of the California Green Building Code Standards, at least 50 percent of all non-hazardous construction waste materials must be recycled and/or salvaged. Based on the reported 2015 citywide disposal rate of 4.9 pounds of solid waste per person per day, the proposed project would generate roughly 905.5 pounds (or 0.45 tons) of common household wastes on a daily basis. Each home would have its own containers for household wastes and recyclable materials, which would be set in front of garages for collection by the City's contracted waste hauler and taken to a licensed/permitted municipal solid waste materials recovery facility in the City of Industry. Project residents could also take their recyclable waste materials to several commercial facilities in or near Covina that handle various types of recyclable wastes. Landscape maintenance contractors would be responsible for proper disposal of green wastes. No permits or other regulatory approvals are required to handle or dispose of the household or commercial wastes that would be generated by this project. The proposed project would not conflict with any federal, state, or local regulations pertaining to waste management and disposal.

Given the infill location of this project, where solid wastes have been generated and disposed of through the municipal waste stream for many years, and given the regional scale of landfill disposal



facilities, this project would not exceed state or local standards or otherwise impair the attainment of solid waste reduction goals. Further analysis of this issue in an EIR is not required.

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

**Less Than Significant Impact.** Assembly Bill (AB) 939, the California Integrated Waste Management Act of 1989, required every city and county in California to reduce the amount of waste disposed at landfills by 25 percent by 1995 and by 50 percent by 2000. The California Green Building Standards Code also requires construction projects for commercial, industrial, or retail structures, as well as all tenant improvements, irrespective of the square footage, to recycle debris. On February 20, 2018, the Covina City Council adopted Ordinance 18-03 to preserve available landfill space and maintain compliance with CALGreen Building Codes. The City's policy applies to all construction, demolition, addition, alteration, and remodeling projects occurring within the City of Covina (Covina 2019a). The requirements consist of the following:

- Recycling/reuse of 75% of the project waste stream.
- Recycling/reuse of 100% of material resulting from non-residential land clearing.
- Use of City-approved recycling facilities.
- Proper disposal of hazardous and universal waste.
- Submittal of a Pre-Project Recycling Plan.
- Payment of an Administrative Fee, non-refundable.
- Payment of a Diversion Security Deposit, refundable upon verification of compliance.
- Submittal of a Post-Project Compliance Report

Assembly Bill 341, Mandatory Commercial Recycling, was signed into California law in 2011. AB 341 requires all California businesses that generate 4 cubic yards or more of solid waste per week, as well as multifamily residential dwellings with five or more units, to implement a recycling program. In addition, AB 341 sets a statewide goal for 75% disposal reduction by 2020. Athens Services currently transports all of Covina's waste to a Material Recovery Facility, where recyclables are sorted and then sold to end markets. Therefore, Covina businesses would be in compliance with AB 341, and no additional containers would be needed to sort any materials (Covina 2019b).

AB 1826, Mandatory Organics Recycling, was signed into California law in 2014. AB 1826 requires all California businesses that generate 4 cubic yards or more of solid waste per week, and produce organic waste, to recycle that organic waste. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste. Approximately one third of California's waste stream consists of organic waste that can be diverted away from landfills through recycling, composting, or donation (CalRecycle 2014). To comply with AB 1826, Covina businesses may select one or more of the following recycling options:

- Subscribe to an organics recycling service through Athens Services. The collected material is delivered to the company's compost facility (American Organics), where it is processed into nutrient-rich compost for agricultural end users.



- Donate usable food to an agency that serves those in need. The EPA provides a variety of resources to help find local food banks and shelters that will accept usable food.
- Self-haul food waste off-site for recycling or beneficial reuse.
- Compost food scraps on-site (Covina 2019b).

During construction, waste materials such as building materials from the demolished structures, concrete/pavement, or asphalt would be disposed of in accordance with Ordinance 18-03. During operation, the proposed project would generate a variety of typical municipal solid wastes associated with residential and commercial uses, estimated to include paper, plastics, cardboard, metals, glass, and electronic wastes. All residential and commercial refuse generated at the project site would be disposed of and reused or recycled by the City's waste hauler, as discussed above under XIX.d).

Furthermore, to the extent any future residents or businesses generate hazardous wastes, they would be obligated to comply with applicable regulations governing the storage, transport, and disposal of such wastes outside of the municipal waste stream. Electronic wastes (e-wastes) would be disposed of during scheduled e-waste collection events sponsored by the City and/or private entities. As discussed in the response to XIX.a), neither of the proposed uses—commercial or single-family residential—would generate substantial quantities of hazardous substances or wastes. Therefore, the proposed project would not result in conflicts with solid waste statutes or regulations, and the project's solid waste disposal impact would be less than significant. Further analysis of this issue in an EIR is not required.

**XX. Wildfire**

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

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

**No Impact.** The project site is not located in or adjacent to an area designated as a very high fire hazard severity zone (VHFHSZ) or any other type of wildfire hazard. Wildland fires typically occur in very low-density hillside areas with large quantities of uncultivated, combustible plants (such as chaparral and riparian communities), brush, and grasslands. The project site is within a flat, urbanized area adjacent to existing commercial and residential structures. Wildland fires would not occur on or near the project site. According to the Covina Fire Department, all major public streets could serve as a principal evacuation route. In any disaster warranting evacuation, the exact emergency routes used would depend on a number of variables, including the type, scope, and location of the incident. It is the responsibility of emergency service and/or appropriate public officials to adequately assess the situation so that safe and efficient evacuation routes are selected (Covina General Plan, Safety Element). Therefore, construction and operation of the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and no further study of this issue is required in the EIR.





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

**No Impact.** The project site is not within or near a VHFHSZ. Therefore, the proposed project would not have the potential to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors, or exacerbate wildfire risks. No further study of this issue is required in the EIR.

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

**No Impact.** The project site is not in or near lands that are classified as a VHFHSZ. The project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. No impacts would occur with regard to this issue, and no further study of this issue is required in the EIR.

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

**No Impact.** The project site is not in or near lands that are classified as a VHFHSZ. The project site is within a flat, urbanized area adjacent to existing commercial and residential structures. Therefore, the project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impacts would occur with regard to this issue, and no further study of this issue is required in the EIR.

**XXI. Mandatory Findings of Significance**

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

**Discussion**

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

**Potentially Significant Impact.** As discussed in Factor XVII, Transportation/Traffic, the proposed project would generate new vehicle trips that could add to congestion levels on the surrounding street network and degrade the performance of that street network. Accordingly, further analysis of the project's traffic impacts will be conducted as part of the EIR to be prepared for this project. As discussed in Factor IV, Biological Resources, there is no remaining natural, undisturbed habitat onsite, and the few ruderal plants and trees within the parking lot planters and in the grass-covered "leg" that extends to Cypress Street are not considered to be biologically sensitive or important resources. Any wildlife presence would be limited to common, urban-adapted species, rather than rare, threatened or endangered species protected under California or federal statutes. There are no surface drainage features or wetland features on or near the site, and thus no habitat to support any aquatic species. Since this site is in a fully urbanized area, surrounded by developed land, the site does not provide a habitat linkage to support fish or wildlife migration or movement. Compliance with the regulations of the federal Migratory Bird Treaty Act and Section 3503 of the California Fish and Game Code during



removal of existing trees will avoid potential impacts to avian species protected by those regulations. As such, removal of the few non-sensitive plants and trees would not result in a reduction of the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed in Factor V, Cultural Resources, the existing, vacant grocery store building and related site improvements were built in 1991 and are modern, rather than historic resources. A search of cultural resources archives at the South Central Coastal Regional Information Center in July 2019 determined that there are no recorded historic or archaeological resources on or near the project site. Proposed grading would generally be shallow and affect previously disturbed soils; however, construction of some underground utilities such as the subsurface drainage basins could potentially extend into native materials where it is possible that some archaeological materials could be discovered. Mitigation Measure V-1 will require archaeological monitoring during those grading activities to ensure that potentially significant cultural resources are not accidentally damaged.

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

**Potentially Significant Impact.** Additional research is needed to identify other pending development projects and major public infrastructure projects that could be constructed in the general vicinity of the project site over the next few years, to determine if there is a potential for overlapping effects that could be cumulatively considerable. For example, the proposed single-family homes, in combination with other proposed new residential development, could further exacerbate the existing deficiency of public parkland in Covina, resulting in cumulatively considerable impacts. Project-related vehicular traffic, in combination with increased traffic from other pending projects and general area growth, could result in cumulatively considerable impacts on the performance of the surrounding street network. Emissions of criteria air pollutants during construction and over the long-term operating life of the project must be quantified to determine whether those emission levels would exceed the thresholds established by the South Coast Air Quality Management District, which are indicators of cumulatively significant impacts. Project-related impacts, combined with impacts from other anticipated growth, could also result in cumulatively considerable impacts involving other environmental factors, such as noise, utility facilities, and water supply resources. Consequently, an assessment of cumulative impacts will be provided in the EIR to be prepared for this project.

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

**Potentially Significant Impact.** The proposed project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. As discussed in the response to Factor III, Air Quality, further analysis is required to determine whether the levels of criteria air pollutants generated during construction and over the operating life of the project could exceed significance thresholds established by the South Coast Air Quality Management District. As discussed in Factor IX, Hazards and Hazardous Materials, potential harmful releases of environmental contaminants during construction are not anticipated, and the proposed fast food, retail and single-family residential uses would not involve the regular use, transport, storage, generation, or disposal of significant quantities



of hazardous substances. Therefore, significant impacts are not anticipated due to releases of hazardous substances and materials. As discussed in Factor XIII, Noise, further assessment of construction-period and long-term operational noise is required to determine whether short-term or long-term noise impacts could result in substantial adverse impacts on human beings. No other environmental impacts resulting from the project were determined to result in potentially adverse impacts to human beings. Further analysis of the potentially significant air quality and noise will be provided in the relevant sections of the EIR to be prepared for this project.



## SECTION E. REFERENCES

### I. Aesthetics

City of Covina, *General Plan*, Natural Resources and Open Space Element, 2000.

City of Covina, *City of Covina Design Guidelines*. 2009.

Caltrans (California Department of Transportation), *California Scenic Highway Mapping System: Los Angeles County*, 2018. Accessible online at [www.dot.ca.gov/design/lap/livability/scenic-highways/](http://www.dot.ca.gov/design/lap/livability/scenic-highways/). Last accessed July 2, 2019.

### II. Agriculture and Forestry Resources

Covina, City of. 2000. *General Plan Land Use Element*

Los Angeles (LA) County. 2019. Los Angeles County Assessor Property Assessment Information System, APNs 8421-001-016, and 8421-001-061. Available online at [http://maps.assessor.lacounty.gov/GVH\\_2\\_2/Index.html?configBase=http://maps.assessor.lacounty.gov/Geocortex/Essentials/REST/sites/PAIS/viewers/PAIS\\_hv/virtualdirectory/Resources/Config/Default](http://maps.assessor.lacounty.gov/GVH_2_2/Index.html?configBase=http://maps.assessor.lacounty.gov/Geocortex/Essentials/REST/sites/PAIS/viewers/PAIS_hv/virtualdirectory/Resources/Config/Default). Last accessed June 24, 2019.

### III. Air Quality

California Air Resources Board (CARB). 2018. Area Designation Maps / State and National. Website. Accessed July 2, 2019. <https://ww3.arb.ca.gov/desig/adm/adm.htm>

SCAQMD (South Coast Air Quality Management District). 2016. Air Quality Management Plan (AQMP). <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

\_\_\_\_\_. 1993. CEQA Air Quality Handbook. <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

\_\_\_\_\_. 1997. SCAQMD Rule 1138 Control of Emissions from Restaurant Operations. Adopted November 14, 1997. <https://ww3.arb.ca.gov/drdb/sc/curhtml/r1138.pdf>

\_\_\_\_\_. 1976. SCAQMD Rule 402 Nuisance. Adopted May 7, 1976. <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

### IV. Biological Resources

California Department of Fish and Wildlife (CDFW). 2018. *California Sensitive Natural Communities List*. October 15, 2018.

Covina, City of. 2000. *General Plan Natural Resources and Open Space Element*, page D-3.

U.S. Fish and Wildlife Service (USFWS). 2019a. *Information for Planning and Consultation (IPaC) report*, generated June 25, 2019.

\_\_\_\_\_. 2019b. *USFWS Species Profiles for Least Bell's Vireo, Southwestern Willow Flycatcher, and Coastal California Gnatcatcher*. Available online at





<https://ecos.fws.gov/ecp0/profile/speciesProfile?sId=5945>,  
<https://ecos.fws.gov/ecp0/profile/speciesProfile?sId=6749>, and  
<https://ecos.fws.gov/ecp0/profile/speciesProfile?sId=8178>; Last accessed June 24, 2019.

## V. Cultural Resources

Partner Engineering and Science, Inc. 2014. Phase I Environmental Site Assessment Report. May 29, 2014

South Central Coastal Information Center (SCCIC). July 19, 2019.

## VII. Geology and Soils

Covina, City of. 2000. *General Plan Safety Element*. April 18, 2000.

Geo Concepts, Incorporated. 2015. *Preliminary Geotechnical Engineering Investigation, Proposed Residential and Commercial Developments*, 1000 North Azusa Avenue, Covina, California. December 7, 2015.

Natural History Museum of Los Angeles County, July 2019. *Vertebrate Paleontology Records Check for Paleontological Resources for the Proposed 1000 N. Azusa Avenue Project, in the City of Covina, Los Angeles County*

## VIII. Greenhouse Gas Emissions

California Air Resources Board (CARB). 2017. *California's 2017 Climate Change Scoping Plan*.  
[https://ww3.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf).

California Environmental Protection Agency. 2015 *Climate Change Research Plan for California*.  
[http://climatechange.ca.gov/climate\\_action\\_team/reports/CAT\\_research\\_plan\\_2015.pdf](http://climatechange.ca.gov/climate_action_team/reports/CAT_research_plan_2015.pdf).

Covina, City of. 2012. *Energy Action Plan*. December 2012.  
<https://covinaca.gov/publicworks/page/energy-action-plan-city-covina>.

Southern California Association of Governments (SCAG). 2016. 2016-2040 *Regional Transportation Plan / Sustainable Communities Strategy*.  
<http://scagrtpscscs.net/Pages/FINAL2016RTPSCS.aspx>.

## IX. Hazards and Hazardous Materials

California Department of Toxic Substances Control (DTSC). 2019. *Envirostor Database*, available online at <https://www.envirostor.dtsc.ca.gov/public/>. Last queried/accessed July 9, 2019.

California Environmental Protection Agency (CalEPA). 2019. Cortese List: Section 65962.5(a). Available online at <https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/>. Last accessed July 9, 2019.

California State Water Resources Control Board (WRCB). 2019. *Geotracker Database*. Available online at <https://geotracker.waterboards.ca.gov/>. Last accessed July 9, 2019.

Covina, City of. 2000. *General Plan Safety Element*



\_\_\_\_\_. 2019. *Household Hazardous Waste Collection Events*. Website accessed July 9, 2019.  
<https://covinaca.gov/publicworks/page/household-hazardous-waste-collection-events>

Los Angeles County. 2012. *Operational Area Emergency Response Plan*.

Partner Engineering and Science, Incorporated. 2014. *Phase I Environmental Site Assessment Report*. May 29, 2014

RSA Associates, Incorporated. 1990. *Phase II Site Assessment NEC Azusa Avenue and Cypress Street*, Covina California.

\_\_\_\_\_. 1991. *Addendum Phase II Site Assessment NEC Azusa Avenue and Cypress Street*, Covina California

## **X. Hydrology and Water Quality**

Covina, City of, *General Plan Safety Element*. 2000.

\_\_\_\_\_. *Form OC1: Owner's Certification, Minimum BMPs for ALL Construction Sites*. Undated.

\_\_\_\_\_. *Urban Water Management Plan*, 2015. Available online at  
[https://covinaca.gov/sites/default/files/fileattachments/public\\_works/page/451/final\\_2015\\_uwmp\\_-\\_city\\_of\\_covina.pdf](https://covinaca.gov/sites/default/files/fileattachments/public_works/page/451/final_2015_uwmp_-_city_of_covina.pdf)

\_\_\_\_\_. *Water Quality*, 2019. Website, <https://covinaca.gov/publicworks/page/water-quality>. Last accessed July 5, 2019.

JLC Engineering and Consulting, Incorporated. *Hydrology and Hydraulic Study for Tract Map No. 83215*. January 17, 2019

Land Development Consultants. *Low Impact Development Plan (LID Plan)*. January 22, 2019.

Main San Gabriel Basin Watermaster. *Five Year Water Quality and Supply Plan (2018-2023)*. November 2018.

Three Valleys Municipal Water District, *Urban Water Management Plan*, 2015.  
<https://www.threevalleys.com/uploads/files/Urban%20Water%20Mgmt.pdf>

Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Map: 06037C1700F.

## **XI. Land Use**

City of Covina. 2017, *Zoning Ordinance*.  
<https://www.codepublishing.com/CA/Covina/#!/Covina17/Covina17.html>

City of Covina. *2015 Zoning Map*. <https://covinaca.gov/pc/page/zoning-map>



## **XII. Mineral Resources**

City of Covina. 2000. *General Plan*. Natural Resources and Open Space Element. Available online at [https://covinaca.gov/sites/default/files/fileattachments/planning\\_commission/page/1073/natural\\_resources\\_and\\_open\\_space.pdf](https://covinaca.gov/sites/default/files/fileattachments/planning_commission/page/1073/natural_resources_and_open_space.pdf).

Partner Engineering and Science, Inc. (Partner) 2014. *Phase I Environmental Site Assessment Report*. May 29.

## **XIII. Noise**

AirNav, LL, 2019. Available online at <https://www.airnav.com/cgi-bin/airport-search>. Last accessed June 26, 2019.

City of Covina. 2000. *General Plan*. Noise Element.

City of Covina Municipal Code. Chapter 9.40 Noise.

## **XV. Public Services**

City of Covina, *Covina Parks and Recreation Department Park System Quick Reference Guide*. Available online at: [https://covinaca.gov/sites/default/files/fileattachments/parks\\_and\\_recreation/page/432/2018\\_park\\_reference\\_guide\\_for\\_web.pdf](https://covinaca.gov/sites/default/files/fileattachments/parks_and_recreation/page/432/2018_park_reference_guide_for_web.pdf). Last accessed July 8, 2019.

City of Covina, *General Plan*. Natural Resources and Open Space Element, 2000.

California Department of Finance (DOF). *E-1 Cities, Counties, and the State Population Estimates with Annual Percent Change — January 1, 2018 and 2019*. Available online at <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/>. Last accessed July 9, 2019.

## **XVI. Recreation**

City of Covina, *Parks and Facilities*, 2019. Available online at <https://covinaca.gov/parksrec/page/parks-facilities>. Last accessed June 26, 2019.

## **XVII. Transportation/Traffic**

Alta Planning+Design, *City of Covina Bicycle Master Plan Final Draft*, 2011.

City of Covina, *General Plan*. *Circulation Element*, 2000.

Foothill Transit. Available online at <http://foothilltransit.org/line/280/>. Last accessed July 8, 2019.

Google Earth, 2019

Metrolink Azusa Gold Line Station. Available online at <http://foothilltransit.org/wp-content/uploads/2018/06/280.pdf>. Last accessed July 8, 2019.



## **XVIII. Tribal Cultural Resources**

Michael Baker International. South Coast Central Informa Center Cultural *Records Search Results for the Cypress Village Specific Plan Project*. July 22, 2019.

## **XIX. Utilities and Service Systems**

City of Covina, Public Works. Refuse (Trash), 2019. Available online at <https://covinaca.gov/publicworks/page/refuse-trash>. Last accessed July 12, 2019.

City of Covina, Construction & Demolition Debris Management, 2019a. Available online at <https://covinaca.gov/publicworks/page/construction-demolition-debris-management>. Last accessed on July 12, 2019.

City of Covina, Commercial and Multifamily Recycling: It's the Law! 2019b. Available online at <https://covinaca.gov/publicworks/page/commercial-and-multifamily-recycling-its-law>. Last accessed July 12, 2019.

City of Covina, Public Works, Recycling. 2019c. Available online at <https://covinaca.gov/publicworks/page/recycling>. Last Accessed July 12, 2019.

CalRecycle (California Department of Resources Recycling and Recovery), Organics in California's Overall Disposed Waste Stream, 2014. Data from Calrecycle's 2014 Waste Characterization Report. Available online at <https://www.calrecycle.ca.gov/Recycle/Commercial/Organics/>. Last accessed July 15, 2019.

CalRecycle, Jurisdiction Diversion/Disposal Rate Summary. Per Capita Disposal Rate, Covina, 2015. Available online at <https://www2.calrecycle.ca.gov/LGCentral/%20DiversionProgram/JurisdictionDiversionDetail/111/Year/2015>. Last accessed July 12, 2019.

CalRecycle, Recycling Market Development Zone Los Angeles County, 2019. Available online at <https://www2.calrecycle.ca.gov/bizassistance/rmdz/zones/details/16#materials>. Last accessed July 12, 2019.

## **XX. Wildfire**

City of Covina, *General Plan. Safety Element*, 2000.

California Department of Forestry and Fire Protection (CalFire). *Draft Fire Hazard Severity Zones in LRA -Los Angeles County*, 2007. Available online at [https://frap.fire.ca.gov/media/6387/fhszl06\\_1\\_map19.pdf](https://frap.fire.ca.gov/media/6387/fhszl06_1_map19.pdf). Last accessed July 16, 2019.

Appendix A:  
Initial Study, Notice of Preparation,  
and Responses to NOP

Part 2: Notice of Preparation





## NOTICE OF PREPARATION AND PUBLIC SCOPING MEETING

### TO: Distribution List

#### Lead Agency:

**Agency Name:** City of Covina  
**Street Address:** 125 E. College Street  
**City/State/Zip:** Covina, CA 91723  
**Contact:** Lisette Sanchez-Mendoza, Community  
Development Consultant  
**Telephone:** (626) 384-5451

#### Consulting Firm:

**Name:** Michael Baker International  
**Street Address:** 3760 Kilroy Airport Way, Suite 270  
**City/State/Zip:** Long Beach, CA 90806  
**Contact:** Randy Nichols, EIR Project Manager  
**Telephone:** (562) 200-7168

**SUBJECT:** Notice of Preparation of Draft Environmental Impact Report and Public Scoping Meeting for the Proposed Cypress Village Mixed Use Development Project

The City of Covina will be the lead agency and will prepare an Environmental Impact Report ("EIR") for the proposed "Cypress Village" Mixed Use Development Project (the "project"). The Project description, location, and the probable environmental effects are contained in the attached materials. A copy of the Initial Study is also included in the attached materials.

#### To Other Government Agencies

We need to know the views of your agency as to the scope and content of the environmental information, which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR prepared by our agency when considering your permit or other approval for the project.

#### To Individuals, Special Interest Groups and Other Interested Parties

We are requesting your written input regarding concerns about environmental effects that may result from this project, to help define the scope of the analysis to be provided in the EIR. The comment period for the Notice of Preparation begins on December 6, 2019 and ends on January 16, 2020. Please send your written response to Lisette Sanchez-Mendoza at the address shown above. We would appreciate the name of a contact person in your agency.

Also, the City of Covina will conduct a public scoping meeting on December 16, 2019, at 5:00 pm in the City of Covina Council Chambers, located at 125 E. College St., Covina, CA 91723, to accept comments on the scope of the EIR for this project. This meeting will serve as a public forum to discuss the environmental issues already identified for the EIR, along with other issues identified by the public that should be included for further analysis within the EIR.

Date: 12-06-19

  
Title: Lisette Sanchez-Mendoza, Community Development Consultant



**CITY OF COVINA  
NOTICE OF PREPARATION AND PUBLIC SCOPING MEETING ATTACHMENT**

**Lead Agency:** City of Covina  
125 E. College Street  
Covina, California 91723

**Contact Person & Phone Number:** Lisette Sanchez-Mendoza, Community Development Consultant  
City of Covina  
Community Development Department  
125 E. College Street  
Covina, California 91723  
(626) 384-5451

**Project Applicant:** PKL Investments, LLC  
2863 Maricopa Street  
Torrance, CA 90503

**Case Numbers:** Case Nos: GPA 19-001, ZCH 19-001, SPR 19-002, TTM 19-002, SP 19-001

**Project Location:** As shown in Figure 1 – Regional Location Map, Covina is in the central San Gabriel Valley area, in the eastern perimeter of Los Angeles County. As shown in Figure 2 – Project Location Map, the project site is located on the east side of Azusa Avenue, between Cypress Street and Covina Boulevard and west of N. Conwell Avenue.

**Assessor's Parcel Numbers:** 8421-001-016 and 8421-001-061. The subject property is assigned two street addresses: 1000 N. Azusa Avenue and 845 W. Cypress Street

**General Plan/Zoning Designation:** C-4 Highway Commercial

**Project Description:**

The project site currently consists of 7.99 acres of developed land, with remnant improvements from a former Albertsons grocery store that was constructed in 1991 and vacated in November 2012. The former grocery store is 81,333 square feet in total floor area, in a box-shaped structure reaching a height of 44 feet. A large surface parking lot with numerous small landscape planters and several pole-mounted lighting clusters is located between the building and the Azusa Avenue frontage, while paved drives abut the northern and eastern sides of the building.

The proposed project would include development of a mixture of retail shops and drive through/fast food service businesses on the western 2.92 acres along the Azusa Avenue frontage and development of 61 single-family detached homes on the eastern and southern 4.99 acres. Figure 3 – Site Plan, illustrates the proposed development plan.

The retail component of the proposed project would consist of four buildings, totaling 14,000 square feet of floor area, arranged in three distinct building sites. Two of these sites would include a drive-thru circulation pattern to accommodate fast-food and beverage businesses with drive-thru service. Vehicular access to these commercial uses would be from three drive approaches along the Azusa Avenue frontage, and from an existing driveway along



Cypress Street that serves existing fast food businesses on adjacent properties. A total of 158 surface parking spaces would be provided within the three commercial sites.

The residential component would consist of 61 single family homes, in two-story and three-story structures, with floor plans ranging from approximately 1,700 square feet to approximately 2,600 square feet. Homes would have three-four bedrooms, with optional bonus areas and loft spaces. The proposed density is 12.25 homes per acre. Vehicle parking would include 122 spaces within attached garages, along with 12 spaces located in driveways, 23 “head-in” spaces located along internal driveways, and 7 parallel spaces along the entrance drive. Vehicular access to the 61 homes would be from Cypress Avenue, via a private, gated driveway located between Los Angeles County Fire Station 152 and an existing restaurant site.

The commercial and residential areas would be developed independently and may be constructed concurrently or at different time frames, in response to market demand. For purposes of analysis, both areas are anticipated to be completed and fully occupied by 2021. The project site is relatively level; however, the project would require demolition of existing improvements and grading of the site in preparation of building pads and streets, drainage and underground utilities improvements.

#### Required City Approvals

- General Plan Amendment (GPA) 19-001: To redesignate the eastern 5.31 acres from General Commercial to Medium-Density Residential, to allow for development of single-family homes at densities of 7-14 units per acre.
- Zone Change (ZCH) 19-001: To rezone the eastern 5.31 acres from C-4, Highway Commercial to RD, Multi-Family Zone, and to approve a Specific Plan to establish custom development standards for the residential component and to provide a unified theme for the overall aesthetic character of the site.
- Tentative Tract Map (TTM) 82315: To reconfigure the existing parcels to create a subdivision of for-sale lots and common areas for the 61 proposed homes and three individual lots for the commercial component.
- Site Plan Review (SPR) 19-002: To approve the layout of the overall development plan.
- Conditional Use Permit (CUP) 19-002: To allow for development of drive-through facilities in the commercial side of the project.

#### **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED BY THE PROPOSED PROJECT**

Based on the findings of a preliminary environmental assessment contained in the attached Initial Study, an environmental impact report (EIR) will be prepared to evaluate the project’s potential impacts on the environment, identify measures to mitigate potentially significant impacts, and examine alternatives. The topics identified for further analysis in the EIR include the following:

- Aesthetics: Because the proposed project would be located in a fully urbanized area, the project will be evaluated in the EIR for whether it would conflict with applicable zoning and other regulations governing aesthetic character, including building height and bulk, design features, landscape elements, and consistency with the scale, massing and character of surrounding development. The EIR will determine whether the project would degrade the visual character and quality of the site and surroundings, by analyzing proposed building heights, bulk, coverage, setbacks, and screening, specifically along the project’s interface with existing homes



to the north and east. Finally, because the project would include new sources of night lighting, such as security lighting on internal walkways, residential common areas, and building exteriors; accent lighting on residential and commercial buildings and in landscaped areas; lighting at the gated entry to the residential area; and potential lighted signs in commercial building drive-throughs, the EIR will analyze whether the type and placement of proposed lighting could create substantial light or glare that could adversely affect day or nighttime views.

- **Air Quality:** The project would generate air pollutants during both construction and operation. Construction of the project includes site clearance, excavation and grading, hauling of materials, and building construction, all of which would generate dust and equipment exhaust. In the long term, the proposed commercial and residential uses would generate an increase in vehicular travel, thus increasing tailpipe emissions, along with emissions resulting from on- and off-site energy use and regular maintenance activities. The EIR will quantify the project's construction and operation emissions and compare the project's emissions to the South Coast Air Quality Management District's (SCAQMD) regional and localized thresholds of significance. Further, the EIR will determine whether the project would expose sensitive receptors, such as those located in residential neighborhoods to the north and east, to substantial pollution concentrations.
- **Greenhouse Gas Emissions:** The project would generate temporary and long-term greenhouse gas (GHG) emissions from construction and operation activities, respectively. GHG emissions would primarily result from construction and material hauling equipment exhaust; increase in vehicle trips to and from the new residential and commercial buildings; use of consumer products and landscaping maintenance of the commercial and residential; and electricity and natural gas consumption in the new buildings. The EIR will quantify the project's direct and indirect GHG emissions and will examine the project's energy footprint with respect to applicable state and local regulatory and planning programs aimed at GHG reduction.
- **Noise:** Construction of the proposed project would temporarily increase noise and vibration levels on and in the vicinity of the project site. Operational noise would primarily result from stationary and mobile noise sources such as vehicle traffic that would increase roadway noise, noise from building mechanical equipment, possibly noise from outdoor speaker systems associated with proposed drive-thru businesses, movements of cars in parking areas, and outdoor recreation activities by people in their back yards and in the common outdoor spaces within the residential area. The nearest noise-sensitive land uses that could be impacted by construction noise include the adjacent residential properties to the north and east sides of the project site and the Northview High School campus to the southwest. The EIR will evaluate short-term and long-term noise and vibration impacts from the construction and operation of the project and will determine if the City's noise standards could be exceeded.
- **Population and Housing:** The project site is currently designated in the Covina General Plan Land Use Element as General Commercial, with a corresponding zoning classification of Commercial Highway (C-4). The proposed project would require a change in the General Plan land use designation and zoning classification for construction of the proposed 61 residential homes on a portion of the project site, which would result in unplanned population growth. The EIR will evaluate whether this unplanned population growth would conflict with adopted growth forecasts and if this growth would be substantial enough to result in impacts related to



accommodation of the population increase in this area (i.e., demand on public services, or utility service systems).

- **Public Services:** As stated above, the proposed project includes new residential development that would directly increase the City's population, on a site currently planned for commercial land uses. The associated increase in demand generated by the project for public school resources will require further evaluation to determine whether the additional students residing in the project site could result in a need to construct new educational facilities within the Covina Valley Unified School District, which could result in environmental impacts. Therefore, this issue will be further analyzed in the EIR. Further, the increase in the City's population associated with this project would also result in greater use of the City's existing park facilities. The City currently has a ratio of 1.26 acres of open space per 1,000 residents, which is significantly below the generally accepted, national guideline of 2.5 to 4.0 acres of parkland per 1,000 residents and below the City's General Plan target of 2 acres per 1,000 residents. The EIR will evaluate whether the project could contribute to any adverse environmental effects due to worsening the existing deficiency of public parkland.
- **Transportation/Traffic:** The proposed residential and commercial project would increase vehicle trips to and from the project site. The volume and distribution of this traffic will be determined through preparation of a detailed traffic impact study (TIS), which will be included in the EIR. This study will determine trip generation and circulation associated with the project, and project effects on the performance of the existing roadway network. The TIS will evaluate the traffic impacts of building all three commercial sites to accommodate fast food restaurant with/drive thru service, as a more conservative analysis that captures the higher trip generation characteristics of fast food with drive-thru service. The EIR will also determine if the new residential and commercial development would create hazards/disruptions at entrance and exit intersections. Specifically, the EIR will evaluate whether the turning movements at the residential site access point on Cypress Street would be safely accommodated without adverse impacts to traffic movements along Azusa Avenue, such as queuing effects.
- **Utilities/Service Systems:** The project would represent a substantial increase in water demand, wastewater generation, storm drainage, and energy and telecommunications usage as compared to the long-vacant project site. Specifically, the EIR will analyze whether water, wastewater, storm drain, electrical, natural gas, and telecommunications infrastructure is sufficient to meet the demands/generation of the proposed project's residential and commercial uses. If new, off-site infrastructure is required to address the increase in demand for these services, then the EIR will include analysis of the impacts associated with construction of this new infrastructure.

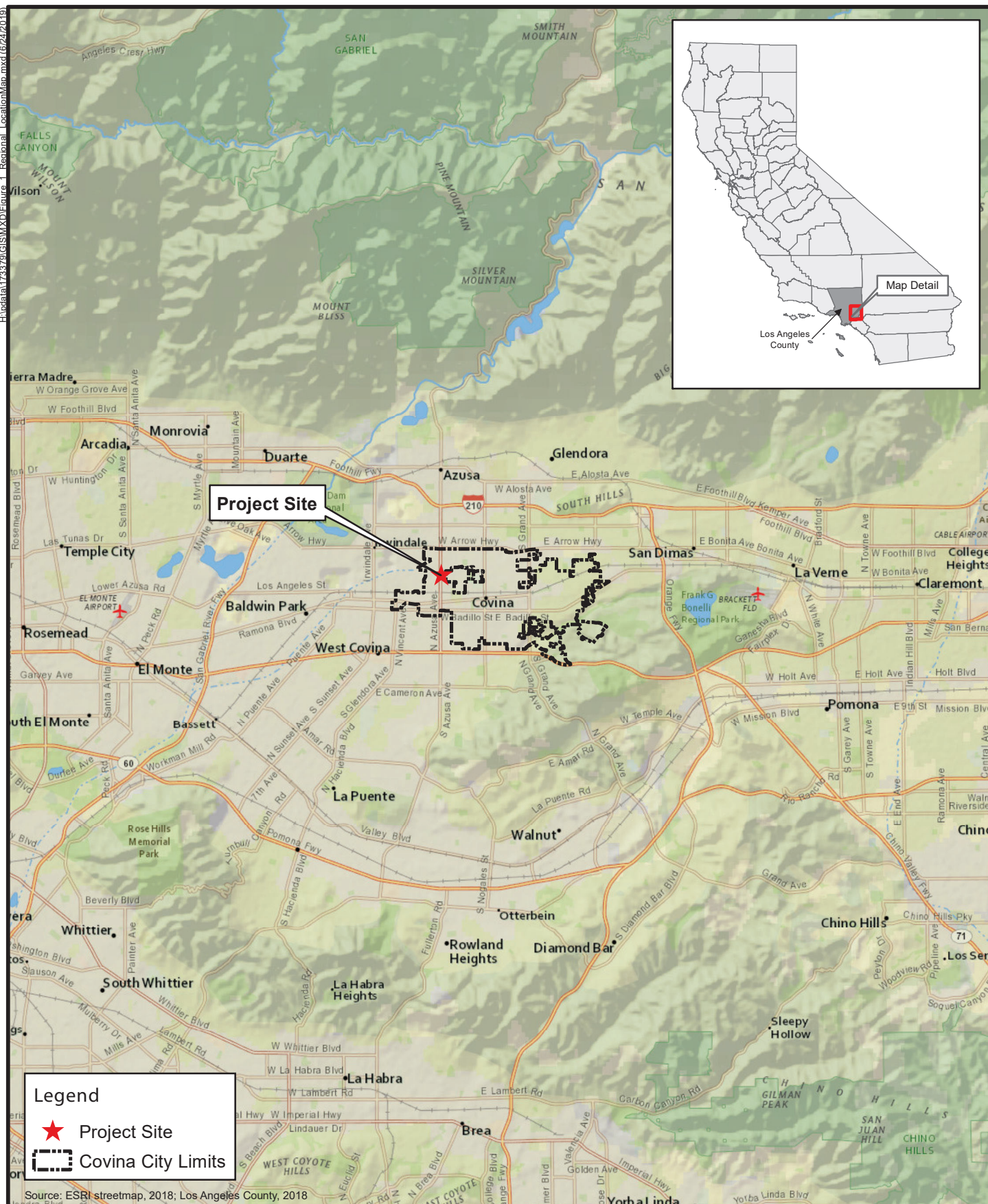
#### Other Required EIR Topics

In addition to the specific environmental issues noted above, the EIR will include sections to address the following topics, as required by the State CEQA Guidelines:

- Cumulative Impacts
- Growth Inducing Effects
- Significant Irreversible Environmental Changes
- Alternatives



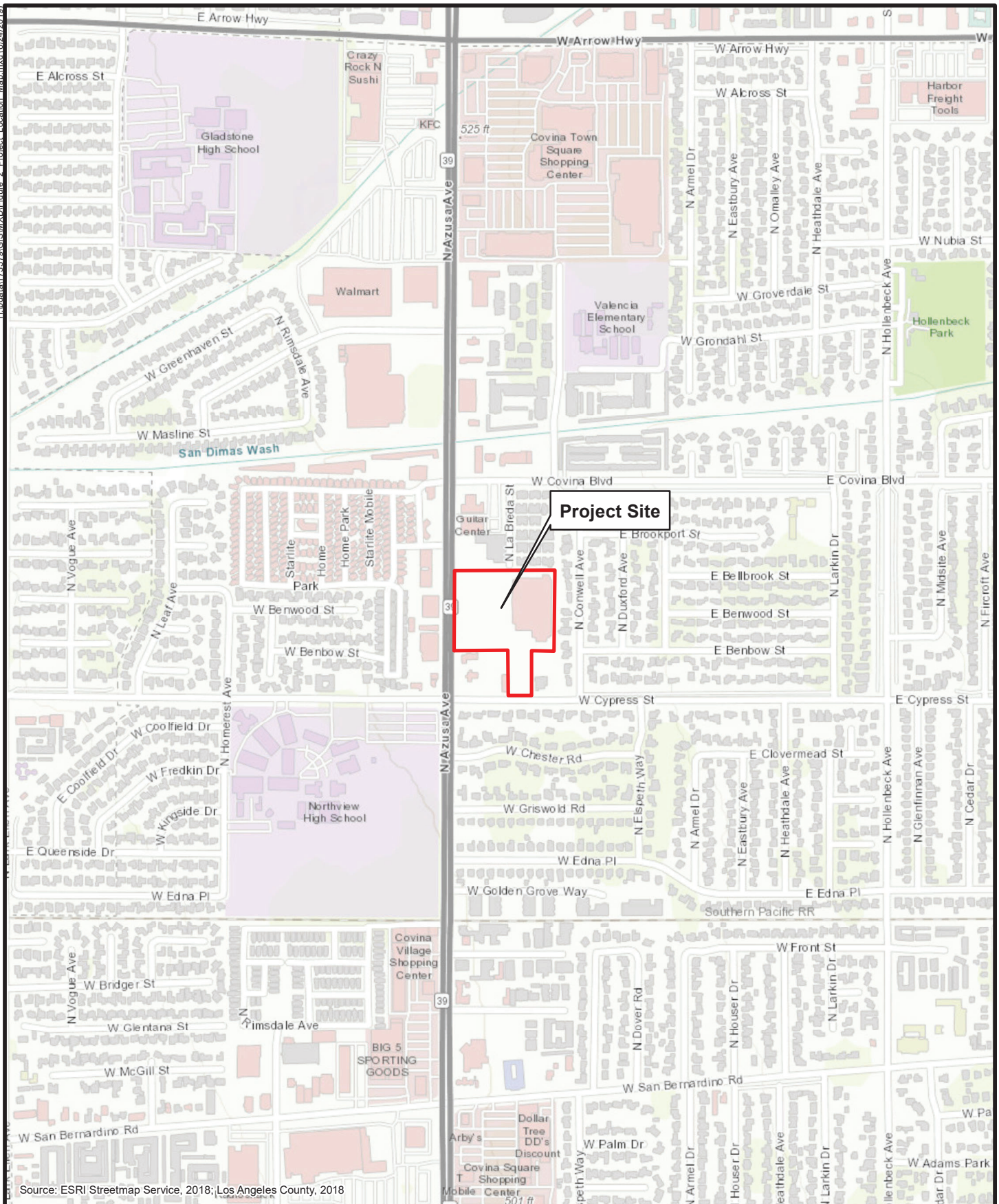




**FIGURE 1**  
Regional Location Map







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Feet

**FIGURE 2**  
Project Location Map









Appendix A:  
Initial Study, Notice of Preparation,  
and Responses to NOP

Part 3: Responses to the Notice of  
Preparation



Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

**Notice of Preparation**

December 5, 2019

To: Reviewing Agencies

Re: 1000 North Azusa Avenue Mixed Use Development  
SCH# 2019120104

Attached for your review and comment is the Notice of Preparation (NOP) for the 1000 North Azusa Avenue Mixed Use Development draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Lisette Sanchez-Mendoza**  
**Covina, City of**  
**125 East College Street**  
**Covina, CA 91723**

with a copy to the State Clearinghouse in the Office of Planning and Research at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov). Please refer to the SCH number noted above in all correspondence concerning this project on our website: <https://ceqanet.opr.ca.gov/2019120104/2>.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

cc: Lead Agency





# COUNTY OF LOS ANGELES FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2401  
[www.fire.lacounty.gov](http://www.fire.lacounty.gov)

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January 7, 2020

Lisette Sanchez-Mendoza, Planner  
City of Covina  
Community Development Department  
125 East College Street  
Covina, CA 91723

Dear Ms. Sanchez-Mendoza:

**NOTICE OF PREPARATION DRAFT ENVIRONMENTAL IMPACT REPORT, "CYPRESS VILLAGE PROJECT," WOULD INCLUDE DEVELOPMENT OF A MIXTURE OF RETAIL SHOPS AND DRIVE THROUGH/FAST FOOD SERVICE BUSINESSES, AND THE DEVELOPMENT OF 61 SINGLE-FAMILY DETACHED HOMES, COVINA, FFER 2019007322**

The Notice of Preparation Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

### **PLANNING DIVISION:**

We will reserve our comments for the draft EIR analysis.

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or [Loretta.Bagwell@fire.lacounty.gov](mailto:Loretta.Bagwell@fire.lacounty.gov).

### **LAND DEVELOPMENT UNIT:**

The Land Development Unit is reviewing the proposed "MIXED USE" Commercial/Residential Project for access and water system requirements. The Land Development Unit comments are only preliminary requirements. Specific fire and life safety requirements will be

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	EL MONTE	INDUSTRY	LAWNDALE	PARAMOUNT	SIGNAL HILL
ARTESIA	CARSON	GARDENA	INGLEWOOD	LOMITA	PICO RIVERA	SOUTH EL MONTE
AZUSA	CERRITOS	GLENDORA	IRVINDALE	LYNWOOD	POMONA	SOUTH GATE
BALDWIN PARK	CLAREMONT	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	MALIBU	RANCHO PALOS VERDES	TEMPLE CITY
BELL	COMMERCE	HAWTHORNE	LA HABRA	MAYWOOD	ROLLING HILLS	WALNUT
BELL GARDENS	COVINA	HERMOSA BEACH	LA MIRADA	NORWALK	ROLLING HILLS ESTATES	WEST HOLLYWOOD
BELLFLOWER	CUDAHY	HIDDEN HILLS	LA PUENTE	PALMDALE	ROSEMEAD	WESTLAKE VILLAGE
BRADBURY	DIAMOND BAR	HUNTINGTON PARK	LAKEWOOD	PALOS VERDES ESTATES	SAN DIMAS	WHITTIER
	DUARTE		LANCASTER		SANTA CLARITA	



addressed during the review for building and fire plan check phases. There may be additional requirements during this time.

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

#### ACCESS REQUIREMENTS:

1. The proposed development will require multiple ingress/egress access for the circulation of traffic and emergency response issues.
2. All on-site Fire Department vehicular access roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.
  - a. The Fire Apparatus Access Road shall be cross-hatch on the site plan with the width clearly noted on the plan.
3. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
4. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction.
5. The edge of the Fire Apparatus Access Road shall be located a minimum of 5 feet from the building or any projections there from.
6. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.
7. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official.
8. Provide a minimum unobstructed width of 28 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Department vehicular access road is more than 30 feet high, or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official.



9. If the Fire Apparatus Access Road is separated by island, provide a minimum unobstructed width of 20 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building.
10. Dead-end Fire Apparatus Access Roads in excess of 150 feet in-length shall be provided with an approved Fire Department turnaround. Include the dimensions of the turnaround with the orientation of the turnaround shall be properly placed in the direction of travel of the access roadway.
11. Fire Department Access Roads shall be provided with a 32-foot centerline turning radius. Indicate the centerline, inside, and outside turning radii for each change in direction on the site plan.
12. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000 lbs. and shall be surfaced so as to provide all-weather driving capabilities. Fire Apparatus Access Roads having a grade of 10 percent or greater shall have a paved or concrete surface.
13. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for Fire Apparatus Access Roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector.
14. A minimum 5-foot wide approved firefighter access walkway leading from the Fire Department Access Road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Clearly identify firefighter walkway access routes on the site plan. Indicate the slope and walking surface material. Clearly show the required width on the site plan.
15. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Fire Code Section 503.2.1 shall be maintained at all times.
16. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official.
17. Security barriers, visual screen barriers, or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 48 inches from the top of the parapet to the roof surface on more than two sides. Clearly indicate the height of all parapets in a section view.



18. Approved building address numbers, building numbers, or approved building identification shall be provided and maintained so as to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their background, be Arabic numerals or alphabet letters, and be a minimum of 4 inches high with a minimum stroke width of 0.5 inch.
19. Multiple residential and commercial buildings having entrances to individual units not visible from the street or road shall have unit numbers displayed in groups for all units within each structure. Such numbers may be grouped on the wall of the structure or mounted on a post independent of the structure and shall be positioned to be plainly visible from the street or road as required by Fire Code 505.3 and in accordance with Fire Code 505.

#### WATER SYSTEM REQUIREMENTS:

1. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal and shall be installed in accordance with the County of Los Angeles Fire Code.
2. The development may require fire flows up to 4,000 gallons per minute at 20 pounds per square inch residual pressure for up to a four-hour duration. Final fire flows will be based on the size of buildings, the installation of an automatic fire sprinkler system, and type(s) of construction used.
3. The fire hydrant spacing shall be every 300 feet for both the public and the on-site hydrants. The fire hydrants shall meet the following requirements:
  - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
  - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
  - c. Additional hydrants will be required if hydrant spacing exceeds specified distances.
4. All required public fire hydrants shall be installed and tested prior to beginning construction.
5. All private on-site fire hydrants shall be installed, tested, and approved prior to building occupancy.
  - a. Plans showing underground piping for private on-site fire hydrants shall be submitted to the Sprinkler Plan Check Unit for review and approval prior to installation.



6. An approved automatic fire sprinkler system is required for the proposed buildings within this development. Submit design plans to the Fire Department Sprinkler Plan Check Unit for review and approval prior to installation. Additional Department requirements will be determined by Fire Prevention Engineering during the Building Plan Check.

For any questions regarding the report, please contact Inspector Claudia Soiza at (323) 890-4243 or [Claudia.soiza@fire.lacounty.gov](mailto:Claudia.soiza@fire.lacounty.gov).

### **FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

### **HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that a leaking underground petroleum storage tank (UST) case was closed at the project site in 1997 either by the Los Angeles County Department of Public Works – Environmental Programs Division and/or by the Cal-EPA Los Angeles Regional Water Quality Control Board. HHMD recommends that the project applicant review and evaluate UST closure documents pertaining to the project site. HHMD has no additional comments at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or [Perla.garcia@fire.lacounty.gov](mailto:Perla.garcia@fire.lacounty.gov) if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7- OFFICE OF REGIONAL PLANNING  
100 S. MAIN STREET, SUITE 100  
LOS ANGELES, CA 90012  
PHONE (213) 897-0067  
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*Making Conservation  
a California Way of Life.*

Governor's Office of Planning & Research

January 14, 2020

**JAN 14 2020**

**STATE CLEARINGHOUSE**

Lisette Sanchez-Mendoza  
Covina, City of  
125 East College Street  
Covina, CA 91723

RE: 1000 North Azusa Avenue Mixed Use  
Development – Notice of Preparation (NOP)  
SCH# 2019120104  
GTS# 07-LA-2019-02948  
Vic. LA-210/PM 39.645 & LA-10/PM 36.571

Dear Lisette Sanchez-Mendoza:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project a retail shop and three drive through/fast food service businesses on the western 2.92 acres along the Azusa Avenue frontage and 61 single-family detached homes on the eastern and southern 4.99 acres. The retail component of the proposed project would consist of four buildings, totaling 14,000 square feet of floor area, arranged in three distinct building sites. Two sites would contain fast food restaurants with drive-thru service, while the third would contain a fast food restaurant and general retail space. Vehicular access to these commercial uses would be from three drive approaches along the Azusa Avenue frontage, and from an existing driveway along Cypress Street that serves existing fast food businesses on adjacent properties. A total of 158 surface parking spaces would be provided within the three commercial sites. The residential component would consist of 61 single family homes with 122 attached garage parking spaces, 12 driveway spaces, 23 "head-in" spaces along internal driveways, and 7 parallel spaces along the entrance drive. Vehicular access to the 61 homes would be from Cypress Avenue, via a private, gated driveway located between Los Angeles County Fire Station 152 and an existing restaurant site.

The nearest State facility to the proposed project is I-210 and I-10. After reviewing the NOP, Caltrans has the following comments:

Caltrans acknowledges and supports development that ultimately helps California to meet its climate, transportation, and livability goals. However, due to the amount of parking, number of drive throughs, and vehicle-centric site plan, the 1000 North Azusa Avenue Mixed Use Development Project is designed in a way that potentially induces demand for additional vehicle trips. For California to achieve its goals, this demand should be addressed with appropriate design and management principles. Caltrans recommends the following:

- Reducing the amount of parking whenever possible, as research on parking suggests that abundant car parking enables and encourages driving. Research looking at the



relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled (VMT), we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building an unnecessary amount of parking.

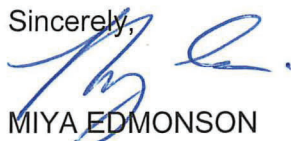
- If surface parking must be built, it is recommended that it not face the street directly. By shifting the parking to the rear or interior of the project site, a more inviting streetscape can be created. A more active frontage, against the sidewalk, can encourage both recreational and transportation walking. These urban design principles can affect mode choice and help the State of California achieve its goals to improve health and reduce Green House Gas (GHG) emissions.
- While the project will contain multiple uses when completed, the lack of connectivity between them means that the goal of "mixing uses" is not achieved. The commercial and residential portions of the project are separated by a six-foot-tall wrought iron fence. It is recommended that a pedestrian pathway be included to connect the residential homes to the goods and services located on the commercial portion of the project site.

When the traffic study is conducted, please include the Azusa Avenue on- and off-ramps to both the I-210 and I-10. The study should include an analysis of potential impacts to existing State transportation facilities, if any. Additionally, Caltrans is replacing Level of Service (LOS) with Vehicle Miles Traveled (VMT) when evaluating traffic impacts. By July 1, 2020, VMT will be the standard transportation metric for land use projects and new Transportation Impact Study guidelines will be used to analyze and address transportation impacts on the State Transportation System. For any future project we encourage the Lead Agency to integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. As required by SB 743, Caltrans recommends the Lead Agency develop a verifiable performance-based VMT criteria.

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.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2019-02948.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

**Cultural and Environmental Department**  
**1550 Harbor Blvd., Suite 100**  
**West Sacramento, CA 95691 Phone: (916) 373-3710**  
**Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)**  
**Website: <http://www.nahc.ca.gov>**



DEC 06 2019

## STATE CLEARINGHOUSE

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).



7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
  - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
  - a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
  - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.



3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:

[Andrew.Green@nahc.ca.gov](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,



Andrew Green  
Staff Services Analyst

cc: State Clearinghouse



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA USPS AND E-MAIL:

February 26, 2020

[nfong@covinaca.gov](mailto:nfong@covinaca.gov)

Nancy Fong, AICP, Consultant

City of Covina, Community Development Department

125 E. College Street

Covina, CA 91723

## **Notice of Preparation of a Draft Environmental Impact Report for the Proposed Cypress Village Mixed Use Development Project**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the Draft EIR upon its completion and public release. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the Draft EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files<sup>1</sup>. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

### **Air Quality Analysis**

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results

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<sup>1</sup> Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance<sup>2</sup> on strategies to reduce air pollution exposure near high-volume roadways can be found at: [https://www.arb.ca.gov/ch/rd\\_technical\\_advisory\\_final.PDF](https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF).

### **Mitigation Measures**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

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<sup>2</sup> In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

- Chapter 11 “Mitigating the Impact of a Project” of South Coast AQMD’s *CEQA Air Quality Handbook* South Coast AQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

### **Alternatives**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

### **Permits**

If implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. For more information on permits, please visit South Coast AQMD’s webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385.

### **Data Sources**

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD’s Public Information Center at (909) 396-2001. Much of the information available through the Public Information Center is also available at South Coast AQMD’s webpage at: <http://www.aqmd.gov>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project’s air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov).

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources