

APPENDIX A: NOP AND NOP COMMENTS

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California Environmental Quality Act NOTICE OF PREPARATION AND SCOPING MEETING

Date: January 23, 2020
To: Responsible Agencies, Trustee Agencies, and Interested Parties
Subject: Notice of Preparation of a Draft Environmental Impact Report and Scoping Meeting for the Covina Bowl Specific Plan Project

Notice of Preparation: The City of Covina (City) will be the Lead Agency and will prepare a Draft Environmental Impact Report (DEIR) for the proposed Covina Bowl Specific Plan (Project) described below. We are interested in your agency's views as to the appropriate scope and content of the DEIR's environmental information pertaining to your agency's statutory responsibilities related to the proposed Project.

The proposed Project, its location, and its potential environmental effects are described below. The City welcomes public input during the Notice of Preparation (NOP) review period. Due to the time limits mandated by the CEQA Guidelines; your response must be sent **no later than 30 days after your receipt of this notice**. If no response or request for additional time is received by the end of the review period, the City may presume that you have no response. The 30-day public comment period is ends **February 24, 2020, before 5 pm**. The City, as the Lead Agency, requests that responsible and trustee agencies respond in a manner consistent with Section 15082(b) of the CEQA Guidelines. All environmental-related comments on the NOP should be submitted in writing by 5 p.m. on **February 24, 2020** to:

Mercy Lugo, Associate Planner
Community Development Department
125 East College Street
Covina, CA 91723
Email: mlugo@covinaca.gov

Copies of the Notice of Preparation and Initial Study are available for review at the following locations:

City of Covina, Planning Division
125 E College Street
Covina, CA 91723

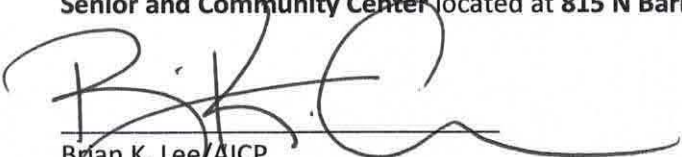
City of Covina Public Library
234 N 2nd Ave
Covina, CA 91723


City of Covina Senior Center
815 N Barranca Ave
Covina, CA 91723

The document can also be accessed on the City's website at: <https://covinaca.gov/pc>

Notice of Scoping Meeting: Pursuant to CEQA Guidelines Section 15082(c) (Notice of Preparation and Determination of Scope of EIR), the City will conduct a scoping meeting for soliciting comments of adjacent cities, responsible agencies, trustee agencies, and interested parties as to the appropriate scope and content of the DEIR.

The scoping meeting will be held on **Monday, February 3, 2020 from 6 p.m. until 8 p.m.**, at the **City of Covina Senior and Community Center** located at **815 N Barranca Ave, Covina, CA 91723**.

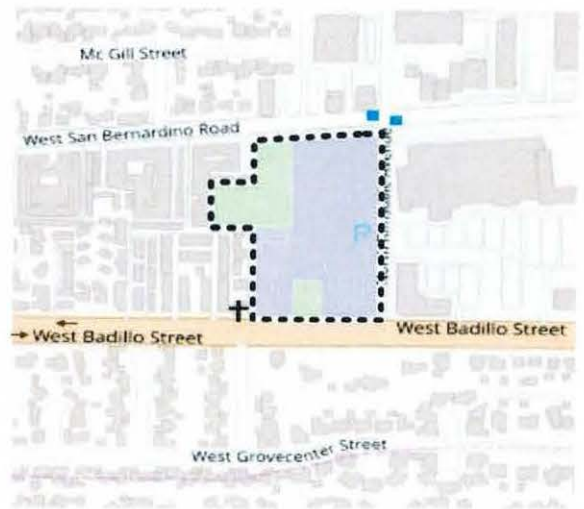

Brian K. Lee / AICP
Director of Community Development
626.384.5458
blee@covinaca.gov


January 23, 2020

Project Title: Covina Bowl Specific Plan

Project Location: The Project is located in the City of Covina in the San Gabriel Valley region of Los Angeles County, approximately 22 miles east of downtown Los Angeles, 35 miles west of downtown San Bernardino, and 10 miles northeast of Orange County.

The Project site is generally bounded by N Rimsdale Avenue to the east, W San Bernardino Road to the north, and W Badillo Street to the south and encompasses a total of five parcels located at 1118 W San Bernardino Road (APN 8434-017-007), 1060 W San Bernardino Road (APN 8434-018-020), 1103 W Badillo Street (APN 8434-017-008), 1085 W Badillo Street (APN 8434-018-021), and 1111 W Badillo Street (APN 8434-017-009). The site is developed and consists of various structures and site improvements associated with the existing commercial and residential uses.



Project Description:

Specific Plan:

The Project consists of implementation of a new Specific Plan on approximately 7.5-acres within the City of Covina. The Specific Plan would establish a land use plan, development standards and guidelines for redevelopment site in accordance with the vision, goals, and policies of the Covina General Plan.

The Covina Bowl Specific Plan would divide the project site into four planning areas, as described below:

Planning Area 1: Planning Area 1 is 0.96 acres and is designed for a variety of uses, which include but are not limited to administrative offices, retail, coffee/bakery and other uses commonly found in neighborhood commercial zones. Vehicular ingress and egress to Planning Area 1 would be from driveways along N Rimsdale Avenue. Planning Area 1 would have a maximum FAR of 1.5, similar to the existing General Commercial land use designation. Planning Area 1 includes the adaptive office reuse of the Covina Bowl building, which would provide approximately 12,000 square feet of commercial space, as well as parking and landscaping improvements.

Planning Area 2: Planning Area 2 is 4.54 acres and is designated for the development of multi-family residential uses at a maximum density of 30 dwelling units per acre. The existing vacant commercial buildings onsite would be demolished to provide for the proposed residential uses, as described below. Vehicular ingress and egress to Planning Area 2 would be from driveways on W San Bernardino Road, N Rimsdale Avenue, and W Badillo Street.

Planning Area 3: Planning Area 3 comprises 0.35 acres designated for development of a range of office, commercial, and retail uses. The existing commercial uses within Planning Area 3 would remain in place and no changes to buildings and land uses would occur.

Planning Area 4: Planning Area 4 comprises 1.71 acres designated for the development of a range of residential, retail, and commercial uses. Potential uses include but are not limited to food/restaurants/eating establishments, and multi-family residential. The proposed Specific Plan would allow for a maximum density of 30 dwelling units per acre. The existing residential apartments, restaurant, and associated site improvements would remain, and no changes would occur.

Mixed-Use Development:

The Project also includes a proposal to develop a mixed-use community which includes the adaptive reuse of the Covina Bowl building to provide 12,000 square feet of commercial uses within Planning Area 1 of the Specific Plan, and development of 132 for-sale residential units within Planning Area 2. The proposed residential units would consist of 1-3-bedroom, 1.5 - 3.5-bath attached condominiums. The Covina Bowl building would be redeveloped to provide 12,000 square feet of commercial space for administrative offices, retail, coffee/bakery, and other uses commonly found in neighborhood commercial zones. The Project also proposes modifications to the N Rimsdale Avenue right-of-way to create angled parking along the Project frontage.

The original Covina Bowl building is proposed for listing on the National Register of Historic Places.

The residential buildings would be built on the parking lots of the Covina Bowl. Recreation amenities for residents in the residential area would include open space courtyards, a playground, a fitness park area with exercise equipment, an outdoor dining BBQ area, and an outdoor lawn bowling amenity featuring a seating area inspired by the historical architecture of the former Covina Bowl.

The Project would connect to the existing utility infrastructure in the N Rimsdale Avenue and W Badillo Street right-of-way. In addition, new landscaping would be installed throughout the Project site that would include ornamental trees, shrubs, and ground covers. New exterior lighting onsite would be provided to accent the landscaping, project signage, light walkways, parking areas, and to provide for security.

The Project requires a General Plan Amendment to change the land use designation of the Project site from General Commercial and High Density Residential to Specific Plan (SP), a zone change to modify the zoning from Regional or Community Shopping Center (C-3A) and Multiple Family (RD-1500) to Specific Plan (SP), and a Vesting Tentative Tract Map to consolidate three separate parcels (APNs 8434-017-009, 8434-017-008, 8434-018-020) to one single parcel. GENERAL PLAN AMENDMENT (GPA) 19-004; ZONE CHANGE (ZCH) 19-004; SITE PLAN REVIEW (SPR) 19-023; TENTATIVE TRACT MAP (TTM) 19-001

Environmental Issues: Based on the proposal, the City anticipates that the following environmental topic areas will be addressed in the EIR:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Noise
- Population and Housing
- Geology and Soils
- Hazards and Hazardous Materials
- Land Use and Planning
- Public Services and Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Project Alternatives

Environmental Factors Not Potentially Affected: It is anticipated that no significant impacts associated with Agriculture and Forest Resources, Biological Resources, Mineral Resources, and Wildfire would occur as a result of the Project, and therefore these factors will not need to be addressed in the DEIR.

Project Planning Areas



- Planning Area Boundary
- Specific Plan Area Boundary



DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

February 20, 2020

Mercy Lugo, Associate Planner
Community Development Department
125 East College Street
Covina, CA 91723

RE: Covina Bowl Specific Plan Project – Notice
of Preparation (NOP)
SCH# 2020010334
GTS# 07-LA-2020-03142
Vic. LA-10 PM36.234

Dear Mercy Lugo,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project consists of implementing a new Specific Plan on approximately 7.5-acres within the City of Covina, which includes mixed use, residential, and commercial land uses. The Project also includes a proposal to develop a mixed-use community which includes the adaptive reuse of the Covina Bowl building to provide 12,000 square feet of commercial uses within Planning Area 1 of the Specific Plan, and development of 132 for-sale residential units within Planning Area 2. The Project also proposes modifications to the N. Rimsdale Avenue right-of-way to create angled parking along the Project frontage.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. SB 743's goals include supporting infill land use, reducing greenhouse gas emissions, and supporting active transportation. As required by SB 743, Caltrans recommends the Lead Agency develop a verifiable performance-based VMT criteria. Please reference the Governor's Office of Planning and Research (OPR) for more information:

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

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

- When conducting the Transportation Impact Study, a VMT based approach should be used. The Study should also consider potential impacts to both the I-10 and I-210 at the Azusa Avenue On- and Off-ramps.

- Create robust non-motorized connections to the Covina Metrolink Station that is approximately 1.5 miles away. By improving the bike and pedestrian experience to this major transit station, there is a potential to greatly reduce VMT.
- Project site design should provide a robust connection to the existing Class II bike lane along Badillo Street. Consider continuing this bike lane through to Citrus Avenue and adding a Class II bike lane to San Bernardino Road as proposed by the City of Covina Bicycle Master Plan. Both facilities should apply high visibility green paint as an added measure of visibility and safety.

Further information included for your consideration;

Caltrans seeks to promote safe, accessible multimodal transportation. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, but not limited to, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.

Regarding parking, Caltrans recommends carefully considering the amount of parking required. Research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation suggests that the amount of car parking supplied can undermine a project's ability to encourage public transit use. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) improvement measures.

Additionally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of 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 and refer to GTS# 07-LA-2020-03142.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

I have some concern over the design of the housing units along Rimsdale that will be adjacent to Covina Bowl. The current design appears a bit beefy/bulky compared to the slimmer or thin-lined designs popular at the time the bowling alley was constructed. For me, the designs don't necessarily need to borrow elements from the bowling alley unless it makes sense but stay true to design detailing of the period. This particular section of the housing deserves some special design attention as well to mitigate the less desirable view & noise of a home improvement retail parking lot to the east.

It would be great to see the entrance canopy on the north elevation retained. Not only is it a prominent & beautiful feature but an important googie design element on that side of the building. After the bouquet canyon rock walls & meeting rooms come down, it would be the only design feature left. Additionally, it would at least demarcate the former entrance & where the terrazzo concourse once was. It would also continue to provide a practical place of shade as it has done for 65 years.

I cannot stress enough how important the former coffee shop is to the revitalization & reuse of this site. There have been many discussions among friends & strangers alike regarding the viability of a food establishment reopening at the location. More & more people are telling me they'd like to see a restaurant reopen there. This would provide more meaningful preservation & a way for people to stay connected to a place they've already been enjoying for decades. A true coffee shop concept would be preferred & it would be of great benefit to this new immediate community as a place to gather or just to have breakfast or coffee without the need of driving. The existing, adjacent meeting rooms could provide community gathering space or could be included to expand the size of the restaurant depending on the needs of the restaurant concept. The customer base at the neighboring Home Depot also provides a built-in cliental for the restaurant, particularly for breakfast or even a bakery/coffee bar. Please fully explore the possibilities for this very important feature.



February 24, 2020

Mercy Lugo
Associate Planner,
City of Covina Community Development Department
125 East College Street
Covina, CA 91723
Email: mlugo@covinaca.gov

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

**RE: Notice of Preparation of a Draft Environmental Impact Report
for the Covina Bowl Specific Plan**

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for an environmental impact report (EIR) for the Covina Bowl Specific Plan Project (Project).

The Conservancy appreciates that the proposed project will partially retain and reuse the historic Covina Bowl building and sensitively incorporate new construction on the site. We submit the following comments to ensure that the rehabilitation and adaptive reuse of the Covina Bowl meets the Secretary of the Interior's Standards for Rehabilitation and, most importantly, retains its eligibility as a historic resource. The new infill construction should be compatible in scale and overall massing so as not to adversely impact the historic building.

With significant impacts anticipated, the Agency must require a range of preservation alternatives to be evaluated and adequate mitigation measures proposed as part of the environmental review process.

I. Historic Significance of the Covina Bowl

Blending Modernism with Egyptian exoticism, Covina Bowl embodies the exuberant postwar Googie architectural style with its enormous glass-filled pyramid entrance and soaring triangular "Covina" sign to attract motorists' attention. The zigzag entrance canopy floats above natural rock piers, melding modern forms with natural materials.



The Covina Bowl was built by and for the Brutocao brothers, local contractors, and developers. Long Beach-based architecture firm Powers, Daly, and DeRosa designed the building, which became the first full-service bowling center in America. The exotic Egyptian theme permeates every aspect of the building, including its enormous neon sign. Covina Bowl became the original prototype for 71 other bowling alleys designed by the firm across the country.

When completed in 1955, Covina Bowl was a complete entertainment center with billiard room, cocktail lounge, banquet hall/live entertainment showroom, coffee shop, conference and meeting rooms, childcare facility, and beauty parlor. Its famous Egyptian Room presented performers such as comic duo Rowan and Martin, Liberace, crooner Mel Tormé, the Smothers Brothers, and many others.

On opening day, February 11, 1956, Covina Bowl was lauded by the local press as “a fabulous recreation center whose opulence rivals that of the days of the Egyptian pharaohs,” “virtually a city within itself,” and “a Dream Palace of Recreation.” Bowling industry leader AMF in a congratulatory newspaper ad called Covina Bowl “The World’s Most Beautiful Bowling Establishment.” As bowling’s popularity began to wane in the 1970s, their large lots became more valuable as redevelopment sites for shopping centers or residential developments. As a result, bowling centers began to disappear, and by the 2000s, most were demolished.

II. Draft EIR should evaluate appropriate treatment options and mitigation measures for the Covina Bowl Project

Located in Planning Area 1 of the proposed project site, is 12,000 square feet of the Covina Bowl building. This section of the building includes the primary façade, main entry and entertainment areas built in 1955. This portion of the building maintains a high degree of integrity due to its many architecture-related character-defining features. Our understanding is these areas will be retained and adaptively reused for office, retail, coffee/bakery and other uses commonly found in neighborhood commercial zones. Special attention must be given to this portion of the proposed Project site as it comprises the only remaining section of the historic Covina Bowl.

Planning Area 2 comprises the remaining sections of the Covina Bowl building that include the 1962 addition designed by Powers, Daly, and DeRosa. The proposed Project will demolish all historic resources in Planning Area 2 and construction approximately 136 multi-family residential units. With the large number of proposed units, we have questions about new construction and how it may overpower the historic fabric of the remaining Covina Bowl. Therefore, it is imperative for new construction to be compatible with the *Secretary of the Interior’s Standards for Rehabilitation*. Compatibility will be achieved through appropriate scale, massing, and materiality. Furthermore, non-compatible new construction has the potential to adversely affect the Covina Bowl’s eligibility as a historic resource.

The proposed Project will rezone Planning Areas 3 and 4 for a range of new uses. However, no other plans are currently being proposed for these two areas and all buildings will remain. When future plans are



made for these areas, we expect a full environmental review to ensure compatability with the adjacent Covina Bowl.

As indicated in the NOP, the Project will impact cultural resources, and the Draft EIR should thoroughly study potential direct and indirect impacts of the project on the historic building, including any exterior and interior modifications and the proposed new construction.

To reduce potentially significant impacts, the Draft EIR should also include a detailed historic preservation plan that outlines recommended treatment options for the Covina Bowl's historic exterior and interior features. The plan should demonstrate adherence to the *Secretary of the Interior's Standards* and ensure that the building retains its eligibility as a historical resource. It should also include a full historic structures report (HSR), which would document and assess the building's unique existing conditions and provide clear guidelines for the appropriate treatments.

The NOP states that the Covina Bowl is proposed for listing on the National Register of Historic Places. The building has already been formally determined eligible for the National Register, as the Conservancy prepared and submitted a nomination to the State and National Park Service in 2016. Due to owner objections at the time the building was not listed, only determined eligible. The Conservancy strongly urges the project applicant and owner to move forward with the nomination and agree to listing as a form of mitigation and to offer additional economic incentives (such as state and federal tax credit for rehabilitation, if applicable in this case) for the proposed rehabilitation project. As the original applicant for this nomination we are happy to be of assistance in this process. .

III. Draft EIR should evaluate the impacts of new construction and demonstrate compatibility with the Covina Bowl

As described in the NOP, the proposed project would develop a mixed-use community that includes the partial adaptive reuse of the Covina Bowl building in Planning Area 1 of the Specific Plan, and development of 132 for-sale residential units within Planning Area 2. The residential buildings would be built on the parking lots of the Covina Bowl. Residential amenities would include courtyards, playground, fitness park, outdoor dining BBQ area and an outdoor lawn bowling amenity inspired by the historic architecture of the Covina Bowl. The Draft EIR should fully analyze and discuss the impacts of the proposed new construction on aesthetics and cultural resources. It should also contain detailed drawings to demonstrate the relationships between the new and historic buildings.

The new buildings should be designed in a manner that is both compatible and appropriate in terms of scale, massing, height, design, and materials to the historic building, in accordance with the *Secretary of the Interior's Standards*. They should be sufficiently set back and detailed as to not overwhelm or compete with the historic building. As a significant architectural feature, the proposed Project should



maintain the Covina Bowl's historic focal point and front entrance orientation as part of the proposed project.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The script is fluid and cursive, with the first letters of each name being capitalized and prominent.

Adrian Scott Fine
Director of Advocacy

cc: Friends of the Covina Bowl





COUNTY OF LOS ANGELES FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
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www.fire.lacounty.gov

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FOURTH DISTRICT
KATHRYN BARGER
FIFTH DISTRICT

February 21, 2020

Mercy Lugo, Associate Planner
City of Covina
Community Development Department
125 East College Street
Covina, CA 91723

Dear Ms. Lugo:

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "COVINA BOWL SPECIFIC PLAN PROJECT," CONSISTS OF IMPLEMENTATION OF A NEW SPECIFIC PLAN ON APPROXIMATELY 7.5-ACRES TO DEVELOP A MIXED-USE COMMUNITY WHICH INCLUDES THE ADAPTIVE REUSE OF THE COVINA BOWL BUILDING TO PROVIDE 12,000 SQUARE FEET OF COMMERCIAL USES, LOCATED AT 1118 W. SAN BERNARDINO ROAD, COVINA, FFER 2020000499

The Notice of Preparation of a 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:

15. Public Services

Under (a) Fire Protection, the paragraph under this section of the Initial Study should correct the closest fire station number; the correct number for the fire station located at 807 Cypress Street in Covina is Fire Station 152. We will reserve further comments for the draft EIR.

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

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

AGOURA HILLS	CALABASAS	EL MONTE	INDUSTRY	LAWDALE	PARAMOUNT	SIGNAL HILL
ARTESIA	CARSON	GARDENA	INGLEWOOD	LOMITA	PICO RIVERA	SOUTH EL MONTE
AZUSA	CERRITOS	GLENDALE	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	CUJAHY	HIDDEN HILLS	LA PUENTE	PALMDALE	ROSEMEAD	WESTLAKE VILLAGE
BRADBURY	DIAMOND BAR	HUNTINGTON PARK	LAKEWOOD	PALOS VERDES ESTATES	SAN DIMAS	WHITTIER
	DUARTE		LANCASTER		SANTA CLARITA	

LAND DEVELOPMENT UNIT:

The Land Development Unit is reviewing the proposed "COVINA BOWL SPECIFIC PLAN" Project for access and water system requirements. The Land Development Unit's comments are only preliminary requirements. Specific fire and life safety requirements will be 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 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.
5. All required public and private on-site fire hydrants shall be installed and tested prior to the beginning of construction.
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.

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.

Mercy Lugo, Associate Planner
February 21, 2020
Page 6

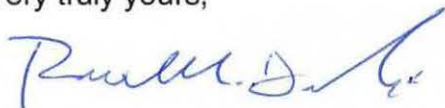
HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department recommends that a Phase I Environmental Site Assessment be conducted for the project site, if not done so already. 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 if you have any questions.

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

Very truly yours,

A handwritten signature in blue ink, appearing to read "Ronald M. Durbin", with a stylized flourish at the end.

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac



SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
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February 24, 2020

Ms. Mercy Lugo, Associate Planner
City of Covina, Community Development Department
125 East College Street
Covina, California 91723
E-mail: mlugo@covinaca.gov

**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental
Impact Report for the Covina Bowl Specific Plan [SCAG NO. IGR10119]**

Dear Ms. Lugo,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Covina Bowl Specific Plan ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Covina Bowl Specific Plan in Los Angeles County. The Specific Plan divides the project into 4 (four) different planning areas: Planning Area 1 (0.96 AC) is primarily commercial and office space, Planning Area 2 (4.54 AC) is primarily residential use, and Planning Area 3 (0.35 AC) and Planning Area 4 (1.71 AC) are mixed uses.

When available, please send environmental documentation to SCAG's Los Angeles office in Los Angeles (900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017) or by email to au@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,

Ping Chang
Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
COVINA BOWL SPECIFIC PLAN [SCAG NO. IGR10119]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

Please note the Draft 2020 RTP/SCS (Connect SoCal) was released for public review on November 14, 2019 until January 24, 2020. The Final Connect SoCal is anticipated to be adopted in April 2020. Please refer to Connect SoCal goals and growth forecast for RTP/SCS consistency for future projects after April 2020. The Draft Connect SoCal can be reviewed here: <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>
*SCAG does not yet have an agreed-upon security performance measure.	

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Covina Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	48,800	50,600	51,600
Households	6,458,000	7,325,000	7,412,300	16,300	16,900	17,200
Employment	8,414,000	9,441,000	9,871,500	27,300	28,700	29,500

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.



South Coast Air Quality Management District

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

SENT VIA USPS AND E-MAIL:

February 20, 2020

blee@covina.ca.gov

Brian K. Lee, AICP, Director
City of Covina, Community Development Department
125 East College Street
Covina, CA 91723

Notice of Preparation of a Draft Environmental Impact Report for the Proposed Covina Bowl Specific Plan

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 files¹. 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.

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

¹ 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. Guidance² 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.

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:

² 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.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources



NATIVE AMERICAN HERITAGE COMMISSION

January 23, 2020

Mercy Lugo
Covina, City of
125 East College Street
Covina, CA 91723

PLANNING DIVISION
CITY OF COVINA

JAN 30 2020

125 E. COLLEGE STREET
(626) 384-5450

Re: 2020010334, Covina Bowl Specific Plan Project, Los Angeles County

Dear Ms. Lugo:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

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

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

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Joseph Myers
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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:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - 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:**
- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - 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:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
 - 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.
 - Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - 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)).
 - 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:
- 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.
 - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - 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

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.

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) 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.

Sincerely,



Andrew Green
Staff Services Analyst

cc: State Clearinghouse

From: [Lauren Lockwood](#)
To: [Lauren Lockwood](#)
Subject: FW: Covina Bowl Specific Plan NOP
Date: Thursday, August 20, 2020 4:35:09 PM

From: Adriene Biondo <adrienebiondo@gmail.com>
Sent: Monday, February 24, 2020 10:47 PM
To: Mercy Lugo <MLugo@covinaca.gov>
Cc: Adrian Fine <afine@laconservancy.org>
Subject: Covina Bowl Specific Plan NOP

Dear Ms. Lugo,

Thank you for the invitation to attend the public scoping meeting for the Covina Bowl Project on February 3, 2020. On behalf of the Friends of Covina Bowl, we appreciate the consideration that the city and the developer are giving to the proposed project, and the input from the historic preservation consultant.

Following are our main concerns:

- 1) The Draft EIR should include a comprehensive historic preservation plan that covers the treatment options for Covina Bowl's historic exterior, main sign, and interior features. This section of the plan needs to follow the Secretary of the Interior's Standards and - very importantly - ensure that the building retains its eligibility as it is a designated historical resource. A comprehensive historic structures report with guidelines for the appropriate treatments should also be provided.
- 2) The Draft EIR should also analyze impacts of the proposed new construction, covering aesthetics and cultural resources. Detailed drawings demonstrating the relationships between proposed new construction and historic buildings should also be drafted.
- 3) New construction should be compatible in style, scale, massing and using materials appropriate to the historic building with setbacks that neither overwhelm nor compete with the historic building.
- 4) In the preliminary renderings presented at the scoping meeting, the design of the new buildings needed to be further refined, and presented in elevation drawings. It also seems that more of the historic building facade to the left of the main entrance needs to be retained in order to give the entire project balance.
- 5) Inside, demolition of the low wall that runs the length of the main concourse needs to be reconsidered. This mosaic tile covered "half-wall" was covered by the last operator but it is an important extant feature of the bowling alley.
- 6) The vintage interior features of the coffee shop/restaurant also need to be carefully considered. This authentic historic coffee shop offers a rare opportunity to reconnect with the community as a future coffee shop/restaurant/eatery.

Thank you again for your consideration and for incorporating our comments.

Sincerely,

Adriene Biondo
Chair, Friends of Covina Bowl

Chair Emeritus, Los Angeles Conservancy Modern Committee

Address:
17125 Lisette St.
Granada Hills, CA 91344

From: [Lauren Lockwood](#)
To: [Lauren Lockwood](#)
Subject: FW: Covina Bowl Specific Plan Project
Date: Thursday, August 20, 2020 4:36:45 PM

From: Dante Pascual Jr. <gsamsabug@ix.netcom.com>
Sent: Monday, February 24, 2020 10:48 PM
To: Mercy Lugo <MLugo@covinaca.gov>
Subject: Covina Bowl Specific Plan Project

Dear Mrs. Lugo,

The meeting was an enlightening experience for me. Im happy that the Covina Bowl will be partially saved and will stay in the neighborhood and further serve the community. Having said that I'd would have loved for the bowling alley to remain as a family recreation site. But Im aware that changes are what makes a city grow and flourish and sorry to see Covina Bowl fall under in the name of growth and development. But at least the city listened enough to what it's citizen wanted and vowed to keep the Covina Bowl as a viable mixed used place.

Although the city has made great strides in protecting the most iconic parts of the structure such as Covina Bowl sign, portecochere and the part of the wall I'd still would like to see more of the structure preserved. For instance, the wall left of the main entrance in which most will be removed and only a portion remain. At least 4 bays or panels will be left standing. Removing so much of that facade wall creates a visual imbalance. I think by extending or keep at least 6 bays or panels will help keep the structure in visual harmony.

I'd also advocate for the coffee shop to remain. I think that having a restaurant will at least keep the memory of Covina Bowl alive since the bowling alley has been completely removed. It would only be the place left of Covina Bowl the community to have that connection to its past and could still feel that one could walk and experience the structure as they once did.

Inside the I'd love to see the low wall in the concourse preserved. It's an original part of the bowling alley that should be reconsidered since it still has all or most of the original mosaic intact. Removing that original tile would be of a great disservice to the structure. I'm sure the architects have to follow the Secretary of the Interior's Standards, but I think can still benefit in the design as long it's preserved thoughtfully without it being an obstruction to the new design.

The new construction I feel is nothing new I've seen. In fact, it looks like many designs I've already seen in and around the south bay and in San Diego. This is not to say that they're identical but they share a common aesthetic that makes it seem like a kind of default design. The new designs are not unique. Further, looking at the main entrance of the Covina Bowl and the new townhomes to its left, both structure are incongruous of each other visually and that they are independent of each other. The new designs of the townhomes look unrelated to the Covina Bowl in spirit and in aesthetics. I wish there was a common thread between the structures that made them coordinated.

I appreciate the consideration that the developer is giving to the project and the valuable input from the historic preservation consultant.

Dante Pascual Jr.
813 E. Francisquito Ave.
West Covina, CA 91792