

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

Kaiser Permanente Covina Medical Office Building Project

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CITY OF COVINA

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Table of Contents

<u>SECTION</u>	<u>PAGE NO.</u>
1.0 INTRODUCTION	1
1.1 Project Overview	1
1.2 California Environmental Quality Act.....	1
1.3 Environmental Setting.....	1
2.0 PROJECT DESCRIPTION	9
2.1 Project Background.....	9
2.2 Project Design.....	9
2.3 Project Construction	14
2.4 Project Operation	14
2.5 Required Permits and Approvals	15
3.0 INITIAL STUDY CHECKLIST	37
3.1 Aesthetics	43
3.2 Agriculture and Forestry Resources	50
3.3 Air Quality	52
3.4 Biological Resources	66
3.5 Cultural Resources.....	71
3.6 Energy	74
3.7 Geology and Soils.....	80
3.8 Greenhouse Gas Emissions.....	86
3.9 Hazards and Hazardous Materials	93
3.10 Hydrology and Water Quality	98
3.11 Land Use and Planning.....	107
3.12 Mineral Resources	108
3.13 Noise.....	109
3.14 Population and Housing.....	124
3.15 Public Services	126
3.16 Recreation	130
3.17 Transportation	132
3.18 Tribal Cultural Resources.....	145
3.19 Utilities and Service Systems.....	147
3.20 Wildfire.....	153
3.21 Mandatory Findings of Significance	159

<u>SECTION</u>	<u>PAGE NO.</u>
4.0 REFERENCES AND PREPARERS.....	161
4.1 References Cited.....	161
4.2 List of Preparers	168

APPENDICES

A	Air Quality and Greenhouse Gas Emissions Modeling Data
B	Health Risk Assessment
C	Arborist's Report
D	Cultural Resources Records Check Results
E	Energy Consumption Modeling Data
F	Geotechnical Report
G	Phase I Environmental Site Assessment
H	Hydrology and Hydraulics Report
I	Noise Impact Modeling Data
J	Traffic Impact Study

FIGURES

1-1	Project Location	5
1-2	Surrounding Land Uses.....	7
2-1	Project Components	17
2-2a	West Elevation.....	19
2-2b	South Elevation.....	21
2-2c	North Elevation	23
2-2d	East Elevation.....	25
2-2e	Parking Structure Elevations (South and West)	27
2-2f	Parking Structure Elevations (North and East)	29
2-3a	Proposed Project Signage.....	31
2-3b	Sign Location Plan	33
2-4	Preliminary Landscape Plan.....	35
3.13-1	Noise Measurement and Modelling Locations	113
3.20-1	Proposed Fire Lanes	157

TABLES

2.2-1	Proposed Medical Office Building Details.....	10
3.3-1	SCAQMD Air Quality Significance Thresholds	55
3.3-2	Construction Workers, Vendor Trips, and Equipment Use.....	56
3.3-3	Maximum Daily Construction Criteria Air Pollutant Emissions	57
3.3-4	Maximum Daily Operational Criteria Air Pollutant Emissions	58
3.3-5	Construction Localized Significance Thresholds Analysis	60
3.3-6	AERMOD Principal Parameters	62
3.3-7	Construction-Related Health Risk	63
3.6-1	Project Operations – Electricity Demand	75
3.6-2	Project Operations – Natural Gas Demand	75
3.6-3	Construction Equipment Diesel Demand.....	76
3.6-4	Construction Worker, Vendor, and Haul Truck Petroleum Demand.....	77
3.6-5	Project Operations – Petroleum Consumption	78
3.8-1	Estimated Annual Construction GHG Emissions	88
3.8-2	Estimated Annual Operational GHG Emissions	90
3.13-1	Measured Noise Levels	110
3.13-2	Construction Equipment Noise Emission Levels.....	115
3.13-3	Construction Noise Model Results Summary	117
3.13-4	Exterior Noise Level Limits (Stationary Noise Sources)	118
3.13-5	Mechanical and Parking Operations Noise Level Analysis	120
3.13-6	Off-Site Traffic Noise Modeling Results.....	121
3.17-1	City of Covina Impact Threshold Criteria	134
3.17-2	City of West Covina Impact Threshold Criteria	134
3.17-3	Existing Roadways	135
3.17-4	Existing Transit Routes.....	135
3.17-5	Project Trip Generation.....	136
3.17-6	Summary of Volume to Capacity Ratios and Levels of Service Weekday AM and PM Peak Hours	139

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ADT	average daily trips
AERMOND	American Meteorological Society/EPA Regulatory Model
afy	acre-feet per year
ANSI	American National Standards Institute
AQMP	Air Quality Management Plan
AWSC	all-way stop-controlled
bgs	below ground surface
BMP	best management practice
C-P	Commercial, Administrative, and Professional Office
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CH ₄	methane
CHRIS	California Historical Resources Information System
CIC	Covina Irrigating Company
City	City of Covina
CMC	Covina Municipal Code
CMP	Congestion Management Program
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
County	Los Angeles County
CRPR	California Rare Plant Rank
CY	cubic yards
dBA	A-weighted decibel
dB	decibel
DLRP	Division of Land Resource Protection
DOC	Department of Conservation
DOGGR	Division of Oil, Gas, and Geothermal Resources
DPM	diesel particulate matter
EB	eastbound
EDR	Environmental Data Resources
EIR	Environmental Impact Report
EAP	Energy Action Plan
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program

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INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Acronym/Abbreviation	Definition
GHG	greenhouse gas
GPD	gallons per day
GWP	global warming potential
HCM	Highway Capacity Manual
HFC	hydrofluorocarbon
HOV	high-occupancy vehicle
HRA	health risk assessment
HVAC	heating, ventilation, and, air conditioning
Hz	hertz
I-	Interstate
ICU	Intersection Capacity Utilization
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
kBtu	thousand British thermal units
kg	kilogram
kWh	kilowatt-hour
LACM	Natural History Museum of Los Angeles County
L_{dn}	day-night average noise level
LED	light-emitting diode
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent noise level over a given period
LID Plan	Low Impact Development Plan
L_{max}	greatest sound level measured during a designated time interval or event
L_n	statistical sound level
LOS	Level of Service
LST	localized significance threshold
MEIR	maximally exposed individual residence
MM-	mitigation measure
MND	Mitigated Negative Declaration
MOB	Medical Office Building
MT	metric ton
MT CO _{2e}	metric tons of CO ₂ equivalent
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NETR	Nationwide Environmental Title Research
NF ₃	nitrogen trifluoride
NO _x	oxides of nitrogen
NO ₂	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Governor's Office of Planning and Research
OWSC	one-way stop-controlled
PCD	Planned Community Development
PFC	perfluorocarbon
Plan	Construction Exhaust Emissions Minimization Plan
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns

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Acronym/Abbreviation	Definition
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to 10 microns
ppm	parts per million
PPV	peak particle velocity
proposed project	Kaiser Permanente Covina Medical Office Building Project
PV	photovoltaic
RCNM	Roadway Construction Noise Model
ROW	right-of-way
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
sec/veh	seconds per vehicle
SF ₆	sulfur hexafluoride
SLF	Sacred Lands File
SO ₂	sulfur dioxide
SR-	State Route
SRA	Source-Receptor Area
SSC	Species of Special Concern
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	tribal cultural resource
TDM	transportation demand management
TIS	Transportation Impact Study
TVMWD	Three Valley Municipal Water District
TWSC	two-way stop-controlled
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
V/C	volume to capacity
VMT	vehicle miles traveled
VOC	volatile organic compound
WB	westbound
WQMP	Water Quality Management Plan
WRP	Water Reclamation Plant

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1.0 INTRODUCTION

1.1.....Project Overview

The Kaiser Permanente Covina Medical Office Building Project (proposed project) would include the development of a currently vacant, 3.42-acre project site located at 1664 Park View Drive in the City of Covina (City). The proposed project would include grading of the project site, the construction of a 58,475–square-foot medical office building, a 4-story parking garage with 256 parking spaces, surface parking with 71 parking spaces and associated infrastructural, utility, and landscaping improvements.

1.2.....California Environmental Quality Act

The California Environmental Quality Act (CEQA) applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed project constitutes a project as defined by CEQA (California Public Resources Code Section 21000 et seq.). State CEQA Guidelines Section 15367 states that a “Lead Agency” is “the public agency which has the principal responsibility for carrying out or approving a project.” Therefore, the City of Covina (City) is the lead agency responsible for the proposed project’s compliance with CEQA.

As lead agency for the proposed project, the City must complete an environmental review to determine if implementation of the proposed project would result in significant adverse environmental impacts. To fulfill the purpose of CEQA, an Initial Study (IS) has been prepared to assist in making that determination. Based on the nature and scope of the proposed project and the evaluation contained in the Initial Study environmental checklist (contained herein), the City, as the lead agency, concluded that a Mitigated Negative Declaration (MND) is the proper level of environmental documentation for this proposed project. The Initial Study shows that impacts caused by the proposed project are either less than significant or significant but mitigable with the incorporation of appropriate mitigation measures, as defined herein. This conclusion is supported by State CEQA Guidelines Section 15070, which states that an MND can be prepared when “(a) the IS shows that there is not substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or (b) the IS identifies potentially significant effects, but (1) revisions in the project plans or proposals made by, or agreed to by the applicant, before a proposed IS/MND is released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and (2) there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.”

1.3.....Environmental Setting

Project Location

The proposed project is located in the City of Covina, an urbanized community in the eastern portion of Los Angeles County (County), approximately 22 miles east of downtown Los Angeles. The City is located 1 mile south of Interstate (I-) 210, 3.8 miles east of I-605, immediately north of I-10, and 1.4 miles west of State Route (SR-) 57. The City is

bordered by the City of West Covina to the south, the cities of Azusa and Glendora to the north, the City of Baldwin Park to the west, and the City of San Dimas to the east. Additionally, multiple unincorporated communities are located adjacent to, and are surrounded by, the City, including the communities of Citrus to the north, Vincent to the west, and Charter Oak to the east. Figure 1-1, Project Location, delineates the project site in the context of the project's local and regional location.

The project site is located along Park View Drive, to the southeast of East Holt Avenue. Park View Drive is a dead-end street that extends southeast from East Holt Avenue before terminating in a cul-de-sac near the I-10 freeway. The project site is approximately 3.42 acres in size and consists of Assessor's Parcel Numbers 8448-019-052, 8448-019-041, and 8448-019-042.

The project site is vacant under existing conditions and is highly disturbed due to previous grading. The project site supports small amounts of low-growing vegetation, including grass and some foliage during the wet season, while non-native, mature trees are situated along the project site's eastern and northern perimeters. An additional row of non-native trees bisects the project site at the northernmost third of the site.

Surrounding Land Uses

A City park (Parque Xalapa, which is 2 acres in size), commercial uses, and single-family residences are located north of the project site across East Holt Avenue. A commercial office building lies immediately north of the project site, beyond which is a vacant parcel that is planned for development of the recently-approved Oakmont Senior Living/Memory Care Facility. Single-family residences are located east of the project site. Commercial buildings lie adjacent to the project site's western perimeter across Park View Drive. The I-10 freeway, which generally extends in an east-west direction, borders the project site's southern perimeter and runs in a northwest-southeast direction immediately adjacent to the commercial buildings west of the project site.

The project site is zoned C-P - Administrative and Professional Office, with a Planned Community Development (PCD) Overlay, in the City's General Plan. The surrounding commercial land uses are zoned C-P, while the surrounding single-family residences are zoned E-1 - Estate Residential (1-acre minimum) and E-2½ - Estate Residential (2½-acre minimum). The zoning of the project site and its surroundings is shown in Figure 1-2, Surrounding Land Uses.

Existing Project Site Access

The project site has frontage along Park View Drive, with two existing access driveways where Park View Drive terminates in a cul-de-sac near the I-10 freeway. Park View Drive is accessed via East Holt Drive to the north.

Existing Infrastructure and Utilities

Park View Drive is a local arterial comprising a single, unmarked lane, which serves traffic in both directions. Although there is no signage demarcating street parking within the Park View Drive right-of way (ROW), cars street-park along the curb in both directions. There are no public sidewalks where Park View Drive runs adjacent to the project site;

however, the surrounding property frontages are landscaped with grass and include signage and street lighting. The project site is currently vacant; however, the following existing utilities serve the surrounding development and are located within proximity to the project site:

- An 8-inch water line that runs within the Park View Drive ROW
- A 6-inch water line that runs along the project site's southwestern property line between the project site and the neighboring commercial development south of Park View Drive before continuing along the project site's southern perimeter, adjacent to the I-10
- An 8-inch sewer line that runs within the Park View Drive ROW
- A 24-inch storm drain line that runs within the Park View Drive ROW and connects to an 18-inch storm drain line beneath the concrete curb adjacent to the project site
- Overhead streetlights, which are located within the landscaped sidewalks that line Park View Drive
- Catch basins within the Park View Drive ROW
- Electric transformers and communication vaults within the project site, immediately adjacent to Park View Drive
- Water meters and fire hydrants located on the northwestern corner of the project site, along Park View Drive and at the end of the Park View Drive cul-de-sac

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SOURCE: Bing Maps 2019

FIGURE 1-1

Project Location

Kaiser Permanente Covina Medical Office Building Project

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SOURCE: City of Covina 2015; Bing Maps 2015

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2.0 PROJECT DESCRIPTION

2.1.....Project Background

In May 1975, the City established the Village Oaks Office Park Planned Community Development Overlay District (PCD 75-001) along with development regulations and design guidelines for the PCD area. Subsequently, the Village Oaks Office Park PCD was amended in 1981 and in 1991. The amendment in 1981 (Ordinance 1510) approved the precise plans for the Village Oaks Office Park (Phase III) project and imposed a condition of approval that states “the C-P permitted uses, with the exception of a restaurant, shall be used to guide and regulate the use and the development of the office building in this project.” The amendment in 1991 (Ordinance 91-1725) approved the sign criteria of the Design Guidelines in the Village Oaks Office Park Area (Phases I, II and III). The project site, as well as the adjacent commercial buildings, are within an area designated as “Phase III” of the Village Oaks Office Park PCD. Subsequent to the adoption of the ordinances establishing the Village Oaks Office Park and the associated development regulations, the Village Oaks Office Park was largely built out. However, there are several parcels that remain vacant, including the parcels proposed for development of the Kaiser Permanente Covina Medical Office Building Project and a vacant parcel recently approved for a senior living center (Oakmont Senior Living/Memory Care Facility), which lies on the corner of East Holt Avenue and Park View Drive. The Oakmont Senior Living/Memory Care Facility is expected to be completed by July 2020.

2.2.....Project Design

As illustrated in Figure 2-1, the proposed project would include the development of a currently vacant, 3.42-acre project site located at 1664 Park View Drive in the City of Covina. The proposed project would include grading of the project site, the construction of a 58,475–square-foot medical office building, a 4-story parking garage with 256 parking spaces, surface parking with 71 parking spaces, and associated infrastructural, utility, and landscaping improvements as follows. These project components are described in greater detail below.

Project Components

Medical Office Building

The proposed project would include the construction of a 3-story, 58,475–square-foot Kaiser Permanente medical office building, which would be located adjacent to the existing cul-de-sac as shown in Figure 2-1, Project Components. The proposed medical office building would be approximately 50 feet in height above ground level (as measured from Park View Drive) and would not include any subterranean/basement levels. With the mechanical equipment enclosure on the rooftop, the building would extend to approximately 58 feet in height (as measured from Park View Drive), as permitted by Section 17.34.100 of the City’s Municipal Code. The single-family residential properties to the east of the project site are located at a higher elevation relative to the project site and Park View Drive. Due to this elevation differential, the proposed medical office building would extend approximately 1.5 stories (20 feet) above the residential properties that border the project site on the east. Including the mechanical equipment enclosure, the medical office building would extend approximately 28 feet above the residential properties to the east.

The proposed project, as well as architectural elements incorporated into the design of the medical office building, are illustrated in Figures 2-2a through 2-2d, which show the proposed project elevations. Architectural elements included in the design of the proposed project would include, but would not be limited to:

- Prefabricated exterior wall panels with exterior finish insulation system.
- Aluminum framed windows with 1-inch insulating glazing units comprised of clear glass.
- 4-sided structural silicone glazed curtain wall framing with painted metal shadowbox panel backing.
- Window/curtain wall trim made from accent metal composite material.
- Metal screen wall with concealed fasteners and vertical seam.
- Custom perforated metal screen integrated into prefabricated exterior wall panels.
- Service storage yard wall with exterior plaster to match the exterior wall panels on the medical office building.

The proposed building would support two outpatient clinics, a retail pharmacy, a behavioral health clinic, imaging, a nurse clinic, speech therapy, and a clinical lab. Specifically, the building is expected to provide the following: 41 provider offices, including behavioral health; 52 exams rooms; behavioral health, physical therapy, pharmacy, imaging, and blood draw services; and, family medicine, internal medicine, and pediatric services. Table 2.2-1, Proposed Medical Office Building Details, lists the specific uses that would be provided on each level of the proposed building.

Table 2.2-1 Proposed Medical Office Building Details

Level 1 21,450 square feet	Level 2 19,345 square feet	Level 3 17,679 square feet
Behavioral Health Clinical Lab Conference Center Imaging Medical Office Building (MOB)-FAC (Facilities) MOB-MAT (Materials Management) Pharmacy Public Square (including a café/coffee shop)	Communications Room Family Medicine/Pediatrics Mechanical Allowance Public Square Non-Autism Speech Therapy Nurse Clinic	Administration Internal medicine/OBGYN Nurse Clinic Public Square
Non-Medical Operational Uses		
Communications Room Environmental Services Storage Area Housekeeping Mechanical Allowance Staff Amenities Vertical Building Circulation	Housekeeping Staff Amenities Vertical Building Circulation	Communications Room Housekeeping Staff Amenities Vertical Building Circulation

Additionally, a separate service storage yard would be enclosed behind freestanding retaining walls on the northwestern corner of the proposed medical office building. The service storage yard would be approximately 9 feet, 8 inches in height, would be partially covered, and would include a door leading to and from the medical office building. The service storage yard would serve as a secure location for covered trash (including sharps, biohazard medical waste, and universal waste), electrical switchgear, storage, and the electrical transformer. Service trucks would also be received at the service storage yard.

The proposed project would be separated from the surrounding land uses, as follows:

- The existing wall that separates the project site's northeastern perimeter from the adjacent residence would be protected in place.
- A new retaining wall and terraced landscaping would be constructed on the project site's eastern perimeter, so as to separate the proposed medical office building from the residences located to the east of the project site.
- Landscaped planter areas would separate the proposed project from the commercial development to the north, the easement adjacent to the I-10 to the south, and Park View Drive to the west of the project site.

Proposed Access, Circulation, and Parking

Parking

As shown in Figure 2-1, Project Components, the proposed project would include the construction of a 4-story parking structure on the northernmost portion of the project site, with one level of parking below grade and three open-air levels above grade. The structure would be approximately 43.5 feet in height above ground, as measured from the lowest point on site. As observed from the residential property to the east of the proposed parking structure, the maximum height of the parking structure (measured to the top of the elevator tower) would be approximately 27 feet. The top of the parking structure (measured to the top of the building) would be approximately 14 feet in height. Figure 2-2e and Figure 2-2f show elevations for the proposed parking structure. The proposed parking structure would include 252 parking spaces, three accessible spaces, and one van accessible space, for a total of 256 spaces. The structure would be accessed via two driveways off Park View Drive. The structure would be approximately 92,785 square feet in size. Solar panels would be installed on the top of the structure.

The proposed project would also include two canopied carports, which would be located on the southern portion of the project site and would cover approximately 6,087 square feet of the site, in total. The canopies would have photovoltaic (PV) panels and would provide nine feet of clearance at the lowest point. Smaller areas of surface parking would be provided adjacent to the parking garage and around the canopied parking areas (see Figure 2-1, Project Components). In total, the on-site surface parking areas would cover approximately 43,009 square feet of the project site and would provide 43 parking spaces, six accessible spaces, two van accessible spaces, 18 electric vehicle spaces, one accessible electric vehicle space, and one electric vehicle accessible van space, for a total of 71 spaces.

Access and Circulation

As shown in Figure 2-1, Project Components, access to the proposed project would be provided via three driveways from Park View Drive. The first driveway would provide access directly between the parking garage and Park View Drive, via an ingress and an egress lane. The second driveway would include one ingress and one egress lane. The ingress lane would lead from Park View Drive to the proposed parking structure, via the proposed medical office building's patient drop-off zone, which would be located immediately west of the medical office building. The egress lane would lead from the parking structure to the exit leading to Park View Drive.

A third driveway would be located at the existing cul-de-sac's southernmost terminus and would include one ingress and one egress lane, both of which would direct traffic to and from the proposed surface parking lot, east of the medical office building.

Clearly delineated lanes, signage, and landscaping, as well as freestanding retaining walls and truncated domes would maintain internal circulation on the project site. Emergency access to the project site would be provided and maintained via the proposed driveways described above. Additionally, a fire access path would be located along the eastern side of the project site, behind the proposed medical office building.

Signage

The proposed project would include sufficient signage, including a welcome sign, site identification and address signs, Kaiser Permanente logo branding signs, directional signs, and informational signs. The details of the on-site signage is shown on Figure 2-3a, Proposed Project Signage and Figure 2-3b, Sign Location Plan, as follows:

- The Kaiser Permanente logo branding sign would be mounted to the western and southern side of the medical office building. The sign would be internally illuminated and would measure approximately 4½ feet wide and 46 feet long at its largest point.
- The site identification entry arch and welcome sign would be located on either side of the first driveway. The site identification sign would be internally illuminated and would measure approximately 15 feet high and 11 feet wide at its widest point. The welcome sign would be mounted on posts, externally illuminated, and would measure approximately 19 feet in length and 6 feet in height at its largest point.
- The project site address would be mounted on the western side of the medical office building alongside the Kaiser Permanente logo branding sign.
- The parking structure identification signs would be flagged outside of the structure and would measure approximately 13 feet high and 3 feet wide. Additional welcome signs would also be mounted to the parking structure's entrance/exit portal. These welcome signs would be externally illuminated and would measure approximately 8 feet long and 2 feet wide.
- All smaller informational signs (e.g. no smoking and access information) would be posted on-site in the relevant locations.

Proposed Infrastructural and Utility Improvements

As stated in Section 1.3, Environmental Setting, there are no public sidewalks adjacent to the project site; however, existing utilities are present and are located within the Park View Drive ROW. Under the proposed project, some existing utilities and associated infrastructure would be protected in place, while others would be removed during construction.

In addition to the demolition and removal of an existing chain-link fence, which borders the project site's southern perimeter, the proposed project would include off-site improvements, implementation of which would require the demolition and removal of off-site utility infrastructure, including:

- A portion of the 8-inch water line, located at the cul-de-sac's northernmost terminus, within the Park View Drive ROW
- A portion of the 8-inch sewer line, located at the cul-de-sac's northernmost terminus, within the Park View Drive ROW
- The existing curb and gutter on the southeastern corner of the Park View Drive cul-de-sac
- A single curb-side catch basin located on the eastern side of Park View Drive

Under the proposed project, new utility lines, including water lines, sewer lines, storm drain lines, and fire water lines would be connected to the existing utility lines in the Park View Drive ROW. These utilities would be undergrounded beneath the project site and would run from Park View Drive, between the proposed parking structure and the medical office building before tying into the medical office building underneath the proposed service storage yard. Additionally, the existing Park View Drive cul-de-sac would remain in place; however, a concrete pedestrian pavement/sidewalk, curb, and gutters would be constructed, thereby extending pedestrian amenities to the project site.

Proposed Landscaping

As shown in Figure 2-4, Preliminary Landscape Plan, the proposed project would include a comprehensive vegetated landscape area, which, when implemented, would cover approximately 38,874 square feet (or, 26.25%) of the project site. In addition to perimeter landscaping around the property line and throughout the surface parking lot, the proposed project would include an entry garden, a landscaped healing garden, a building support yard, a pollinator garden, and a garden path. All trees and landscaping planted under the proposed project would be drought resistant and would require low water use. The plant palette would consist of native and adapted plants. The irrigation system would be designed to minimize water use and would include valves for different hydro zones and proper use of irrigation spray heads and bubblers. Surface parking stalls would be paved with permeable asphalt to reduce site runoff.

Sustainable Design Features

The project is anticipated to be designed such that it achieves Gold certification under the Leadership in Energy and Environmental Design (LEED) program, which is the second highest of four certification ratings offered through LEED. The project is anticipated to incorporate light-emitting diode (LED) lighting, optimized envelope thermal properties (which would decrease reliance on conventional heating and air conditioning), water efficiency techniques, optimized energy performance and controls, materials with renewable content, and measures to protect indoor environmental quality. These building and operational measures would contribute to achievement of the LEED Gold rating. The LEED rating that is ultimately pursued and the associated sustainable design features would be refined during the engineering design phases of the project.

The project would also incorporate a solar panel system that would be installed on the roof of the parking structure and on canopies covering the surface parking areas. The annual production of the solar panel system is expected to be 556.2 megawatt hours. The surface parking area would provide 20 electric vehicle spaces.

2.3.....Project Construction

The proposed project includes grading of the entire project site, followed by construction of the proposed uses. Project construction is anticipated to start in April 2020¹ and would last approximately 15 months, ending in July 2021. Construction activities for the proposed project would include removing the existing chain-link fence that surrounds the project site's perimeter, grading, site preparation, building construction and utility trenching, paving, and architectural coating. The equipment fleet, number of workers, and expected duration for each of these activities is shown in detail in Table 3.3-2, Construction Scenario Assumptions, in Section 3.3, Air Quality.

2.4.....Project Operation

The proposed medical office building would be fully operational by September 2021. The medical office building would maintain operational business hours between 8:00 a.m. and 5:00 p.m., and the building would be open between 7:00 a.m. and 7:00 p.m. The conference center would be made available after hours as needed. The project would not include any emergency services (i.e., all services would be outpatient). Approximately 125 full-time employees would work out of the medical office building. Some employees may also be part time. The maximum shift at the building would have 167 employees. The building is expected to receive between 600 and 650 visitors per day.

The site design would include an area that could be used for a farmer's market in the future. However, initiation and operation of a farmer's market would ultimately be coordinated at a future time between Kaiser Permanente and the City.

On-site security would be provided for the building between 7:00 a.m. and 8:00 p.m. Security services would include security officers and management oversight. The main lobby of the building would have a security desk, and the pharmacy would be subject to a variety of specialized security measures, including alarms, lockers, security grills, and secure cabinets. The building would also be equipped with alarms and closed-circuit television cameras. The alarms and camera feeds would be remotely accessible for monitoring by security officers at Kaiser's Security Operations Center, which would provide 24/7 security to the site.

¹ The analysis assumes a construction start date of April 2020. In practice, construction is anticipated to begin at a later date. However, using an earlier start date represents the worst-case scenario for criteria air pollutant emissions (evaluated in Section 3.3 of this IS/MND) because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

2.5.....Required Permits and Approvals

In order for the proposed project to proceed, the following permits and approvals would be required from the City:

- Site Plan Review for the Kaiser Permanente Covina Medical Office Building Project
- Lot Merger

Permits or approvals from other agencies may also be required and are listed below. These permits would be administrative in nature.

- State Water Resources Control Board, Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit, Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ, NPDES No. CAS000002.
- Los Angeles County Fire Department – Plan approval for the Kaiser Permanente Covina Medical Office Building Project.
- Utility providers – Utility connection permits for the Kaiser Permanente Covina Medical Office Building Project
- California Department of Transportation – Coordination and encroachment permit to implement transportation mitigation measures

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SOURCE: Cannon Design 2019

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SOURCE: Cannon Design 2019

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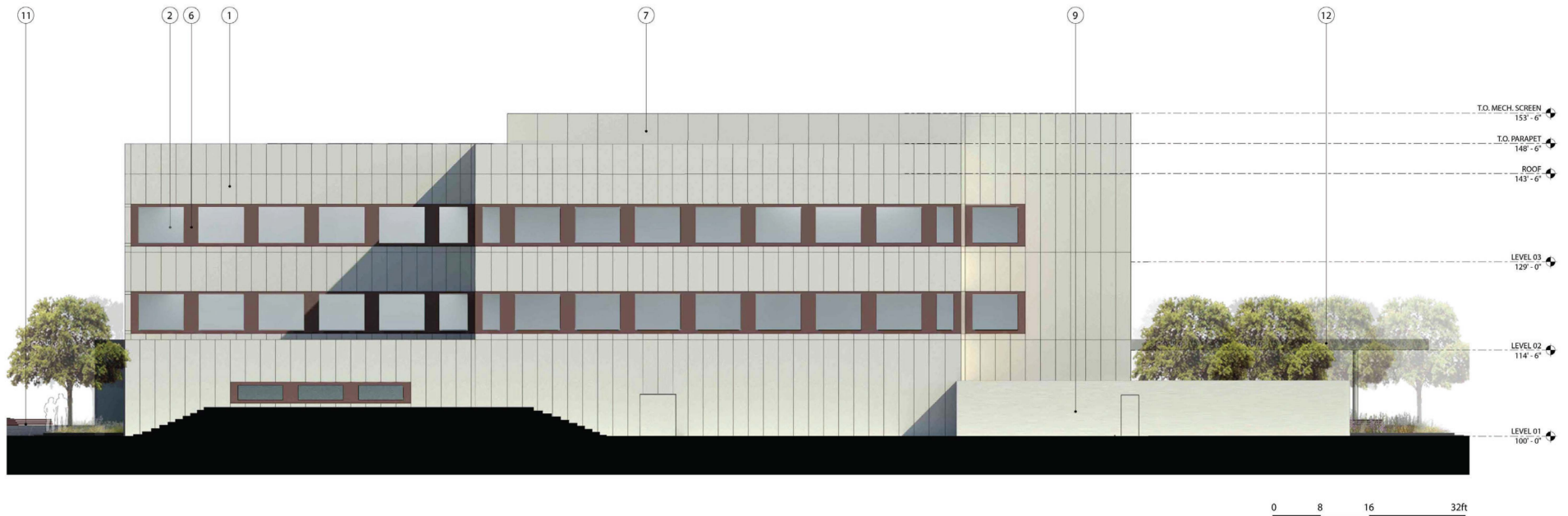
FIGURE 2-2b

South Elevation

Kaiser Permanente Covina Medical Office Building Project

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1. PREFABRICATED EXTERIOR WALL PANELS WITH EXTERIOR FINISH INSULATION SYSTEM (EIFS)
2. ALUMINUM FRAMED WINDOWS WITH 1" INSULATING GLAZING UNITS (IGL-1), CLEAR GLASS WITH TRIPLE SILVER LOW-E COATING
3. GLAZED CURTAIN WALL - 4-SIDED SSG SYSTEM WITH 1" INSULATING GLAZING UNITS (IGL-1), CLEAR GLASS WITH TRIPLE SILVER LOW-E COATING
4. SPANDREL GLAZING - 4-SIDED SSG CURTAIN WALL FRAMING WITH PAINTED METAL SHADOWBOX PANEL BEHIND
5. WINDOW/CURTAIN WALL TRIM - METAL COMPOSITE MATERIAL (MCM)
6. WINDOW/CURTAIN WALL TRIM, ACCENT COLOR - METAL COMPOSITE MATERIAL (MCM)
7. METAL SCREEN WALL WITH CONCEALED FASTENERS AND VERTICAL SEAM
8. CUSTOM PERFORATED METAL SCREEN INTEGRATED INTO PREFABRICATED EXTERIOR WALL PANELS
9. SERVICE YARD WALL - CMU WITH EXTERIOR PLASTER FINISH MATCHING EXTERIOR WALL PANELS
10. HOLLOW METAL DOOR FLUSH WITH FACADE PANELS, COLOR TO MATCH
11. CONCRETE BENCHES WITH WOOD SEATS
12. CANOPY - PAINTED STEEL STRUCTURE WITH PERFORATED RIB PANELS
13. SERVICE YARD GATE

SOURCE: Cannon Design 2019

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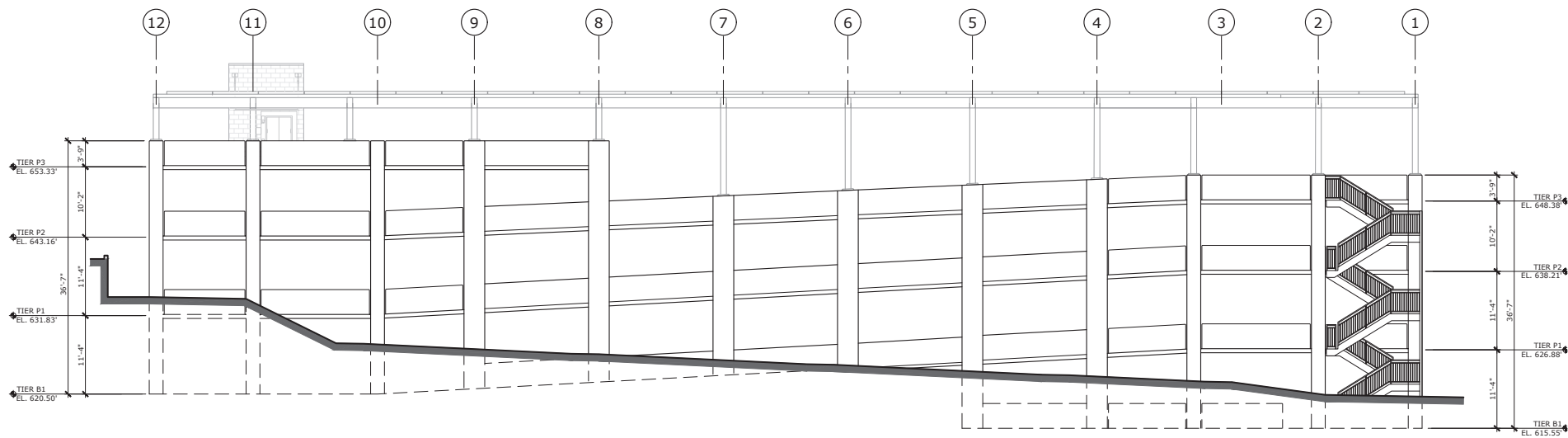
FIGURE 2-2d

East Elevation

Kaiser Permanente Covina Medical Office Building Project

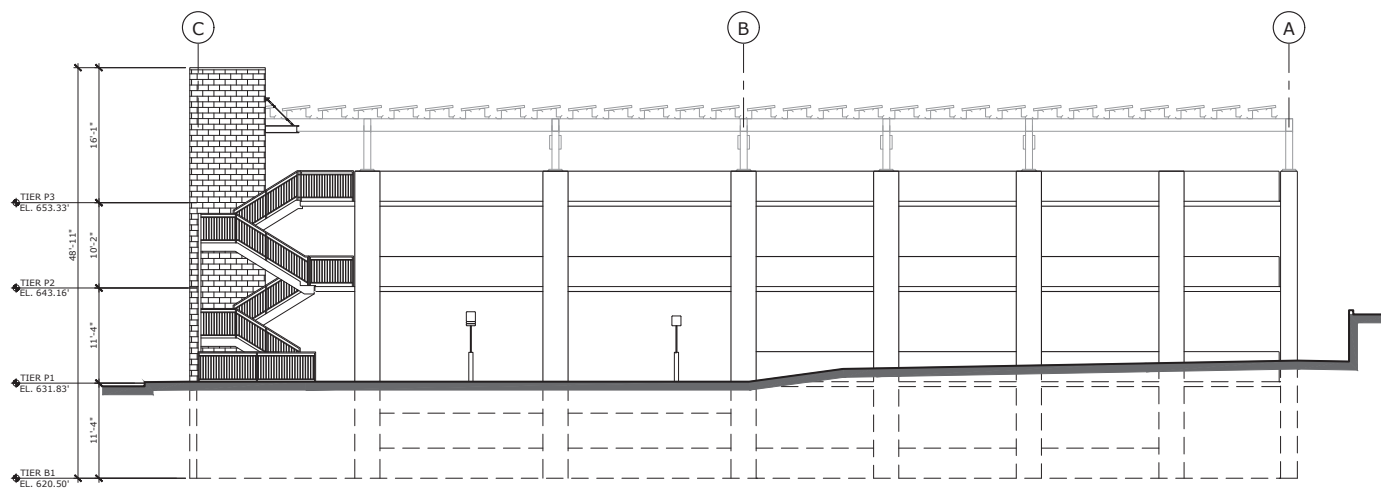
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1 NORTH ELEVATION

SCALE = 1/8" = 1'-0"



2 EAST ELEVATION

SCALE = 1/8" = 1'-0"

SOURCE: Parking Design Solutions 2019

DUDEK

FIGURE 2-2f

Parking Structure Elevations (North and East)

Kaiser Permanente Covina Medical Office Building Project

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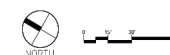


LANDSCAPE AREA RATIO

LOT AREA:	148,104 SF
OPEN SPACE:	102,802 SF
VEGETATED LANDSCAPE AREA:	38,874 SF
LANDSCAPE AREA RATIO:	26.25%

LEGEND

1. PATIENT DROP OFF
2. ENTRY GARDEN
3. HEALING COURTYARD
4. BUILDING SUPPORT YARD
5. POLLINATOR GARDEN
6. THRIVE PATH
7. FIRE ACCESS PATH



SOURCE: Cannon Design 2019

DUDEK

FIGURE 2-4

Preliminary Landscape Plan

Kaiser Permanente Covina Medical Office Building Project

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3.0 INITIAL STUDY CHECKLIST

1. Project title:

Kaiser Permanente Covina Medical Office Building Project

2. Lead agency name and address:

City of Covina
125 East College Street
Covina, California 91723

3. Contact person and phone number:

Brian K. Lee, AICP – 626.384.5460

4. Project location:

1664 Park View Drive, Covina, California 91724

5. Project sponsor's name and address:

Kaiser Permanente
393 E. Walnut Street, 4th Floor 043W02
Pasadena, California 91188

6. General plan and zoning designation:

General Commercial

7. Zoning:

C-P - Administrative and Professional Office, with a Planned Community Development (PCD) Overlay

8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

The Kaiser Permanente Covina Medical Office Building Project (proposed project) would include the development of a currently vacant, 3.42-acre project site located at 1664 Park View Drive in the City of Covina (City). The proposed project would include the demolition and grading of the project site, the construction of a 58,475 square-foot medical office building, a 4-story parking garage with 256 parking spaces, surface parking with 71 parking spaces and associated infrastructural, utility, and landscaping improvements.

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

A City park (Parque Xalapa, which is 2 acres in size), commercial uses, and single-family residences are located north of the project site across East Holt Avenue. A commercial office building lies immediately north of the project site, beyond which is a vacant parcel that is planned for development of the recently-approved Oakmont Senior Living/Memory Care Facility. Single-family residences and one commercial building are located east of the project site. Commercial buildings lie adjacent to the project site's western perimeter across Park View Drive. The I-10 freeway, which generally extends in an east-west direction, lies borders the project site's southern perimeter and runs in a northwest-southeast direction southwest of the project site immediately adjacent to these commercial buildings west of the project site.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

State Water Resources Control Board, Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) 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.?

Yes; refer to Section 3.18 of this IS/MND for details.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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

Determination (To be completed by the Lead Agency)

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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


Signature

3.30.2020
Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance

3.1.....Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines. Less commonly, certain urban settings or features, such as a striking or renowned skyline, may also represent a scenic vista. Scenic vistas are generally considered views that are accessible from public vantage points, such as public roadways and parks. Effects to private views are not specifically protected under CEQA. (Effects on private views are not considered impacts on the environment generally under CEQA.) There are no officially designated scenic vistas in the City (City of Covina 2000). However, views of scenic resources, namely the San Gabriel Mountains and the Covina Hills, are available from a variety of locations throughout the City. Due to the low topography of the Covina Hills, views of that resource are primarily observed from roadways that lead up to the hills or from the southbound travel lanes of major north–south roadways in the City. Due to the size and height of the San Gabriel Mountains, views of this resource are more prominent throughout the City. However, many views of the Covina Hills and San Gabriel Mountains have been compromised, either partially or entirely, by existing development, landscaping, and urban infrastructure. Complete views of the San Gabriel Mountains and the Covina Hills are generally limited to the City’s north–south roadway corridors. Potential effects of the proposed project on public views of the San Gabriel Mountains and Covina Hills are characterized in the subsection below.

Clear views of, and through, the project site are only available from one public vantage point: Park View Drive. Park View Drive extends southeast, parallel to the project site, from East Holt Avenue. Commercial office uses are located along both sides of the street, with the exception of the recently-approved Oakmont Senior

Living/Memory Care Facility and the project site, both of which front Park View Drive to the east. Views of the San Gabriel Mountains are available from Park View Drive, traveling north. However, these views are limited, fleeting, and are only available from the southern portions of the roadway where Park View Drive terminates in a cul-de-sac. As such, views of the San Gabriel Mountains from Park View Drive are of poor quality and would not be considered as contributing towards a scenic vista. As a traveler approaches the intersection of Park View Drive with East Holt Avenue, the San Gabriel Mountains become completely obstructed by vegetation and urban development. Development of the 58-foot high Kaiser Permanente Covina Medical Office Building would eliminate the partial view of the San Gabriel Mountains ridgeline from the Park View Drive cul-de-sac. However, the view is limited to a specific location along Park View Drive and is substantially compromised by existing development under current conditions. As such, the proposed project would not result in a substantial adverse effect when compared to existing conditions.

A portion of the Covina Hills is visible from Park View Drive, traveling southeast. However, the view is limited to the roadway corridor only. Existing development and landscaping on either side of Park View Drive obstructs any other views that may have been available. Development of the proposed project would not further compromise this view.

Other public viewer locations in the vicinity of the project site that provide views of the San Gabriel Mountains and the Covina Hills include East Holt Avenue, East Via Verde Street, and the I-10. However, views of scenic resources from these public vantage points would not be impacted by the proposed project for the reasons described below.

- East Holt Avenue is a northeast–southwest trending roadway that lies approximately 460 feet north of the project site. Partial views of the Covina Hills are available to northeast-bound travelers. Views are very limited, as they are generally obstructed by existing vegetation and topography. No scenic resources are visible when traveling southwest. The view to the northeast is only experienced when looking directly along the corridor formed by East Holt Avenue. The proposed project would be located south of East Holt Avenue along Park View Drive and would introduce height and mass to a site that is currently vacant. However, because the existing view is only experienced when looking directly along the corridor formed by East Holt Avenue, the proposed project would not obstruct any views that are currently available along this corridor. Moreover, existing views of the project site from East Holt Avenue are obstructed by the commercial building located at 1074 Park View Drive. For these reasons, views of scenic resources that can be observed from East Holt Avenue would not be adversely affected by implementation of the proposed project.
- East Via Verde Street is a residential street that extends southeast from East Holt Avenue and runs approximately 480 feet east of, and parallel to, the project site. Residential development separates East Via Verde Street from the project site under existing conditions. No existing views of the project site are available to travelers along East Via Verde Street due to intervening dense vegetation and residential development on both sides of the roadway. Furthermore, low hills rise up on either side of the roadway, obstructing surrounding properties and developments that are not situated directly along East Via Verde Street. Upon project implementation, the proposed medical office building would be 58 feet in height at the highest point (with the rooftop mechanical equipment), and the higher stories could be visible to travelers driving along East Via Verde Street, looking west. However, potential views of the proposed development would be fleeting (i.e. temporary views to drivers passing on the street) and would not obstruct any views of any scenic resources, which are not available from East Via Verde Street under existing conditions.

- The I-10 is a major highway with a total of 10 travel lanes. It extends in an east–west direction, just south of the City’s southern borders. The I-10 runs adjacent to the southern boundary of the project site; however, is separated from the project site by a retaining/sound wall, which measures 14 to 20 feet in height. Fleeting glimpses of the Covina Hills ridgeline are available when looking southeast from the I-10, and fleeting glimpses of the San Gabriel Mountains are available when looking northwest from the I-10. Upon project operation, the proposed medical office building would be 58 feet in height at its highest point (with the rooftop mechanical equipment) and the higher stories may be visible to drivers traveling along the I-10, specifically in a northwest direction. However, views of the proposed development would be fleeting (i.e. temporary views to drivers passing on the street) and would not obstruct any views of scenic resources, which are not visible looking north towards the project site from the I-10 due to the existing retaining/sound wall.

For the reasons described above, scenic vistas are not available from public vantage points surrounding the project site, as existing views of scenic resources have already been substantially blocked by existing development, vegetation, and/or the topography of the surrounding landscape. As such, the proposed development would not have the potential to adversely affect any scenic vistas that are currently available in and around project site. Impacts would be **less than significant**. No mitigation is required.

b) *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 nearest officially designated state scenic highway is a portion of State Highway 2 that extends through the San Gabriel Mountains, beginning just north of the City of La Cañada Flintridge (Caltrans 2011). The portion of State Highway 2 that is officially designated as a State Scenic Highway is located approximately 15 miles northwest of the City of Covina. Due to this distance, the City is not within the viewshed of this State Scenic Highway. As such, the proposed project would not substantially affect any scenic resources within State Highway 2. Therefore, **no impact** on scenic resources within a state scenic highway would occur as a result of the proposed project.

c) *In non-urbanized areas, would the project 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?*

Less Than Significant Impact. A majority of the City is developed with commercial and residential structures, with some industrial buildings and public facilities in limited areas of the City. As such, the overall visual character and quality of the City is that of an urbanized, built-out community. Most existing buildings are one to two stories in height and are generally built with outer materials such as earth-toned stucco, earth-toned paints, wooden trim, and standard-sized windows. Landscaping trees and utility poles extend above most structures and can be seen in the foreground, middleground, and background from most vantage points around the City. Potential effects of the proposed project on the existing visual character and quality of the project area are described below.

The project site is currently vacant and includes some groundcover comprising grass, weeds, and several trees. Mature trees are situated along the site’s northwestern and eastern boundaries. The project site is surrounded by exiting commercial development and residential development and is bound by East Holt Avenue, Park View

Drive, and the I-10 freeway (see Figure 1-1, Project Location). As described in Section 2.1, the project site is located within the Village Oaks Office Park PCD. All other properties within the Village Oaks Office Park PCD have been developed or are under development currently, with the exception of the project site. As such, the project would bring the site into consistency with the surroundings properties within the Village Oaks Office Park through the construction of an office park use on a currently vacant the site.

Development of the proposed medical office building and associated parking garage would alter the visual character of the project site; however, the project would be consistent with the City's zoning requirements and regulations governing scenic quality. The existing office buildings along Park View Drive range in height from one to three stories, are surrounded with surface parking and landscaping planters, and are generally large, square, neutral-colored buildings with large windows. The proposed medical office building would be three stories (50 feet) in height, and the proposed parking structure would also be three stories above grade. Similar to the surrounding land uses, the project would be surrounded by surface parking and landscape planters. Additionally, as shown in Figures 2-2a through 2-2d, and the proposed project would incorporate design elements that generally improve the aesthetic of the project site and surrounding area. Furthermore, the proposed project would not include any design elements that would significantly interrupt the existing visual cohesion of the project area (such a bright paints/bright stucco, ill-fitting height, etc.). While the proposed project would be generally consistent in appearance with typical office park uses, the project would represent a visual change on the project site relative to existing conditions. This change would be primarily observable from Park View Drive. However, as described above, Park View Drive is characterized by other business park uses. As such, the proposed project would bring the site into consistency with existing land uses along Park View Drive. As described in Section 1.3 of this document, there are residential properties immediately east of the project site. While views from private properties are not considered impacts on the environment generally under CEQA, an evaluation of the change in the project site's appearance as viewed from the neighboring residences is provided below for informational purposes.

The project site is bordered to the east and north by residential properties, which are currently separated from the project site by retaining walls and/or vegetated berms. The proposed medical office building would be situated adjacent to existing residential properties to the north and east. The medical office building would be separated from the property to the north by a paved drive aisle/fire lane and a landscaped planter, which would include trees (see Figure 2-4). The paved area would provide a minimum separation of 32 feet between the medical office building and the planter area. As such, the residential property to the north would be separated from the medical office building by landscaping, trees, and a wide drive aisle/fire lane, all of which would serve to visually buffer the medical office building from the property to the north. The medical office building facade would be closer to the residential properties to the east (see Figure 2-1, which shows the orientation of the medical office building relative to the eastern project site boundary). Due to elevation differentials between the project site and adjacent residential properties, the proposed medical office building would appear lower when viewed from the adjacent residential properties. As explained in Section 2.2, the medical office building would extend approximately 1.5 stories (20 feet) above the residential properties, where they abut the project site on the east. Including the mechanical equipment enclosure, the medical office building would extend approximately 28 feet above the residential properties to the east. Currently, these properties are separated from the site by a landscaped berm and retaining wall. Under the proposed project, the existing retaining wall would be kept in place. Additional retaining walls would be installed on the berm at increasing elevations, with landscaping in between each wall. See Figure 2-2b, which shows the berm, proposed retaining walls, and landscaping along the eastern property boundary. Figure 2-4 shows an aerial view of this area. The landscaping

and walls would serve as partial visual screening of the proposed project. A structure that appears to be 1.5 stories in height (with some additional screening provided by landscaping and walls), would be generally consistent in scale with a residential neighborhood. However, as stated above, the medical office building would still be visible from adjacent residential properties and would change the appearance of the project site when viewed from these properties.

The proposed parking garage would also be situated adjacent to a residential property to the east. As with the medical office building, the elevation differentials between the project site and the adjacent residential property would cause the parking garage to appear shorter, when viewed from the neighboring property. As observed from the residential property to the east of the proposed parking structure, the maximum height of the parking structure (measured to the top of the elevator tower) would be approximately 27 feet. The top of the parking structure (measured to the top of the building) would be approximately 14 feet in height. As with the proposed medical office building, some screening would be provided by landscaping that would be installed along the project site boundaries. With the exception of the elevator shaft, the structure would appear to be about 1.5 stories in height. A 1.5-story building with some additional screening provided by landscaping and walls would be generally consistent in scale with a residential neighborhood. However, the presence of the parking structure on the project site would change the appearance of the site when viewed from the adjacent residential properties.

As previously stated, while the visual character of the site would change when viewed from adjacent residential properties, effects to private views are not considered to be impacts on the environment generally under CEQA. Furthermore, the project site is located within a business park and within the vicinity of a 10-lane freeway. The project site is considered to be located within an urbanized area, and the proposed project would be consistent with applicable regulations governing scenic quality. Impacts would be **less than significant**. No mitigation is required.

d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less Than Significant Impact. Approximately 99% of the City is developed. As such, much of the City is currently exposed to numerous sources of nighttime lighting and nighttime glare, such as nighttime lighting from streetlights, business identification signs, commercial and residential windows, and headlights from vehicles. Additional lighting or lighting in new locations within the City could result in potential effects if new sources of light trespass are introduced and if the light trespass affects light-sensitive receptors such that daytime or nighttime views would become adversely affected. (Light-sensitive receptors are generally considered to be residential properties, and also may include hotel, hospital, or nursing home uses, where excessive light at night may impact the use of the property). There are lighting regulations at the state and local level that help protect light-sensitive receptors. For example, the California Green Building Standards Code Section 5.106.8, Light Pollution Reduction, sets forth requirements for all non-residential outdoor lighting, which include standards for backlight, uplight, and glare. The City also has its own regulations that limit the amount of light spillover onto residential uses. Covina Municipal Code (CMC) Section 9.42.020 (applicable to disturbances imposed on residential uses only) requires that “no operation, activity, sign, or lighting fixture shall create illumination that exceeds five foot-candles² on any adjacent property, whether the illumination is direct or indirect light from the

² Municipal Code Section 9.42.020 defines a foot-candle as the illumination produced by a light of one international candle upon a surface one foot away.

source. Glare levels shall be measured with a photoelectric photometer following the standard spectral luminous efficiency curve adopted by the International Commission on Illumination.”

The project site does not currently contain sources of nighttime lighting or glare, since it is currently vacant and undeveloped. However, numerous sources of nighttime lighting are present in the surrounding area. Park View Drive is lined with streetlights on both sides. Some of the surface parking lots along Park View Drive have lampposts, and all of the commercial buildings have windows, some of which may be lit during nighttime hours. The proposed project would introduce several new sources of nighttime lighting to the area, including business identification signs, landscape lighting, pedestrian pathway illumination, and architectural lighting. As described above, lighting is of most concern when it may potentially spill over or trespass from a project site onto nearby properties, particularly residential properties, and the public sidewalk or right-of-way.

As described in Section 3.1(c), residential properties abut the project site to the north and east. Some separation would be provided between the proposed medical office building and the residential property to the north. However, the east facade of the medical office building and the east facade of the parking structure would be within close proximity to residential properties. As described in Section 3.1(c), portions of these facades would be visible from the adjacent residential properties, although some screening would be provided by landscaping and retaining walls. However, the facades facing the residential properties would not provide significant sources of nighttime illumination. As shown in Figure 2-2c and Figure 2-2d, no lit signage is proposed for these facades of the medical office building. Nighttime lighting would be generally limited to light emanating from windows, which would be limited after operational hours. (The medical office building would maintain operational business hours between 8:00 a.m. and 5:00 p.m., and the building would be open between 7:00 a.m. and 7:00 p.m.). As with the medical office building, the parking garage would not have lit signage on its eastern facade. Additionally, the parking garage would not be in use at night, as the medical office building would close at 7:00 p.m. For these reasons, lighting would be limited on the facades of the buildings that directly face adjacent residential properties.

Additionally, the proposed project would comply with the state and local lighting regulations described above, which would further limit any potential light trespass onto residential properties and would limit outdoor lighting levels. As a condition of approval, the City will require that a complete exterior lighting plan, including photometric printout, be submitted for review and approval, prior to the issuance of building permits. The plan shall illustrate light fixture features, locations, height, and compliance with applicable City Code provisions on illumination, design, and lighting orientation/glare prevention and the minimum one foot-candle standard, where applicable. The photometric printout will include a point-by-point lighting study that demonstrates light spillage will not exceed one foot-candle at a maximum of 20 feet beyond the property boundary line onto the adjoining residential property. Due to the design of the proposed project, as well as required compliance with state and local lighting regulations, the proposed project is not expected to create a substantial new source of nighttime lighting, such that nighttime views in the area would be substantially affected.

Daytime glare is typically associated with reflective building materials, such as glass, stainless steel, aluminum, and photovoltaic panels, which produce glare when the sun shines on the surface. Daytime glare is considered significant if it adversely affects daytime views in the area. With respect to daytime glare, building materials would include neutral-colored plaster, metal composite window/curtain walls and trim, and glazed windows. As shown in Figures 2-2a through 2-2d, although the proposed project would incorporate glass windows into project design, the majority of these windows are situated on the medical office building’s western facade,

fronting Park View Drive and oriented away from residential development to the north and east. As shown in Figure 2-2c and Figure 2-2d, the medical office building would primarily include smaller windows and neutral-colored prefabricated wall panels where it fronts residential development, thereby reducing the potential for significant daytime glare at nearby residences. Additionally, as described in Section 3.1(c), the proposed structures would be partially screened from adjacent residential properties by existing topography, proposed landscaping, and retaining walls. These features would partially obstruct and reduce light and glare that may emanate from the project site.

The proposed project would include solar panels on the canopied rooftop of the surface parking lot, as well as on the rooftop of the parking structure. Although these solar panels would be made from materials that are typically reflective and, as such, could produce glare, any solar panels associated with the proposed project would be placed on rooftops and, thus, would be obscured from motorists, pedestrians and the adjacent residences at street level. For these reasons, the proposed project is not anticipated to produce new sources of daytime glare such that daytime views are substantially affected. Impacts relative to light and glare would therefore be **less than significant**. No mitigation is required.

3.2.....Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Department 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:				
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"/>

- 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. No areas within the City have been designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on maps prepared pursuant to the Department of Conservation's Division of Land Resource Protection (DLRP) Farmland Mapping and Monitoring Program (FMMP; DOC DLRP 2019). The project site, although currently vacant, is not zoned for agricultural uses in the City's General Plan and is surrounded by urban development, which precludes the use of the project site for agricultural activities. Therefore, development of the proposed project would not convert Farmland to non-agricultural uses. **No impact** would occur.

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

No Impact. The proposed project is located within the Commercial, Administrative, and Professional Office (C-P) zoning district and is also within a PCD overlay area for the Village Oaks Office Park, “Phase III” (City of Covina 2015). As such, no portion of the project would occur within an area zoned by the City for agricultural use. As shown on the Los Angeles County Williamson Act Fiscal Year 2015/2016 map, no areas that are under a Williamson Act contract exist in the City (DOC DLRP 2016). For these reasons, implementation of the proposed project would not conflict with existing zoning for agricultural use, nor would it conflict with a Williamson Act contract. **No impact** to Williamson Act contract lands or land zoned for agricultural uses would occur as a result of the proposed project.

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. As described in Section 3.2(b), the project site is located in the C-P zoning district and is also within a PCD overlay area for the Village Oaks Office Park, “Phase III.” As such, the proposed project would not be within areas zoned for forest land, timberland, or Timberland Production, and would not affect any areas zoned for forest land, timberland, or Timberland Production. The proposed project is located within a developed, urban area, and there are no areas zoned for agricultural or forest land uses within the vicinity of the project area. Therefore, the project would not conflict with existing zoning, or cause the rezoning of, forest land, timberland, or Timberland Production land, and **no impact** would occur.

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

No Impact. The project area is located within a built-out, urbanized area of the City. No forest lands exist within the project area. As such, the proposed project would not result in loss of forest land or conversion of forest land to non-forest use. **No impact** would occur.

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. No agricultural resources or forest land resources currently exist within the project area. Therefore, the proposed project would not involve changes in the existing environment that would result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. **No impact** would occur.

3.3.....Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" 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"/>

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

Less Than Significant Impact. The project area is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board in March 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus, if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows (SCAQMD 1993):

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion regarding the proposed project's potential to result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP, project-generated criteria air pollutant emissions were estimated and analyzed for significance and are addressed under Section 3.3(b). Detailed results of this analysis are included in Appendix A. As presented in Section 3.3(b), construction and operation of the proposed project would not generate criteria air pollutant emissions that would exceed the SCAQMD threshold.

The second criterion regarding the proposed project's potential to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the proposed project's land use designations and potential to generate population growth. In general, projects are considered consistent with, and would not conflict with or obstruct implementation of the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016), which is based on general plans for cities and counties in the SCAB, for the development of the AQMP emissions inventory (SCAQMD 2017).³ The SCAG 2016 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans, and therefore, the 2016 AQMP is generally consistent with local government plans.

As discussed in Section 1.3 of this IS/MND, the project site is zoned C-P - Administrative and Professional Office, in the City's General Plan. Medical office buildings are allowed within the C-P zone and, as such, the proposed project would not require a zoning change or General Plan amendment. The project is consistent with the underlying commercial and professional land use assumed in the SCAG RTP/SCS forecasts and used in the SCAQMD AQMP development.

³ Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board, Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

In summary, based on the considerations presented for the two criteria, impacts relating to the project's potential to conflict with, or obstruct implementation of, the applicable AQMP would be **less than significant**. No mitigation is required.

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?*

Less Than Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003a).

A quantitative analysis was conducted to determine whether the proposed project would result in a cumulatively considerable net increase in emissions of criteria air pollutants for which the SCAB is designated as nonattainment under the NAAQS or CAAQS. Criteria air pollutants include ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM₁₀; coarse particulate matter), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM_{2.5}; fine particulate matter), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O₃, as well as CO, sulfur oxides (SO_x), PM₁₀, and PM_{2.5}.

Regarding NAAQS and CAAQS attainment status,⁴ the SCAB is designated as a nonattainment area for federal and state O₃ and PM_{2.5} standards (CARB 2017a; EPA 2018a). The SCAB is also designated as a nonattainment area for state PM₁₀ standards; however, it is designated as an attainment area for federal PM₁₀ standards. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. SCAB is designated as an attainment area for federal and state CO and NO₂ standards, as well as for state SO₂ standards. Although the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.⁵

The proposed project would result in emissions of criteria air pollutants for which the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (EPA) have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. The SCAQMD CEQA Air Quality Significance Thresholds, as revised in April 2019, set forth quantitative emission significance thresholds for criteria air pollutants, which, if exceeded, would

⁴ An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. These standards for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare are set by the U.S. Environmental Protection Agency and CARB, respectively. Attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards.

⁵ The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

indicate the potential for a project to contribute to violations of the NAAQS or CAAQS. Table 3.3-1 lists the revised SCAQMD Air Quality Significance Thresholds (SCAQMD 2019a).

Table 3.3-1 SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	Construction (in pounds/day)	Operation (in pounds/day)
VOC	75	55
NO _x	100	55
CO	550	550
SO _x	150	150
PM ₁₀	150	150
PM _{2.5}	55	55
Lead ^a	3	3
Toxic Air Contaminants and Odor Thresholds		
TACs ^b	Maximum incremental cancer risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic and Acute Hazard index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Source: SCAQMD 2019a.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); PM_{2.5} = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District; TAC = toxic air contaminant

^a The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the proposed project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

^b TACs include carcinogens and noncarcinogens.

The project would result in a substantial contribution to an existing air quality violation of the NAAQS or CAAQS for O₃, which is a nonattainment pollutant, if the proposed project's construction or operational emissions exceed the SCAQMD VOC or NO_x thresholds shown in Table 3.3-1. These emission-based thresholds for O₃ precursors are intended to serve as surrogates for an "ozone significance threshold" (i.e., the potential for adverse O₃ impacts to occur) because O₃ itself is not emitted directly, and the effects of an individual project's emissions of O₃ precursors (i.e., VOCs and NO_x) on O₃ levels in ambient air cannot be reliably or meaningfully determined through air quality models or other quantitative methods.

The California Emissions Estimator Model (CalEEMod) version 2016.3.2 was used to estimate emissions from construction and operation of the proposed project. The following discussion quantitatively evaluates project-generated construction and operational emissions and impacts that would result from implementation of the proposed project.

Construction Emissions

Construction of the proposed project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, and VOC off-gassing from architectural coatings and asphalt pavement application) and off-site sources (e.g., vendor trucks, haul trucks, and worker vehicle trips). Specifically, the exposure of earth surfaces to wind from the direct disturbance and movement of soil can result in entrained dust and PM₁₀ and PM_{2.5} emissions. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result

in emissions of VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. Application of architectural coatings, such as exterior paint and other finishes, and application of asphalt pavement would also produce VOC emissions. Construction emissions can vary substantially from day to day depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather conditions.

For purposes of estimating proposed project emissions, and based on information provided by the project applicant, it is assumed that construction of the project would commence in April 2020⁶ and would last approximately 15 months. The analysis contained herein is based on the following schedule assumptions (duration of phases is approximate):

- a) Site Preparation: 2 weeks
- b) Grading: 5 weeks
- c) Trenching: 9 months
- d) Building Construction: 9 months
- e) Architectural Coating: 4 months
- f) Paving: 4 months

General construction equipment modeling assumptions are provided in Table 3.3-2. The equipment mix was provided by the project applicant, with default horsepower and load factors provided in CalEEMod. For the analysis, it was generally assumed that heavy-duty construction equipment would be operating at the site five days per week, up to a maximum of eight hours per day. Vendor truck trips include water/sweep trucks and building material delivery. Total haul trucks account for the net export of 11,000 cubic yards (CY) of soils, based on the anticipated 41,000 CY of cut and 30,000 CY of fill needed at the project site. Detailed construction equipment modeling assumptions are provided in Appendix A.

Table 3.3-2 Construction Workers, Vendor Trips, and Equipment Use

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Daily Usage Hours
Site Preparation	20	6	0	Excavator	1	8
				Tractors/Loaders/Backhoes	3	8
Grading	26	6	1,376	Graders	2	8
				Scrapers	4	8
Trenching	30	6	0	Excavators	4	8
				Tractors/Loaders/Backhoes	4	8
Building Construction	180	44	0	Cranes	1	8
				Forklifts	2	8
				Aerial Lifts	2	8
Architectural Coating	20	2	0	Aerial Lifts	2	8
				Air Compressors	2	8
Paving	20	6	0	Cement and Mortar Mixers	2	6

⁶ The analysis assumes a construction start date of April 2020. In practice, construction is anticipated to begin at a later date. However, using an earlier start date represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Table 3.3-2 Construction Workers, Vendor Trips, and Equipment Use

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Daily Usage Hours
				Excavators	2	8
				Rollers	3	8
				Tractors/Loaders/Backhoes	3	8

Notes: See Appendix A for additional details.

The proposed project would be required to comply with SCAQMD Rule 403 to control dust emissions generated during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the actively disturbed areas, depending on weather conditions.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers used during construction of the project. CalEEMod calculates the VOC evaporative emissions from application of surface coatings based on the VOC emissions factor, the building square footage, and the assumed fraction of surface area. VOC rates of 100 grams per liter for interior and exterior coatings were assumed consistent with CalEEMod default values. Table 3.3-3 shows the estimated maximum daily construction emissions associated with the construction phase of the proposed project.

Table 3.3-3 Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds per day					
2020	5.31	69.26	39.44	0.10	5.41	2.53
2021	11.49	35.67	46.25	0.10	4.46	2.23
Maximum	11.49	69.26	46.25	0.10	5.41	2.53
SCAQMD threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: SCAQMD 2019a.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); PM_{2.5} = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District.

See Appendix A for detailed results. The values shown are the maximum summer or winter daily emissions results from CalEEMod and reflect control of fugitive dust (watering two times daily) required by SCAQMD Rule 403.

As shown in Table 3.3-3, the proposed project's maximum daily construction emissions would not exceed the SCAQMD thresholds for any criteria air pollutant.

Operational Emissions

Operation of the proposed project would generate VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions associated with vehicular traffic, area sources (consumer products, architectural coatings, landscaping equipment), and energy sources (natural gas, appliances, and space and water heating). CalEEMod was used to estimate daily emissions from operational sources for the proposed project.

On-road vehicular trip generation data provided in the Transportation Impact Study (TIS) for the proposed project (Appendix J) was incorporated into CalEEMod. CalEEMod default data, including trip characteristics, emissions factors, and trip distances, were conservatively used for the model inputs. Emission factors representing the vehicle mix and emissions for 2022 were used to estimate emissions associated with vehicular sources for the proposed project. The 2022 operational year represents the first year after build-out and would represent maximum daily operational emissions.

CalEEMod was also used to estimate emissions associated with area and energy sources. Area sources include landscape maintenance equipment, consumer products, and architectural coatings for maintenance of buildings. Energy sources include emissions associated with building electricity and natural gas usage (non-hearth). Default assumptions in CalEEMod were used for natural gas consumption. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHGs in CalEEMod, since criteria pollutant emissions occur at the location of power generation, which is typically off site.

Table 3.3-4 presents the maximum daily emissions associated with operation of the proposed project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Complete details of the emissions calculations are provided in Appendix A.

Table 3.3-4 Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds per day					
Area	1.42	<0.01	0.04	<0.01	<0.01	<0.01
Energy	0.02	0.17	0.14	<0.01	0.01	0.01
Mobile	3.35	15.77	40.64	0.14	11.63	3.19
Total	4.79	15.94	40.83	0.15	11.65	3.20
SCAQMD Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes:

VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); PM_{2.5} = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District.

See Appendix A for complete results.

Values of “<0.01” indicate that the estimated emissions are less than two decimals. The values shown are the maximum summer or winter daily emissions results from CalEEMod. The total values may not add up exactly due to rounding.

As shown in Table 3.3-4, the maximum increase in daily operational emissions of VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} generated by the proposed project would not exceed the SCAQMD’s significance thresholds.

As discussed previously, the SCAB has been designated as a federal nonattainment area for O₃ and PM_{2.5}, and a state nonattainment area for O₃, PM₁₀, and PM_{2.5}. Construction and operational activities of the proposed project would generate VOC and NO_x emissions (precursors to O₃) and emissions of PM₁₀ and PM_{2.5}. However, as indicated in Tables 3.3-3 and 3.3-4, project-generated emissions would be minimal and would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x, PM₁₀, or PM_{2.5}.

Cumulative localized impacts would potentially occur if construction of a project were to occur concurrently with another off-site project. Schedules for potential future projects near the project area are currently unknown; therefore, potential impacts associated with two or more simultaneous projects would be considered speculative.⁷ However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by SCAQMD. Cumulative PM₁₀, PM_{2.5}, and VOC emissions would be reduced because all future projects would be subject to SCAQMD Rule 403, Fugitive Dust, which sets forth general and specific requirements for all sites in the SCAQMD, and SCAQMD Rule 1113, which regulates VOC emissions in architectural coatings.

Based on the preceding considerations, the proposed project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be **less than significant** during construction and operation. No mitigation is required.

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

Less Than Significant with Mitigation Incorporated. Localized project impacts associated with construction criteria air pollutant emissions are assessed below.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The closest sensitive receptor land uses are single-family residences located directly east of the project site.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of a project site as a result of construction activities. The impacts of the proposed project were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2009). According to the Final Localized Significance Threshold Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2009). Hauling of soils and construction materials associated with project construction are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions from the trucks would be relatively brief in nature and would cease once the trucks pass through the main streets.

The project site is located in Source-Receptor Area (SRA) 9 (East San Gabriel Valley). The SCAQMD provides guidance for applying CalEEMod to the LSTs. LST pollutant screening level concentration data is currently published for 1-, 2-, and 5-acre sites for varying distances. The maximum number of acres disturbed on the

⁷ The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145).

peak day was estimated using the “Fact Sheet for Applying CalEEMod to Localized Significance Thresholds” (SCAQMD 2011), which provides estimated acres per 8-hour day for crawler tractors, graders, rubber tired dozers, and scrapers. Based on the SCAQMD guidance, it was estimated that the maximum acres on the project site that would be disturbed by off-road equipment would be five acres per day (two graders and four scrapers operating during the grading phase).⁸ Although the closest sensitive receptors are single-family homes located approximately 20 feet to the east of the project boundary, the shortest receptor distance available in the SCAQMD LST Methodology and what assumed for this analysis is 25 meters (82 feet).⁹

Construction activities associated with the project would result in temporary sources of on-site fugitive dust and construction equipment emissions. Off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis. The maximum allowable daily emissions that would satisfy the SCAQMD localized significance criteria for SRA 9 are presented in Table 3.3-5 and are compared to the maximum daily on-site construction emissions generated during the project.

Table 3.3-5 Construction Localized Significance Thresholds Analysis

Year	NO ₂	CO	PM ₁₀	PM _{2.5}
	pounds per day (on site) ^a			
2020	59.66	33.46	4.73	2.33
2021	16.32	22.13	0.92	0.85
Maximum	59.66	33.46	4.73	2.33
SCAQMD LST Criteria	203	1,733	14	8
Threshold Exceeded?	No	No	No	No

Source: SCAQMD 2009.

Notes: NO₂ = nitrogen dioxide; CO = carbon monoxide; PM₁₀ = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); PM_{2.5} = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.

See Appendix A for detailed results. These estimates reflect control of fugitive dust (watering two times daily) required by SCAQMD Rule 403.

^a Localized significance thresholds are shown for a 5-acre disturbed area corresponding to a distance to a sensitive receptor of 25 meters in SRA 9, East San Gabriel Valley.

As shown in Table 3.3-5, proposed construction activities associated with the proposed project would not generate emissions in excess of site-specific LSTs; therefore, localized project construction impacts would be less than significant. No mitigation is required.

CO Hotspots

Regionally, proposed project-related travel would add to regional trip generation and increase the vehicle miles traveled within the local airshed and the SCAB. Locally, traffic generated by the proposed project would be added to the City’s roadway system near the project site. If such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles cold-started and operating at pollution-inefficient speeds, and is operating on roadways already crowded with non-proposed project traffic, there is a

⁸ The estimated disturbed area of 5 acres is based on each scraper disturbing 1 acre/8-hour day and each grader disturbing 0.5 acre/8-hour day. Since the project site is only 3.2 acres in size, the disturbed area estimate of 5 acres indicates that the equipment mix would be able to complete more than one pass during an 8-hour day.

⁹ Although receptors would be potentially 20 feet from the project boundary, the SCAQMD recommends that projects with boundaries closer than 25 meters to the nearest receptors should use the LSTs for receptors located at 25 meters (SCAQMD 2009).

potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing.

At the time that the SCAQMD 1993 Handbook was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP (Appendix V: Modeling and Attainment Demonstrations, SCAQMD 2003b) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. As a screening analysis to determine if there would be a potential CO impact for the project, the maximum 1-hour and 8-hour CO concentrations from these worst-case intersections were added to the background 1-hour CO concentration in the project area. If the summed 1-hour and 8-hour CO concentrations would be less than the respective CO CAAQS, and if the project would not increase daily traffic volumes at any study intersections to more than 100,000 vehicles per day, then the project would not result in a potential CO hotspot impact.

Using CO emission factors for 2002, the peak modeled CO 1-hour concentration was estimated to be 4.6 parts per million (ppm) at the intersection of Wilshire Boulevard and Veteran Avenue. When added to the maximum 1-hour CO concentration of 2.1 ppm for 2018 at the Pomona monitoring station (EPA 2018b), which is the nearest station to the project site that is also proximate to Interstate 10, the 1-hour CO would be 6.7 ppm, while the CAAQS is 20 ppm.

The 2003 AQMP also projected 8-hour CO concentrations at the four worst-case intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 ppm at the Sunset Boulevard and Highland Avenue intersection in 2002; the maximum 8-hour CO concentration was 3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002. Adding the 3.8 ppm to the maximum 8-hour CO concentration of 1.8 ppm at the Pomona monitoring station (EPA 2018b), the 8-hour CO would be 5.6 ppm, while the CAAQS is 9.0 ppm.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. Because the proposed project would not increase daily traffic volumes at any study intersection to more than 100,000 vehicles per day (Appendix J), a CO hotspot is not anticipated to occur and associated impacts would be less than significant.

Toxic Air Contaminants

Toxic Air Contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. As discussed under the LST analysis, the nearest sensitive receptors to the proposed project are residences located approximately 20 feet from the proposed project boundary. Health effects from carcinogenic air toxics are usually described in terms of cancer risk. SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a

project will contract cancer based on the use of standard California Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) non-carcinogenic effects.¹⁰ The TAC that would potentially be emitted during construction activities associated with development of the proposed project would be diesel particulate matter (DPM).

In addition to cancer and non-cancer risk thresholds, if the cancer risk at the maximally exposed individual resident exceeds 1 in a million, the SCAQMD also requires the evaluation of cancer burden (increase in cancer cases in the population), to be compared to the threshold of 0.5 excess cancer cases (SCAQMD 2019a). However, cancer burden was not evaluated for health risk impacts from construction, since it is based on a 70-year exposure period, whereas the duration of proposed project construction would be only 15 months (about 1.3 years).

The dispersion modeling of DPM was performed using the American Meteorological Society/EPA Regulatory Model (AERMOD), which is the model SCAQMD requires for atmospheric dispersion of emissions (SCAQMD 2019b). Principal parameters of this modeling are presented in Table 3.3-6.

Table 3.3-6 AERMOD Principal Parameters

Parameter	Details
Meteorological Data	The latest 5-year meteorological data for the Azusa (AZUS) station (Station ID 3179) from SCAQMD were downloaded (SCAQMD 2019c), and then input to AERMOD.
Urban versus Rural Option	Typically, urban areas have more surface roughness and structures and low-albedo surfaces that absorb more sunlight, and thus, more heat, relative to rural areas. According to SCAQMD guidelines, the urban dispersion option was selected and the Los Angeles County population for year 2010 (9,818,605 persons) input into AERMOD (SCAQMD 2019b).
Terrain Characteristics	Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate. Per SCAQMD guidance, the National Elevation Dataset (NED) dataset with resolution of 1 arc-second was used (SCAQMD 2019b).
Emission Sources and Release Parameters	Air dispersion modeling of DPM from construction equipment and diesel vehicles was conducted using emissions estimated using the CalEEMod, assuming emissions would occur up to 8 hours per day, 5 days per week. The construction equipment DPM emissions were modeled as a line of adjacent volume sources across the project site to represent proposed project construction with a release height of 5 meters, plume height of 2.33 meters, and plume width of 11.63 meters.
Receptors	This health risk assessment (HRA) evaluates the risk to existing residential receptors located in proximity to the project. A uniform 2-kilometer by 2-kilometer Cartesian grid with 50-meter spacing was centered over the project site and converted into discrete receptors to represent proximate sensitive receptors.

Source: SCAQMD 2019b; SCAQMD 2019c.

Note: See Appendix B.

Dispersion model plot files from AERMOD were then imported into CARB's Hotspots Analysis and Reporting Program Version 2 (HARP2) model to determine health risk, which requires peak 1-hour emission rates and annual-averaged emission rates for all pollutants for each modeling source. For the residential health risk, the HRA assumes exposure would start in the third trimester of pregnancy, per OEHHA guidance, in order to account for the greater sensitivity to TACs during early-life exposure. The detailed HRA is included as Appendix B, with results summarized below.

¹⁰ Non-cancer adverse health risks are measured against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various non-carcinogens from the proposed project to published reference exposure levels that can cause adverse health effects.

The maximally exposed receptor would be the nearest existing residence to the east of the project site. Potential health risk at the maximally exposed individual residence (MEIR) resulting from construction activities are shown in Table 3.3-7 below.

Table 3.3-7 Construction-Related Health Risk

Receptor	Cancer Risk (persons per million)	Chronic Impact
Unmitigated Construction		
Maximally Exposed Individual Resident (MEIR) ¹	60.20	0.053
SCAQMD Significance Criteria	10	1.0
Exceed Threshold?	Yes	No
Mitigated Construction²		
Maximally Exposed Individual Resident (MEIR) ¹	7.07	0.0062
SCAQMD Significance Criteria	10	1.0
Exceed Threshold?	No	No

Source: Appendix B

Note: MEIR = maximally exposed individual resident; SCAQMD = South Coast Air Quality Management District

Diesel exhaust exposure at receptors modeled with AERMOD, which were then input into HARP2 to generate health risk estimates. Construction diesel particulate exposure was assumed to begin in the 3rd trimester of pregnancy for a duration of 321 days of active construction.

¹ The MEIR for annual cancer and chronic health risk impacts is located to the east of the proposed project at Universal Transverse Mercator coordinates 420725 meter Easting (m E)/ 3770125 meters Northing (m N)

² Mitigated emissions include implementation of Mitigation Measure **MM-AQ-1**.

As shown in Table 3.3-7, Construction-Related Health Risk, the incremental cancer risk at the MEIR of 60.20 in one million (assuming exposure starts in 3rd trimester of pregnancy) from project construction would exceed the SCAQMD threshold of 10 in a million without mitigation. With incorporation of higher tier engines as included in Mitigation Measure **MM-AQ-1**, the project would result in an incremental cancer risk of 7.07 in one million.¹¹ The unmitigated and mitigated chronic hazard index would be 0.053 and 0.0062 at the MEIR, respectively, which would be below the SCAQMD threshold of 1.0. Project health risk impacts associated with construction would thus be less than significant after mitigation.

In regards to operations, the proposed project does not include potential sources of substantial TACs, such as large boilers or emergency generators. As such, the proposed project would not result in a substantial increase in TAC generation from on-site sources during long-term operations and would not result in significant health risk at nearby sensitive receptors.

Health Impacts of Criteria Air Pollutants

Operation of the proposed project would generate criteria air pollutant emissions; however, the proposed project would not exceed the SCAQMD mass-emission thresholds, as shown in Table 3.3-3 and 3.3-4.

VOCs would be associated with motor vehicles, construction equipment, and architectural coatings; however, project-generated VOC emissions would not result in the exceedances of the SCAQMD thresholds. Generally, the VOCs in architectural coatings are of relatively low toxicity. Additionally, SCAQMD Rule 1113 restricts the VOC content of coatings for both construction and operational applications. VOCs and NO_x are precursors to

¹¹ Mitigation Measure AQ-1 would also result in reduced criteria air pollutants, including NO_x, from construction equipment. These mitigated values are included in Appendix B.

O₃, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O₃ are generally associated with reduced lung function. The contribution of VOCs and NO_x to regional ambient O₃ concentrations is the result of complex photochemistry. The increases in O₃ concentrations in the SCAB due to O₃ precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O₃ concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O₃ NAAQS and CAAQS tend to occur between May and October when solar radiation is highest. The holistic effect of a single project's emissions of O₃ precursors is speculative due to the lack of quantitative methods to assess this impact. Nonetheless, because VOC and NO_x emissions associated with construction and/or operation would not exceed the SCAQMD daily thresholds (as depicted in Tables 3.3-3 and 3.3-4), it is not anticipated that the proposed project would contribute substantially to regional O₃ concentrations and the associated health effects. Impacts are considered less than significant. No mitigation is required.

As shown in Tables 3.3-3 through 3.3-5, construction and operation of the proposed project would not exceed thresholds for PM₁₀ or PM_{2.5} and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter or would obstruct the SCAB from coming into attainment for these pollutants. Additionally, the proposed project would implement dust control strategies and be required to comply with SCAQMD Rule 403, which limits the amount of fugitive dust generated during construction. Due to the minimal contribution of particulate matter during construction and operation, health impacts would be considered less than significant. No mitigation is required.

Construction and operation of the project would not contribute to exceedances of the NAAQS and CAAQS for NO₂. Health impacts that result from NO₂ include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, proposed project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the project site at any one time. In addition, existing NO₂ concentrations in the area are well below the NAAQS and CAAQS standards. As indicated in Table 3.3-5, construction of the proposed project would result in a minimal increase in localized NO₂ emissions and would not contribute to exceedances of the NAAQS and CAAQS for NO₂. Therefore, the proposed project is not anticipated to result in substantial NO₂ emissions or the potential health effects associated with NO₂. Impacts are considered less than significant. No mitigation is required.

CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, thereby reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. CO hotspots were discussed previously as a less-than-significant impact. Thus, the proposed project's CO emissions would not contribute to the health effects associated with this pollutant. In summary, health impacts of criteria air pollutants would be less than significant, and no mitigation is required.

As described above, the proposed project has the potential to result in significant impacts to sensitive receptors due to emissions of diesel particulate matter in close proximity to residences during construction. However, upon implementation of **MM-AQ-1**, impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-AQ-1 Prior to the issuance of a construction permit, the project applicant, or its designee, shall submit a Construction Exhaust Emissions Minimization Plan (Plan) to the City of Covina (City) or its designated representative for review and approval. The Plan shall detail project compliance with the following requirements:

1. Where access to alternative sources of power and alternative-fueled equipment are available, portable diesel engines shall be prohibited.
2. All diesel-powered equipment with engines equal or greater to 80 horsepower shall be powered by Tier 4 Final engines certified by the California Air Resources Board (CARB). If 80-horsepower or greater engines that comply with Tier 4 Final emissions standards are not commercially available, then the project applicant shall ensure that all diesel-powered equipment equal to or greater than 50 horsepower will have at least CARB-certified Tier 3 engines with the most effective Verified Diesel Emission Control Strategies available for the engine type, such as Level 3 Diesel Particulate Filters (Tier 4 engines automatically meet this requirement).
 - a. For purposes of this mitigation measure, “commercially available” shall mean the availability of the Tier 4 Final equipment taking into consideration factors such as (1) critical path timing of construction, and (2) geographic proximity of the equipment location to the project site.
 - b. The project applicant shall maintain and submit records to the City concerning its efforts to comply with this requirement.

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

During construction of the proposed project, exhaust from equipment may produce discernible odors typical of most construction sites. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. However, such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people.

SCAQMD provides a list of land uses associated with odor concerns, which include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The project includes operation of a medical office building, which is not anticipated to generate odors and would not result in operation of the types of land uses listed in SCAQMD’s screening criteria. For the reasons described above, project construction and operation would result in a **less than significant** odor impact. No mitigation is required.

3.4.....Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 U.S. 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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"/>

- 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?*

Less Than Significant Impact. The project site appears to be routinely mowed, with minimal native vegetation present. A biological reconnaissance survey was conducted for the project site by a qualified biological resources specialist. No special-status plant or wildlife species were observed during the site visit. A search of the California Natural Diversity Database (CNDDDB), which is maintained and compiled by the California Department of Fish and Wildlife (CDFW), and United States Fish and Wildlife Service (USFWS) species occurrence database and designated critical habitat areas was conducted to determine which special-status species have been documented to occur within the vicinity of the project site (CDFW 2018; USFWS 2018). The search was conducted for the project site and a one-mile radius around the sites. Critical habitat for the coastal California gnatcatcher (*Poliophtila californica californica*) was identified 0.35 mile southeast of the project

site. The coastal California gnatcatcher is a federally threatened and state species of special concern (SSC). This species is a year-round resident of southern California and is found within coastal sage scrub habitat. Direct and/or indirect impacts to coastal California gnatcatcher would not occur due to a lack of potentially suitable habitat for this species on the project site or within 500 feet of the site. Additionally, the I-10 freeway (which is a major highway with a total of 10 travel lanes) and residential development on the opposite side of the freeway separates the project site from the federally designated coastal California gnatcatcher critical habitat. As a result, direct and/or indirect impacts to federally designated critical habitat or individuals of this species are not anticipated to occur as a result of project implementation.

The CNDDDB search results did not identify any special-status plants on the project site or within the 1-mile search radius of the site. A search of the California Native Plant Society's Inventory of Rare and Endangered Plants was also conducted for the project site, as well as the surrounding areas. No state or federally listed plants were identified on the project site or in surrounding areas. However, four plant species with California Rare Plant Rank (CRPR) 1B were identified in the search: intermediate mariposa lily (*Calochortus weedii* var. *intermedius*), many-stemmed dudleya (*Dudleya multicaulis*); mesa horkelia (*Horkelia cuneate* var. *puberula*); and, San Bernardino aster (*Symphyotrichum defoliatum*) (CNPS 2018). However, the project site is highly disturbed under existing conditions due to routine mowing and is isolated by surrounding development, including a major 10-lane highway. As such, the site would not provide suitable habitat to support these plants species. Furthermore, these species were not observed during the biological reconnaissance survey, which overlaps with the blooming period for these species. Thus, no special-status plants are anticipated to occur on the project site, and, therefore, special-status plants would not be adversely affected by the development of the proposed project.

The CNDDDB search results identified several special-status wildlife species that have been documented to occur within the 1-mile search radius of the project site. The special-status wildlife species that were documented to occur are as follows: coastal whiptail (*Aspidoscelis tigris stejnegeri*; state SSC), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*; state watch list), and coastal California gnatcatcher (*Poliophtila californica californica*; federally threatened and state SSC). All three species were recorded within Forest Lawn Memorial Park, which is 0.8 mile southeast of the project site and contains large expanses of landscaped area associated with its use as a cemetery. The coastal whiptail habitat typically consists of coastal sage scrub, annual non-native grassland, chaparral, deerweed scrub, mulefat scrub, mixed sycamore/walnut oak woodland. The project site is primarily vacant. The site does not contain coastal sage scrub, chaparral, deerweed scrub, mulefat scrub, or sycamore/walnut oak woodlands. The project site contains minimal vegetation. While the site may seasonally support non-native grasses, the site appears to be mowed frequently, which would generally preclude the site from supporting established grasslands that provide viable, suitable habitat for the coastal whiptail. While several non-native trees are present on the site, they are isolated stands and do not comprise a mixed sycamore/walnut oak woodland. As such, the coastal whiptail is unlikely to occur on the project site, due to the absence of potentially suitable habitat. The southern California rufous-crowned sparrow habitat typically consists of coastal sage scrub, mixed sycamore/walnut oak woodland, and willow scrub. As described above, the project site does not contain coastal sage scrub or mixed sycamore/walnut oak woodland. Additionally, the project site does not contain willow scrub. Due to the absence of potentially suitable habitat, the southern California rufous-crowned sparrow is unlikely to occur on the project site. The coastal California gnatcatcher's habitat typically consists of coastal sage scrub habitat. As noted above, the project site is routinely mowed, with the exception of screening trees that grow along the eastern boundary. No coastal sage scrub habitat is present. As such, the coastal California gnatcatcher is unlikely to occur on the project site, due to the absence of potentially suitable habitat (CDFW 2018). For these reasons, special-status special are not expected to occur on the project site. Impacts would be **less than significant**. No mitigation is required.

- 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 U.S. Fish and Wildlife Service?*

No Impact. The project site is a currently vacant, graded site that is highly disturbed. The project site supports small amounts of low-growing vegetation, primarily when it rains, although mature stands on non-native trees border the site to the east and intersect the project site to the north. Upon project implementation, the existing trees would be removed; however, these trees and the low-growing vegetation do not constitute a sensitive natural community. According to the Fish and Wildlife Service's National Wetlands Inventory (NWI), the project site does not contain any riparian areas (USFWS NWI 2019). The nearest wetland to the project site is a Freshwater Emergent Wetland, located approximately 0.1-mile south of the project site, across the I-10 freeway. This wetland is characterized as a Paulstrine (non-tidal) Wetland that experiences surface water intermittently (a few days to a few weeks of the year). Given the intervening distance between the project site and this wetland, as well as the interceding I-10 freeway that lies between the project site and the wetland, development at the project site would not result in substantial adverse effects to the wetland. Given the intervening distance between the project site and this wetland, as well as the interceding I-10 freeway that lies between the project site and the wetland, development at the project site would not result in substantial adverse effects to the wetland or the surrounding riparian habitat. As such, project implementation would not 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 U.S. Fish and Wildlife Service. **No impact** would occur.

- 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. According to the NWI, the project site does not contain any wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) (USFWS NWI 2019). The nearest wetland to the project site is a Freshwater Emergent Wetland, located approximately 0.1-mile south of the project site, across the I-10 freeway. This wetland is characterized as a Paulstrine (non-tidal) Wetland that experiences surface water intermittently (a few days to a few weeks of the year). Given the intervening distance between the project site and this wetland, as well as the interceding I-10 freeway that lies between the project site and the wetland, development at the project site would not result in substantial adverse effects to the wetland. As such, the project would not have a substantial adverse effect on any 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** would occur.

- 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 with Mitigation Incorporated. There are no wetlands or water bodies located on the project site; therefore, development of the proposed project and associated parking garage would have no potential to affect the movement of migratory fish.

As described in Section 3.4(b), the project site contains rows of primarily non-native trees, which appear to have been planted to function as fence lines to separate the property from neighboring residential land uses to the east and northeast. While these vegetated areas could potentially support wildlife, they are not connected with other naturalized corridors or habitat areas. Rather, these stands of trees are isolated from other naturalized areas and potential habitat by the I-10 to the south, by residential land uses to the east, and by roadways to the north and west (East Holt Avenue and Park View Drive). As such, the existing rows of trees along the eastern and northeastern boundary of the project site serve limited function towards the movement of wildlife species. Therefore, development of the project site is not anticipated to interfere with wildlife corridors.

However, the mature trees could provide potential nesting sites for birds and raptors, which are protected under Sections 3503, 3503.5, and 3513 of the Fish and Game Code and under the Migratory Bird Act (MBTA 1918). Tree removal and other construction activities could negatively affect individual birds that are nesting on or within the vicinity of the project site. In the event that a native bird were actively nesting in one of the trees planned for removal, removal of the tree could adversely affect or kill the bird(s). Construction activities would also elevate noise levels and could cause disturbance to protected bird species nesting on site or adjacent to the construction areas. Construction could potentially occur during breeding, reproduction, and juvenile rearing periods for nesting birds and raptors (i.e., between February 15–August 31). Thus, there is potential for construction activities and construction noise to negatively affect breeding or reproduction of bird and/or raptor species on or adjacent to the project site. Implementation of mitigation measure **MM-BIO-1** would reduce this impact to below a level of significance. Construction impacts would therefore be less than significant with mitigation incorporated. Once the proposed project has been constructed, construction-related disturbances would not occur, and landscaping trees would be re-planted on the site. As such, the site would continue to provide potential nesting sites in an urban environment, consistent with existing conditions. Therefore, long-term impacts to nesting and migratory birds would not be significant. Overall, impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-BIO-1 If vegetation removal and/or outdoor construction activities will occur during the migratory bird nesting season (i.e., between February 15 and August 31), preconstruction surveys for nesting migratory birds and raptors shall be conducted by a qualified biologist, up to 14 days before initiation of construction activities. The qualified biologist shall survey the construction zone and a 250-foot radius surrounding the construction zone (500-foot radius within suitable raptor nesting habitat) to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds and/or raptors. If active nest(s) are identified during the preconstruction survey, a qualified biologist shall flag and demarcate the location of nesting birds. Temporary avoidance of active bird nests, including the enforcement of an avoidance buffer as determined by the qualified biological monitor, shall be required until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive. The biological monitor shall have the authority to cease construction if there is any sign of distress to a raptor or migratory bird.

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

Less Than Significant Impact. CMC Chapter 11.36 sets forth provisions for protection of the City's street trees. This chapter prohibits trimming, removing, or injuring trees and other plants that are within public streets. (Public streets include parkway strips, sidewalk areas, and easements and rights-of-way granted to the City.) CMC Chapter 17.83 sets forth the provisions of the City's Tree Preservation Ordinance. This ordinance prohibits the damaging of designated heritage trees within the City. Heritage trees are defined in Section 17.83.020 of the ordinance as all species of oak tree and as any individual tree or groups of trees that have been specifically designated as heritage trees by the City Council (Covina Municipal Code Chapter 17.83). According to an arborist report prepared for the project site in 2017 (Appendix C), there are no oak trees (*Quercus*) on the project site.

As described in Section 3.4(b), the project site contains rows of primarily non-native trees (elms, ash trees, and silk oaks¹²), which appear to have been planted to function as fence line to separate the property from neighboring residential land uses to the east and northeast. These trees are proposed for removal under the proposed project; however, all tree removal would comply with the CMC. As such, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Impacts would be **less than significant**. No mitigation is required.

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 General Plan does not designate any portions of the City as being within a habitat conservation plan (City of Covina 2000). Furthermore, the project area is not within any of the regional conservation plans designated by the state (CDFW 2019). Therefore, implementation of the project would not 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** would occur.

¹² Silk Oaks (*Grevillea*) are not within the same genus as Oak trees (*Quercus*) and are not considered heritage trees.

3.5.....Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

No Impact. The project site is vacant under existing conditions. No historical resources were identified on or within the immediate vicinity of the project site as a result of a records search and pedestrian survey (see Section 3.5(b) below for methodology and results). **No impact** would occur.

- 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. The project site is located in a developed area surrounded by commercial development to the west and residential development to the east. Historic aerials indicate that the project site was used for agricultural purposes in the mid twentieth century. After this, the area surrounding the site became developed, but the project site itself remained vacant. The project site appears to have been graded and maintained to an extent over the years. The records search results indicate that no cultural resources have been recorded within the site. An intensive pedestrian survey of the site failed to identify any prehistoric or historic cultural resources.

Records Search Results

A California Historical Resources Information System (CHRIS) records search was conducted for the project site and a 1.0-mile radius around the project site at the South Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton on August 1, 2019. This search included their collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation Site Records, technical reports, and ethnographic references. Additional consulted sources include historical maps of the study area, the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historic Property Data File, the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. SCCIC records indicate that no previously recorded cultural resources exists within the proposed project site.

Sacred Lands File Search

Dudek contacted the Native American Heritage Commission (NAHC) on August 2, 2019, and requested a review of their Sacred Lands File (SLF) as part of the process of identifying cultural resources within or near the project site. The NAHC replied via email on August 27, 2019, stating that the results of the SLF search results were positive. Additionally, the NAHC recommended contacting the Gabrieleno Band of Mission Indians – Kizh Nation for more information. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC also suggested contacting an additional four Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the project site. All tribal coordination was completed by the City pursuant to California Assembly Bill (AB) 52. See Section 3.18, Tribal Cultural Resources, and Appendix D for more information.

Historic Aerial Review

In order to understand development of the project site and surrounding properties, Dudek consulted historic maps and aerial photographs accessible online from Nationwide Environmental Title Research's (NETR) historic aerial viewer. Topographic maps are available for the following years: 1897, 1898, 1902, 1904, 1908, 1912, 1923, 1927, 1932, 1939, 1941, 1946, 1955, 1960, 1967, 1975, 1982, 2012, 2015 (NETR 2018a). Aerial images are available for the following years: 1948, 1954, 1964, 1965, 1972, 1977, 1980, 1995, 2003, 2004, and 2005 (NETR 2018b).

The project site was used as agricultural fields until the mid-1900s and was never developed after this period. The areas immediately adjacent to the project site were developed between 1980 and 1995.

Field Survey

Dudek conducted a pedestrian survey of the project site on July 16, 2018, using standard archaeological procedures and techniques. During the survey, the project site appeared to have been extensively disturbed. The soil had apparently been tilled and there was a push pile in the southern section of the site. Soils in the area were largely medium brown–reddish brown, fine-grained, and compact, with small to medium sized gravel inclusions. There are several cobbles throughout the site. Disturbances include some brick fragments, crushed metal, and trash, which was strewn throughout the site. No archaeological resources were identified during the survey of the project site.

No newly or previously recorded archaeological resources were identified within the project site through the SCCIC records, archival review, or pedestrian survey. However, results of the NAHC SLF review indicate that cultural resources could be present at the project site. Moreover, according to the historic map and aerial image review, the project site was an agricultural field until the mid-1990s and although it has been graded and maintained to an extent over the years, it has not been subject to development since that time. Additionally, SCCIC records indicate that only portions of the project site has been previously studied, suggesting that the proposed site has not been extensively studied for the presence of cultural resources. As such, there is a possibility that intact previously unknown archaeological deposits could persist in some areas below the surface.

Grading and ground disturbance during construction activities has the potential to unearth and potentially damage intact archaeological deposits if proper measures are not taken to protect the resources. In the event that archaeological resources are inadvertently discovered and subsequently damaged or destroyed, a significant

impact could occur. In the event that archaeological resources are inadvertently discovered during ground-disturbing activities at the project site, implementation of mitigation measure **MM-CUL-1** would ensure that significant archaeological resources would be protected to the extent possible. Implementation of this mitigation measure would ensure that the proposed project's impacts to archaeological resources are **less than significant with mitigation incorporated**. No further mitigation is required.

MM-CUL-1 Native American and archaeological monitoring of all project-related ground-disturbance activities shall be required. A Native American monitor who has familiarity with the local archaeology, as well as an archaeological monitor, shall be retained at the expense of the applicant. Monitoring activities shall be conducted under the direction of an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology. If archaeological and Native American resources are encountered during ground-disturbing activities, all earth-disturbing work within 50 feet of the discovery shall be temporarily suspended or redirected until an archaeologist and a Native American Monitor has evaluated the nature and significance of the find. Evaluation of significance for the find may include the determination of whether or not the find qualifies as an archaeological site. Depending upon the significance of the find under CEQA (California Code of Regulations Title 14 Section 15064.5(f); Public Resources Code Section 21082), the archaeologist may exhaust the data potential of the find through the process of field-level recordation and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

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

Less Than Significant with Mitigation Incorporated. No prehistoric or historic burials were identified within the project site as a result of the records searches. However, in the unexpected event that human remains are found, implementation of **MM-CUL-2** would reduce potential impacts below a level of significance. Impacts would therefore be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-CUL-2 In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

3.6.....Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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 checked="" type="checkbox"/>	<input type="checkbox"/>

- 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 short-term construction and long-term operation of the proposed project will require the consumption of energy resources in several forms at the project site and within the project area. Construction and operational energy consumption is evaluated in detail below.

Electricity

Construction Use

Temporary electric power for as-necessary lighting and electronic equipment such as computers inside temporary construction trailers would be provided by Southern California Edison (SCE). The electricity used for such activities would be temporary and would have a negligible contribution to the project's overall energy consumption.

Operational Use

Project operation would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. The estimation of operational building energy was based on the applicant-provided forecasted annual electricity consumption estimate of 569,720 kilowatt-hours (kWh). Supply, conveyance, treatment, and distribution of water for the project would also require the use of electricity. Similarly, wastewater generated by the project would require the use of electricity for conveyance and treatment. Water consumption estimates for both indoor (767,000 gallons per year) and outdoor (472,507 gallons per year) water use were provided by the project applicant, and associated electricity consumption from water use and wastewater generation were estimated using CalEEMod. Table 3.6-1, Project Operations – Electricity Demand, presents the electricity demand for the project.

Table 3.6-1 Project Operations – Electricity Demand

Project Facility	kWh/year
Project Buildings	569,720.00
Water/Wastewater	15,242.14
Total	584,962.14

Source: Appendix A and Appendix E

Notes: kWh = kilowatt-hour.

For comparison, electricity demand for Los Angeles County in 2018 was 67,856 million kWh (CEC 2018a). The proposed project would result in a minimal increase in electricity consumption and would be inherently energy efficient (target of LEED Gold) by implementing measures such as LED lighting, optimizing building envelope thermal properties, managing water usage, and optimizing energy performance and controls. Additionally, solar photovoltaic (PV) panels would be incorporated into the project design with an anticipated renewable electricity generation of approximately 556,200 kWh per year, which would offset the majority of electricity that would be consumed by the project. Impacts related to operational electricity use would therefore be less than significant.

Natural Gas

Construction Use

Natural gas is not anticipated to be required during construction of the proposed project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the “petroleum” subsection. Any minor amounts of natural gas that may be consumed as a result of project construction would have a negligible contribution to the project’s overall energy consumption.

Operational Use

Natural gas consumption during operation would be required for various purposes, including building heating and cooling. For building consumption, default natural gas generation rates in CalEEMod for the proposed project land uses and climate zone were used. Table 3.6-2, Project Operations – Natural Gas Demand, presents the natural gas demand for the proposed project

Table 3.6-2 Project Operations – Natural Gas Demand

Project Facility	kBtu/year
Medical Office Building	624,600.00

Source: Appendix A and Appendix E

Notes: kBtu = thousand British thermal units.

As shown in Table 3.6-2, the project would consume approximately 624,600 thousand British thermal units (kBtu) per year. For comparison, in 2018 SoCalGas delivered approximately 2,921 million therms (292.1 billion kBtu) to Los Angeles County (CEC 2018b). The proposed project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Title 24, Part 11, contains additional energy measures that are applicable to proposed project under the California Green Building Standards Code (CALGreen). Additionally, the project has the target of LEED Gold. Overall, due to the

inherent increase in efficiency of building code regulations, as well as the proposed project's commitment to sustainability through LEED development, the proposed project would not result in a wasteful use of energy. Impacts related to operational natural gas use would be less than significant.

Petroleum

Construction Use

Heavy-duty construction equipment associated with construction activities would rely on diesel fuel, as would haul and vendor trucks involved in delivery of materials to the project site. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel to and from the site in gasoline-powered light-duty vehicles.

Heavy-duty construction equipment of various types would be used during each phase of project construction. Appendix A lists the assumed equipment usage for each phase of construction. The project's construction equipment is estimated to operate a total combined 31,576 hours.

Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO₂) emissions from each construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO₂ per gallon (The Climate Registry 2019). The estimated diesel fuel usage from construction equipment is shown in Table 3.6-3, Construction Equipment Diesel Demand.

Table 3.6-3 Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO ₂ (MT)	Kg CO ₂ /Gallon	Gallons
Site Preparation	4	6.36	10.21	623.05
Grading	6	81.12	10.21	7,945.08
Trenching	8	290.64	10.21	28,465.85
Building Construction	5	107.06	10.21	10,485.33
Architectural Coatings	4	41.48	10.21	4,062.35
Paving	10	106.93	10.21	10,472.91
Total				62,054.56

Sources: Pieces of equipment and equipment CO₂ (Appendix E); kg CO₂/Gallon (The Climate Registry 2019).

Notes: CO₂ = carbon dioxide; MT = metric ton; kg = kilogram.

Fuel estimates for total worker, vendor, and haul truck fuel consumption are provided in Table 3.6-4, Construction Worker, Vendor, and Haul Truck Petroleum Demand.

Table 3.6-4 Construction Worker, Vendor, and Haul Truck Petroleum Demand

Phase	Trips	Vehicle MT CO ₂	Kg CO ₂ / Gallon	Gallons
Worker Vehicles (Gasoline)				
Site Preparation	200	1.02	8.78	116.33
Grading	650	3.32	8.78	378.06
Trenching	6,000	30.44	8.78	3,467.08
Building Construction	36,000	182.65	8.78	20,802.54
Architectural Coatings	1,700	8.41	8.78	957.38
Paving	1,720	8.50	8.78	968.64
Total				26,690.05
Vendor Trucks (Diesel)				
Site Preparation	60	0.75	10.21	73.00
Grading	150	1.86	10.21	182.49
Trenching	1,200	14.88	10.21	1,457.57
Building Construction	8,800	109.13	10.21	10,688.88
Architectural Coatings	170	2.10	10.21	205.21
Paving	516	6.36	10.21	622.88
Total				13,230.03
Haul Trucks (Diesel)				
Site Preparation	0	0	10.21	0
Grading	1,376	22.52	10.21	2,206.15
Trenching	0	0.00	10.21	0.00
Building Construction	0	0.00	10.21	0.00
Architectural Coatings	0	0.00	10.21	0.00
Paving	0	0.00	10.21	0.00
Total				2,206.15

Sources: Trips and vehicle CO₂ (Appendix E); kg CO₂/Gallon (The Climate Registry 2019).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram.

In summary, construction of the project is conservatively anticipated to consume 26,690 gallons of gasoline and 77,491 gallons of diesel over a period of approximately 15 months. For comparison, approximately 25 billion gallons of petroleum will likely be consumed in California over the course of the proposed project's construction phase, based on the California daily petroleum consumption estimate of approximately 78.6 million gallons per day (EIA 2019). Overall, because petroleum use during construction would be temporary, and would not be wasteful or inefficient, impacts would be less than significant.

Operational Use

The fuel consumption resulting from the project's operational phase would be attributable to employees and visitors traveling to and from the project site. Petroleum fuel consumption associated with motor vehicles traveling to and from the project site during operation is a function of vehicle miles traveled (VMT). As shown in Appendix A, the annual VMT attributable to the project is expected to be 4,093,553 VMT per year. Similar to construction worker and truck trips, fuel consumption for operation is estimated by converting the total CO₂ emissions from VMT to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Based on the default CalEEMod vehicle mix and the countywide proportion of gasoline and diesel on-road vehicle VMT, the vehicles associated with

project operations would likely be approximately 93% gasoline powered and 7% diesel powered vehicles. The estimated fuel use from vehicles traveling to and from the project site during operation is shown in Table 3.6-5, Project Operations – Petroleum Consumption.

Table 3.6-5 Project Operations – Petroleum Consumption

Fuel	Vehicle MT CO ₂	kg CO ₂ /Gallon	Gallons
Gasoline	1,637.67	8.78	186,522.27
Diesel	127.83	10.21	12,520.42

Source: Appendix A and Appendix E

Notes: CO₂ = carbon dioxide; kg = kilogram; MT = metric ton.

As depicted in Table 3.6-5, project operation would result in approximately 199,043 gallons of petroleum fuel usage per year. This is a conservative estimate, since it does not account for usage of electric vehicles (EVs). By comparison, California as a whole consumes approximately 28.7 billion gallons of petroleum per year (EIA 2019).

Over the lifetime of the project, the fuel efficiency of vehicles is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the project site during operation is expected to decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency, such as efforts to accelerate the number of plug-in hybrids and zero-emissions vehicles in California and increasingly stringent emissions standards (CARB 2011). As such, operation of the project is expected to use decreasing amounts of petroleum over time due to advances in fuel economy. Impacts related to operational petroleum use would therefore be less than significant.

In summary, although the project would increase energy use, the use would be a small fraction of the statewide use and, due to efficiency increases, is expected to diminish over time (particularly with respect to petroleum). Given these considerations, energy consumption associated with the project would not be considered inefficient or wasteful and would result in a **less than significant impact**. No mitigation is required.

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

Less Than Significant Impact. Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically (every 3 years) to incorporate and consider new energy efficiency technologies and methodologies. Title 24 also includes Part 11, CALGreen. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The proposed project would meet Title 24 and CALGreen standards to reduce energy demand and increase energy efficiency.

The City's Energy Action Plan (EAP) demonstrates the City's commitment to pursue energy efficiency and reduce GHGs across the community and municipal operations (City of Covina 2012). The proposed project would be consistent with the intent of the EAP since the project would be designed to be inherently energy efficient (target of LEED Gold) by implementing measures such as LED lighting, optimizing building envelope thermal properties, managing water usage, and optimizing energy performance and controls while also

managing material selections for renewable content and indoor environmental quality. Additionally, PV panels would be incorporated into the project design with an anticipated renewable electricity generation of 556,200 kWh per year, which would offset the majority of electricity that would be consumed by the project.

Overall, the proposed project would not conflict with existing energy standards and regulations; therefore, impacts during construction and operation of the proposed project would be **less than significant**. No mitigation is required.

3.7.....Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the project 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.*

No Impact. No active faults have been identified within or adjacent to the boundaries of the City (DOC CGS 2019; City of Covina 2000). According to the geotechnical report prepared for the project (Appendix F), the closest Alquist-Priolo Earthquake Fault Zone boundary is designated for the Sierra Madre Fault zone located approximately 4.8 miles to the north-northwest of the project site. Known faults or fault-related features are not located within the site; therefore, the potential for fault rupture within the site is considered low. Furthermore, the City monitors the faults for movement and, if any activity is detected, the City would closely investigate the fault(s) and adopt reasonable development policies and standards to address any potential hazards, as required by provisions in the City's General Plan Safety Element (City of Covina 2000). As such, the City as a whole faces limited susceptibility to ground rupture (City of Covina 2000). Development of the proposed project would not exacerbate the potential for fault rupture to occur. Therefore, the proposed project is not expected to cause substantial adverse effects, including the risk of loss, injury, or death, due to rupture of a known earthquake fault. **No impact** would occur.

ii) *Strong seismic ground shaking?*

Less Than Significant Impact. Despite the fact that the City faces limited threats from interior seismicity, there are a number of active faults in southern California that could potentially move and thus result in hazards to the people and structures in the City. Active faults in the area are the Sierra Madre and Duarte and Lower Duarte Faults, which are located between two and four miles north of the City. A significant earthquake originating along any of these or other regional faults could pose a hazard to buildings and people in the City (City of Covina 2000).

Engineering and construction techniques have been developed to reduce the risk of structural damage caused by ground shaking to acceptable levels. The proposed project would be required to be designed to resist seismic forces in accordance with the criteria contained in the California Building Code (CBC). Project developers would be required to obtain a building permit from the City, which would ensure that project plans and specifications are in compliance with the CBC and local ordinances. Design and construction in accordance with the CBC, local requirements, and recommendations from the site-specific geotechnical report (Appendix F) would minimize public exposure to earthquake risks to the extent practicable. Moreover, development of the proposed project would not exacerbate the potential for strong seismic ground shaking to occur. As such, impacts would be **less than significant**. No mitigation is required.

iii) *Seismic-related ground failure, including liquefaction?*

Less Than Significant Impact. In the event of seismic-related ground failure, structures and people can be exposed to substantial adverse effects including risk of loss, injury, or death. Types of seismic-related ground failure include liquefaction, seismically induced settlement, and seismically induced landslides. The project site is not mapped as occurring within a liquefaction zone. (DOC CGS 2019). However, the areas immediately

surrounding the project site are mapped as being potentially susceptible to liquefaction. As such, the project site could be subject to some risks associated with seismic-related ground failure. However, the proposed project is required to comply with the CBC, which outlines specific design, engineering, and development standards for structures proposed in areas with potentially unstable soils. Additionally, the proposed project would be subject to review and plan approval by the City, prior to and during construction. The City's building inspectors would review plans to ensure compliance with the seismic design provisions of the CBC. Compliance with the current regulations and recommendations in the site-specific geotechnical report (Appendix F) would ensure that structures are designed and built to current standards to minimize impacts associated with seismic-related ground failure, including liquefaction. Moreover, development of the proposed project would not exacerbate the potential for seismic-related ground failure, including liquefaction, to occur. Therefore, impacts would be **less than significant**. No mitigation is required.

iv) Landslides?

Less Than Significant Impact. Areas at risk from landslides include areas on or close to steep hills and steep road cuts or excavations, or areas where landslides have previously occurred. However, much of the City is characterized by flat topography and is not expected to be susceptible to landslide hazards. The project site is located within a highly developed urban area and is located on relatively flat terrain. The project site is not located within a landslide hazard zone; however it is located relatively close to several recorded landslide zones associated with the Covina Hills, the nearest of which is 0.25 mile east of the project site. According to the DOC's Landslide Inventory, these landslide zones are dormant and, as such, do not pose a significant existing risk of landslides at the project site (DOC 2019). Additionally, the project site is separated from these landslide zones by urban development, which would largely diminish the likelihood of a landslide ever reaching the project site. As such, development of the proposed project is not anticipated to cause or exacerbate slope stability issues on the project site, since it is not within a mapped landslide area and is relatively level.

Additionally, project developers would be required to obtain a building permit from the City, which would ensure that project plans and specifications are in compliance with the CBC and local ordinances. Design and construction in accordance with the CBC, local requirements, and recommendations from the site-specific geotechnical report (Appendix F) would minimize public exposure to earthquake risks, including landslides, to the extent practicable. Moreover, development of the proposed project would not exacerbate the potential for landslides to occur. As such, impacts would be **less than significant**. No mitigation is required.

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

Less Than Significant Impact. In an urbanized setting, substantial erosion or loss of topsoil typically occurs when ground disturbance causes soils to be exposed, and the soils are washed away during a storm or wind event. Surface structures, such as paved roads and buildings, decrease the potential for erosion. Once covered, soil is no longer exposed to wind or water erosion.

The proposed project would cause minor amounts of ground disturbance during construction activities. The construction contractor would be required to comply with the Construction General National Pollution Discharge Elimination System (NPDES) Permit (SWRCB Order No 2009-009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ, NPDES No. CAS000002), hereafter referred to as the Construction General Permit. The Construction General Permit requires preparation of and compliance with a Storm Water

Pollution Prevention Plan (SWPPP). The SWPPP must include erosion control measures such as covering exposed soil stockpiles and working slopes, lining the perimeter of the construction site with sediment barriers, and protecting storm drain inlets. The construction contractor would be required to comply with CMC Section 8.50.100(C)(2), which states that prior to obtaining a grading or building permit, each operator of any construction site must prepare and submit to the City an Erosion and Sediment Control Plan. CMC Section 8.50.100(C)(2) sets forth requirements for the contents of the Erosion and Sediment Control Plan. For sites greater than one acre in size, the erosion and sediment control plan must (at a minimum) include:

- All elements of a SWPPP
- Methods to minimize the footprint of the disturbed area and prevent soil compaction
- Methods to protect native vegetation and trees
- Sediment and erosion control
- Controls to prevent tracking on and off the site
- Non-storm water control (e.g. vehicle washing, dewatering etc.)
- Material management
- Spill prevention and control
- Waste management (e.g. concrete washout, waste management etc.)
- Identification of site risk level as identified per the construction permit
- Rationale for the selection and design of the proposed best management practices (BMPs), including quantifying the expected soil loss from different BMPs
- Any other element required by the director

With adherence to the Construction General Permit, as well as CMC Section 8.5.100(C)(2), construction activities would not result in significant erosion or the loss of topsoil.

During operation, the project site would be fully developed with buildings, hardscape, and landscaping, all of which would preclude erosion and the associated loss of topsoil during project operation. Adherence to existing regulations and implementation of standard construction practices would ensure that soil erosion impacts are **less than significant**. No mitigation is required.

- 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. In the event of soil instability, structures have the potential to undergo damage, and safety hazards for people may result. As stated in the City's General Plan Safety Element, liquefaction, settlement, and subsidence are issues that have not been detected in the City (City of Covina 2000). Limited areas within and near the Covina Hills and Walnut Creek are mapped as being potentially susceptible to liquefaction and/or landslides (DOC CGS 2019). However, the project site is not within an area mapped as potentially susceptible to landslides or within a liquefaction hazard area (DOC CGS 2019).

Additionally, the proposed project is required to comply with the CBC, which outlines specific design, engineering, and development standards for structures proposed in areas with unstable geologic units or soils and would be subject to review and plan approval by the City, prior to and during construction. The City's building inspectors would review plans to ensure compliance with the design and structural safety provisions

of the CBC. Compliance with the current regulations would ensure that the proposed project is designed and built to current standards, which would minimize impacts associated with geologic instability. Therefore, impacts would be **less than significant**. No mitigation is required.

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 are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or structural damage can occur if wetting and drying of the clay does not occur uniformly across an entire area. Foundation movement and structural damage can lead to safety hazards for building occupants. Soils containing high clay content often exhibit a relatively high potential to expand when saturated and to contract when dried out. According to the geotechnical report prepared for the project (Appendix F), the native geologic materials beneath the project site consist of older alluvial-fan deposits of the late to middle Pleistocene age. As such, and according to the geotechnical report, special structural design and/or construction procedures to specifically address expansive soil movements are not necessary at the project site. Additionally, the City's building inspectors would review plans to ensure compliance with the design provisions of the CBC. Compliance with current regulations and the recommendations in the geotechnical report would ensure that the proposed project is designed and built to current standards. Therefore, **no impact** would occur.

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. No septic tanks or alternative wastewater disposal systems are proposed. The proposed project would be connected to existing utility infrastructure. As such, **no impact** associated with the use of alternative wastewater disposal systems would occur as a result of the proposed project.

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

Less Than Significant with Mitigation Incorporated. A paleontological records search was conducted at the Natural History Museum of Los Angeles County (LACM) for the project site (McLeod 2018a, Appendix D). According to the paleontological records search, while the LACM records searches did not report any previous fossil localities within the project site or surrounding area, they do have nearby localities from Pleistocene older alluvium and the late Miocene Sycamore Canyon Member of the Puente Formation (McLeod 2018b; Appendix D). Near-surface, Holocene Quaternary alluvium and gravels are unlikely to yield significant paleontological resources due to the young age but can be underlain by Pleistocene older alluvium that has the potential to yield significant paleontological resources (McLeod 2018a, McLeod 2018b; Appendix D).

The LACM reported several paleontological localities from Pleistocene older alluvium, which crops out in the southern and east-central areas of the City and the southern portion of the LACM locality 1807, which is located northwest of the proposed project area, south of Arrow Highway and east of Irwindale Avenue, yielded a fossil mastodon (*Mammuth americanum*) at a depth of 115 feet to 120 feet below the ground surface (McLeod 2018a, McLeod 2018b; Appendix D). LACM 8014 consists of a fossil bison (*Bison*) specimen, which was recovered near the surface in the northeastern Puente Hills, southwest of the intersection of the Riverside Freeway (Highway 60) and the Corona Freeway (Highway 71). Fossil specimens of horse (*Equus*) and camel (*Camelops*)

were recovered from LACM 1728 west of Chino in English Canyon from a depth 15 feet to 20 feet below the surface (McLeod 2018a, McLeod 2018b; Appendix D).

There are no unique geological resources within the project site and no unique geological resources are anticipated subsurface.

The potential for encountering paleontological resources is considered moderate to high for the project site. During excavations for the proposed project, specifically during the approximately 6-foot excavation of the subterranean level of the parking structure, there is the possibility that undiscovered, buried paleontological resources might be encountered during project construction in areas underlain by Pleistocene older alluvium. Older alluvium can shallowly underlie younger alluvium; therefore, substantial (in general five feet or greater) excavations into younger alluvium within the project site has the potential to reach older alluvium with the potential for encountering significant paleontological resources.

As such, prior to the start of construction at the project site, mitigation measure **MM-GEO-1** would be implemented, which would require the project applicant to contract with a qualified paleontologist who will determine any areas on the site with undisturbed sediments that could have moderate or high paleontological sensitivity. The qualified paleontologist should ensure that a qualified paleontological monitor is available to monitor all ground-disturbing activities in these areas. Implementation of mitigation measure **MM-GEO-1** would ensure that impacts to paleontological resources are **less than significant with mitigation incorporated**. No further mitigation is required.

MM-GEO-1 Prior to the initiation of any site preparation or start of construction, the project applicant shall contract with a qualified professional paleontologist or a California Registered Professional Geologist with appropriate paleontological expertise, as defined by the Society of Vertebrate Paleontology's Conformable Impact Mitigation Guidelines Committee (SVP 2010 Guidelines). The qualified paleontologist shall be responsible for preparing and implementing a Paleontological Resources Monitoring and Mitigation Program. The qualified paleontologist shall be available "on-call" to the City and the applicant throughout the duration of ground-disturbing activities. The Paleontological Resources Monitoring and Mitigation Program shall include preconstruction coordination; construction monitoring; emergency discovery procedures; sampling and data recovery, if needed; preparation, identification, and analysis of the significance of fossil specimens salvaged, if any; museum storage of any specimens and data recovered; and reporting. Earth-moving construction activities shall be monitored due to the moderate to high paleontological sensitivity (Pleistocene older alluvium) of the project site.

3.8.....Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO₂, methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃) (see also 14 CCR 15364.5). The three GHGs evaluated herein are CO₂, CH₄, and N₂O, because these are the only GHG gases that would be emitted during project construction and/or operations.

Gases in the atmosphere can contribute to climate change both directly and indirectly.¹³ The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO₂; therefore, GWP-weighted emissions are measured in metric tons of CO₂ equivalent (MT CO₂e). Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH₄ is 25 (emissions of 1

¹³ Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo).

MT of CH₄ are equivalent to emissions of 25 MT of CO₂), and the GWP for N₂O is 298, based on the IPCC's Fourth Assessment Report (IPCC 2007).

As discussed in Section 3.3 of this IS/MND, the project is located within the jurisdictional boundaries of the SCAQMD. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association (CAPCOA), explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO₂e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

- Tier 1.** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2.** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3.** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO₂e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO₂e per year), commercial projects (1,400 MT CO₂e per year), and mixed-use projects (3,000 MT CO₂e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO₂e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4.** Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of Assembly Bill (AB) 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO₂e per-service population for project-level analyses and 6.6 MT CO₂e per-service population for plan-level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5.** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

Section 15064.7(c) of the State CEQA Guidelines specifies that “[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.” The State CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the State CEQA Guidelines emphasize the lead agency’s discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009).

To determine the proposed project’s potential to generate GHG emissions that would have a significant impact on the environment, the project’s GHG emissions were compared to the quantitative threshold of 3,000 MT CO₂e per year, which is used for all non-industrial projects. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the project, which is assumed to be 30 years (SCAQMD 2008). Thus, this impact analysis compares estimated operational emissions plus amortized construction emissions to the proposed SCAQMD threshold of 3,000 MT CO₂e per year.

Construction

Construction of the proposed project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road trucks, and worker vehicles. A depiction of expected construction schedules (including information regarding phasing, equipment used during each phase, truck trips, and worker vehicle trips) assumed for the purposes of emissions estimation is provided in Table 3.3-2 and in Appendix A. On-site sources of GHG emissions include off-road equipment; off-site sources include trucks and worker vehicles. Table 3.8-1, Estimated Annual Construction GHG Emissions, presents construction GHG emissions for the proposed project from on-site and off-site emissions sources.

Table 3.8-1 Estimated Annual Construction GHG Emissions

Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
	Metric Tons per Year			
2020	702.37	0.14	0.00	705.98
2021	323.15	0.07	0.00	324.90
Total				1,030.88
Amortized Emissions (over 30 years)				34.36

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent.

See Appendix A for complete results.

As shown in Table 3.8-1, the estimated total GHG emissions in 2020 and 2021 would be approximately 706 MT CO₂e and 325 MT CO₂e, respectively. Amortized over 30 years, construction GHG emissions would be approximately 34 MT CO₂e per year. In addition, as with project-generated construction criteria air pollutant emissions, GHG emissions generated during proposed construction activities would be short term, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.

Operations

CalEEMod version 2016.3.2 was used to estimate potential project-generated operational GHG emissions from area sources (landscape maintenance), energy sources (natural gas and electricity), mobile sources, solid waste, and water supply and wastewater treatment. For additional details, see Section 3.3 for a discussion of operational emission calculation methodology and assumptions, specifically for area and energy (natural gas) sources. Year 2022 was assumed as the first full year of operations after project construction.

The estimation of operational energy emissions was based on the applicant-provided forecasted annual electricity consumption estimate of 569,720 kWh. Furthermore, as part of the project design, approximately 556,200 kWh per year of electricity is anticipated to be generated by on-site solar PV panels. Annual electricity emissions were estimated in CalEEMod using the emissions factors for SCE, which would be the energy source provider for the proposed project. In addition, for electricity, the CO₂ intensities for the proposed project were adjusted based on the value reported in the SCE 2017 Power Content Label, including 32% renewables (CEC 2018c).

Supply, conveyance, treatment, and distribution of water for the project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor (767,000 gallons per year) and outdoor (472,507 gallons per year) water use were provided by the project applicant, and associated electricity consumption from water use and wastewater generation were estimated using CalEEMod default values.

All details for criteria air pollutants discussed in Section 3.3 are also applicable for the estimation of operational mobile source GHG emissions. Regulatory measures related to mobile sources include Assembly Bill (AB) 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the National Highway Traffic Safety Administration and U.S. Environmental Protection Agency have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the proposed project's motor vehicles throughout project operation.

The project would also generate solid waste and would result in CO₂e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste, with 50% waste diversion assumed, consistent with AB 939 requirements.

Table 3.8-2, Estimated Annual Operational GHG Emissions, presents the annual GHG emissions associated with operation of the proposed project. Additional details are included in Appendix A.

Table 3.8-2 Estimated Annual Operational GHG Emissions

Emission Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
	Metric Tons per Year			
Area	0.01	<0.01	0.00	0.01
Energy	37.20	<0.01	<0.01	37.41
Mobile	1,765.50	0.09	0.00	1,767.84
Waste	65.77	3.89	0.00	162.94
Water	4.40	0.03	<0.01	5.22
Total	1,872.88	4.01	<0.01	1,973.42
<i>Amortized Construction Emissions</i>				34.36
Operation + Amortized Construction Total				2,007.78

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent

See Appendix A for detailed results.

Values of “<0.01” indicate that the estimated emissions are less than two decimals. Totals may not sum due to rounding.

As shown in Table 3.8-2, the estimated annual project-generated GHG emissions would be approximately 1,973 MT CO₂e per year as a result of project operation. When summed with the amortized project construction emissions, the total annual GHGs would be approximately 2,008 MT CO₂e per year. Annual operational GHG emissions with amortized construction emissions would not exceed the SCAQMD threshold of 3,000 MT CO₂e per year. Therefore, the proposed project’s GHG contribution would be **less than significant**. No mitigation is required.

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

Less Than Significant Impact. The City adopted an Energy Action Plan (EAP) in 2012; however, the EAP’s scope was limited to energy and gas consumption and did not address strategies to reduce GHG emissions from other sources, such as transportation or solid waste. As discussed in Section 3.6(b), the proposed project would be consistent with the intent of the EAP due to the project’s energy efficient design and development. The City has not adopted a comprehensive climate action plan and there is currently no local guidance that would be applicable to the project. However, there are regional and statewide plans and goals that have been set forth to reduce GHG emissions at the regional and statewide scale, such as the CARB Scoping Plan and SCAG’s 2016 RTP/SCS. The project’s consistency with these plans and future GHG reduction goals is described below.

Consistency with the Scoping Plan

The CARB Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California’s GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations.¹⁴ Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures

¹⁴ The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that “[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan” (CNRA 2009).

focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others. The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of Assembly Bill (AB) 32 and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions.¹⁵ To the extent that these regulations are applicable to the project or its uses, the project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law.

Consistency with SCAG's 2016 RTP/SCS

SCAG's 2016 RTP/SCS is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2016 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2016 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. The proposed project would be consistent with the goals of the 2016 RTP/SCS based on the following considerations:

- As discussed in Section 3.3, vehicle trip generation and VMT for the project site are concluded to have been anticipated in the SCAG 2016 RTP/SCS growth projections since the project is consistent with the underlying commercial and professional land uses assumed for the site in the 2016 RTP/SCS.
- The proposed project would be consistent with policy initiatives in the 2016 RTP/SCS supporting increased use of alternative fueled vehicles since it would include 20 electric vehicle spaces.
- The proposed project would be energy efficient (target of LEED Gold) by implementing measures such as LED lighting, optimizing building envelope thermal properties, managing water usage, and optimizing energy performance and controls while also managing material selections for renewable content and indoor environmental quality. Additionally, PV panels would be incorporated into the project design with an anticipated renewable electricity generation of approximately 556,200 kWh per year.

Based on the analysis above, the proposed project would be consistent with the SCAG 2016 RTP/SCS.

Consistency with SB 32 and EO S-3-05

The project would also not impede the attainment of the GHG reduction goals for 2030 or 2050 identified in SB 32 and EO S-3-05, respectively. EO S-3-05 establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050. SB 32 establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030. While there are no established protocols or thresholds of significance for that future year analysis, CARB forecasts that compliance

¹⁵ AB 32 is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California's GHG emissions at 1990 levels by 2020 and initiate the transformations required to achieve the state's long-range climate objectives.

with the current Scoping Plan puts the state on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014).

CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that “California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32” (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update states the following (CARB 2014):

This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and EO S-3-05. This is confirmed in the Second Update, which states (CARB 2017b):

The Proposed Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while also identifying new, technologically feasibility and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Proposed Plan is developed to be consistent with requirements set forth in AB 32, SB 32, and AB 197.

As discussed previously, the proposed project would be consistent with the applicable strategies and measures in the Scoping Plan, as well as the 2016 RTP/SCS, and would therefore not conflict with the state’s trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050. In addition, the specific path to compliance for the state in regards to the term goals will likely require development of technology or other changes that are not currently known or available. As such, identifying ways that the project would be consistent with future goals would be speculative and cannot be meaningfully discussed at this time. However, the proposed project’s consistency with current goals, policies, and regulations would assist in meeting the City’s contribution to GHG emission reduction targets in California. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet SB 32’s 40% reduction target by 2030 and EO S-3-05’s 80% reduction target by 2050. This legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets.

Based on the above considerations, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be **less than significant**, and no mitigation is required.

3.9.....Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<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 type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that 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 checked="" type="checkbox"/>	<input type="checkbox"/>

- 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. The proposed project is not expected to create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials, for the reasons outlined below.

Construction

Construction Materials

Relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, adhesive materials, grease, solvents, and architectural coatings would be used during construction of the proposed project. These materials are not considered acutely hazardous and are used routinely throughout

urban environments for construction projects and small-scale structural improvements. Further, these materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment. Once construction has been completed at the project site, fuels and other petroleum products would no longer remain on the site.

Soil Contamination

The project site was previously used for agricultural purposes, from the late 1930s through the mid-1960s. Agricultural operations ceased by the early 1970s, and the site has been vacant since that time. Given the historic agricultural uses at the project site, pesticides and herbicides may have been used on the project site at some point in time. The historic use of pesticides and herbicides at the project site would not likely present a threat to human health or the environment with project implementation. In the event that contaminated soils are encountered in the areas of ground disturbance, the contaminated soils would be transported and disposed of according to local and state regulations.

During transport or disposal of contaminated soils, workers, the public, and/or the environment could be exposed to potential hazards, in the event that the contaminated soils are released to the environment or otherwise handled improperly. However, workers would be required to adhere to existing state and federal requirements pertaining to safe handling and proper disposal of contaminated soils. Adherence to regulations for safe handling and proper disposal of contaminated soils would minimize the likelihood that significant hazards would occur to the public or to the environment as a result of ground disturbing activities on or near potential contamination at the project site.

Operation

Project operation would require a variety of materials, some of which may be potentially hazardous. The proposed project would involve use of cleaning solvents, pesticides, fertilizers, and miscellaneous organics and inorganics that are typically used as part of building and grounds maintenance. Other potentially hazardous materials that may be associated with medical office uses include pharmaceuticals, regulated medical waste, sterilants, disinfectants, medical oxygen, biohazardous materials, radioactive materials, medical sharps, and stains used in laboratories. The hazardous materials used during operation of the proposed project would be used on site, transported to and from the site, and ultimately disposed of off site. During these processes, there is the potential for a hazardous materials incident to occur, if hazardous substances are handled improperly or unsafely such that the substance is released or the public is exposed to the substance. Medical wastes are regulated by state laws, including the Hazardous Materials Management Act and the California Medical Waste Management Act, which set forth specific requirements for handling, treating, storing, and disposing medical waste. Medical wastes would be stored on site per regulatory and industry procedures and transported off site by qualified vendors, in accordance with applicable regulations. Additionally, medical facilities are typically required to prepare a medical waste management plan for submittal to the state. The plan must describe the types and amounts of medical waste generated and how the waste would be disposed. Compliance with applicable regulations involving hazardous materials and potentially hazardous medical materials during operation of the medical office would ensure that such materials are transported, used, and disposed in a manner that minimizes potential effects to workers, the public, and the environment. Upon compliance with applicable regulations, the proposed project would not be expected to create a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials.

Conclusion

In summary, construction and operation of the proposed project would not be expected to create a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials for the reasons described above. As such, impacts would be **less than significant**. No mitigation is required.

- 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 proposed project is not expected to 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, for the reasons outlined below.

Construction

Construction Materials

As discussed under Section 3.9(a), construction of the proposed project would involve relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, grease, adhesive materials, solvents, and architectural coatings. These materials are not considered acutely hazardous and are used routinely throughout urban environments for construction projects and structural improvements. Further, these materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. For these reasons, construction of the proposed project is not anticipated to release hazardous materials into the environment that such a significant hazard to the public or the environment would occur.

Soil Contamination

As described in Section 3.9(a), the project site was previously used for agricultural purposes, from the late 1930s through the mid-1960s. However, according to the Phase I Environmental Site Assessment (ESA) that was conducted for the project site, the potential historical use of pesticides and herbicides would not likely present a threat to human health or the environment, as no evidence of a Vapor Encroachment Condition was found on the project site (Appendix G). Additionally, no indications of pesticide and/or herbicide misuse were observed on the site (Appendix G). In the unlikely event that contaminated soils are encountered in the areas of ground disturbance, the contamination could be released to the environment, resulting in potential hazards to workers, the public, and/or the environment. However, workers would be required to adhere to existing state and federal requirements pertaining to safe handling and proper disposal of contaminated soils. Adherence to regulations for safe handling and proper disposal of contaminated soils would minimize the likelihood that significant hazards would occur to the public or to the environment as a result of ground disturbing activities within or near contamination at the project site.

Operation

Operation of the proposed project would require a variety of materials, some of which may be potentially hazardous. These materials are described in Section 3.9(a). In the event of an upset or accident condition involving hazardous materials used during operation, such materials could be released to the environment and could pose a hazard to the public or the environment. However, due to the types of materials that are expected to be used and the existing regulations that are in place to control the manner in which such substances are used, handled, stored, transported, and disposed, potential upset and accident conditions are unlikely to occur. Upon compliance with applicable local, state, and federal regulations, the likelihood of upset or accident conditions involving hazardous materials used at the project site would be reduced to the extent practicable.

Conclusion

In summary, construction and operation of the proposed project would not be expected to create a significant hazard to the public or to the environment through upset and accident conditions involving release of hazardous materials into the environment, for the reasons described above. As such, impacts would be considered **less than significant**. No mitigation is required.

- 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?*

No Impact. There are no schools within one-quarter mile of the project site. The nearest school is West Covina Hills Adventist School approximately 0.5-mile west of the project site. As such, the proposed project would not have the potential to create a hazard at a nearby school. Additionally, as described in Sections 3.9(a) and 3.9(b), the use, storage, transport, and disposal of hazardous materials are regulated by local, state, and federal law. Compliance with applicable regulations during both construction and operation of the proposed project would ensure that local schools are not exposed to hazardous materials. Therefore, **no impact** would occur.

- d) *Would the project be located on a site that 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. A search of regulatory database listings of hazardous materials sites was conducted by Environmental Data Resources (EDR) for the project site and is included in the Phase I ESA (Appendix G). The project site is not listed on any regulatory database listings for hazardous materials (Appendix G). As such, the proposed project would not be located on a site that is included on a list of hazardous materials sites, and **no impact** would occur.

- 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. Brackett Field Airport is the closest public airport to the City. It is located approximately 4 miles northeast of the project site. The project site is not within the airport influence area for the Brackett Field Airport (Los Angeles County Airport Land Use Commission 2015). As such, the proposed project would not occur within an airport land use planning area or within two miles of a public airport. **No impact** would occur relative to airport-related safety hazards.

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

Less Than Significant Impact. The City has prepared the “multi-hazard Covina Emergency Plan” for emergency response within the City. The multi-hazard Covina Emergency Plan addresses the City’s planned response to emergencies associated with natural disasters and hazardous materials incidents (City of Covina 2000). The proposed project would be required to comply with the multi-hazard Covina Emergency Plan. In the event of a disaster, the City’s emergency plan would proceed with or without the proposed project. According to the City’s General Plan Safety Element, all major public streets in the City serve as the principal evacuation routes. These principal routes are well maintained to support an evacuation function to the extent feasible (City of Covina 2000). The Los Angeles County Fire Department provides emergency response service to the City. Site plans for the proposed project would be reviewed by the Los Angeles County Fire Department during plan check review. Adherence to Los Angeles County Fire Department requirements would ensure that the proposed project would not impair implementation of or physically interfere with emergency plans and emergency evacuation plans. Impacts would therefore be **less than significant**. No mitigation is required.

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

Less Than Significant Impact. The City is located within an urban setting and is generally surrounded on all sides by commercial or residential development. The nearest wildland areas are located at the bottom of the San Gabriel Mountains, approximately three miles north of the City, and within the Covina Hills, which overlap with the southeastern corner of the City. Due to the distance between most commercial areas within the City and the nearest wildland areas, wildland fire hazards are unlikely to occur in the majority of the City. However, a small section of the City’s southeastern corner is mapped as a Very High Fire Hazard Severity Zone by the state. The Very High Fire Hazard Severity Zone overlaps with the Covina Hills and surrounding areas. The project site is located within this Very High Fire Hazard Severity Zone (CAL FIRE 2011). However, the proposed project would be reviewed by the Los Angeles County Fire Department during plan check review. The Los Angeles County Fire Department would verify adequate fire and emergency access, as well as other applicable provisions of the fire code. In the event of a wildland fire emergency, the Los Angeles County Fire Department, specifically Fire Station 154 (401 North Second Avenue), Fire Station 153 (1577 East Cypress Street), and Fire Station 152 (807 West Cypress Street), all located in Covina, would provide fire protection services. Upon compliance with applicable fire code provisions, the proposed project is not likely to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be **less than significant**. No mitigation is required.

3.10 ...Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<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 checked="" type="checkbox"/>	<input 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; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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"/>

- 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. A significant impact would occur if the proposed project would discharge water that does not meet existing water quality standards. Such standards include those of the State Water Resources Control Board (SWRCB) NPDES and waste discharge requirement (WDR) permit programs, and the Los Angeles Regional Water Quality Control Board (RWQCB) implementation of the Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan). The proposed project

is not anticipated to violate any water quality standards or waste discharge requirements during construction or operation, for the reasons described below.

Construction

Stormwater Runoff

During construction of the proposed project, stormwater runoff could potentially violate applicable water quality standards by introducing pollutants to stormwater surface runoff. There are two primary ways that construction activities could adversely affect water quality: land disturbances and spills or leaks of pollutants. Land disturbances such as vegetation removal, compaction, grading, and temporary soil stockpiling could potentially increase sediment loads in stormwater runoff by eroding soils that have been loosened or newly exposed by construction activity. Materials that could spill or leak during construction include diesel fuel, gasoline, lubrication oil, cement slurry, hydraulic fluid, antifreeze, transmission fluid, lubricating grease, and construction-related trash and debris. The amount of such materials used during construction would be the minimum necessary to fuel vehicles, power equipment, and complete activities. Improper management of hazardous materials could result in accidental spills or leaks, which could locally contaminate stormwater runoff.

The potential water quality impacts associated with construction, as described above, would be temporary and highly localized and would only occur on an improperly managed construction site. Because land disturbances associated with the proposed project would be greater than one acre in size, the applicant or its construction contractor would be required to submit a Notice of Intent to the SWRCB in order to obtain approval to carry out construction activities under the Construction General Permit. This permit includes a number of design, management, and monitoring requirements for the protection of water quality and the reduction of construction-phase impacts related to stormwater (and some non-stormwater) discharges. Compliance with the Construction General Permit requires that a SWPPP be developed and implemented by qualified individuals, as defined by the SWRCB.

The SWPPP is required to include BMPs for preventing water quality degradation, identifying stormwater collection and discharge points, and maintaining drainage patterns across a construction site. At a minimum, BMPs would include erosion controls (e.g., mulches, soil binders, erosion control blankets/mats, outlet projection/energy dissipation devices), sediment controls (e.g., silt fences, fiber rolls, gravel bags), tracking controls (e.g., stabilized construction entrance/exit, entrance/outlet tire wash), wind erosion controls, non-stormwater management, and materials and water management (cleanup and containment of trash and debris, stockpile management, spill prevention and control, hazardous waste management). Implementation of these BMPs would reduce the amount of sediment and other potential water pollutants that leave the project site during construction. The SWPPP would also include hazardous materials BMPs necessary to prevent or contain any spills or leaks that may be associated with construction equipment and materials. Because SWPPPs are designed and implemented to comply with the effluent standards and receiving water limitations contained in the Construction General Permit, as well as the numeric and narrative water quality objectives in the Basin Plan, implementation of the SWPPP would prevent construction activities from having substantial adverse impacts on water quality.

Additionally, the construction contractor would be required to comply with CMC Section 8.50.100(C)(2), which states that prior to obtaining a grading or building permit, each operator of any construction site greater than one acre in size must prepare and submit to the City an Erosion and Sediment Control Plan. CMC Section 8.50.100(C)(2) sets forth requirements for the contents of the Erosion and Sediment Control Plan (see Section 3.7(b) for details).

Non-Stormwater Runoff

Dewatering is not anticipated during construction of the proposed project. The shallowest groundwater in the vicinity of the project site is present at depths of approximately 39 feet below ground surface (bgs) (Appendix F). The proposed medical office building would be constructed as a slab-on-grade structure and would not require extensive excavation (although grading to level the project site would occur). However, the proposed parking garage would require excavation to approximately 6 feet to accommodate the subterranean level. Given the approximate depth of groundwater at the project site, it is unlikely that construction of the proposed project would encounter groundwater; therefore, construction dewatering is not anticipated. Additionally, the proposed project would not include the installation of any groundwater wells. For these reasons, the proposed project construction is not expected to affect groundwater quality.

Conclusion

In summary, compliance with the Construction General Permit and local regulations for proper management of construction sites would prevent construction activities associated with the proposed project from having substantial adverse impacts on water quality. Construction impacts would be less than significant.

Operation

The proposed development would not introduce any industrial discharges and, therefore, would not violate any water quality standards or waste discharge requirements related to non-stormwater discharges. Under current conditions, the project site produces nonpoint source pollutants associated with stormwater runoff and would continue to do so upon project implementation. Under existing conditions, the project site is vacant and undeveloped. As such, the site is entirely pervious. Runoff that does not permeate into the ground generally sheet flows and discharges into existing catch basins in Park View Drive, approximately 150 feet northwest of the site. The primary stormwater pollutants that may occur under existing conditions are sediments carried in stormwater from the vacant, unpaved surfaces at the project site.

According to the project-specific Hydrology Report/LID Plan, the project site has limited infiltration (0.3 inches per hour), which significantly reduces the probability of groundwater contamination during project operation. Upon project implementation, the project site would be predominantly covered with structures, pavement, and some landscaped areas. Due to the 75% increase in impervious surfaces on the site, less stormwater would percolate into the ground, and stormwater runoff would increase. Additionally, operation of the medical office building and parking structure could introduce pollutants to stormwater runoff such as trash, fertilizers, cleaning agents, spilled or leaked petroleum products, etc. However, during operation, the proposed project would be subject to CMC Section 8.5.120, which requires “planning priority projects” to incorporate a Low Impact Development Plan (LID Plan) in order to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. These standards and regulations, which are summarized in the paragraph below, would reduce the potential effects of project operation on surface and groundwater quality.

Local requirements for water quality and stormwater runoff are set forth in CMC Chapter 8.50 (Stormwater Quality and Urban Runoff Control). Specific sections that would address the potential effects of project operation include Section 8.50.060 (Best Management Practices and Permits Authorized and Required) and Section 8.50.120 (Low Impact Development). Section 8.50.060 sets forth requirements for BMPs including prohibition of leaks, spills, or discharge of oil, grease, coolant, or other hazardous material onto any street, alley, road, parking area, or surface in the City, where such pollutants could enter the public storm drain system or any receiving water. Section 8.50.120 requires projects to be designed in accordance with the current Los Angeles Municipal NPDES permit, as amended. In accordance with this permit and CMC Section 8.50.120, the project applicant has prepared a Hydrology/LID Plan (Appendix H) to comply with the performance criterion set forth in Section 8.50.120(E).

The overarching performance criterion is that projects are required to retain 100% of the “Stormwater Quality Design Volume” on site, which is equivalent to the greater of (1) the 85th percentile, 24-hour rain event, or (2) the 0.75-inch, 24-hour rain event. If compliance with the 100% retention requirement is technically infeasible, partially or fully, infeasibility must be demonstrated in a LID Plan and the remaining stormwater must be biofiltered. The remaining stormwater quality design volume that cannot be retained or biofiltered must be treated on site to reduce pollutant loading, as outlined in Section 8.50.120(E)(3)(d). Compliance with CMC Section 8.50.120 would reduce the peak volume of stormwater runoff discharged into, as well as the potential for pollutants to enter, the public storm drain system.

The LID Plan for the proposed project is contained in Appendix H of this document. Due to the bedrock underlying the project site, infiltration, bioretention, and biofiltration systems were deemed infeasible in the LID Plan; however, a stormwater capture and reuse system was designed for the project to conform to the City and County LID requirements. The capture and reuse system would include four storage cisterns with a combined capacity of 65,212.85 gallons, which would store rainwater (collected from catch basins trench drains, and downspouts) over a 96-hour period for reuse in designated landscape areas. The proposed storm drain system would be designed to convey the 25-year, 24-hour rainfall event to catch basins, and the underground storm drain network and LID compliance would be obtained by treating all stormwater runoff onsite (85th percentile criteria) before discharging it into the storm drain system. Specifically, project-specific BMPs included in the LID Plan are as follows:

- Harvesting and reusing rainfall on site;
- Providing drainage inlet filters and a Continuous Deflective Separation System, both of which would capture solid waste particles and other pollutants before they enter the storm drain network;
- Implementing an Operations and Maintenance Plan to ensure that the catch basins and trench drain filters are routinely inspected and maintained.

Compliance with the above-mentioned water-quality requirements, including those outlined in the CMC and in the project-specific Hydrology Report/LID Plan and SWPPP, would ensure that impacts of the proposed project related to water quality standards and waste discharge requirements would be **less than significant** during construction and operation. No mitigation is required.

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?*

Less Than Significant Impact. According to the City's Urban Water Management Plan (UWMP), the City's water supply is predominantly sourced from groundwater and locally treated surface water purchased from the Covina Irrigating Company (CIC) and imported surface water from the Three Valley's Municipal Water District (TVMWD; City of Covina 2017). However, in 2018, 100% of the City's potable water was supplied by the CIC (City of Covina 2019). The CIC water from the Main San Gabriel Basin (Main Basin) every year and delivers treated, potable water to the City (City of Covina 2017). The Main Basin is replenished by stream runoff from the adjacent mountains and hills, rainfall, subsurface inflow from the Raymond and Puente Hills Basins, return flow from overlying uses, and imported water (City of Covina 2017). Management of the Main Basin is undertaken by an adjudication called the Main San Gabriel Basin Watermaster (Watermaster). According to the Watermaster's Five Year Water Quality and Supply Plan (2019–2024), the CIC has groundwater well capacity of approximately 7,581 acre-feet and a projected demand through 2024 of only 4,600 acre-feet, leaving a groundwater supply surplus of approximately 2,981 acre-feet for the CIC through the planning horizon of 2024 (Watermaster 2019). The proposed project's water demand from the supplies sourced from the Main Basin would represent a nominal proportion of this surplus and, as such, would not interfere with the Watermaster's management of the Main Basin. Moreover, the proposed project would connect to municipal water service. As such, the proposed project would not involve groundwater wells and, therefore, would not have the potential to directly deplete groundwater supplies.

However, interference with groundwater recharge can occur when pervious areas that provide for recharge are covered with impervious surfaces as a result of urban development. The proposed project would involve increased impervious surfaces at the site, which would result in a notable decrease in rainwater and runoff percolation. However, geotechnical exploration at the project site has identified Puente Formation siltstone of low permeability underlying much of the site (Appendix F). This low permeability formation is less conducive to groundwater recharge than geologic units composed of alluvial plains or gravelly riverine deposits. Additionally, the San Gabriel Valley covers approximately 167 square miles of which the project site only comprises 3.4 acres; as such, the project site would increase impermeability in the groundwater basin by a maximum of 0.003%. As such, development of the proposed project would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

The proposed project would increase water demand relative to existing site conditions, since no development currently exists on the site. As stated above, the City's water is typically supplied by the CIC, which sources a majority of its water from the Main Basin (City of Covina 2017). As such, increased water demand would involve increased groundwater use. However, the proposed project would be developed in compliance with the California Green Building Code. The California Green Building Code implements water efficiency standards for appliances and fixtures and reduces the degree to which new development increases water demand. The proposed project would also be designed to achieve LEED Gold certification, which would include sustainable design measures (reduced irrigation, native vegetation planting, water-efficient indoor plumbing fixtures/fittings, etc.) to reduce water consumption. Furthermore, as described in Section 3.19(b), the proposed project would constitute a minor portion of the City's total available water supply through the UWMP's planning horizon of 2040.

For the reasons describe above, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin. Impacts would be **less than significant**. No mitigation is required.

c) *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:*

i) *result in substantial erosion or siltation on or off site;*

Less Than Significant Impact. The project site does not contains any streams, rivers, or other waterbodies. As such, development of the project site would not alter the course of a river or a stream. However, construction activities would have the potential to cause ground surface disruption during grading and excavation, which could create the potential for erosion to occur. However, construction contractors would be required to implement erosion and sediment control BMPs, as described under Section 3.10(a). Implementation of required BMPs would minimize erosion during construction to the extent practicable. Required BMPs could include sandbag barriers, dust controls, perimeter controls, drain inlet protection, and proper construction site housekeeping practices. As such, construction impacts would be less than significant.

Upon project buildout, the site would be covered with buildings, hardscape, and landscaping, which would largely preclude on-site erosion and siltation. Any long-term changes in drainage patterns are expected to be minor, highly localized changes. Compliance with the project-specific LID Plan (Appendix H), per CMC Section 8.5.120, would reduce stormwater runoff from the project site and would require capture and treatment of all runoff before it is discharged into the public storm drain system, thereby reducing the potential for on-site and off-site erosion and siltation (See Section 3.10(a) for details).

Due to required compliance with existing regulations, any alterations to the existing drainage pattern at the project site would result in **less than significant** impacts relative to erosion or siltation. No mitigation is required.

ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;*

Less Than Significant Impact. As described in Section 3.10(c)(i), the project area does not contain any streams or rivers having the potential to be altered by the proposed project. As such, the proposed project is not expected to result in alteration of the course of a stream or river. Construction activities associated with the proposed project would temporarily alter drainage patterns. However, compliance with project-specific erosion and sediment control BMPs (as described in Section 3.10(a)) would ensure that on- and off-site flooding is minimized during construction to the extent practicable.

Upon project buildout, the site would be covered with buildings, hardscape, and landscaping, which could result in changes to on-site drainage patterns when compared to the existing vacant conditions of the site. However, any long-term changes in drainage patterns are expected to be minor, highly localized changes. Additionally, compliance with the project-specific Hydrology/LID Plan (Appendix H) would ensure that pre-development hydrologic conditions are replicated to the extent practicable at the project site and that the rate and volume of stormwater runoff is reduced, thereby reducing the potential for flooding on- and offsite. As such, flooding as

a result of increased surface runoff at the project site is not anticipated. Impacts would be less than significant during operation of the proposed project.

Due to required compliance with existing stormwater management regulations, any alterations to the existing drainage pattern at the project site would result in **less than significant** impacts relative to flooding. No mitigation is required.

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. During construction of the proposed project, drainage patterns and runoff quantities on the construction site may be temporarily altered. Compliance with a project-specific SWPPP and an Erosion and Sediment Control Plan would ensure that runoff quantities are controlled to the extent practicable, to avoid overwhelming the existing stormwater drainage system. Furthermore, the SWPPP or Erosion and Sediment Control Plan would contain project-specific BMPs that would help prevent construction-related pollutants (such as sediments and fuels for equipment) from entering stormwater runoff. Upon compliance with the measures outlined in the SWPPP or Erosion and Sediment Control Plan, construction activities associated with the proposed project are not expected to provide a substantial source of polluted runoff nor would they substantially increase runoff volumes leading to exceedances in the storm drain capacity.

Development of the project site would involve covering existing pervious areas with structures, hardscape, and landscaping. The project site would change from being 100% pervious to approximately 25% pervious (Appendix H). As such, the proposed project would have the potential to increase runoff volumes from the project site. Additionally, as explained in Section 3.10(a), operation of a medical office building and parking structure could introduce new stormwater pollutants to the area such as trash, fertilizers, cleaning agents, and spilled or leaked petroleum products. However, compliance with the project-specific LID Plan would replicate pre-development site conditions and would help to reduce stormwater runoff during operations to the extent feasible. Compliance with the project-specific Hydrology/LID Plan (Appendix H), per CMC Section 8.5.120, would not only help reduce stormwater runoff from the project site, but would also require capturing and treating all runoff before discharging it to the public storm drain system. According to the project-specific Hydrology Report/LID Plan, the existing public storm drain system has available capacity to accommodate runoff from the proposed project.

Overall, due to the minor changes in drainage patterns that would be associated with the proposed project, as well as compliance with applicable regulations, the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be **less than significant**. No mitigation is required.

iv) impede or redirect flood flows?

No Impact. The City is not mapped within a 100-year flood hazard zone. The project site is mapped by the Federal Emergency Management Agency as Zone X, which is an area of minimal flood hazard (FEMA 2008) and, as such, the potential for flooding at the project site and surrounding area is unlikely. Accordingly, **no impact** would occur.

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

Less Than Significant Impact. As stated under Section 3.10(c)(iv), the project area is not located within a 100-year flood zone or plain (FEMA 2008). However, the City is located approximately 1.5 miles east of the Puddingstone Reservoir and Dam complex. In the event of dam failure, some areas of the City could be subject to flooding and associated hazards, including the risk of pollutant release. As specified in the City's General Plan Safety Element, dam failure would result in hazardous flooding in the Covina Hills area, and flooding could extend beyond this area, inundating a portion of the community roughly south of Workman Avenue (City of Covina 2000). The project site is located within areas that could be subject to inundation, in the event of dam failure. However, the potential for dam failure is considered remote and would likely only occur during extremely severe seismic shaking conditions. Dams are continually monitored by various government agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. The Division of Safety of Dams requires annual inspection of dam facilities to detect and repair any identified deficiencies. Examples of measures taken to reduce the threat of dam failure include seismically reinforcing the Puddingstone Dam or lowering the Puddingstone Reservoir water level during the winter months. The proposed project would not directly or indirectly affect a dam's propensity to fail, and the existing level of hazard from dam failure would not change upon project implementation. In the unlikely event of a dam failure, the emergency response plans applicable to the project area would go into effect and evacuation and emergency response procedures would be implemented.

Seiches are earthquake-induced waves in enclosed bodies of water, such as lakes or reservoirs. The City has identified seiches as a potential hazard that could occur in the community due to the presence of the nearby Puddingstone Reservoir and Dam complex. In its General Plan Safety Element, the City identifies several courses of action to deal with this potential hazard: administering reasonable development standards for properties abutting Walnut Creek, which extends to the west of Puddingstone Dam and could be affected in the event of a seiche, and continuing ongoing emergency preparedness activities (City of Covina 2000). While a catastrophic earthquake event and associated seiche could pose a hazard to the project area, inundation of the project area is not anticipated due to the intervening distance between Puddingstone Reservoir and the project site, as well as existing flood control infrastructure. Furthermore, as described above, dams are subject to a variety of inspections and regulations that preclude dam failure to the extent practicable.

A tsunami is a sea wave generated by an underwater seismic disturbance, such as sudden faulting or landslide activity. The project area is not located near any coastal areas. (The City is located approximately 27 miles inland from the Pacific Ocean, at an elevation of around 500 feet above mean sea level.) The risk of a tsunami inundating the project is negligible.

In conclusion, although the proposed project is located within a City-identified inundation area from the Puddingstone Reservoir and Dam, the likelihood of project inundation occurring is very low. Additionally, although some hazardous medical materials would be stored on site, these materials would be securely stored and disposed of according to local, state, and federal law. As such, in the unlikely event of project inundation as a result of dam failure or seiche, a significant release of pollutants from the project is not likely. Impacts would be **less than significant**. No mitigation is required.

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 Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties is the Water Quality Management Plan (WQMP) for the Los Angeles Region, which includes the City of Covina. The Basin Plan: (i) identifies beneficial uses for surface and ground waters, (ii) includes the narrative and numerical water quality objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy, and (iii) describes implementation programs and other actions that are necessary to achieve the water quality objectives established in the Basin Plan (LARWQCB 2019). The proposed project would comply with regional and local regulations for water quality control and would not obstruct existing water quality control plans, including the Basin Plan.

Management of the Main Basin (groundwater) is undertaken by the Watermaster. According to the Watermaster's Five Year Water Quality and Supply Plan (2019–2024), the CIC has groundwater well capacity of approximately 7,581 acre-feet and a projected demand through 2024 of only 4,600 acre-feet, leaving a groundwater supply surplus for the CIC through the planning horizon of 2024 (Watermaster 2019). The proposed project's water demand from the supplies sourced from the Main Basin would represent a nominal proportion of this surplus and, as such, would not interfere with the Watermaster's implementation of the Main Basin management plans.

Furthermore, the City requires hydrology and stormwater discharge review during the City's standard development review process and would ensure there is no conflict with existing water quality control or sustainable groundwater management plans. Additionally, as discussed in Section 3.10(b), the proposed project would not deplete or substantially interfere with the local groundwater supplies because no groundwater wells are proposed as part of the project, the project's use of groundwater supplies would be nominal when compared to available and projected supplies from the CIC, and because the proposed project would not substantially interfere with groundwater recharge. The proposed project would have a less than significant impact relative to groundwater use and groundwater quality and, as such, would not conflict with any plans pertaining to groundwater management. Therefore, impacts associated with a water quality control plan or sustainable groundwater management plan would be **less than significant**. No mitigation is required.

3.11 ...Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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 checked="" type="checkbox"/>	<input type="checkbox"/>

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

No Impact. The project site is a vacant parcel within a designated office park area. The site is located just north of the I-10 freeway and is bordered by other commercial uses. The project site is located at the edge of a single-family residential neighborhood that extends to the northeast. However, the proposed project would be located outside of this neighborhood, and the proposed development of the site would not divide the neighborhood in any way. Rather, development of the proposed project would constitute infill of vacant sites in an office park area that has been designated and planned for office park uses for several decades. Furthermore, the proposed project would not include any other infrastructure (e.g. roads, railways etc.) that would divide the surrounding neighborhood and existing community. As such, project implementation would not physically divide a community. **No impact** would occur.

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?*

Less Than Significant Impact. Land use plans and policies applicable to the project site and surrounding area are set forth in the City's General Plan, the City's zoning ordinance, and the PCD Overlay District for the Village Oaks Office Park. The project site is zoned C-P - Administrative and Professional Office with a PCD Overlay in the City's General Plan. The surrounding commercial land uses are zoned C-P, while the surrounding single-family residences are zoned E-1 – Estate Residential (1-acre minimum) and E-2½– Estate Residential (2½-acre minimum). The proposed project would bring the project site into consistency with surrounding office park uses. Upon project implementation, the project site would differ in use and character from the neighboring residential uses to the north and east. However, medical office buildings are allowed within the C-P zone. As such, the proposed project would not require a zoning change or General Plan amendment and would adhere to the provisions of the CMC and the City's General Plan, where applicable. As substantiated throughout this document, no significant, adverse environmental effects would occur as a result of the proposed project. As such, the proposed project would not cause a significant environmental impact due to a conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigation and environmental effect. For these reasons, impacts would be **less than significant**. No mitigation is required.

3.12 ...Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<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"/>

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. According to the DOC's Division of Oil, Gas, and Geothermal Resources (DOGGR), there are no oil, gas, geothermal, or other known wells located on the project site (DOC DOGGR 2019). As such, the proposed project would not interfere with extraction of oil, gas, or geothermal resources.

The City is located within the San Gabriel Production-Consumption Region for Portland Cement Concrete-grade aggregate resources, as mapped by the Division of Mines and Geology (renamed the California Geological Survey [CGS] in 2006). The Division of Mines and Geology has mapped the project site within Mineral Resource Zone 3 for aggregate resources (Division of Mines and Geology 1995). Mineral Resource Zone 3 is a designation given to "areas containing mineral deposits the significance of which cannot be evaluated from available data." The City's General Plan states that there are no mining activities, aggregate production activities, or drilling/producing of minerals in the City and that such activities are prohibited from occurring within the City. As such, the proposed project would not result in adverse effects to mineral resources. For these reasons, **no impact** to the availability of state or regionally important mineral resources would occur.

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. The City's General Plan states that there are no mining activities within the City and that none are expected to occur in the future because of the City's built-out nature, land use restrictions, and the potential for land use conflicts such as noise and dust (City of Covina 2000). The General Plan discusses two sites in the northern portion of the City that were identified by the state as potentially containing mineral deposits. However, the state declared these areas insignificant due to urbanization and potentially negative incursions that would preclude extraction (City of Covina 2000). The City has not identified any locally important mineral resource recovery sites and in fact prohibits such activities within its jurisdiction. For these reasons, the proposed project would not result in the loss of availability of a known locally important mineral resource. As such, **no impact** to availability of locally important mineral resources would occur.

3.13...Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" 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"/>

Noise Characteristics

Sound may be described in terms of level or amplitude (measured in decibels (dB)), frequency or pitch (measured in hertz (Hz) or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the amplitude of sound is the decibel. Because the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against low and very high frequencies in a manner approximating the sensitivity of the human ear. Several descriptors of noise (noise metrics) exist to help predict average community reactions to the adverse effects of environmental noise, including traffic-generated noise, on a community. These descriptors include the equivalent noise level over a given period (L_{eq}), the statistical sound level (L_n), the day-night average noise level (L_{dn}), and the community noise equivalent level (CNEL). Each of these descriptors uses units of dBA. In terms of changes in environmental or community noise levels, a 3 dBA increase or decrease is generally recognized as the threshold for an average person to notice a change has occurred.

L_{eq} is a sound energy level averaged over a specified time period (typically no less than 15 minutes for environmental studies). L_{eq} is a single numerical value that represents the amount of variable sound energy received by a receptor during a time interval. For example, a 1-hour L_{eq} measurement would represent the average amount of energy contained in all the noise that occurred in that hour. L_{eq} is an effective noise descriptor because of its ability to assess the total time-varying effects of noise on sensitive receptors. L_{max} is the greatest sound level measured during a designated time interval or event.

Unlike the L_{eq} metrics, L_{dn} and CNEL metrics always represent 24-hour periods, usually on an annualized basis. L_{dn} and CNEL also differ from L_{eq} because they apply a time-weighted factor designed to emphasize noise events that occur

during the evening and nighttime hours (when speech and sleep disturbance is of more concern). “Time weighted” refers to the fact that L_{dn} and CNEL penalize noise that occurs during certain sensitive periods. In the case of CNEL, noise occurring during the daytime (7:00 a.m.–7:00 p.m.) receives no penalty. Noise during the evening (7:00 p.m.–10:00 p.m.) is penalized by adding 5 dB, while nighttime (10:00 p.m.–7:00 a.m.) noise is penalized by adding 10 dB. L_{dn} differs from CNEL in that the daytime period is defined as 7:00 a.m.–10:00 p.m., thus eliminating the evening period. L_{dn} and CNEL are the predominant criteria used to measure roadway noise affecting residential receptors. These two metrics generally differ from one another by no more than 0.5 to 1 dB.

Existing Noise Conditions

Currently, the project site is vacant, with residences located immediately to the east, commercial offices to the north and west, and the I-10 freeway to the south. Because the site is vacant, it does not currently generate noise. The site and the surrounding area are primarily subject to traffic noise associated with adjacent roadways including the I-10 freeway, Park View Drive, and East Holt Avenue.

Dudek conducted noise measurements in the project vicinity to characterize the existing noise environment. The daytime, short-term (1 hour or less) attenuated sound level measurements were taken with a Rion NL-52 sound-level meter. This sound-level meter meets the current American National Standards Institute (ANSI) standard for a Type 1 precision sound-level meter. The calibration of the sound level meter was verified before and after the measurements were taken, and the measurements were conducted with the microphone positioned approximately five feet above the ground.

Dudek selected six noise measurement locations (ST1–ST6) near the project site to characterize noise levels from important transportation sources in the area, as well as to establish ambient noise levels at sensitive receptors that could be affected by project construction or operation. The measurement locations are shown in Figure 3.13-1, Noise Measurement Modeling Locations, and the measured average noise levels and measurement location descriptions are provided in Table 3.13-1, Measured Noise Levels. Noise measurement data is also included in Appendix I. The primary noise sources at the measurement locations consisted of traffic along the adjacent roads. As shown in Table 3.13-1, the measured sound levels ranged from approximately 59 dBA L_{eq} at ST4 to approximately 68 dBA L_{eq} at ST6.

Table 3.13-1 Measured Noise Levels

Receptors	Location/Address	Date	Time	L_{eq}^1 (dBA)	L_{max}^2 (dBA)
ST1	North of I-10 Freeway. East of Park View Dr.	October 17, 2017	2:22 p.m. – 2:32 p.m.	67	71
ST2	North of I-10 Freeway. East of Park View Dr.	October 17, 2017	2:33 p.m. – 2:43 p.m.	62	66
ST3	North of I-10 Freeway. East of Park View Dr.	October 17, 2017	2:10 p.m. – 2:20 p.m.	64	68
ST4	North of I-10 Freeway. East of Park View Dr.	October 17, 2017	1:58 p.m. – 2:58 p.m.	59	66
ST5	South of E Holt Ave. Between Park view Dr. and E Via Verde St	October 17, 2017	2:48 p.m. – 3:03 p.m.	65	73
ST6	North of 3700 E Garvey Ave S West Covina, California 91791.	October 17, 2017	1:34 p.m. – 1:49 p.m.	68	88

Source: Appendix I

Notes:

¹ Equivalent Continuous Sound Level (Time-Average Sound Level)

² Maximum noise level

Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. Sensitive receptors near the project site include the following:

- Single-family residential land uses located immediately east of the project site.
- Single-family residences along East Garvey Avenue (a roadway to which the proposed development would contribute trips).

The above sensitive receptors represent the nearest residential land uses with the potential to be impacted by construction and operation of the proposed development. Additional sensitive receptors are located farther from the project site in the surrounding community and would be less impacted by noise and vibration levels from the project.

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SOURCE: Bing Maps 2019

FIGURE 3.13-1

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- 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?*

Less Than Significant with Mitigation Incorporated. On-site noise-generating activities associated with the proposed project would include short-term construction as well as long-term operational noise associated with mechanical equipment operation and parking structure activities. The proposed project would also generate off-site traffic noise along various roadways in the area. These potential impacts are discussed below.

Construction Noise (Short-Term Impacts)

On-Site Construction Activities

Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use, the operations being performed, and the distance between the source and receptor.

The construction activities for the proposed project would include site preparation, grading and trenching of the site, building construction, paving of the on-site roads and parking areas, and application of architectural coatings. Noise impacts from construction activities are a function of the noise generated by construction equipment, equipment location, and sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest sensitive receptors are single-family homes located as close as 20 feet east of the project site. Other residential land uses are located further to the north, northeast, west and northwest of the project site.

Construction noise is difficult to quantify because of the many variables involved, including the specific equipment types, size of equipment used, percentage of time, condition of each piece of equipment, and number of pieces of equipment that will actually operate on site. The range of maximum noise levels for various types of construction equipment at a distance of 50 feet is depicted in Table 3.13-2, Construction Equipment Noise Levels. The noise values represent maximum noise generation, or full-power operation of the equipment. As an example, a loader and two dozers, all operating at full power and relatively close together, would generate a maximum sound level of approximately 90 dBA at 50 feet from their operations. As one increases the distance between equipment, and/or the separation of areas with simultaneous construction activity, dispersion and distance attenuation reduce the effects of separate noise sources added together. In addition, typical operating cycles may involve two minutes of full-power operation, followed by three or four minutes at lower levels. The average noise level during construction activity is generally lower, since maximum noise generation may only occur up to 50% of the time. Noise levels from construction operations decrease at a rate of approximately 6 dBA per doubling of distance from the source.

Table 3.13-2 Construction Equipment Noise Emission Levels

Equipment	Typical Sound Level (dBA) 50 Feet from Source
Roller	74
Concrete vibrator	76
Pump	76
Saw	76

Table 3.13-2 Construction Equipment Noise Emission Levels

Equipment	Typical Sound Level (dBA) 50 Feet from Source
Backhoe	80
Air compressor	81
Generator	81
Compactor	82
Concrete pump	82
Crane, mobile	83
Concrete mixer	85
Dozer	85
Grader	85
Impact wrench	85
Loader	85
Pneumatic tool	85
Jackhammer	88
Truck	88
Paver	89

Source: FTA 2006

The nearest point of construction activities to the closest noise-sensitive receivers (single-family residences located to the east) would be approximately 20 feet and the furthest would be approximately 350 feet. For construction noise, a concept called the “acoustic center” is useful in describing average noise levels across the entire construction period for adjacent receivers. The acoustic center is the idealized point from which the energy sum of all construction activity noise near and far would originate, and it is derived by taking the square root of the product of the shortest distance multiplied by the furthest distance. The nearest noise-sensitive receivers are located approximately 84 feet away from the acoustic center of construction activity. Thus, the distance to the nearest construction activities would be approximately 20 feet, but average construction noise levels at the closest receivers would be approximated by the acoustic center 84 feet away, because equipment would be operated across the whole site rather than remaining only along the closest boundary to adjacent receivers.

The Federal Highway Administration’s Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at these noise-sensitive land uses. Although the model was developed by the Federal Highway Administration (FHWA), RCNM is often used for non-roadway projects, because the same types of construction equipment used for roadway projects are also used to construct other project types. Input variables for RCNM consist of the receiver/land use types, the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of each hour the equipment typically works per day), and the distance between the construction activity and noise-sensitive receivers. No topographical or structural shielding was assumed in the modeling of construction noise (i.e., the receivers are modelled with no obstacles to the travel of sound between the construction activity and receiver location, a worst-case assumption). The noise levels from the proposed construction activities are summarized in Table 3.13-3, Construction Noise Model Results Summary. The complete set of RCNM input and output data for construction noise is provided in Appendix I. As shown, at the nearest residences, noise levels would range from approximately 74 to 84 dBA L_{eq} when construction is taking place at or near the project site boundary. More typical construction noise levels (represented by the acoustic center distance noise levels) at the closest residences to the southeast would range from approximately 68 to 78 dBA L_{eq} .

Table 3.13-3 Construction Noise Model Results Summary

Construction Phase	Construction Noise at Representative Receiver Distances (dBA L _{eq})	
	Nearest Construction Work (approximately 75 feet from sensitive receptors)	Typical Construction Noise Levels (acoustic center, 160 feet from sensitive receptors)
Site Preparation	89	77
Grading	96	83
Trenching	92	80
Building Construction	92	79
Paving	93	80
Architectural Coating	86	73

Notes: L_{eq} = equivalent continuous sound level

As presented in Table 3.13-3, the highest noise levels are predicted to occur during grading activities when noise levels from construction activities would be as high as 96 dBA L_{eq} at the nearest existing residences, approximately 20 feet away. Based upon the acoustic center distance of 84 feet, construction noise would also be highest during grading, with an average of 83 dBA L_{eq}.

The City regulates construction noise by restricting the allowable hours of construction. Section 9.40.110 of the CMC exempts construction noise from the stationary noise standards, provided construction occurs between 7:00 a.m. and 8:00 p.m. Monday through Saturday, excluding holidays. Through adherence to the limitation of allowable construction times provided in Section 9.40.110, as well as the implementation of mitigation measures **MM-NOI-1** and **MM-NOI-2**, construction-related noise levels would not exceed any standards and would not be substantially higher than existing ambient daytime noise levels (as shown in Table 3.13-1). Therefore, temporary construction-related noise impacts for the proposed project would be less than significant with mitigation incorporated.

Off-Site Construction Traffic Noise

During demolition and construction phases of the project, off-site noise would also result from construction-related traffic. Construction traffic levels would vary by construction phase, ranging from 20 trips per day to 180 trips per day for construction workers (with the peak of 180 trips per day during the building construction phase). Medium and heavy truck trips would also vary by phase, ranging from 2 to 55 trips per day (with the peak of 55 trips per day for haul trucks occurring during the grading phase). The building construction phase would have the highest combined trips, with 180 worker trips and 44 medium or heavy truck trips per day.

Using acoustical calculations adapted from the FHWA traffic noise prediction model (TNM 2.5), traffic noise levels were determined for construction worker and heavy truck trips, when added to the existing traffic volumes. Construction trips would primarily travel along East Holt Avenue to I-10. East Holt Avenue currently carries approximately 3,000 average daily trips (ADT). The addition of construction-related traffic during the peak construction period would increase traffic volumes along this roadway by 0.3 dBA L_{eq}. Therefore, while the noise from individual truck pass-by events may be discernible to a person nearby, construction traffic would not substantially increase average traffic noise levels above existing (the increase would be well below the 3 dBA significance threshold). Construction-related traffic noise is therefore deemed a less than significant impact.

Operational Noise (Long-Term Impacts)

The implementation of the project would also result in changes to existing noise levels on the project site by developing new stationary sources of noise, including introduction of heating, ventilation, and, air conditioning (HVAC) equipment, a trash compactor, a parking structure, and a surface parking lot. These sources may affect noise-sensitive land uses in the vicinity of the project site. The following analysis evaluates noise from exterior mechanical equipment and activities associated with parking facilities. Each of these impacts is discussed below, following a description of the City's regulations for noise-generating sources and noise exposure limits for noise-sensitive land uses.

Noise-generating sources in the City are regulated under Chapter 9.40 of the CMC. The noise limits apply to noise generation from one property to an adjacent property. The noise level limits depend on time of day, duration of the noise, and land use. The exterior noise level limits are presented in Table 3.13-4, Exterior Noise Level Limits (Stationary Noise Sources). The noise levels in this table are used to determine long-term operational noise impacts associated with on-site noise sources and activities.

Table 3.13-4 Exterior Noise Level Limits (Stationary Noise Sources)

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

Source: City of Covina Municipal Code. Residential Units and Commercial Uses.

HVAC Equipment

The proposed medical office building would require installation and use of HVAC equipment. Based on information provided by the project applicant, two HVAC package units each with 25-ton capacity would be required to maintain temperature control in the building. The applicant has used the Carrier 48TC WeatherMaker 25-ton package units as the basis for design. The Carrier 48TC WeatherMaker 25-ton package unit has a sound power rating of 86 dBA (Carrier 2014).

The HVAC units would be installed on the building roof, and architecture building elevations indicate the parapet wall and mechanical screen combined would extend to a height of ten feet above the roof plane on which the HVAC units would be installed. The parapet and mechanical screen are included as a noise barrier in the calculation of off-site noise levels from HVAC operations.

Trash Compactor

A trash compactor is proposed to be included for the project, in an equipment yard at the northeast corner of the building. To determine typical commercial trash compactor noise levels, reported noise level measurement data collected at a Wal-Mart store was used (City of Santa Rosa 2006). Recorded noise levels from the commercial trash compactor operation were 58 dBA L_{eq} , with a maximum of 62 dBA, at a distance of 25 feet. This level would be reduced to 52 dBA L_{eq} at 50 feet away (a doubling of the reference distance for the compactor noise would reduce the sound level by 6 dBA less, or 52 dBA L_{eq}).

According to architecture plan elevation details, the trash enclosure area would have a 10-foot high perimeter wall. In addition, stepped retaining walls with a combine height of 19 feet are proposed between the trash compactor location and the adjacent residences easterly of the project. The trash enclosure wall and retaining walls are included as a noise barrier in the calculation of off-site noise levels from trash compactor operations, which are shown in Table 3.13-5, Mechanical and Parking Operations Noise Level Analysis.

Parking Structure

To determine the noise level impacts associated with parking structure vehicle movement, a noise measurement program conducted by Urban Crossroads was relied upon (Urban Crossroads 2017). Urban Crossroads conducted sound level measurements for a three-level parking structure associated with the Canyon Springs Healthcare Campus in Riverside. The noise levels recorded in the Urban Crossroads study were used to represent parking structure operational noise levels for this component of the Kaiser Covina project. The measurements were performed adjacent to the parking lot vehicle entrance, which captured noise both from entering and exiting vehicles and movements within the lower floor of the structure. Higher levels (beyond the second level) have a much lower contribution to noise levels measured at the ground level, and therefore measured noise levels would be representative of parking structures that are 2 levels or higher. The parking structure short-term noise level measurements indicate that the parking structure vehicle movement generates a noise level of 60 dBA L_{eq} at a uniform reference distance of 50 feet. To be conservative in the analysis, parking structure vehicle movement within the project site is expected to operate for 60 minutes during typical hourly daytime and nighttime conditions, thereby resulting in an hourly noise level of 60 dBA L_{eq} at 50 feet from the entrance, during each hour of the day and night.

Surface Parking Lot

The proposed project would include a surface level parking lot in the southern portion of the parcel. Noise sources from parking lots include car alarms, door slams, radios, and tire squeals. These sources typically range from about 30 to 66 dBA at a distance of 100 feet (Gordon Bricken & Associates 1996), and are generally short-term and intermittent. Noise sources from the parking lot would be different from each other in kind, duration, and location, so that the overall effects would be separate and in most cases would not affect noise-sensitive receptors at the same time. However, potential surface parking noise levels were assessed using a value in the middle of the range identified by Gordon Bricken (i.e., 48 dBA at 100 feet).

Sound Levels from Combined On-site Noise Sources

Using the reference noise levels to represent the proposed operations that include parking lot and parking structure vehicle movements, mechanical ventilation (roof-top air conditioning) units, and trash compactor use, the

operational source noise levels that are expected to be generated by the project were calculated, as experienced at the closest sensitive receiver locations along the easterly side of the subject property. There are three separate residential parcels aligned north-south along the easterly site boundary, so noise levels were modelled at the property line of each of the three parcels. The distance from each noise source to the closest receiver property lines was determined using the measurement tools available in Google Earth Pro.

The operational noise level calculations account for distance attenuation provided due to geometric spreading when sound from a localized stationary source (i.e., a point source) propagates uniformly outward in a spherical pattern. With geometric spreading, sound levels attenuate (or decrease) at a rate of 6 dB for each doubling of distance from a point source. The calculations also take into account attenuation from wall, parapet, and retaining wall elements that are proposed between the sound source locations and receiver locations.

The noise level contribution from each source at each of the closest three off-site receivers was calculated separately, and then the individual sound level contributions at each receiver were summed using appropriate logarithmic calculations. Assuming all the equipment is operating simultaneously for a minimum period of one hour, and with steady vehicle movement activity for that same hour in the parking structure and parking lot, the worst-case calculated noise level at the closest receivers is presented in Table 3.13-5, Mechanical and Parking Operations Noise Level Analysis. The noise level calculations are included in Appendix I.

Table 3.13-5 Mechanical and Parking Operations Noise Level Analysis

Summary of Results - Average Noise Levels (dBA L _{eq})							
Operational Noise From Individual Noise Sources and Combined at Closest Residences							
Receiver Property Line	HVAC	Compactor	Parking Gar.	Parking Lot	Combined	Existing Ambient	Operations + Ambient
Southeastern Residential	27	35	35	43	44	67	67
Eastern Residential	32	37	36	37	42	64	64
Northern Residential	30	31	31	22	41	59	59

Source: Ambient noise levels from short-term sound level measurements on-site (Appendix I); mechanical equipment assessment using exterior attenuation rates and manufacturer sound level data. Refer to Appendix I for worksheets.

The results of the mechanical equipment and parking structure operations noise analysis indicate that the proposed project would comply with noise limits established in CMC Chapter 9.40, which are applicable to residential low density uses (50 dBA daytime and 45 dBA nighttime). Operational noise from the project would comply with the night-time limit of 45 dBA L_{eq} applicable to low density residential land uses, at the property boundary of the closest existing residence in each direction from the project site. In addition, project operational noise levels would increase existing ambient noise levels at the closest adjacent residences by less than 1 dBA L_{eq} which is an imperceptible change. As such, the project would not generate noise at the closest neighboring residential properties that exceeds the noise level limits applicable to those residential zone districts (which are more restrictive than the C-P district). Consequently, operational noise impacts would be less than significant.

Off-site Traffic Noise Levels

The proposed project would generate traffic along adjacent roadways including Park View Drive, East Holt Avenue, and East Garvey Avenue. Potential noise effects from vehicular traffic were assessed using the FHWA's Traffic Noise Model version 2.5 (FHWA 2004). Information used in the model included the site geometry; existing, existing plus project, future without project, and future with project traffic volumes (provided in the Traffic Impact Study [Appendix J]); and posted traffic speeds. Noise levels were modeled at representative noise-sensitive receivers. The receivers were modeled to be five feet above the local ground elevation. Figure 3.13-1 presents the locations of the modeled off-site noise receivers, and the noise model results are summarized in Table 3.13-6, Off-Site Traffic Noise Modeling Results. Spreadsheets containing the inputs and outputs for the traffic noise modelling are contained in Appendix I. The City does not have a specific criterion for evaluating the significance of project-related increases in off-site traffic noise levels at residences or noise-sensitive areas. For the purposes of this analysis, traffic noise level increases are considered significant if they exceed ambient traffic noise levels by five dB or more, or cause noise levels to exceed the 65 dBA CNEL noise threshold. An increase or decrease in noise level of three dBA is the minimum before any noticeable change in community response would be expected (Caltrans 1998).

Table 3.13-6 Off-Site Traffic Noise Modeling Results

Modeled Receptor	Existing Noise Level (dBA CNEL)	Existing with Project Noise Level (dBA CNEL)	Future without Project Noise Level (dBA CNEL)	Future with Project Noise Level (dBA CNEL)	Maximum Noise Level Increase (dB)
R1, Residence north of Project Site	49	49	49	49	0
R2, Residence northeast of Project Site	52	52	52	52	0
R3, Residence east of Project Site	48	49	49	49	1
R4, Residence east of Project Site	57	57	57	57	0
R5, Residence northwest of Holt/Garvey	66	66	66	66	0
R6, Residence southwest of Holt/Garvey	65	66	66	66	1

Source: Appendix I

Table 3.13-6 shows that the maximum noise level increase would be 1 dB, at a residential receiver located to the northeast of the project site, across Holt Avenue (R3), and also at a residential receiver site at the southwest corner of Holt Avenue and South Garvey Avenue (R6). A change in noise level of 1 dB is not an audible change, in the context of community noise. At the other modeled receivers, noise level increases would be zero dB (when rounded to whole numbers). Based upon these results, off-site traffic noise impacts associated with the proposed project would be less than significant. No mitigation is required.

Conclusion

For the reasons described above, the overall proposed project is not expected to generate noise levels in excess of applicable standards upon implementation of mitigation measures **MM-NOI-1** and **MM-NOI-2**. As such, impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

- MM-NOI-1** Construction activities for the project shall take place during the permitted time and day per Chapter 9.40.110 of the City's Municipal Code. The applicant shall ensure that construction activities are limited to the hours of 7 a.m. to 8 p.m. Monday through Saturday, and not at all during other hours or on Sundays or public holidays. This condition shall be listed on the final designs for the proposed project to the satisfaction of the City of Covina Engineering Department.
- MM-NOI-2** The City of Covina shall require the applicant to adhere to the following measures as a condition of approving the grading permit for the proposed project:
- The project contractor shall schedule construction activities to reduce the simultaneous operation of construction equipment so as to minimize noise levels resulting from operating several pieces of high noise level emitting equipment.
 - All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Enforcement shall be accomplished by random field inspections by applicant personnel during construction activities, to the satisfaction of the City of Covina Engineering Department.
 - Construction noise reduction methods such as shutting off idling equipment, construction of a temporary noise barrier, maximizing the distance between construction equipment staging areas and adjacent residences, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used.
 - During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors.
 - Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City of Covina receives a complaint, appropriate corrective actions shall be implemented to reduce noise and a report of the action provided to the reporting party.

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

Less Than Significant with Mitigation Incorporated. Construction activities that might expose persons to excessive ground-borne vibration or ground-borne noise could cause a potentially significant impact. Ground-borne vibration information related to construction activities has been collected by the California Department of Transportation (Caltrans 2013). Information from Caltrans indicates that continuous vibrations with a peak particle velocity (PPV) of approximately 0.1 inch/second begin to annoy people. Heavier pieces of construction equipment, such as bulldozers, generate vibration of approximately 0.089 inch/second PPV or less at a distance of 25 feet (Caltrans 2013). Ground-borne vibration is typically attenuated over short distances. At the distance from the nearest residence to the construction area for project (approximately 75 feet) and with the anticipated construction equipment, vibration would be approximately 0.017 inch/second PPV at the nearest residence. This vibration level would fall below the threshold for annoyance but would exceed the City of Covina's vibration threshold of perceptibility of 0.01 inch/second PPV as legislated by Section 9.40 of the CMC. Vibration is very subjective, and some people may be annoyed at continuous vibration levels near the level of perception (or approximately 0.01 inch/second PPV), even if levels fall below the threshold for annoyance. Although construction activities would not use construction equipment that would result in continuous vibration levels that typically annoy people, since some residences are as near as 20 feet from the construction

area, residents could be temporarily annoyed with the use of some construction equipment. Implementation of mitigation measure **MM-NOI-2** would ensure that contact information is provided for reporting a noise- or vibration-related complaint. Impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

- 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 proposed project would not expose people residing or working in the project area to excessive noise levels from aircraft. The nearest airport is Brackett Field Airport, located approximately 4 miles northeast of the project site. Ontario International Airport is located approximately 13.7 miles east of the project site (Airnav.com 2019). Site observations made during the noise measurements indicated that occasionally audible aircraft noise at the project site is not loud enough to measurably increase the ambient noise levels, which are primarily the result of traffic on nearby roads. The project site is located outside of the 65 dBA CNEL noise contours of these airports and outside of the airport planning areas (County of Los Angeles 2015; Mead & Hunt 2010). As such, the proposed project would not occur within an airport land use planning area or within 2 miles of a public airport and would not expose people residing or working in the project area to excessive noise levels. **No impact** would occur.

3.14 ...Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

- 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)?*

Less Than Significant Impact. The proposed project would involve the construction and operation of a new Kaiser Permanente medical office building. The proposed project would not include a residential component; however, the project would still have the potential to indirectly increase the residential population of the City through the provision of both temporary and permanent employment opportunities.

Temporary employment increases would also be associated with construction jobs available during construction of the proposed project. However, given the relatively common nature of the construction activities required for such projects, the demand for construction employment would likely be met within the existing and future labor market in the City, as well as in the surrounding metropolitan area. If construction workers live outside of the City, these workers would likely commute during the temporary construction period.

The proposed project would provide a total of 125 new full-time employment opportunities; however, with part-time employees, the maximum shift size is expected to be 167 employees. Employment increases have the potential to cause indirect population growth, as they may draw additional people and their households to the City. According to SCAG, the City had 25,300 jobs in 2012 and is expected to accommodate 29,500 jobs in 2040 (or an additional 4,200 jobs by 2040) (SCAG 2016). The maximum shift of 167 employees associated with the proposed project would comprise only 4% of SCAG's projected employment growth for the City through 2040 and, as such, is well within employment growth projections for the City of Covina.¹⁶ The proposed project is expected to be in operation around September 2021. As such, an additional 167 employees within the City would fall well within SCAG's employment projections for the City. Furthermore, because the proposed project would be located in the densely populated Los Angeles metropolitan area, it is anticipated that the jobs at the project would be filled, in part, by City residents or by residents of neighboring cities. In the unlikely event that some of the new employees were to relocate to the City upon obtaining a job at the Kaiser Permanente Covina Medical Office Building, this would result in minor to negligible population growth.

¹⁶ 167 projected employees / 4,200 new jobs by 2040 = 0.039*100 = 3.9%

For the reasons described above, the proposed project would result in a **less than significant** impact relative to population growth. No mitigation is required.

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

No Impact. The project site is vacant under existing conditions, does not contain any residences, and is not zoned for residential land uses. As such, development at the project site would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. **No impact** would occur.

3.15...Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- 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:*

Fire protection?

Less Than Significant Impact. New or physically altered governmental facilities are usually required when the population in a localized area increases substantially such that existing facilities and services cannot meet the increase in demand. The City contracts with the County of Los Angeles Fire Department to provide fire protection services and emergency response services. There are three fire stations within the City: Fire Station 154, located at 401 North Second Avenue; Fire Station 153, located at 1577 East Cypress Street; and Fire Station 152, located at 807 West Cypress Street. In the event that a station cannot meet the immediate needs of a call for services independently or does not have capability to address the full extent of a larger incident, the other fire stations within the City or the closest available County of Los Angeles Fire Department resources could respond or provide support.

Of the three fire stations within the City of Covina, Fire Station 153 is closest to the project site (located approximately three roadway miles north of the site). However, according to the County of Los Angeles Fire Department, Fire Station 141, located at 1124 W. Puente Street in the City of San Dimas, is closer

(approximately two roadways miles to the east) and, as such, would be the first responder to the site in case of an emergency (Michael Takeshita, pers. comm. 2019). Fire Station 141 is equipped with one 3-person engine company and is staffed with one captain, one fire fighter specialist, and one fire fighter (Michael Takeshita, pers. comm. 2019). Based on the project site's distance from Fire Station 141, emergency response times would be between 5-6 minutes in the case of an emergency at the project site (Michael Takeshita, pers. comm. 2019).

The proposed project would involve development of a vacant site within the City, resulting in an increase in employees at the project site and a potential indirect increase in residents in the City. The proposed project would have a maximum of 167 employees on site during a single shift. As explained in Section 3.14, Population and Housing, this increase in City residents and employees would represent a nominal proportion of the employment growth forecast in the City through 2040 (SCAG 2016), especially considering that employees would be predominantly sourced from the existing employment pools in the City and the surrounding Los Angeles metropolitan area. As such, the proposed project is not anticipated to result in an increased demand for fire protection services within the City such that new or physically altered facilities would be required (Michael Takeshita, pers. comm. 2019).

Additionally, the proposed project would be subject to current County of Los Angeles Fire Department requirements for fire sprinkler systems, fire alarm systems, fire flow, and equipment and firefighter access. Compliance with fire code standards would be ensured through the plan check process prior to the issuance of building permits and would reduce the potential demand for fire services, by decreasing the likelihood and/or severity of a fire emergency at the site. Due to the limited increase in demand that would be attributable to the proposed project, the availability of fire services within proximity to the site, and required compliance with fire code standards, the construction or expansion of existing fire facilities would not be required as a result of developing the proposed project. Therefore, substantial adverse physical impacts associated with the provision of new or physically altered facilities would not result. Impacts would be **less than significant**. No mitigation is required.

Police protection?

Less Than Significant Impact. New or physically altered governmental facilities, including police stations, are usually required when the population in a localized area increases substantially such that existing facilities and services cannot meet the increase in demand. Police protection services in the City are provided by the City of Covina Police Department. The Covina Police Department is located at 444 North Citrus Avenue. The City is divided into three service areas (East Service Area, Central Service Area, and West Service Area), with one lieutenant assigned to each area (Stephanie Stabio, pers. comm. 2019).

The project site is within the department's East Service Area and is located approximately three roadway miles southeast of the police station (Stephanie Stabio, pers. comm. 2019). The goal response time of the Covina Police Department is 3 minutes; under existing conditions, average response times for the Covina Police Department are 4 minutes 25 seconds (Stephanie Stabio, pers. comm. 2019).

The proposed project would have a maximum of 167 employees on site during a single shift. As explained in Section 3.14, Population and Housing, this increase in City residents and employees would represent an incremental proportion of the growth forecast in the City through 2040 (SCAG 2016). As such, the proposed project is not anticipated to result in a significant increase in demand for police protection services within the City such that new or physically altered facilities would be required.

However, the increased land use intensity could increase the frequency of emergency and non-emergency calls to the Covina Police Department (Stephanie Stabio, pers. comm. 2019). The proposed project would employ defensible design, lighting, and landscaping, as well as open fencing to minimize secluded and nonvisible areas. These techniques would minimize spaces hidden from public view, which would help prevent loitering and crime. Additionally, on-site security would be provided for the building between 7:00 a.m. and 8:00 p.m. Security services would include security officers and management oversight. The main lobby of the building would have a security desk, and the pharmacy would be subject to a variety of specialized security measures, including alarms, lockers, security grills, and secure cabinets. The building would also be equipped with alarms and closed-circuit television cameras. The alarms and camera feeds would be remotely accessible for monitoring by security officers at Kaiser's Security Operations Center, which would provide 24/7 security to the site. These aspects of the proposed project's design could lessen the demand for police protection services. Furthermore, police units are continuously mobile, and service calls are responded to by the nearest available mobile unit. While new development may place increased demand on police protection services, the proposed project would not warrant the construction or expansion of police facilities, as the current staffing and facilities are expected to be sufficient to serve the proposed project. The proposed project would not, therefore, result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities. Impacts would be **less than significant**. No mitigation is required.

Schools?

No Impact. The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to require a new school. The City is served by the Covina Valley Unified School District. The proposed project would have a maximum of 167 employees on site during a single shift. As explained in Section 3.14, Population and Housing, in the unlikely event that employees were to relocate to the City, the associated population growth is expected to be minor to negligible relative to the City's current and projected future population (see Section 3.14(a) for details). As such, the proposed project would not result in increased enrollment in local schools to the extent that new school facilities would be required. **No impact** would occur.

Parks?

Less Than Significant Impact. New or physically altered governmental facilities, including parks, are usually required when the population in a localized area increases substantially such that existing facilities and services cannot meet the increase in demand. The employees and patients of the proposed medical office building could use nearby park facilities. The closest park to the project site is Parque Xalapa, which is a 2-acre neighborhood park owned by the City, located across East Holt Avenue from Park View Drive. Overall, the City contains approximately 62 acres of parkland, comprised of nine parks and two ballparks. Additionally, the 11-acre Walnut Creek Park, which is owned by the County of Los Angeles, lies within the boundaries of the City. At the time of General Plan adoption in 2000, the City had 1.3 acres of open space for every 1,000 residents. This ratio is considered significantly below the National Park and Recreation Association's guideline of 2.5–4.0 acres of parkland for every 1,000 residents (City of Covina 2000). While the City is currently deficient in parkland acreage, implementation of the proposed project would not substantially exacerbate this issue. The proposed project is not expected to increase the City's residential population (see Section 3.14 for details) and would, therefore, not significantly exacerbate the City's parkland deficiency. Furthermore, the project applicant would be required to pay development fees that would help support recreational facilities in the City. Payment of fees

would help address any incremental increase in demand for recreational facilities that may be caused by the project. Additionally, as shown in Figure 2-4, the proposed project would incorporate landscaped open space areas, including an entry garden, healing courtyard, and pollinator garden, which may alleviate any potential minor increases in the use of nearby park facilities, as these areas would provide open space for employees and patients of the medical office building. For these reasons, impacts to park facilities from implementation of the proposed project would be **less than significant**. No mitigation is required.

Other public facilities?

Less Than Significant Impact. Other public facilities and services provided within the City include library services and City administrative services. New or physically altered governmental facilities, such as libraries, are usually required when the population in a localized area increases substantially such that existing facilities and services cannot meet the increase in demand. Library services are provided by the Covina Public Library, located at 234 North Second Avenue, which is approximately three roadway miles northwest of the project site. The employees and patients of the proposed medical office building could use the City's library services, but the increase in use would not be significant relative to Citywide demand. As described in Section 3.14, the proposed project is not expected to generate substantial population growth within the City. Growth associated with the proposed project, if any, would be minor to negligible, and it is anticipated that existing library and City administrative services would accommodate any negligible increase in demand due to implementation of the proposed project. As such, the proposed project is not expected to require the construction or expansion of library facilities or City administrative facilities. Impact would be **less than significant**. No mitigation is required.

3.16 ...Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<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"/>

- 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. The employees and patients of proposed project could use nearby park and recreational facilities. The closest park to the project site is Parque Xalapa, which is a 2-acre neighborhood park owned by the City, located on the opposite side of East Holt Avenue. Additionally, the Michael D. Antonovich Trail extends through portions of the Village Oaks Office Park and residential areas to the northwest of East Holt Avenue. (The trail begins at Parque Xalapa and extends to the north and west.) Overall, the City contains approximately 62 acres of parkland, comprised of nine parks and two ballparks. Additionally, the 11-acre Walnut Creek Park, which is owned by the County of Los Angeles, lies within the boundaries of the City. At the time of General Plan adoption in 2000, the City had 1.3 acres of open space for every 1,000 residents. This ratio is considered significantly below the National Park and Recreation Association's guideline of 2.5–4.0 acres of parkland for every 1,000 residents (City of Covina 2000). While the City is currently deficient in parkland acreage, implementation of the proposed project would not substantially exacerbate this issue. The proposed project is not expected to increase the City's residential population (see Section 3.14 for details) and would, therefore, not significantly exacerbate the City's parkland deficiency. The project applicant would be required to pay development fees that would help support recreational facilities in the City. Payment of fees would help address any incremental increase in demand for recreational facilities that may be caused by the project. Additionally, as shown in Figure 2-4, the proposed project would include landscaped open space areas, including an entry garden, healing courtyard, and pollinator garden, which may alleviate any potential minor increases in the use of nearby park facilities, as these areas would provide open space for employees and patients of the medical office building. For these reasons, the project would not 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. Impacts would be **less than significant**. No mitigation 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 would include some open space and recreational areas, as described under Section 3.16(a), including an entry garden, healing courtyard, and pollinator garden. The effects of constructing these recreational areas are included as part of the proposed project and, therefore, have been analyzed for their potential environmental effects in this IS/MND. As substantiated throughout this document, no significant, adverse environmental effects would occur as a result of the proposed project. As described above in Section 3.16(a), the proposed project would not require construction or expansion of recreational facilities, beyond the private open spaces that would be constructed as part of the project. For these reasons, impacts would be **less than significant**. No mitigation is required.

3.17 ...Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Information in this section is taken from a Traffic Impact Study prepared by Linscott, Law, and Greenspan in August 2018 and revised in October 2019. The TIS is included in this document as Appendix J.

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law, which changed the way that transportation impacts are analyzed under CEQA. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to require analysis of vehicle miles traveled (VMT) as the new metric for evaluating transportation impacts.

Once the new transportation guidelines are adopted, Level of Service (LOS), or automobile delay, will no longer be considered an environmental impact under CEQA. Per OPR's Final Proposed Updates to the CEQA Guidelines released on November 27, 2017, OPR proposes to add Section 15064.3 to the CEQA Guidelines, which would provide that, in most cases, VMT is the most appropriate measure of transportation impacts. OPR also proposed several changes to the questions related to transportation in Appendix G of the CEQA Guidelines. First, OPR proposed to revise the question related to "measures of effectiveness" (threshold question A) so that the analysis focuses on circulation elements of city and county general plans and other land use plans governing transportation. Second, OPR proposed to delete the second question related to LOS and insert references to proposed new Section 15064.3. Third, OPR proposed to clarify the question related to design features.

The new Section 15064.3(b), “Criteria for Analyzing Transportation Impacts,” states “If existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may analyze the project’s VMT qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.”

OPR’s regulatory text indicates that a public agency may immediately commence implementation of the transportation impact guidelines, however, the guidelines shall applied by all lead agencies, statewide, by July 1, 2020. At this time, the City has not yet implemented VMT as a primary traffic evaluation methodology. As such, the proposed project’s potential to impact transportation and circulation has been evaluated by analyzing changes in LOS at eleven impacted intersections surrounding the project site consistent with the City’s current Traffic Impact Analysis Guidelines (2014).

Level of Service Methodology

The concept of LOS was developed to evaluate the operating conditions of the circulation network. The Highway Capacity Manual (HCM) defines LOS as a qualitative measure which describes the operational conditions of a traffic stream, generally in terms of such factors as speed and travel time, freedom to maneuver, traffic interruptions, comfort and convenience. LOS is rated A through F, with LOS A representing the best operating conditions and LOS F representing the worst.

Signalized Intersections

Signalized intersections were analyzed using the Intersection Capacity Utilization (ICU) methodology adopted by the City of Covina and City of West Covina. The ICU value is a quantitative ratio which compares intersection volume to capacity.

Unsignalized Intersections

The HCM established a procedure for calculating the control delay measured in seconds per vehicle (sec/veh) at unsignalized intersections. LOS for all-way stop-controlled (AWSC) intersections was determined by the computed or measured average control delay for the entire intersection. LOS for one-way stop-controlled (OWSC) or two-way stop-controlled (TWSC) intersections was determined by the computed or measured control delay and was defined for each minor movement.

Significance Criteria

The City of Covina has established LOS D or better as the acceptable LOS for intersections within the City of Covina. For the purpose of traffic study, any intersection within the City of Covina operating at LOS E or F was considered to be deficient. The City of West Covina and the California Department of Transportation (Caltrans) has established LOS E or better as the acceptable LOS in the City of West Covina or on Caltrans facilities. Therefore, any intersection in the City of West Covina or on Caltrans facilities operating at LOS F was considered to be deficient.

As shown in Tables 3.17-1, City of Covina Impact Threshold Criteria, and 3.17-2, City of West Covina Impact Threshold Criteria, significant adverse traffic impact would occur in the City of Covina and City of West Covina if the implementation of the proposed project would result in one or more of the following:

- The intersection that would operate at an acceptable LOS without the proposed project, but would operate at unacceptable LOS with the proposed project.
- The intersection to operate at an unacceptable LOS with an increase in the ICU of 0.02 or greater.

Table 3.17-1 City of Covina Impact Threshold Criteria

Signalized Intersections		
Pre-Project Delay	Level Of Service	Project Related Increase in v/c
0.71 to 0.80	C	Equal to or greater than 0.04
0.81 to 0.90	D	Equal to or greater than 0.02
0.91 or more	E/F	Equal to or greater than 0.01
Unsignalized Intersections		
Pre-Project Delay	Level Of Service	Project Related Increase in v/c
≤25.0 seconds	A/B/C	LOS D or worse
>25.0 seconds	D/E/F	Equal or greater than 5.0 seconds

Source: Appendix J

Table 3.17-2 City of West Covina Impact Threshold Criteria

Final v/c	Level of Service	Project Related Increase in v/c
>0.800	D, E, F	Equal to or greater than 0.02

Source: Appendix J

Existing Conditions

The proposed project is generally bounded by East Holt Drive to the north, Park View Drive to the west, and the I-10 Freeway to the south. Regional access to the project site is provided via the I-10 Freeway, which is located immediately south of the project site, while immediate access is provided via Park View Drive under existing conditions. A review of the key roadways in the project site vicinity and study area is summarized in Table 3.17-3, Existing Roadways, below.

Table 3.17-3 Existing Roadways

Roadway	Classification ¹	Travel Lanes		Median Types ⁴	Speed Limit
		Direction ²	No. of Lanes ³		
Grand Avenue (City Boundary to Holt Avenue) (Holt Avenue to City Boundary)	Commercial/Mixed-Use Thoroughfare ⁶ Residential Connector ⁶	N-S N-S	4	RMI RMI	40 45
Garvey Avenue (South of Holt Avenue) (North of Holt Avenue)	Local Street ⁶ Commercial/Mixed-Use Main ⁶	N-S E-W	2 2	N/A N/A	25 45
Park View Drive	Local Street ⁵	N-S	2	N/A	25
Holt Avenue (Barranca Street to I-10 Freeway) (I-10 Freeway to Via Verde Street)	Residential Connector ⁶ Collector ⁵	E-W E-W	2 2	N/A N/A	40 40

Source: Appendix J

Notes:

- ¹ Roadway classifications obtained from the City of Covina General Plan Land Use Element
- ² Direction of roadways in the project area: N-S (North-South) and E-W (East-West)
- ³ Number of lanes in both directions on the roadway
- ⁴ Median type of the road: RMI = Raised Median Island; 2WLT = 2-Way Left-Turn Lane; and N/A = Not Applicable.
- ⁵ Source: City of Covina General Plan Land Use Element, April 18, 2000
- ⁶ Source: City of West Covina General Plan, Adopted January 20, 2016.

Public Bus Transit Service

Public bus transit service within the project study area is currently provided by Foothill Transit and the City of West Covina Go West Shuttle. A summary of the existing transit service, including the transit route, destinations and peak hour headways is presented in Table 3.17-4, Existing Transit Routes.

Table 3.17-4 Existing Transit Routes

Route	Destinations	Roadways Near Site	Number of Buses During Peak Hour		
			DIR	AM	PM
Foothill Transit 498	Azusa to Downtown Los Angeles via Glendora, Covina and West Covina	Grand Avenue, Rowland Avenue	EB WB	0 4	6 0
Go West Shuttle Red Line	City of West Covina	Grand Avenue, Holt Avenue	EB WB	0 1	0 1
Total				5	7

Source: Appendix J

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

Less Than Significant with Mitigation Incorporated. The TIS for the proposed project examined existing traffic conditions at four key intersections within the project vicinity, estimated trip generation for the project, forecast future traffic conditions (years 2020 and 2022) without and with the proposed project, included a level of service analysis, and provided improvement recommendations.

Project Trip Generation

Traffic volumes expected to be generated by the proposed project during the weekday AM and PM peak hours, as well as on a daily basis, were estimated using rates published in the ITE Trip Generation Manual. Traffic volumes expected to be generated by the proposed project were based upon rates per 1,000 gross square feet for the project. ITE Land Use Code 720 (Medical-Dental Office) trip generation rates were used to forecast the traffic volumes expected to be generated by the proposed project.

The trip generation forecast for the proposed project is summarized in Table 3.17-5, Project Trip Generation. The trip generation forecast for the proposed project was submitted for review and approval by City of Covina staff. As presented in Table 3.17-5, the proposed project is forecast to generate 167 vehicle trips (130 inbound trips and 37 outbound trips) during the AM peak hour and 208 vehicle trips (58 inbound trips and 150 outbound trips) during the PM peak hour. Over a 24-hour period, the proposed project is forecast to generate 2,088 daily trips during a typical weekday.

Table 3.17-5 Project Trip Generation¹

Land Use	Size (Square Feet)	Daily Trip Ends Volumes ²	AM Peak Hour ²			PM Peak Hour ²		
			In	Out	Total	In	Out	Total
Medical Office Building ³	60,000	2,088	130	37	167	58	150	208

Notes:

- ¹ ITE "Trip Generation Manual," 10th Edition, 2017
- ² Trips are one-way traffic movements, entering or leaving
- ³ ITE Land Use Code 720 (Medical-Dental Office Building) trip generation average rates

Traffic Impact Study

The traffic impact study for the proposed project follows the City's traffic study guidelines and is consistent with the traffic impact assessment guidelines set forth in the Los Angeles County Congestion Management Program (CMP).

The traffic analysis evaluates potential project-related impacts at four study intersections in the vicinity of the project site. These study locations were considered as they have the greatest potential to experience traffic impacts as a result of the proposed project. The intersections were evaluated during the weekday morning and afternoon peak hours. The four intersections are as follows:

1. Grand Avenue/Holt Avenue – Signalized – City of West Covina
2. I-10 Freeway EB Ramps/Holt Avenue – Unsignalized – City of West Covina
3. I-10 Freeway WB Ramps/Holt Avenue– Unsignalized – City of Covina
4. Park View Drive/Holt Avenue– Unsignalized – City of Covina

Traffic Impact Analysis Methodology

In order to estimate the traffic impact characteristics of the proposed project, a multi-step process was utilized, as follows:

1. Forecasting trip generation, which estimates the total arriving and departing traffic volumes from the proposed Project on a peak hour and daily basis. The traffic generation potential is typically forecast by applying the appropriate vehicle trip generation equations or rates to the project development tabulation.
2. Forecasting trip distribution, which identifies the origins and destinations of inbound and outbound project traffic volumes. These origins and destinations are typically based on demographics and existing/anticipated travel patterns in the study area.
3. Forecasting traffic assignment, which involves the allocation of project traffic to study area streets and intersections. Traffic assignment is typically based on minimization of travel time, which may or may not involve the shortest route, depending on prevailing operating conditions and travel speeds. Traffic distribution patterns are indicated by general percentage orientation, while traffic assignment allocates specific volume forecasts to individual roadway links and intersection turning movements throughout the study area.

With the forecasting process complete and project traffic assignments developed, the impact of the proposed project is evaluated by comparing LOS conditions at the study area intersections using existing and expected future traffic volumes with and without anticipated project traffic. Based on the outcome of the “with project” conditions, the effects of the project are measured against City traffic guidelines to determine their significance.

Impact Criteria and Thresholds

The significance of the potential impacts of project-generated traffic at the City of Covina study intersections was identified using the traffic impact criteria set forth in the City of Covina’s Traffic Impact Analysis Guidelines (May 2014). According to the City’s traffic impact analysis guidelines, a significant transportation impact is determined based on the impact threshold criteria presented in Table 3.17-1 above. The City’s traffic impact analysis guidelines require mitigation of project traffic impacts whenever traffic generated by the proposed development exceeds the criteria below.

The significance of the potential impacts of project-generated traffic at the City of West Covina study intersections was identified using the traffic impact criteria as summarized below based on discussions with City staff. According to the City of West Covina, a significant transportation impact is determined based on the impact threshold criteria presented in Table 3.17-2 above.

Pursuant to the City’s traffic impact analysis guidelines, LOS calculations have been prepared for the following scenarios:

- (a) Existing conditions.
- (b) Existing with project conditions.

- (c) Condition (b) with implementation of project mitigation measures, where necessary.
- (d) Condition (a) plus 1.0 percent (1.0%) annual ambient traffic growth through year 2022 and with completion and occupancy of the related projects (i.e., future without project conditions). It should be noted that this scenario assumes completion of the Caltrans I-10 Freeway HOV Lane Improvement project in summer of Year 2021.
- (e) Condition (d) with completion and occupancy of the proposed project.
- (f) Condition (e) with implementation of project mitigation measures, where necessary.

The traffic volumes for each new condition were added to the volumes in the prior condition to determine the change in capacity utilization at the study intersections.

Existing Traffic Volumes

As indicated in column [1] of Table 3.17-6, Summary of Volume to Capacity Ratios and Levels of Service Weekday AM and PM Peak Hours, below, all four study intersections are presently operating at LOS C or better during the weekday AM and PM peak hours.

Existing with Project Conditions

As shown in column [2] of Table 3.17-6, application of the City's threshold criteria to the "Existing With Project" scenario indicates that the proposed project is expected to result in a significant impact at one of the four study intersections. Incremental, but not significant, impacts are noted at the remaining study intersections. As presented in column [2] of Table 3.17-6, application of the City's threshold criteria to the "Existing With Project" scenario indicates that the project is expected to result in a significant impact at the following study intersection:

- Int. No. 3: I-10 Freeway WB Ramps/Holt Avenue: Weekday PM Peak Hour

Table 3.17-6 Summary of Volume to Capacity Ratios and Levels of Service Weekday AM and PM Peak Hours

No.	Intersection	Peak Hour	Year 2018 Existing		Year 2018 Existing with Project		Change		Year 2022 Future Pre-Project		Year 2022 Future with Project		Change		Year 2022 Future with Project Mitigation		Change	
			V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	Sig. Impact	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	Sig. Impact	V/C or Delay	LOS [a]	V/C or Delay	Mitigated
1	Grand Avenue/Holt Avenue [a]	AM	0.716	C	0.725	C	0.009	NO	0.743	C	0.752	C	0.009	NO	-	-	-	-
		PM	0.612	B	0.640	B	0.028	NO	0.638	B	0.666	B	0.028	NO	-	-	-	-
2	I-10 Freeway EB Ramps- Garvey Street/Holt Avenue [a] [c]	AM	23.5	C	34.8	D	0.058	NO	26.8	D	42.2	E	0.058	YES	19.1	C	-7.7	YES
		PM	20.0	C	24.9	C	0.026	NO	22.2	C	28.3	D	0.025	NO	-	-	-	-
		AM	0.410		0.468				0.434		0.492				-			
		PM	0.409		0.435				0.431		0.456				-			
3	I-10 Freeway WB Ramps-Garvey Street/Holt Avenue [b] [d]	AM	13.1	B	15.9	C	2.8	NO	19.2	C	23.6	C	4.4	NO	-	-	-	-
		PM	21.2	C	43.7	E	22.5	YES	50.9	F	>80.0	F	[e]	YES	42.4	E	-8.5	YES
4	Park View Drive/Holt Avenue [b] [c]	AM	11.2	B	13.2	B	2.0	NO	11.8	B	13.7	B	1.9	NO	-	-	-	-
		PM	10.9	B	13.8	B	2.9	NO	11.4	B	14.6	B	3.2	NO	-	-	-	-

Source: Appendix J

Notes:

- [a] City of West Covina impact threshold applied
- [b] City of Covina intersection impact threshold applied
- [c] Unsignalized intersection. Two-way stop controlled.
- [d] Unsignalized intersection. All-way stop controlled.
- [e] Oversaturated conditions

Future without Project Conditions

The future cumulative baseline conditions were forecast based on the addition of traffic generated by the completion and occupancy of the related projects, as well as the growth in traffic due to the combined effects of continuing development, intensification of existing developments and other factors (i.e., ambient growth). The v/c ratios at all of the study intersections are incrementally increased with the addition of ambient traffic and traffic generated by the related projects listed in Table 2 of Appendix J. As presented in column [3] of Table 3.17-6, three of the four study intersections are expected to operate at LOS D or better during the weekday AM and PM peak hours with the addition of growth in ambient traffic and related projects traffic under the future without project conditions.

The following study intersection is expected to operate at LOS F during the peak hour shown below with the addition of growth in ambient traffic and related projects traffic under the future without project conditions:

- Int. No. 3: I-10 Freeway WB Ramps/Holt Avenue: Weekday PM Peak Hour

Future with Project Conditions

As shown in column [4] of Table 3.17-6, application of the City's threshold criteria to the "With Proposed Project" scenario indicates that the proposed project is expected to result in a significant impact at two of the four study intersections. Incremental, but not significant, impacts are noted at the remaining study intersections. As presented in column [4] of Table 3.17-6, application of the City's threshold criteria to the "Future With Proposed Project" scenario indicates that the project is expected to create a significant impact at the following study intersections:

- Int. No. 2: I-10 Freeway EB Ramps/Holt Avenue: Weekday AM Peak Hour
- Int. No. 3: I-10 Freeway WB Ramps/Holt Avenue: Weekday PM Peak Hour

As summarized above, the proposed project is forecast to result in significant cumulative traffic impacts at the following study intersections:

- Intersection No. 2: I-10 Freeway EB Ramps/Holt Avenue
- Intersection No. 3: I-10 Freeway WB Ramps/Holt Avenue

Transportation improvement mitigation measures typically consist of transportation demand management (TDM) measures, improvements such as roadway and/or intersection restriping and roadway widening to accommodate additional travel lanes, and/or additional traffic control (e.g., stop signs) or traffic operations/signal modifications.

The I-10 Freeway WB Ramps/Holt Avenue intersection was operating under two-way stop control (i.e., Holt Avenue eastbound and westbound traffic was not required to stop) prior to commencement of construction activities associated with the I-10 Freeway HOV Lane improvement project. Prior to the HOV lane construction, two through travel lanes were also provided along Holt Avenue at this intersection. During construction of the I-10 Freeway improvement project, however, the intersection was converted to all-way stop control and the through travel lanes along Holt Avenue were reduced to one in each direction. Since the I-10 Freeway HOV Lane improvement project is expected to be completed in Year 2021, the analysis of "Future

Without Project” and “Future With Project” (Year 2022) conditions was based on the type of traffic control and lanes prior to the construction activities associated with the I-10 Freeway improvement project. Implementation of mitigation measure **MM-TRA-1** would convert this intersection from two-way stop control (i.e., the type of traffic control prior to the I-10 Freeway construction project) to permanent all-way stop-control. As shown in Table 3.17-6, this mitigation measure is expected to reduce the forecast cumulative and project impact to less than significant levels by reducing overall delays and improving the intersection LOS.

Similar to mitigation measure **MM-TRA-1**, mitigation measure **MM-TRA-2** requires the conversion of two-way stop control to all-way stop-control at the I-10 Freeway EB Ramps/Holt Avenue intersection. As shown in Table 3.17-6, this measure is expected to reduce the forecast cumulative impact to less than significant levels by reducing overall delays and improving the intersection LOS. Implementation of mitigation measures **MM-TRA-1** and **MM-TRA-2** would reduce potentially significant impacts to the above-mentioned intersections to below a level of significance.

MM-TRA-1 Intersection No. 3: I-10 Freeway WB Ramps/Holt Avenue.

Permanent stop signs shall be installed on the Holt Avenue eastbound and westbound approaches at the I-10 Freeway WB Ramps/Holt Avenue intersection. This shall occur prior to issuance of a certificate of occupancy for the proposed project. In the event that the I-10 Freeway improvement construction signage is still in place at the Holt Avenue/I-10 ramps at that time, the permanent stop signs shall be installed once freeway construction activity at the Holt Avenue/I-10 ramps has ceased. The project applicant (Kaiser Permanente), in coordination with the California Department of Transportation and the City, shall either construct or fully fund the improvement at the I-10 Freeway WB Ramps/Holt Avenue intersection.

MM-TRA-2 Intersection No. 2: I-10 Freeway EB Ramps/Holt Avenue.

The two-way stop control at the I-10 Freeway EB Ramps/Holt Avenue intersection shall be converted to all-way stop-control. Stop signs shall be installed on the Holt Avenue eastbound and westbound approaches prior to issuance of a certificate of occupancy for the proposed project. The project applicant (Kaiser Permanente), in coordination with the California Department of Transportation, shall either construct or fully fund the stop sign installation at the I-10 Freeway EB Ramps/Holt Avenue intersection.

2010 Congestion Management Program Freeways

The following CMP freeway monitoring location in the project vicinity has been identified:

- CMP Station No. 1019, Segment I-10 Freeway at Grand Avenue

The CMP TIA guidelines require that freeway monitoring locations must be examined if the proposed project will add 150 or more trips (in either direction) during either the weekday AM or PM peak periods. The proposed project will not add 150 or more trips (in either direction) during either the weekday AM or PM peak hours to CMP freeway monitoring locations which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. Therefore, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is required.

CMP Intersections

The following CMP intersection monitoring locations have been identified in the project vicinity:

- CMP Station No. 158, located at Azusa Avenue/Cameron Avenue
- CMP Station No. 159, located at Azusa Avenue/Workman Avenue

The CMP TIA guidelines require that intersection monitoring locations must be examined if the proposed project will add 50 or more trips during either the weekday AM or PM peak hours. The proposed project will not add 50 or more trips during either the weekday AM or PM peak hours (i.e., of adjacent street traffic) at CMP monitoring intersections, as stated in the CMP manual as the threshold criteria for a traffic impact assessment. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.

Transit Impact Review

As required by the 2010 Congestion Management Program, a review has been made of the potential impacts of the project on transit service. As discussed above, existing transit service is provided in the vicinity of the proposed Kaiser Permanente Covina MOB project.

The project trip generation, as shown in Table 3.17-5, was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to the CMP guidelines, the proposed project is forecast to generate demand for seven additional transit trips during the weekday AM peak hour and 11 additional transit trips during the weekday PM peak hour. Over a 24-hour period, the proposed project is forecast to generate demand for 106 additional daily transit trips. Therefore, the calculations are as follows:

- Weekday AM Peak Hour = $143 \times 1.4 \times 0.035 = 7$ Transit Trips
- Weekday PM Peak Hour = $214 \times 1.4 \times 0.035 = 11$ Transit Trips
- Weekday Daily Trips = $2,168 \times 1.4 \times 0.035 = 106$ Transit Trips

As shown in Table 3.17-4, three bus transit lines and routes are provided adjacent to or in close proximity the project site. As outlined in Table 3.17-4, under the “No. of Buses During Peak Hour” column, these three transit lines provide services for an average of (i.e., average of the directional number of buses during the peak hours) roughly 10 and 11 buses during the weekday AM and PM peak hours. Therefore, based on the above calculated weekday AM and PM peak hour trips, this would correspond to one additional transit rider per bus during the PM peak hour. It is anticipated that the existing transit service in the project area will adequately accommodate the increase of project-generated transit trips. Thus, given the number of project-generated transit trips per bus, no project impacts on existing or future transit services in the project area are expected to occur as a result of the proposed project.

Conclusion

As shown in Table 3.17-6, application of the City’s threshold criteria indicates that the proposed project is expected to create significant impacts at two of the study intersections under the Existing with Project or Future with Project scenarios. Incremental, but not significant, impacts are noted at the remaining study intersections.

However, with implementation of mitigation measures **MM-TRA-1** and **MM-TRA-2**, the proposed project's impact to intersections in the vicinity would be reduced to a less than significant level. As such, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

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

Less Than Significant Impact. CEQA Guidelines Section 15064.3, subdivision (b), lists the criteria that must be used for applying VMT analysis to development projects and for determining the significance of transportation impacts under VMT criteria. Section 15064.3, subdivision (b) is further divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. The proposed project is a medical office project, which would include the construction of a 58,475-square-foot medical office building, a 4-story parking garage with 256 parking spaces, surface parking with 71 parking spaces, and associated infrastructural, utility, and landscaping improvements. The proposed Project would generate temporary construction-related traffic and would generate 2,088 daily trips ends during typical weekday operation (refer to Appendix J).

As previously stated, the guidelines shall applied by all lead agencies, statewide, by July 1, 2020, and at this time, the City has not yet implemented VMT as a primary traffic evaluation methodology. As such, the proposed Project's potential to impact transportation and circulation has been evaluated with the City's current guidelines (based on LOS). Because the City has not adopted the use of VMT pursuant to SB 743, the proposed project would be evaluated according to CEQA Guidelines Section 15064.3, subdivision (b)(3), qualitative analysis. This guideline recognizes that lead agencies may not be able to quantitatively estimate VMT for every project type. In those circumstances, this subdivision encourages lead agencies to evaluate factors such as the availability of transit, proximity to other destinations, and other factors that may affect the amount of driving required by the project.

As stated above in Section 3.17(a), the proposed project is located in close proximity to public bus service. Public bus transit service within the project study area is currently provided by Foothill Transit and the City of West Covina Go West Shuttle. A summary of the existing transit service, including the transit route, destinations and peak hour headways is presented in Table 3.17-4 above.

In addition to readily available public transit, the proposed project would provide enhanced pedestrian and bicycle amenities. The proposed project would provide a combination of landscape and hardscape improvements that would facilitate internal accessibility and encourage active transportation. The project site is accessible from surrounding land uses, nearby public transportation, and via existing public sidewalks on East Holt Drive and Park View Drive, as well as planned sidewalks on Park View Drive, which would be constructed under the proposed project. The Project is well located to further facilitate and encourage bicycling as a mode of transportation as these facilities are updated and built throughout the City.

In summary, the proposed Project is conveniently located in close proximity to public transit and would provide opportunities for increased pedestrian and bicycle activity, all of which would contribute to reducing the proposed Project's VMT. As such, the proposed Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts would be **less than significant** and no mitigation is required.

- 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)?*

Less Than Significant Impact. The proposed project would not modify any other existing roadways leading to the site and would not involve construction of structures that would cause transportation hazards. All access points would be designed in accordance with the City's Municipal Code, Development Code, and Design Standards. Therefore, the proposed project would not substantially increase roadway hazards due to design features. The proposed project would involve construction of a medical office building in an existing office park area that has been designated and planned for such uses. As such, development of the proposed project would not introduce incompatible uses to the project area having the potential to contribute to hazardous roadway conditions. Impacts would be **less than significant**. No mitigation is required.

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

No Impact. Emergency access to the project site is currently provided via Park View Drive and would continue to be provided from Park View Drive upon operation of the proposed project. While numerous driveway configurations would be introduced to the currently vacant site under the proposed project (see the discussion under Section 2.2), emergency access would still be provided. Additionally, the proposed project has been designed with required clearance for emergency access to the proposed buildings. As described in Sections 3.9 and 3.15, the proposed project's plans would be reviewed by the Los Angeles County Fire Department as part of the plan check process, ensuring that emergency access is provided per Los Angeles County Fire Department requirements. As such, the project would not result in inadequate emergency access. **No impact** would occur.

3.18 ...Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in 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:				
g) 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 checked="" type="checkbox"/>	<input type="checkbox"/>
h) 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"/>

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)?*

Less Than Significant Impact. As described in Section 3.5(b), a CHRIS records search and SLF search were conducted for the proposed project site. No previously recorded tribal cultural resources (TCRs) listed in the CRHR or a local register were identified within the project site. Further, no specific TCRs have been identified by California Native American tribes as part of the City's AB 52 notification and consultation process (see Section 3.18(a)(ii) below for a description of this process). Therefore, the proposed project would not adversely affect TCRs that are listed or eligible for listing in the state or local register. Impacts are considered **less than significant**. No mitigation is required.

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?*

Less Than Significant with Mitigation Incorporated. As previously mentioned, no Native American or tribal cultural resources were identified within the proposed project as a result of the CHRIS records search. The NAHC was contacted on August 2, 2019, for a review of their SLF as part of the process of identifying cultural resources

within or near the project site. The NAHC replied via email on August 27, 2019, stating that the results of the SLF search were positive. Moreover, the NAHC recommended contacting the Gabrieleno Band of Mission Indians – Kizh Nation for more information. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC also suggested contacting an additional four Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the project site. Documents related to the NAHC SLF search are included in Appendix D of this IS/MND.

The proposed project is subject to compliance with Assembly Bill 52 (AB 52) (PRC 21074), which requires consideration of impacts to TCRs as part of the CEQA process. Lead agencies are required to notify California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed project. The City mailed notification letters for the proposed project to NAHC-listed California Native American Tribal representatives on August 12, 2019 via standard mail delivery.

One tribe, the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe), contacted the City on August 19, 2019, via email requesting formal consultation regarding the proposed project. The City subsequently held a consultation meeting with the Tribe. During consultation, the Tribe stated that the project site is within a tribal travel route used for trade with other tribal communities. The Tribe requested copies of soil and geologic studies for the project site, which were subsequently provided by the City. (Because AB 52 is a government-to-government process, all records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City.)

There are no known resources within the project boundaries that have been determined by the City to be significant pursuant to the criteria set forth in Public Resources Code Section 5024.1. However, based on AB 52 consultation the with Tribe, the City has determined that the project may have the potential to impact previously unknown subsurface TCRs. In the event that unknown subsurface TCRs are uncovered during construction ground disturbance, and such resources are not identified and avoided or properly treated, a potentially significant impact could result. As such, mitigation measure **MM-TCR-1** has been set forth to protect any TCRs discovered during project construction. Mitigation measure **MM-TCR-1** requires that a Native American monitor be present on site during all ground disturbing activities. Upon implementation of mitigation measure **MM-TCR-1**, impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-TCR-1 The project applicant shall retain the services of a tribal monitor approved by the Gabrieleno Band of Mission Indians-Kizh Nation, who will be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The tribal monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the tribal representatives and monitor have indicated that the site has a low potential for impacting tribal cultural resources.

3.19 ...Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

- 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?*

Water

Less Than Significant Impact. The proposed project would tie in to the existing 8-inch water line in Park View Drive. Although the project would require the installation of additional utility infrastructure (e.g. water pipelines) on site, these facilities are considered part of the proposed project and are therefore analyzed in this IS/MND for potential environmental effects. The proposed project is not expected to require construction of on-site potable water treatment facilities. However, the proposed project includes the development of a currently vacant site, and, as such, would result in increased water demand relative to existing conditions. Project construction would result in temporary increases in water use in the project area, since water would be required for dust control, concrete mixing, etc. However, temporary, minor increases in water use in the project area during the construction phase of the project would not result in the need for new or expanded water and/or wastewater facilities.

Based on CalEEMod's estimated daily water usage for the proposed project, the increase in water demand could be met by the City's existing and projected supplies. Water consumption estimates for both indoor (767,000 gallons per year) and outdoor (472,507 gallons per year) water use were provided by the project applicant. Projected demand for water upon operation of the proposed project would total 1,239,507 gallons per year, or approximately 3.8-acre feet per year (afy). As a point of comparison, the City's Water Utility Division supplied 5,396-acre feet to its service area during fiscal year 2014–2015 (City of Covina 2017). Moreover, the City projects adequate water supply through the planning horizon of 2040 in normal year, single-dry year, and multiple-dry year scenarios (City of Covina 2017). As shown in the City's UWMP, the reliable quantities of projected water supply for normal conditions in the years 2020, 2025 and 2040 are 5,705 afy; 5,762 afy; and 5,940 afy, respectively (City of Covina 2017). As such, water demand from the proposed project would equate to approximately 0.066% of the City's projected water supplies in 2020; 0.065% in 2025; and 0.064% in 2040. Additionally, the proposed project is anticipated to be designed to achieve a LEED Gold standard and, as such, would incorporate water use reduction and efficiency measures into project design that would exceed requirements. Thus, the City is expected to have sufficient supplies to serve the proposed project, and no new water or water treatment facilities would be required.

Wastewater

Less Than Significant Impact. The proposed project would tie in to the existing 8-inch sanitary sewer line in Park View Drive. Although the project would require the installation of additional utility infrastructure (e.g. sewer pipelines and connections) on site, these facilities are considered part of the proposed project and are analyzed in this IS/MND for potential environmental effects. The proposed project is not expected to require construction of domestic wastewater treatment facilities. However, the proposed project includes the development of a currently vacant site, and, as such, would result in increased demand for wastewater treatment services. Wastewater produced during construction of the proposed project would likely be hauled off site. However, such discharges would be minimal and temporary in nature and would comingle with wastewater in the municipal sewer collection system prior to being treated at a regional wastewater treatment plant. As such, construction of the proposed project would not result in the need for need or expanded wastewater facilities.

Based on CalEEMod's estimated daily wastewater rates for the proposed project, the increase in demand for wastewater treatment would not result in the direct need for additional wastewater treatment facilities. The proposed project is anticipated to produce approximately 767,000 gallons of wastewater per year, or 2,101 gallons per day (GPD). As a point of comparison, the San Jose Creek Water Reclamation Plant (WRP), which serves the project area, has a total capacity for 100 million GPD of wastewater with an average daily treatment capacity of 77 million GPD of wastewater, equating to approximately 23 million GPD of unutilized treatment capacity (LACSD 2012; LACSD 2019). Thus, the proposed project's anticipated wastewater generation rate represents approximately 0.009% of the WRP's remaining daily treatment capacity.¹⁷ This increase in wastewater generation would, therefore, be minor and would fall well within the remaining treatment capacity of the WRP. As such, the proposed project would not require or result in the construction (or expansion) of wastewater treatment facilities.

¹⁷ $2,101 \text{ GPD project wastewater} / 23,000,000 \text{ (San Jose WRP daily treatment capacity)} * 100 = 0.009\%$

For both water and wastewater service connections, Kaiser Permanente would be required to pay impact fees (or connection fees) to both the City and the County. These fees must be paid before connection permits are issued. Among other things, these fees are used to fund improvements needed to continue serving the applicable service area, to ensure adequate capacity, and to comply with regulatory requirements for wastewater treatment and discharge.

For the reasons described above, the proposed project is not expected to require or result in the construction or expansion of wastewater treatment facilities.

Stormwater

Less Than Significant Impact. The City is served by a municipal storm drain system maintained by the Los Angeles County Flood Control District. The flood control district operates and maintains a network of storm drains throughout the City. Construction or expansion of stormwater drainage facilities can result from development projects that cause stormwater runoff volumes that exceed the capacity of existing facilities. Construction or expansion of stormwater drainage facilities can also be required for development projects in areas with no stormwater drainage infrastructure, where new infrastructure is required to serve a particular project. The proposed project would be infill occurring in a commercialized, urbanized area. As such, stormwater drainage infrastructure is already present in the project area.

As discussed in Section 3.10, the project would adhere to local requirements for water quality and stormwater runoff, which are set forth in CMC Chapter 8.50 (Stormwater Quality and Urban Runoff Control). Specifically, the project applicant has prepared a Hydrology/LID Plan (Appendix H) to comply with the performance criterion set forth in CMC Section 8.50.120(E). Compliance with CMC Section 8.50.120 would reduce the peak volume of stormwater runoff discharged into, as well as the potential for pollutants to enter, the public storm drain system and would ensure that impacts to public stormwater drainage infrastructure as a result of project implementation would be less than significant. Additionally, according to the project-specific Hydrology Report/LID Plan (Appendix H), the existing public storm drain system has available capacity to accommodate runoff from the proposed project. As such, the proposed project is not anticipated to require the construction or expansion of storm water drainage facilities.

Electric Power

Less Than Significant Impact. The proposed project would connect to existing electric utility infrastructure in Park View Drive. However, connection to electric power is considered part of the proposed project and is analyzed in this IS/MND for potential environmental effects. The proposed project is not expected to require construction of additional electricity generation facilities. However, the proposed project includes the development of a currently vacant site, and, as such, would result in increased demand for electric power. As stated in Section 3.6, Energy, temporary electric power used during construction would be provided by SCE. The electricity used for construction activities would be temporary and would have a negligible contribution to the project's overall electricity consumption.

Project operation would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. The estimation of operational building energy was based on the applicant-provided forecasted annual electricity consumption estimate of 569,720 kWh (see Table 3.6-1).

For comparison, electricity demand in Los Angeles County in 2018 was 67,856 million kWh (CEC 2018a). The proposed project would result in a minimal increase in electricity consumption and would also be energy efficient through features such as LED lighting, optimizing building envelope thermal properties, managing water usage, and optimizing energy performance and controls. Additionally, solar PV panels would be incorporated into the project design with an anticipated renewable electricity generation of approximately 556,200 kWh per year, which would offset the majority of electricity to be consumed by the project. As such, the proposed project's demand on electric utility would be less than significant and no additional facilities would be warranted as a result of the project.

Telecommunications

Frontier Communications currently provides telecommunication services to the City. As such, the project site is in an area with existing telecommunication facilities. Connections to existing infrastructure would be made during construction and are considered part of this project. As such, impacts of such connections have been analyzed for their effects in this IS/MND. As demonstrated throughout this document, significant environmental impacts would not result from the proposed project. Per CMC Section 17.64.040A(19), the project site plans, including the location of any new telecommunication facilities, would be subject to the City's review and approval. During project operation, Frontier Communication's existing local maintenance and operations group would continue to ensure that telecommunication services reach the project area and the City of Covina. As such, the proposed project is not expected to require construction, expansion, or relocation of telecommunications facilities.

Conclusion

In summary, due to the urbanized nature of the project area, utilities are available in the area. The proposed project would include connection to these existing utilities but, as explained above, is not expected to involve new construction, expansion, or relocation of utility infrastructure outside of the project site or its immediate street frontage. The connections required for the project are included as part of the project and have thus been analyzed for environmental effects in this IS/MND. As demonstrated herein, the proposed project is not expected to result in significant impacts on the environment. Impacts would be **less than significant** and no mitigation is required.

- 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?*

Less Than Significant Impact. As described in Section 3.10(b), the City's water supply is predominantly sourced from groundwater and locally treated surface water purchased from the CIC and imported surface water from the TVMWD (City of Covina 2017). However, in 2018, 100% of the City's potable water was supplied by the CIC (City of Covina 2019). The CIC sources approximately 476.89 acre-feet of water from the Main Basin every year and delivers treated, potable water to the City (City of Covina 2017). The Main Basin is replenished by stream runoff from the adjacent mountains and hills, rainfall, subsurface inflow from the Raymond and Puente Hills Basins, by return flow from overlying uses, and by imported water (City of Covina 2017).

As stated above in Section 3.19(a), the proposed project would connect to the existing municipal water pipelines in Park View Drive. The proposed project includes the development of a currently vacant site, and, as such, would result in increased water demand. Project construction would result in temporary increases in water use

in the project area, since water would be required for dust control, concrete mixing, etc. However, temporary, minor increases in water use in the project area during the construction phase of the project would not result in the need for new or expanded water and/or wastewater facilities.

Based on the currently available information about the proposed project and CalEEMod's estimated daily water usage for the proposed project, this increase in water demand could be met by the City's existing and projected supplies. Water consumption estimates for both indoor (767,000 gallons per year) and outdoor (472,507 gallons per year) water use were provided by the project applicant. Projected demand for water upon operation of the proposed project would total 1,239,507 gallons per year, or approximately 3.8 afy. As a point of comparison, the City's Water Utility Division supplied 5,396-acre feet to its service area during fiscal year 2014–2015 (City of Covina 2017). Moreover, the City projects adequate water supply through the planning horizon of 2040 in normal year, single-dry year, and multiple-dry year scenarios (City of Covina 2017). As shown in the City's UWMP, the reliable quantities of projected water supply for normal conditions in the years 2020, 2025 and 2040 are 5,705 afy; 5,762 afy; and 5,940 afy, respectively (City of Covina 2017). As such, water demand from the proposed project would equate to approximately 0.066% of the City's projected water supplies in 2020; 0.065% in 2025; and 0.064% in 2040. Additionally, the proposed project is anticipated to be designed to achieve a LEED Gold standard and, as such, would incorporate water use reduction and efficiency measures into project design that would exceed requirements. Thus, the City is expected to have sufficient water supplies to serve the proposed project. Impacts would be **less than significant**. No mitigation is required.

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

Less Than Significant Impact. The proposed project would tie in to the existing 8-inch sanitary sewer line in Park View Drive. Although the project would require the installation of additional utility infrastructure (e.g. sewer pipelines) on site, these facilities are considered part of the proposed project and are analyzed in this IS/MND for potential environmental effects. The proposed project is not expected to require construction of domestic wastewater treatment facilities. However, the proposed project includes the development of a currently vacant site, and, as such, would result in increased demand for wastewater treatment services.

Based on CalEEMod's estimated daily wastewater rates for the proposed project, this increase in demand for wastewater treatment could be reasonably met by the existing wastewater treatment provider, which is the Sanitation Districts of Los Angeles County (LACSD). The proposed project is anticipated to produce approximately 767,000 gallons of wastewater per year, or 2,101 GPD. As a point of comparison, the San Jose Creek WRP, which serves the project area, has a total capacity for 100 million GPD of wastewater with an average daily treatment capacity of 77 million GPD of wastewater, or approximately 23 million GPD of unutilized treatment capacity (LACSD 2012; LACSD 2019). Thus, the proposed project's anticipated wastewater generation rate represents approximately 0.009% of the WRP's remaining daily treatment capacity.¹⁸ As such, the project's anticipated wastewater generation would be nominal and could be met by the San Jose WRP's existing operational capacity. Impacts would be **less than significant**. No mitigation is required.

¹⁸ 2,101 GPD project wastewater / 23,000,000 (San Jose WRP daily treatment capacity) * 100 = 0.009%

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. Construction activities associated with the proposed project would generate minor amounts of solid waste. The City's Construction and Demolition Debris Management Program requires as a condition of demolition and building permits that 75% of all construction waste materials be recycled. The City maintains an exclusive franchise agreement with Athens Services to carry out the Construction and Demolition Diversion Program for construction contractors (City of Covina 2018). The City's requirement of a 75% construction waste diversion rate would reduce solid waste from construction associated with the proposed project. Further, any hazardous wastes that are generated during construction activities would be managed and disposed of in compliance with all applicable federal, state, and local laws. The remaining 25% of construction material that is not required to be recycled would either be disposed of or voluntarily recycled at a solid waste facility with available capacity. Once operational, the proposed would produce solid waste on a regular basis, in association with operation and maintenance activities.

According to the CalEEMod projections for the project, the proposed medical office building is expected to generate approximately 324 tons of solid waste per year (see Appendix A). Waste would be collected and disposed of by Athens Services. Athens is a mixed-waste processor that can process 5,000 tons of mixed material each day. Athens uses regional landfills in Los Angeles County and San Bernardino County to dispose of waste from its collection, transfer, and disposal services. For 2016, Los Angeles County landfills had a total yearly surplus capacity of 5,891,813 tons (or about 47% capacity remaining) and San Bernardino County landfills had a total yearly surplus capacity of 7,779,840 tons (or about 80% capacity remaining; CalRecycle 2018). As such, the landfills in both counties are anticipated to have adequate capacity to accommodate regional waste disposal needs through 2025 assuming a medium growth rate projection for the region (CalRecycle 2018). Therefore, it is anticipated that, when combined with the remaining capacity of the regional landfills in Los Angeles and San Bernardino County, one of the landfills used by Athens would have sufficient permitted capacity to accommodate the project's solid waste disposal needs.

For the reasons described above, the impact of the overall proposed project with respect to permitted landfill capacity is expected to be **less than significant**. No mitigation is required.

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

No Impact. Kaiser Permanente would be required to comply with all local, state, and federal requirements for integrated waste management (e.g., recycling, green waste) and solid waste disposal. The project would be required to comply with the City's Recycling and Waste Handling Requirement for construction and demolition debris, which requires at least 75% of all construction waste materials to be recycled (City of Covina 2018). Athens Services currently transports all of Covina's residential recycling to a Material Recovery Facility, where recyclable materials are sorted and then diverted from local landfills, pursuant to AB 341 (City of Covina 2018; Athens Services 2019). As a result, Covina businesses that are serviced by Athens Services would be in compliance with applicable laws for recycling and disposal of solid waste (Athens Services 2019). **No impact** would occur.

3.20 ...Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Less Than Significant Impact. As stated in Section 3.9(g), the City is located within an urban setting and is generally surrounded on all sides by commercial or residential development. The nearest wildland areas are located at the bottom of the San Gabriel Mountains, approximately three miles north of the City, and within the Covina Hills, which overlap with the southeastern corner of the City. Due to the distance between most commercial areas within the City and the nearest wildland areas, wildland fire hazards are unlikely to occur in the majority of the City. However, a small section of the City's southeastern corner is mapped as a Very High Fire Hazard Severity Zone by the state. The Very High Fire Hazard Severity Zone overlaps with the Covina Hills and surrounding areas. The project site is located within this Very High Fire Hazard Severity Zone (CAL FIRE 2011). However, the proposed project would be reviewed by the Los Angeles County Fire Department during plan check review. The County Fire of Los Angeles Department would verify adequate fire and emergency access, as well as other applicable provisions of the fire code. The project site is not within a State Responsibility Area (BOF 2019) and in the event of a wildland fire emergency, the County of Los Angeles Fire Department, specifically Fire Station 154 (401 North Second Avenue), Fire Station 153 (1577 East Cypress Street), and Fire Station 152 (807 West Cypress Street), all located in Covina, and Fire Station 141 (1124 W. Puente Street) in San Dimas, would provide fire protection services (Michael Takeshita, pers. comm. 2019). Additionally, the City has prepared the "multi-hazard Covina Emergency Plan" for emergency response within the City. The multi-hazard Covina Emergency Plan addresses the City's planned response to emergencies associated with natural disasters, which would include wildland fires (City of Covina 2000). The proposed project would be required to comply with the multi-hazard Covina Emergency Plan. In the event of a disaster,

the City's emergency plan would proceed with or without the proposed project. According to the City's General Plan Safety Element, all major public streets in the City serve as the principal evacuation routes. These principal routes are well maintained to support an evacuation function to the extent feasible (City of Covina 2000). The County of Los Angeles Fire Department provides emergency response service to the City. Given that the project site is located off a private street, which terminates in a cul-de-sac, project construction would not interfere with an emergency evacuation or response plan. Prior to operation of the proposed project, site plans for the proposed project would be reviewed and approved by the County of Los Angeles Fire Department during plan check review and prior to approval by the City's Planning Commission and City Council. Adherence to County of Los Angeles Fire Department requirements would reduce potential impacts related to implementation of emergency plans and emergency evacuation plans to a **less-than-significant** level. No mitigation is required.

- b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

Less Than Significant Impact. The project site is located on relatively flat terrain within an urban setting and is generally surrounded on all sides by commercial or residential development. The nearest wildland areas are located at the bottom of the San Gabriel Mountains, approximately three miles north of the City, and within the Covina Hills, which overlap with the southeastern corner of the City. However, the project site is located within a Very High Fire Hazard Severity Zone (CAL FIRE 2011). The proposed project would be reviewed and approved by the County of Los Angeles Fire Department during plan check review, which would guarantee that on-site development shall comply with the applicable Los Angeles County code requirements for construction, access, water mains, fire flows, and fire hydrants, as stipulated by the County of Los Angeles Fire Department. In the unlikely event of a wildland fire emergency, the County of Los Angeles Fire Department, specifically Fire Station 154 (401 North Second Avenue), Fire Station 153 (1577 East Cypress Street), and Fire Station 152 (807 West Cypress Street), all located in Covina, and Fire Station 141 (1124 W. Puente Street) in San Dimas, would provide fire protection services (Michael Takeshita, pers. comm. 2019).

Furthermore, operation of the proposed project would not involve activities that are typically associated with a high risk of wildfire ignition. Additionally, as shown in Figure 3.20-1, Proposed Fire Lanes, the medical office building would include adequate emergency vehicle access throughout operation.

Given the above, and given compliance with applicable fire code provisions, the proposed project is not likely to exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be **less than significant**. No mitigation is required.

- c) 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?*

Less Than Significant Impact. As stated in Section 3.19, the proposed project would connect to the existing underground utility infrastructure, including an 8-inch sewer line and existing water mains located in Park View Drive. During the installation of new underground utility connections, minor interruptions to public utilities may occur as a result of the project; however, these interruptions would be brief and intermittent. Furthermore,

construction of these connections is analyzed as part of the proposed project, and potential impacts to the environment are shown to be less than significant throughout this IS/MND. Utilities for the proposed project would be located underground and would not exacerbate fire risk.

Although new internal driveways are planned as part of the proposed project, these access routes would be built according to California Building Code 17.124.070, and thus would provide efficient ingress/egress for emergency vehicles.

Given the above, the proposed project would not include 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 significant impacts to the environment. Impacts would be **less than significant**. No mitigation is required.

d) *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?*

Less Than Significant Impact. The project site is located within a highly developed urban area and is located on relatively flat terrain. The project site is not located within a flood or landslide hazard zone (see Section 3.7, Geology and Soils); however it is located relatively close to several recorded landslide zones associated with the Covina Hills, the nearest of which is 0.25 mile east of the project site. According to the DOC's Landslide Inventory, these landslide zones are dormant and, as such, do not pose a significant existing risk of landslides at the project site (DOC 2019). Additionally, the project site is separated from these landslide zones by urban development, which would largely diminish the likelihood of a landslide ever reaching the project site.

Although construction of the proposed project would result in ground surface disruption during grading and excavation, temporarily altering the drainage pattern of the project site during construction, compliance with the project-specific SWPPP and Erosion and Sedimentation Control Plan that are required per CMC Section 8.50.100 (specifically the use of run-off control devices) would ensure that the risk of flooding on- or off-site is minimized during construction, to the extent practicable. During project operation, the project-specific Hydrology/LID Plan (Appendix H) would be implemented, which would ensure that all runoff is retained on-site to the extent practicable, thereby reducing the risk of downslope or downstream flooding and associated landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Given the relatively flat topography of the project site, the distance of the project site from flood and dormant landslide areas, and the sufficiency of the proposed project's on-site drainage, impacts related to downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes would be **less than significant**. No mitigation is required.

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3.21 ...Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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?*

Less Than Significant with Mitigation Incorporated. As discussed in Section 3.4 of this IS/MND, the project area is located in a developed and urbanized community and is not expected to support sensitive vegetation, sensitive wildlife species, or sensitive habitat. However, the project area contains trees and other vegetation that have the potential to support nesting birds and raptors that are protected under the California Fish and Game Code and under the Migratory Bird Treaty Act. In the event that any such nesting birds or raptors are present during construction activities associated with the proposed project, the birds and/or raptors would be protected in accordance with mitigation measure **MM-BIO-1**, which would require a nesting bird and raptor survey to be completed if construction occurs during the nesting season. In accordance with mitigation measure **MM-BIO-1**, any nesting birds or raptors that are discovered within or near a construction area would be monitored by a qualified biologist, who would have the authority to cease construction if there is any sign of distress to the nesting bird or raptor. Any impacts to biological resources resulting from the proposed project are therefore expected to be less than significant with mitigation incorporated. No further mitigation is required.

As described in Section 3.5 of this IS/MND, the project site not have any historical resources. However, the proposed project would include grading activities that could result in the inadvertent discovery of sub-surface cultural resources. In the unlikely event that sub-surface cultural resources were to be discovered during grading/construction activities associated with the proposed project, the resource(s) would be protected in accordance with mitigation measures **MM-CUL-1**, **MM-CUL-2**, and **MM-TCR-1**. Therefore, the proposed project would not eliminate important examples of the major periods of California history or prehistory. For these reasons, impacts to cultural resources resulting from the proposed project would be less than significant with mitigation incorporated. No further mitigation is required.

As such, effects to biological and cultural resources are expected to be **less than significant with incorporation of mitigation measures MM-BIO-1, MM-CUL-1, MM-CUL-2, and MM-TCR-1**. No further mitigation is required.

- 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)?*

Less Than Significant with Mitigation Incorporated. As described throughout this IS/MND, the proposed project would result in potentially significant impacts involving air quality, biological resources, cultural resources, geology and soils, noise, transportation, and tribal cultural resources. However, mitigation measures have been identified that would reduce these impacts to less than significant levels. Furthermore, the Air Quality and Transportation analyses presented in Section 3.3 and Section 3.17 of this IS/MND consider cumulative impacts and have determined that cumulative air and traffic impacts would not be significant. All reasonably foreseeable future development in the City would be subject to the same land use and environmental regulations that have been described throughout this document. Furthermore, all development projects are guided by the policies identified in the City’s General Plan and by the regulations established in the CMC. Therefore, compliance with applicable land use and environmental regulations would ensure that environmental effects associated with the proposed project would not combine with effects from reasonably foreseeable future development in the City to cause cumulatively considerable significant impacts. For these reasons, cumulative impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

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

Less Than Significant with Mitigation Incorporated. As detailed throughout this IS/MND, the proposed project would not exceed any significance thresholds or result in significant impacts in the environmental categories typically associated with indirect or direct effects to human beings, such as aesthetics, air quality, hazards and hazardous materials, or public services. However, the proposed project could result in potentially significant impacts in the category of noise. With implementation of mitigation measures identified in Section 3.12 of this IS/MND, this impact would be reduced to a less than significant level (mitigation measures **MM-NOI-1** and **MM-NOI-2**). As such, impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

4.0 REFERENCES AND PREPARERS

4.1.....References Cited

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