

Draft

# CITY OF COVINA'S MIXED-USE OVERLAY DISTRICT

## Initial Study/Mitigated Negative Declaration

Prepared for  
City of Covina

June 2022





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City of Covina

June 2022

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# SECTION 1

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## Introduction

The City of Covina (City) proposes to adopt the Mixed-Use Overlay District (MUOD) regulations for a portion of the City in order to comply with State mandates to accommodate future housing development commensurate with the Regional Housing Needs Assessment (RHNA). Because the Draft 2021-2029 Housing Element<sup>1</sup> has determined that there currently are insufficient sites to accommodate the City's RHNA allocation of 1,910 additional housing units for the 2021-2029 planning period, State law requires the City to amend its land use plans and regulations to create additional opportunities for housing development. Failure to amend City land use plans and development regulations could result in State-imposed fines, sanctions and other penalties including litigation and court-imposed zoning amendments, freezing the issuance of building permits, and court-ordered housing project approvals.

The MUOD Project (the Project or the Project and the associated future development and redevelopment) is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). No specific development project is proposed at this time in connection with the MUOD regulations. Therefore, no direct environmental impacts would be caused by adoption of the MUOD, and this Initial Study/Mitigated Negative Declaration (IS/MND) addresses the indirect and cumulative environmental impacts expected to occur as a result of the future development and redevelopment consistent with the MUOD regulations.

The Project consists of adding a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located on 141 parcels within 13 Project Areas throughout the City, excluding the Covina Town Center Specific Plan (TCSP). The total acreage of parcels where the MUOD would be applied is approximately 74.83 acres. Parcels less than 1 acre (0.99) in size would allow a density range of 14 to 22 units per acre and parcels of more than 1 acre in size would allow a density range of 22 to 40 units per acre.

CEQA requires evaluation of the reasonably foreseeable direct and indirect physical impacts that would be caused by a project. Because no specific development is proposed in connection with adoption of the MUOD regulations, no direct physical impacts would occur. Therefore, the City must evaluate potential indirect physical impacts that would be caused by reasonably foreseeable future development consistent with the MUOD.

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<sup>1</sup> [https://covina.ca.gov/sites/default/files/fileattachments/planning\\_commission/page/6971/public\\_review\\_draft\\_covina\\_6th\\_housing\\_element\\_2021-11-24.pdf](https://covina.ca.gov/sites/default/files/fileattachments/planning_commission/page/6971/public_review_draft_covina_6th_housing_element_2021-11-24.pdf)

While cities are required by State law to ensure the availability of housing development opportunities commensurate with the RHNA, CEQA requires analysis of reasonably foreseeable physical impacts. In theory, it is possible that every parcel within the MUOD area could be developed at up to the maximum allowable density and intensity (i.e., “full maximum buildout”); however, such a scenario is not reasonably foreseeable consistent with the legislative intent of CEQA. Instead, environmental impact analyses for policy plans and regulations when no specific development project is proposed typically are based upon the adopted growth forecast because it is considered to be the best available estimate of future development and reasonably foreseeable physical changes. As noted in CEQA Guidelines Sec. 15358(b), effects analyzed under CEQA must be related to a physical change. In addition, *Project* is defined in CEQA as “an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment....” To base the environmental analysis on maximum theoretical development, rather than the adopted growth forecast, would result in a substantial overstatement of reasonably foreseeable physical changes in the environment contrary to the intent of CEQA.

The Southern California Association of Governments (SCAG) is the federally-designated metropolitan planning organization (MPO) for the 6-county region that includes Los Angeles County. Every four years SCAG is required to prepare an updated forecast of population, households and employment as part of its regional planning activities, and SCAG’s growth forecasts are used for a variety of purposes including planning for transportation, housing, air quality and greenhouse gas emissions. Because of the fundamental role of SCAG’s growth forecast in land use policy, it is considered appropriate to use the growth forecast in CEQA impact analyses for land use plans and regulations.

SCAG’s household growth forecast includes the number of additional households expected to reside in each city and the region as a whole. SCAG’s 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which has a “horizon year” of 2045, is based upon a growth forecast that assumes approximately 800 additional households will be added in the entire City during the 2016-2045 period.

For the purposes of the environmental analyses set forth in this document, it has been conservatively assumed that 60 percent of the total development for mixed-use development and redevelopment would be for residential uses and the remaining 40 percent would be for either commercial or industrial uses. The assumption is that 60 percent of the total approximate 74.83 acres will be for residential uses at an average density of 30 dwelling units per acre, resulting in the potential for 1,360 additional dwelling units.

It is important to note that these development assumptions and the resulting indirect and cumulative environmental impacts analyzed in this IS/MND significantly exceed the reasonably foreseeable level of development in the City based upon the regional growth forecast adopted by SCAG as part of the 2045 RTP/SCS. The 2045 RTP/SCS<sup>2</sup> anticipates an increase of approximately 800 households and 2,600 employees in the City during the 2016-2045 period.

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<sup>2</sup> <https://scag.ca.gov/read-plan-adopted-final-plan>

However, this analysis is conservatively based upon future development of every parcel within the MUOD, which would result in an increase of 70 percent more housing units in just the MUOD area than are expected to occur in the entire City by 2045.

## 1.1 Statutory Authority and Requirements

In accordance with the CEQA (Public Resources Code Sections 2100–21177) and pursuant to California Code of Regulations (CCR) Title 14, Section 15063, the City, acting in the capacity of Lead Agency, is required to undertake the preparation of an Initial Study to determine if the Project would have a significant environmental impact. If the Lead Agency finds that there is no evidence that the Project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the Lead Agency must find that the Project would not have a significant effect on the environment and must prepare a Negative Declaration (ND) or Mitigated Negative Declaration (MND) for that Project. Such determination can be made only if, “there is no substantial evidence in light of the whole record before the Lead Agency” that such impacts may occur (Public Resources Code Section 21080(c)).

The environmental documentation is intended as a document undertaken to provide an environmental basis for discretionary actions required to implement the Project. The environmental documentation and supporting analysis is subject to a public review period. During this review, public agency comments on the document should be addressed to the City. Following review of any comments received, the City will consider these comments as part of the Project’s environmental review and include them with the Initial Study documentation for consideration by the Planning Commission and City Council.

The determination by the City is that the preparation of an MND is adequate to address the potential environmental issues associated with construction and operation of the Project. Therefore, this document is an Initial Study/MND (IS/MND). If the evaluation determines that a significant impact cannot be reduced to a less than significant level, then an environmental impact report would be required.

## 1.2 Purpose

The City has prepared this Draft IS/MND to provide the public and responsible agencies with information about the potential environmental impacts associated with implementation of the City’s MUOD Project. This Draft IS/MND includes project-level analysis of the potential effects associated with the Project.

This Draft IS/MND was prepared in compliance with the content requirements in Section 15071 of the CEQA Guidelines of 1970 (as amended) and CCR Title 14, Division 6, Chapter 3. In accordance with Section 15071, this Draft IS/MND includes a description of the Project, the location of the Project, a proposed finding that the Project will not have a significant effect on the environment, an Initial Study that documents reasons to support the finding, and mitigation measures to avoid potentially significant impacts.

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## SECTION 2

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## Project Description

### 2.1 Project Location

Regionally, the Project is located in the City of Covina within the San Gabriel Valley of Los Angeles County (County); refer to **Figure 2-1, Regional Location Map**. The surrounding jurisdictions include Duarte, Azusa, and Glendora to the north, San Dimas to the east, West Covina to the south, and Irwindale and Baldwin Park to west and pockets of Los Angeles County Unincorporated Areas adjacent and within city limits. Locally, the Project is located in 141 parcels within 13 Project Areas (Areas A, B, C, D, E, F, G, H, I, J, K, L, and M) consisting of approximately 74.83 acres located throughout the City; refer to **Figure 2-2, Local Vicinity Map**. The 141 parcels within the 13 Project Areas, in their entirety, are referred to as the Project Sites. Regional access to the Project Sites is via Interstate 210 (I-210) to the north, Interstate 10 (I-10) to the south, and South Azusa Avenue/California State Route 39 to the east of Project Areas L, K, and M and to the west for the remainder of the Project Areas. Local access to the Project Areas is from various roadways throughout the City.

### 2.2 Surrounding Land Uses

As described above, the Project and the associated future development and redevelopment are located in 141 parcels within 13 Project Areas located throughout the City. Land uses immediately adjacent to the 13 Project Areas consist of the following:

- **Project Area A:** East Arrow Highway, commercial uses, and multifamily residences to the north; single-family residences and Ranger Drive to the east; commercial uses, multifamily residences, single-family residences, and the Tri-Community Adult School to the south; and Ranger Drive, North Citrus Avenue, and commercial uses to the west.
- **Project Area B:** East Arrow Highway and commercial uses to the north; single-family residences to the east; single-family residences to the south; and North Hollenbeck Avenue and commercial uses to the west.
- **Project Area C:** East Arrow Highway and commercial uses to the north; North Hollenbeck Avenue and commercial uses to the east; commercial uses and single-family residences to the south; and single-family residences to the west.
- **Project Area D:** East Covina Boulevard, commercial uses, and single-family residences to the north; multifamily residences, single-family residences, North Citrus Avenue, and commercial uses to the east; East Cypress Street, single-family residences, multifamily residences, and commercial uses to the south; and North Citrus Avenue, single-family residences, multifamily residences, and commercial uses to the west.



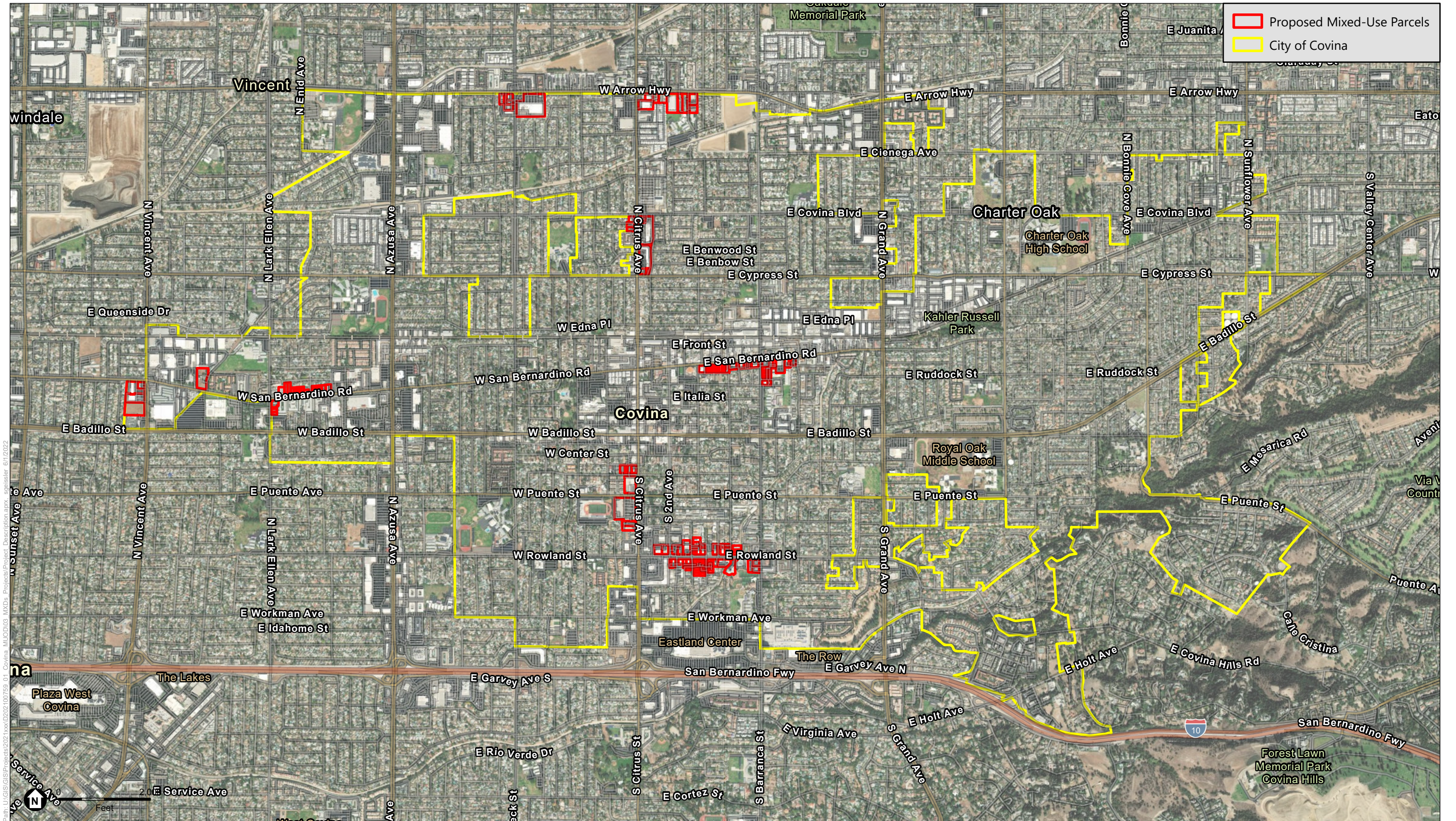


SOURCE: ESRI

City of Covina's Mixed-Use Overlay District Project

**Figure 2-1**  
Regional Location Map





SOURCE: Mapbox, 2021

City of Covina's Mixed-Use Overlay District Project

**Figure 2-2**  
Local Vicinity Map



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- **Project Area E:** Commercial uses and single-family residences to the north; South Citrus Avenue and single-family residences to the east; West Dexter Street and commercial uses to the south; and commercial uses to the west.
- **Project Area F:** West Dexter Street, commercial uses, and West Puente Street to the north; commercial uses and single-family residences to the east; West Puente Street and commercial uses to the south; single-family residences and Covina District Field to the west.
- **Project Area G:** East Rowland Street and commercial uses to the north; commercial uses and South Barranca Avenue to the east; East Rowland Street, commercial uses, and single-family residences to the south; and commercial uses to the west.
- **Project Area H:** East San Bernardino Road and commercial uses to the north; North Barranca Avenue and commercial uses to the east; single-family residences to the south; and Oakbank Avenue and commercial uses to the west.
- **Project Area I:** East San Bernardino Road and commercial uses to the north; Oakbank Avenue and commercial uses to the east; North San Jose Avenue and multifamily residences to the south; and North 1st Avenue and religious uses to the west.
- **Project Area J:** East San Bernardino Road, commercial uses, and East Rue Royale Street to the north; North Prospero Drive and multifamily residences to the east; East Rue Royale Street, multifamily residences, and Covina Elementary School to the south; North Barranca Avenue, commercial uses, and single-family residences to the west.
- **Project Area K:** Single-family residences, West San Bernardino Road and commercial uses to the north; commercial uses to the east; West San Bernardino Road, multifamily residences and commercial uses to the south; North Lark Ellen Avenue and commercial uses to the west.
- **Project Area L:** Commercial uses to the north; Cutter Way and multifamily residences to the east; West San Bernardino Road and commercial uses to the south; and commercial uses to the east.
- **Project Area M:** West San Bernardino Road, commercial uses, and single-family residences to the north; North Vincent Avenue and commercial uses to the east; commercial uses to the south; and single-family residences to the west.

## 2.3 Existing Site Conditions

As described above, the Project and the associated future development and redevelopment are located in 141 parcels within 13 Project Areas located throughout the City. The existing site conditions of the 13 Project Areas consist of developed lots generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees.

## 2.4 Existing General Plan Designations/Zoning Classifications

The existing general plan designations for the 141 parcels within the 13 Project Areas consist of General Commercial (GC), Town Center Commercial (TC-C), and General Industrial (GI). Permitted uses in each general plan designation is described below.

Permitted uses in the General Commercial (GC) general plan designation include various types of retail and service businesses and administrative, professional, and governmental offices that serve a diverse population and that comply with applicable use, operation, and other provisions of the City of Covina's Zoning Ordinance (Zoning Ordinance) and the applicable Redevelopment Plan. Additionally, permitted uses include, but are not limited to, institutional uses, such as churches, group homes, nursing homes, and hospitals; utility and transportation facilities; automotive sales; automotive repair shops; gas stations; self-storage outlets; animal hospitals; and parking lots.

Within the Town Center Commercial (TC-C) general plan designation, permitted uses include high density residential, commercial, and service uses that provide resources to transit riders and the immediate and neighboring residential areas, and public open space.

Permitted uses in the General Industrial (GI) general plan designation include manufacturing, processing, assembly, warehousing, and related activities plus ancillary administrative offices that comply with applicable use, operation, and other provisions of the Zoning Ordinance, the City's Building Code, Fire Code, and other related City codes. Additionally, permitted uses include, but are not limited to, animal hospitals, automotive repair shops, very limited retail functions, gas stations, self-storage outlets, and parking lots.

The existing zoning classifications for the 141 parcels within the 13 Project Areas consist of C-P (Administrative and Professional Office), C-2 (Neighborhood Shopping Center), C-3 (Central Business), C-3A (Commercial Zone, Regional or Community Shopping Center), C-3A (Planned Community Development [PCD]) (PCD Administrative and Professional Office), C-4 (Commercial Zone, Highway), C-5 (Specified Highway), M-1 (Industrial Zone), TC-C (Town Center Zone), and RD-1500 (Multiple-Family).

The C-P (Administrative and Professional Office) zoning classification is intended to provide for the development of an integrated office and professional zone wherein all of the related types of uses and facilities may be located. The C-2 (Neighborhood Shopping Center) zoning classification is intended to serve as a shopping center. The intent of the C-3 (Central Business) zoning classification is to serve as the central trading area of the City. The C-3A (Commercial Zone, Regional or Community Shopping Center) zoning classification is intended to provide for planned, unified shopping centers at community and regional levels. The C-3A (PCD) (PCD Administrative and Professional Office) zoning classification is intended to include any of the uses allowed in the underlying zone by rights of zoning or by conditional use permit, as well as such other uses as may be permitted. The PCD may provide diversification in location of structures, uses, and other site qualities while ensuring compatibility with uses and future developments on the surrounding areas as indicated within the City's General Plan (General Plan). The intent of the C-4 (Commercial Zone, Highway) zoning classification is to provide for highway-related uses. The C-5 (Specified Highway) zoning classification is intended to provide for specified highway-related commercial uses. The M-1 (Industrial Zone) zoning classification is intended to provide for the development of industrial uses which include fabrication, manufacturing, assembly or processing of materials that are in already processed form. The intent of the TC-C (Town Center Zone) zoning classification is to serve as a general commercial trading area, emphasizing unique services and specialty shops that preserve the character of the town

center and promote a pedestrian-oriented environment. The RD-1500 (Multiple-Family) is intended to provide for the development of multifamily residential structures such as apartments, condominiums, townhouses, stock cooperatives, and community apartments.

Specifically, the existing general plan designations and zoning classification for each of the 13 Project Areas are the following:

- **Project Area A:** The general plan designation for Project Area A is General Commercial (GC). The zoning classifications for Project Area A are C-3A (Commercial Zone, Regional or Community Shopping Center) and C-4 (Commercial Zone, Highway).
- **Project Area B:** The general plan designation for Project Area B is General Commercial (GC). The zoning classification for Project Area B is C-3A (PCD) (PCD Administrative and Professional Office).
- **Project Area C:** The general plan designation for Project Area C is General Commercial (GC). The zoning classification for Project Area C is C-2 (Neighborhood Shopping Center).
- **Project Area D:** The general plan designation for Project Area D is General Commercial (GC). The zoning classifications for Project Area D are C-2 (Neighborhood Shopping Center) and C-4 (Commercial Zone, Highway).
- **Project Area E:** The general plan designation for Project Area E is Town Center Commercial (TC-C). The zoning classifications for Project Area E are C-3 (Central Business) and TC-C (Town Center Zone).
- **Project Area F:** The general plan designation for Project Area F is General Commercial (GC). The zoning classifications for Project Area F are C-3A (Commercial Zone, Regional or Community Shopping Center), C-3 (Central Business), and C-4 (Commercial Zone, Highway).
- **Project Area G:** The general plan designation for Project Area G is General Commercial (GC). The zoning classifications for Project Area G are C-2 (Neighborhood Shopping Center), C-3A (Commercial Zone, Regional or Community Shopping Center), C-P (Administrative and Professional Office), and RD-1500 (Multiple-Family).
- **Project Area H:** The general plan designation for Project Area H is General Commercial (GC). The zoning classifications for Project Area H are C-2 (Neighborhood Shopping Center), C-5 (Specified Highway), and C-P (Administrative and Professional Office).
- **Project Area I:** The general plan designation for Project Area I is General Commercial (GC). The zoning classifications for Project Area I are C-2 (Neighborhood Shopping Center) and C-4 (Commercial Zone, Highway).
- **Project Area J:** The general plan designation for Project Area J is General Commercial (GC). The zoning classifications for Project Area J are C-5 (Specified Highway), C-4 (Commercial Zone, Highway), and C-P (Administrative and Professional Office).
- **Project Area K:** The general plan designation for Project Area K is General Commercial (GC). The zoning classifications for Project Area K are C-4 (Commercial Zone, Highway) and C-P (Administrative and Professional Office).
- **Project Area L:** The general plan designation for Project Area L is General Industrial (GI). The zoning classification for Project Area L is M-1 (Industrial Zone).
- **Project Area M:** The general plan designation for Project Area M is General Commercial (GC). The zoning classification for Project Area M is C-2 (Neighborhood Shopping Center).

## 2.5 Project Background and Objectives

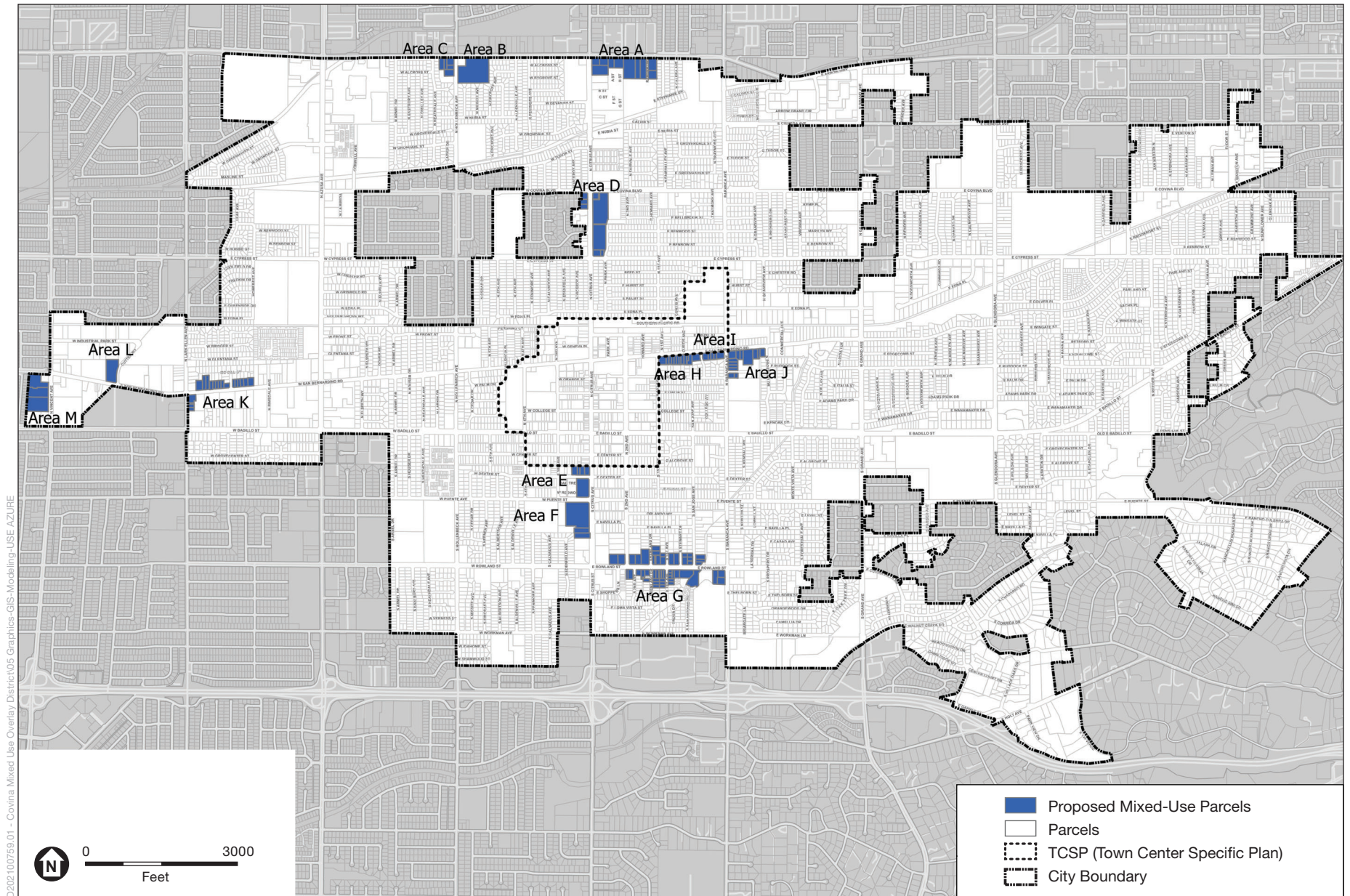
The purpose of the City's MUOD is to guide and regulate future mixed-use development and redevelopment under the policies and objectives of the Mixed-Use general plan designation as established in the City's General Plan. The MUOD allows horizontal mixed-use and vertical mixed-use development and redevelopment and creates specific development regulations and design criteria and standards to achieve a high-quality mixed-use residential project. The MUOD applies on an as-requested, project-by-project basis, to General Commercial (GC), Town Center Commercial (TC-C), and General Industrial (GI) general plan designations. The MUOD is an overlay zone, that may be added to, but not replace, the underlying zoning classification of the existing parcel. In addition to establishing a new chapter of the MUOD zoning regulations, the City desires to initiate a Zone Change and to amend the City's Official Zoning Map to add the MUOD to various sites.

The City's General Plan Environmental Impact Report (EIR), including the Technical Appendices, is dated 1998/2000. The City's General Plan is dated 2000 with updates to only the Housing Element (5th Cycle adopted). Because the MUOD includes residential uses with a density range from 14 to 40 units per acre, the MUOD may have a growth-inducing environmental impact. One objective of the City is to ensure compliance with CEQA for the Zone Change. The RHNA assignment for the City is 1,910 new housing units. With the proposed updates to the Housing Element (6th Cycle), the City must demonstrate to the state Housing and Community Development (HCD) that the City will address several required components. One component is an inventory of sites available for future housing developments. Another component is that the City has reduced the CEQA and land use obstacles by rezoning potential sites within the MUOD. The City's second objective is to comply with the proposed updated Housing Element (6th Cycle).

## 2.6 Project Features

The Project consists of adding a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas throughout the City, excluding the Covina TCSP; refer to **Figure 2-3, Proposed Project Areas and Mixed-Use Parcels**. However, the proposed zone change does not take away the underlying commercial and industrial zones and would assume there is no net increase or additional commercial and industrial development. No specific development project is proposed in connection with the MUOD at this time.





SOURCE: City of Covina, Geographic Information Systems, 2022

City of Covina's Mixed-Use Overlay District Project

**Figure 2-3**  
Proposed Project Areas and Mixed-Use Parcels

The total acreage of parcels where the MUOD would be applied is approximately 74.83 acres with parcels less than 1 acre (0.99) in size would allow a density range of 14 to 22 units per acre and parcels of more than 1 acre in size would allow a density range of 22 to 40 units per acre. City staff assumed that 60 percent of the total development for mixed-use development and redevelopment is for residential uses and the remaining 40 percent is for either commercial or industrial uses. The assumption is that 60 percent of the total approximate 74.83 acres will be for residential uses at an average density of 30 dwelling units per acre, resulting in the potential for 1,360 additional dwelling units. Refer to **Table 2-1, Proposed Mixed-Use Parcels**, for the number of parcels, acreage, and potential dwelling units within each Project Area.

**TABLE 2-1  
PROPOSED MIXED-USE PARCELS**

Project Area	Number of Parcels	Acreage	Potential Dwelling Units <sup>a</sup>
A	9	7.4395	133
B	1	6.3280	113
C	5	2.0528	37
D	10	8.9483	159
E	4	1.3815	24
F	4	8.6438	154
G	54	16.3965	295
H	11	3.0056	54
I	5	1.3362	24
J	13	4.9018	90
K	20	5.2349	95
L	1	2.2735	59
M	4	6.8869	123
<b>TOTAL</b>	<b>141</b>	<b>74.8293</b>	<b>1,360</b>

NOTE:

<sup>a</sup> City staff used 60 percent of the land area in the calculations to satisfy HCD's criteria. City staff used 30 units per acre for the density. City's assumption is to have 60 percent residential development and a density of 30 units per acre.

SOURCE: City of Covina, January 2022.

## 2.7 Construction Schedule and Activities

No specific development project is proposed in connection with the MUOD at this time. The MUOD applies on an as-requested, project-by-project basis, to General Commercial (GC) and General Industrial (GI) general plan designations. As such, the construction schedule and activities associated with the future development and redevelopment of the Project has not been determined until specific projects have been proposed and submitted to the City.



## 2.8 Project Approvals

The City of Covina, as Lead Agency for the Project, has discretionary authority over the Project. Refer to **Table 2-2, *Project Approvals***, for the anticipated required review and approvals for the Project.

**TABLE 2-2  
PROJECT APPROVALS**

Agency	Action
City of Covina	<ul style="list-style-type: none"><li>• Certification of the IS/MND.</li><li>• Approval of the new Chapter of the MUOD.</li><li>• Approval of the Zone Change to add the MUOD to various sites.</li><li>• Amending the City's Official Zoning Map.</li></ul>
State Housing and Community Development (HCD)	Housing Element (6 <sup>th</sup> cycle).
SOURCE: City of Covina, January 2022.	

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## SECTION 3

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### Initial Study/Environmental Checklist

#### 3.1 Project Information

- 1. Project Title:** City of Covina's Mixed-Use Overlay District (MUOD) Project
- 2. Lead Agency Name and Address:** City of Covina, Community Development Department, 125 E. College Street, Covina, CA 91723
- 3. Contact Person and Phone Number:** Nancy Fong, (626) 384-5450
- 4. Project Location:** Regionally, the Project is located in the City of Covina within the San Gabriel Valley of Los Angeles County. The surrounding jurisdictions include Duarte, Azusa, and Glendora to the north, San Dimas to the east, West Covina to the south, and Irwindale and Baldwin Park to west and pockets of Los Angeles County Unincorporated Areas adjacent and within city limits. Locally, the Project is located in 141 parcels within 13 Project Areas (Areas A, B, C, D, E, F, G, H, I, J, K, L, and M) consisting of approximately 74.83 acres located throughout the City.
- 5. Project Sponsor's Name and Address:** City of Covina, Community Development Department, 125 E. College Street, Covina, CA 91723
- 6. General Plan Designation(s):** The existing general plan designations for the 141 parcels within the 13 Project Areas consist of General Commercial (GC), Town Center Commercial (TC-C), and General Industrial (GI); refer to Section 2.4, Existing General Plan Designations/Zoning Classifications.

## **7. Zoning:**

The existing zoning classifications for the 141 parcels within the 13 Project Areas consist of C-P (Administrative and Professional Office), C-2 (Neighborhood Shopping Center), C-3 (Central Business), C-3A (Commercial Zone, Regional or Community Shopping Center), C-3A (Planned Community Development [PCD]) (PCD Administrative and Professional Office), C-4 (Commercial Zone, Highway), C-5 (Specified Highway), M-1 (Industrial Zone), TC-C (Town Center Zone), and RD-1500 (Multiple-Family); refer to Section 2.4, Existing General Plan Designations/Zoning Classifications.

## **8. Description of Project:**

The Project consists of adding a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas throughout the City, excluding the Covina TCSP. However, the proposed zone change does not take away the underlying commercial and industrial zones and would assume there is no net increase or additional commercial and industrial development. No specific development project is proposed in connection with the MUOD at this time.

The total acreage of parcels where the MUOD would be applied is approximately 74.83 acres with parcels less than 1 acre (0.99) in size would allow a density range of 14 to 22 units per acre and parcels of more than 1 acre in size would allow a density range of 22 to 40 units per acre. City staff assumed that 60 percent of the total development for mixed-use development and redevelopment is for residential uses and the remaining 40 percent is for either commercial or industrial uses. The assumption is that 60 percent of the total approximate 74.83 acres will be for residential uses at an average density of 30 dwelling units per acre, resulting in the potential for 1,360 additional dwelling units.

## **9. Surrounding Land Uses and Setting.**

The Project and the associated future development and redevelopment are located in 141 parcels within 13 Project Areas located throughout the City. The existing site conditions of the 13 Project Areas consist of developed lots generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. For land uses immediately adjacent to the 13 Project Areas, please refer to Section 2.2, Surrounding Land Uses.

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

State Housing and Community Development (HCD) for the Housing Element (6<sup>th</sup> cycle).

**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, the City conducted consultation with California Native American tribes pursuant to Assembly Bill (AB) 52 to identify tribal cultural resources in or near the Project Site. On March 29, 2022, the City sent notification letters via email to the designated representative of one California Native American tribe (Gabrieleno Band of Mission Indians – Kizh Nation). In an email dated March 31, 2022, the Gabrieleño Band of Mission Indians-Kizh Nation asked the City if ground disturbance was planned as part of the Project. On April 4, 2022, the City indicated that no ground disturbance was proposed, and as a result, the Gabrieleño Band of Mission Indians-Kizh Nation stated that there was no need for consultation. For further information, please refer to Section XVIII, *Tribal Cultural Resources*.

## 3.2 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/Soils        | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality         | <input type="checkbox"/> Land Use/Planning                   | <input type="checkbox"/> Mineral Resources                        |
| <input checked="" type="checkbox"/> Noise                | <input type="checkbox"/> Population/Housing                  | <input type="checkbox"/> Public Services                          |
| <input type="checkbox"/> Recreation                      | <input type="checkbox"/> Transportation                      | <input type="checkbox"/> Tribal Cultural Resources                |
| <input type="checkbox"/> Utilities/Service Systems       | <input type="checkbox"/> Wildfire                            | <input type="checkbox"/> Mandatory Findings of Significance       |

### Determination (to be completed by the Lead Agency):

On the basis of this initial study:

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

Signature

Date

## 3.3 Environmental Checklist

### Aesthetics

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>I. AESTHETICS</b> —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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

Would the Project:

- a) **Have a substantial adverse effect on a scenic vista?**

**Less than Significant Impact.** Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or “vista” of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project’s proposed height, mass, and location relative to surrounding land uses and travel corridors.

The City’s General Plan Natural Resources and Open Space Element does not designate any scenic vistas within the City (Covina, 2000). However, the City is located near the foot of the San Gabriel Mountains, which are considered a prominent visual resource. The Project Sites are located within highly urbanized areas of the City predominately developed with residential, commercial, and industrial uses. The Project Sites are developed lots generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. Intermittent long-range views of the San Gabriel Mountains can be seen across the Project Sites in between existing buildings, fencing, and trees from the surrounding roadways, but the majority of these views are obstructed due to the existing structures, trees, and the relatively flat topography of the Project Areas. No mitigation is required.

The Project consists of adding a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas. Future development and redevelopment associated with the Project would include the potential for 1,360 additional dwelling units and commercial and general light industrial land uses. It is anticipated that future development would be considered infill and/or redevelopment and would likely replace an existing building of similar type and intensity, thereby not substantially altering the current land use intensity or land use patterns within the City. The purpose of the City's MUOD is to guide and regulate future mixed-use development and redevelopment under the policies and objectives of the Mixed-Use general plan designation as established in the City's General Plan. The Project itself would not result in direct impacts to scenic vistas. The MUOD applies on an as-requested, project-by-project basis. As such, the types and sizes of future development and redevelopment associated with the Project cannot be determined until specific projects have been proposed and submitted to the City. Compliance with the City's Municipal Code and proposed MUOD guidelines and restrictions restricting height to a maximum of 50 feet for all future development and redevelopment associated with the Project would ensure that views of scenic resources, including views of the San Gabriel Mountains, would be preserved. As such, the Project would not result in a substantial adverse effect on a scenic vista, and impacts would be less than significant. No mitigation is required.

b) **Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

**Less than Significant Impact.** The Project Sites are located in a highly urbanized areas of the City predominantly developed with residential commercial, and industrial uses. The Project Sites are developed lots generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. The Project Sites are not located in the vicinity of a City or state-designated scenic highway. The nearest officially designated state scenic highway, State Route 2 (SR-2), is located in the San Gabriel Mountains and would not be visible to motorists (Caltrans, 2020). The Project Sites do not contain any rock outcroppings or historical buildings. As the Project is not located in the vicinity of a state scenic highway, no historical buildings would be substantially damaged with implementation of the Project. Vegetation on the Project Site consists of a mix of ornamental landscaping and trees. The Project would comply with applicable provisions pertaining to the removal and replacement of trees per Chapter 17.83, Tree Preservation, of the City's Municipal Code (Covina, 2022). Overall, based on the above, the Project would not substantially damage scenic resources located within the vicinity of a scenic highway and a less than significant impact would occur. No mitigation is required.



- 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?**

**Less than Significant Impact.** The Project Sites are located in a highly urbanized areas of the City predominantly developed with residential commercial, and industrial uses. The Project Sites are developed lots generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. Construction activities associated with the future development and redevelopment of the Project would require the use of construction equipment and storage of materials on-site, thus introducing contrasting features into the visual landscape that affect the visual quality of the Project Sites and immediate vicinity. Contrasting features could include demolition materials, excavated areas, stockpiles, and other materials generated and stored on-site during construction. However, adverse effects to visual character associated with future Project construction would be temporary.

The Project consists of adding a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas. Future development and redevelopment associated with the Project would include the potential for 1,360 additional dwelling units and commercial and general light industrial land uses. It is anticipated that future development would be considered infill and/or redevelopment and would likely replace an existing building of similar type and intensity, thereby not substantially altering the current land use intensity or land use patterns within the City. As discussed above, the purpose of the City's MUOD is to guide and regulate future mixed-use development and redevelopment under the policies and objectives of the Mixed-Use general plan designation as established in the City's General Plan. The rezoning program as part of the Project would allow for greater densities than currently allowed within the City. However, the proposed MUOD is an overlay zone, that may be added to, but not to replace the underlying zoning classification. Future development would be subject to review by the City to ensure that design of the proposed development is consistent will all applicable design requirements, objective standards, and regulations set forth in the City's Municipal Code and the proposed MUOD. As such, a less than significant impact would occur in this regard. No mitigation is required.

- d) **Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?**

**Less than Significant Impact.** The Project Sites are located in a highly urbanized areas of the City predominantly developed with residential commercial, and industrial uses. The Project Sites are developed lots generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. The Project vicinities exhibit considerable ambient nighttime illumination levels due to the densely developed nature of Project Areas and adjacent properties. Artificial light sources from the on-site uses and other surrounding properties include interior and exterior lighting for security, parking lot lighting, and incidental landscape lighting. Automobile

headings, streetlights, and stoplights for visibility and safety purposes along adjacent roadways contribute to overall ambient lighting levels as well.

Security lighting used during construction of the future development and redevelopment associated with the Project, if necessary, could introduce new sources of light to the Project Sites and the immediate vicinities. If security lighting is needed, it can be shielded and directed away from surrounding light-sensitive land uses. Further, construction of the future development and redevelopment would not occur during evening hours. Temporary impacts associated with light during future construction activities would be less than significant.

The Project consists of adding a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas. Future development and redevelopment associated with the Project would include to the potential for 1,360 additional dwelling units and commercial and general light industrial land uses. The purpose of the City's MUOD is to guide and regulate future mixed-use development and redevelopment under the policies and objectives of the Mixed-Use general plan designation as established in the City's General Plan. The Project itself would not result in direct impacts to light. Future development and redevelopment associated with the Project would be required to submit a lighting plan for review and approval by the City as part of the site plan review process. Further, all proposed outdoor lighting would be subject to applicable regulations contained within the City's Municipal Code. Compliance with these regulations would ensure that operational impacts regarding Project lighting would be less than significant. No mitigation is required.

Glare within the Project Sites and the surrounding areas occur from sunlight reflected from reflective materials utilized in existing buildings along adjacent roadways and from vehicle windows and surfaces. Glare-sensitive receptors include motorists on the roadways surrounding the Project Sites. As glare is a temporary phenomenon that changes with the movement of the sun, receptors other than motorists are generally less sensitive to glare impacts than to light impacts. All future development and redevelopment associated with the Project would be subject to review and approval by the City as part of the site plan review process to determine potential impacts related to glare. As such, a less than significant impact would occur in this regard. No mitigation is required.

## References

- Caltrans, 2020. California Department of Transportation, List of Eligible and Officially Designated State Scenic Highways. Available at <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed April, 2022.
- Covina, 2000. City of Covina's General Plan, Natural Resources and Open Space Element, adopted April 18, 2000.
- Covina, 2022. City of Covina Municipal Code, passed January 18, 2022, <https://www.codepublishing.com/CA/Covina/>, accessed April 2022.
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## Agriculture and Forestry Resources

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

## Discussion

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?**

**No Impact.** The Project Sites are located in highly urbanized areas of the City which are predominately developed with residential, commercial, and industrial uses. The Project Sites are currently developed generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. According to the City's General Plan Natural Resources and Open Space Element, the City is approximately 99 percent built out and does not contain usable agricultural soils or important agricultural areas (Covina, 2000). Further, the Project Sites do not contain agricultural uses or related operations and are not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (DOC, 2020). Therefore, implementation of the Project and the associated future development and redevelopment would not convert Prime

Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impact would occur in this regard.

**b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** The Project Sites are currently developed generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. The existing zoning classifications for the 141 parcels within the 13 Project Areas consist of C-P (Administrative and Professional Office), C-2 (Neighborhood Shopping Center), C-3 (Central Business), C-3A (Commercial Zone, Regional or Community Shopping Center), C-3A (Planned Community Development [PCD]) (PCD Administrative and Professional Office), C-4 (Commercial Zone, Highway), C-5 (Specified Highway), M-1 (Industrial Zone), TC-C (Town Center Zone), and RD-1500 (Multiple-Family); refer to Section 2.4, Existing General Plan Designations/Zoning Classifications. No portions of the Project Sites or surrounding land uses are zoned for agriculture and no nearby lands are enrolled under the Williamson Act. As discussed above, the City is approximately 99 percent built out and does not contain usable agricultural soils or important agricultural areas (Covina, 2000). As such, implementation of the Project and the associated future development and redevelopment would not conflict with existing zoning for agricultural uses or a Williamson Act Contract and no impact would occur in this regard.

**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))?**

**No Impact.** The existing zoning classifications for the 141 parcels within the 13 Project Areas consist of C-P (Administrative and Professional Office), C-2 (Neighborhood Shopping Center), C-3 (Central Business), C-3A (Commercial Zone, Regional or Community Shopping Center), C-3A (Planned Community Development [PCD]) (PCD Administrative and Professional Office), C-4 (Commercial Zone, Highway), C-5 (Specified Highway), M-1 (Industrial Zone), TC-C (Town Center Zone), and RD-1500 (Multiple-Family); refer to Section 2.4, Existing General Plan Designations/Zoning Classifications. The Project Sites are located in highly urbanized areas of the City predominately developed with residential, commercial, and industrial uses. The Project Sites are currently developed generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. No forest land or land zoned for timberland is present on the Project Sites or in the surrounding areas. According to the City's Natural Resources and Open Space Element, the City is approximately 99 percent built out and does not contain any forests (Covina, 2000). As such, implementation of the Project and the associated future development and redevelopment would not conflict with existing zoning for forest land or timberland and no impact would occur in this regard.

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

**No Impact.** The Project Sites are currently developed generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. No forest land exists on the Project Site or in the surrounding area. As discussed above in Response II.c, the City is

approximately 99 percent built out and does not contain any forests (Covina, 2000). As such, implementation of the Project and the associated future development and redevelopment would not result in the loss of forestland or the conversion of forestland to non-forest use. No impact would occur in this regard.

- 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?**

**No Impact.** As discussed above in Responses II.a through II.d, there are no agricultural or forest uses or related operations on or near the Project Sites. Therefore, implementation of the Project and the associated future development and redevelopment would not involve the conversion of farmland forest land to other uses. No impacts to agricultural or forest land or uses would occur in this regard.

## References

Covina, 2000. City of Covina's General Plan, Natural Resources and Open Space Element, adopted April 18, 2000.

DOC, 2020. California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed March 2022.

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## Air Quality

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>III. AIR QUALITY</b> —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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>

## Discussion

Would the Project:

- a) **Conflict with or obstruct implementation of the applicable air quality plan?**

**Less than Significant Impact with Mitigation Incorporated.** The Project Sites are located within the 6,745-square-mile South Coast Air Basin (SCAB). Air quality planning for the SCAB is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for criteria air pollutants. The SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., ozone [O<sub>3</sub>], and particulate matter 2.5 microns in diameter or less [PM<sub>2.5</sub>]). The SCAQMD, California Air Resources Board (CARB), and United States Environmental Protection Agency (USEPA) have adopted the 2016 AQMP which incorporates scientific and technological information and planning assumptions, regarding air quality, including the SCAG 2016–2040 RTP/SCS, and emission inventory methodologies for various source categories (SCAQMD, 2016).<sup>3</sup> The AQMP provides strategies for stationary and mobile sources to ensure the region can meet attainment deadlines, public health is protected to the maximum extent feasible, and to avoid sanctions for violation of attainment standards. The main objectives of the AQMP includes implementing fair-share emissions reductions strategies at the federal, state, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of zero

<sup>3</sup> SCAQMD, South Coast Air Quality Management District, 2016 Air Quality Management Plan (AQMP), 2017.

and near-zero-emissions technologies; and taking credit from co-benefits from greenhouse gas (GHG), energy, transportation and other planning efforts.<sup>4</sup>

The AQMP contains control measures for reducing emissions from mobile sources, with an emphasis on NO<sub>x</sub> and VOC emissions from on-road and off-road sources. Control measures that are most relevant to the future development and redevelopment associated with the Project that could occur include the following:

**MOB-05-ACCELERATED PENETRATION OF PARTIAL ZERO-EMISSION AND ZERO-EMISSION VEHICLES:** This measure proposes to continue incentives for the purchase of zero-emission vehicles and hybrid vehicles with a portion of their operation in an “all-electric range” mode. The State Clean Vehicle Rebate Pilot (CVRP) program is proposed to continue from 2016 to 2030 with proposed funding up to \$5,000 per vehicle and for low-income eligible residents, additional funding of up to \$1,500 for a total of \$6,500 per vehicle. The California State legislature has appropriated \$133 million statewide for the CVRP for Fiscal Year 2016–17. The proposed measure seeks to provide funding rebates for at least 15,000 zero-emission or partial-zero emission vehicles per year.

**MOB-06-ACCELERATED RETIREMENT OF OLDER LIGHT-DUTY AND MEDIUM-DUTY VEHICLES:** This proposed measure calls for promoting the permanent retirement of older eligible vehicles through financial incentives currently offered through local funding incentive programs, and AB 118 Enhanced Fleet Modernization Program (EFMP), and the Greenhouse Gas Reduction Fund (EFMP Plus-Up). The proposed measure seeks to retire up to 2,000 older light- and medium-duty vehicles (up to 8,500 pounds gross vehicle weight [GVW]) per year. The proposed measure seeks to provide funding assistance for at least 2,000 replacement vehicles per year.

**MOB-10-EXTENSION OF THE SOON PROVISION FOR CONSTRUCTION/ INDUSTRIAL EQUIPMENT:** To promote turnover (i.e., retire, replace, retrofit, or repower) of older in-use construction and industrial diesel engines, this proposed measure seeks to continue the SCAQMD’s Surplus Off-Road Opt-In for NO<sub>x</sub> (SOON) provision of the Statewide In-Use Off-Road Fleet Vehicle Regulation beyond 2023 through the 2031 timeframe. In order to implement the SOON program in this timeframe, funding of up to \$30 million per year would be sought to help fund the repower or replacement of older Tier 0 and Tier 1 equipment to Tier 4 or cleaner equipment, with approximately 2 tons per day (tpd) of NO<sub>x</sub> reductions.

**MOB-11-EXTENDED EXCHANGE PROGRAM:** This measure seeks to continue the successful lawnmower and leaf blower exchange programs in order to increase the penetration of electric equipment or new low emission gasoline-powered equipment used in the region. The proposed extended exchange program will focus on incentives to accelerate the replacement of older equipment with new Tier 4 or cleaner equipment or zero-emission equipment where applicable. In addition, other small off-road equipment (SORE) equipment may also be considered for exchange programs for accelerating the turnover of existing engines.

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<sup>4</sup> SCAQMD, South Coast Air Quality Management District, 2016 Air Quality Management Plan (AQMP), 2017.

The following analysis addresses the Project's consistency with applicable SCAQMD plans, inclusive of regulatory compliance. The SCAQMD recommends, when determining whether a proposed project is consistent with the 2016 AQMP, that the lead agency should assess whether the proposed project would directly obstruct implementation of the plans by impeding SCAQMD's efforts to achieve attainment with respect to any criteria air pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM10, and PM2.5) and whether it is consistent with the demographic and economic assumptions (typically land use related, such as employment and population/residential units) upon which the plan is based. In accordance with SCAQMD's *CEQA Air Quality Handbook*, the Project would have a significant impact relative to criterion a) if it would result in any of the following: i) An increase in the frequency or severity of existing air quality violations; ii) Cause or contribute to new air quality violations; or iii) Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP (SCAQMD Criterion No. 1). Additionally, the Project would have a significant impact relative to criterion a) if it would exceed the assumptions utilized in preparing the AQMP (SCAQMD Criterion No. 2).

### ***Criterion No. 1***

The first criterion evaluates the potential for a proposed project to result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP. The SCAQMD numerical significance thresholds for construction and operational emissions are designed for the analysis of individual projects and not for long-term planning documents, such as the MUOD. Emissions are dependent on the exact size, nature, and location of an individual land use type, combined with reductions in localized impacts from the removal of existing land use types, as applicable (i.e., conversion of light industrial uses).

### **Construction**

The MUOD applies on an as-requested, project-by-project basis, to General Commercial (GC) and General Industrial (GI) general plan designations. As such, the construction schedule and activities associated with the future development and redevelopment of the Project has not been determined until specific projects have been proposed and submitted to the City.

As discussed in Issue c) below, construction of the future development and redevelopment associated with the Project may have the potential to create localized air quality impacts through the use of heavy-duty construction equipment. No specific projects are proposed under the Project and no information is available regarding specific projects that could be facilitated by adoption of the MUOD. However, it is reasonable to assume that future development and redevelopment associated with the Project could occur close to existing sensitive receptors. Thus, construction of future development and redevelopment associated with the Project could generate localized emissions in excess of the concentration-based localized significance thresholds. Therefore, in response to Criterion 1, future development and redevelopment associated with the Project could potentially increase the frequency or severity of an existing violation or cause or contribute to new violations and impacts would be significant and mitigation measures would be required. Implementation of Mitigation Measures **AIR-1** through **AIR-4** would reduce emissions from



future development and redevelopment associated with the Project such that they would not conflict with the SCAQMD AQMP. As a result, impacts would be less than significant with mitigation incorporated.

## **Operations**

The Project is a comprehensive planning document outlining the City's proposed approach to guide and regulate future mixed-use development and redevelopment under the policies and objectives of the Mixed-Use general plan designation as established in the City's General Plan. As discussed in Issue b) below and in the Project's Transportation Assessment (LLG, 2022),<sup>5</sup> future development and redevelopment associated with the Project would not conflict with City's efficiency-based impact thresholds, which means that such projects would generally align with the long-term vehicle miles traveled (VMT) and associated vehicle emissions reduction goals of SCAG's RTP/SCS. Nonetheless, as discussed in Issue c) below, and in response to Criterion 1, future development and redevelopment associated with the Project could potentially increase the frequency or severity of an existing violation or cause or contribute to new violations and impacts would be significant and mitigation measures would be required. Implementation of Mitigation Measures **AIR-1** through **AIR-4** would reduce emissions from future development and redevelopment associated with the Project such that they would not conflict with the SCAQMD AQMP. As a result, impacts would be less than significant with mitigation incorporated.

## **Criterion 2**

While striving to achieve the NAAQS for ozone and PM<sub>2.5</sub> and the CAAQS for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> through a variety of air quality control measures, the 2016 AQMP also accommodates planned growth in the SCAB. With respect to the second criterion for determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a proposed project exceeds the assumptions reflected in the AQMP involves the evaluation of consistency with applicable population, housing, and employment growth projections and appropriate incorporation of AQMP control measures. The following discussion provides an analysis with respect to these criteria.

## **Construction**

### **Control Strategies**

The SCAB is designated nonattainment for ozone and PM<sub>2.5</sub> under the CAAQS and NAAQS, nonattainment for lead (Los Angeles County only) under the NAAQS, and nonattainment for PM<sub>10</sub> under the CAAQS. Future development and redevelopment associated with the Project would be required to comply with State requirements to minimize short-term emissions from on-road and off-road diesel equipment, including the CARB Air Toxics Control Measure to limit heavy-duty diesel motor vehicle idling to no more than five minutes at a location, and with SCAQMD's regulations such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. Furthermore, as applicable to the type of

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<sup>5</sup> Linscott Law & Greenspan, Transportation Assessment Report, Covina Mixed-Use Overlay District, March 2022 (**Appendix D**, of this Draft IS/MND).

project, future development and redevelopment associated with the Project with construction contractors would be required to comply with fleet rules to reduce on-road truck emissions. Compliance with these measures and requirements would be consistent with and meet or exceed the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Therefore, future development and redevelopment associated with the Project would not conflict with the control strategies of the AQMP and impacts would be less than significant.

### **Growth Projections**

Future development and redevelopment associated with the Project would generate an increase in short-term construction employment; however, such short-term employment would likely be filled by employees within the construction industry in the SCAB region. Construction industry jobs generally have no regular place of business, as construction workers commute to job sites throughout the region, which may change several times a year. Moreover, these jobs would be temporary in nature. Therefore, the construction jobs generated by the future development and redevelopment associated with the Project would not conflict with the long-term employment or population projections upon which the AQMPs are based and impacts would be less than significant.

### **Operations**

#### **Control Strategies**

The operation of future development and redevelopment associated with the Project would be required to comply with applicable SCAQMD regulations for stationary sources and architectural coatings, Title 24 energy efficiency standards. Furthermore, vehicles used by residents, employees, and visitors of the future development and redevelopment associated with the Project would be required to comply with State vehicle emissions standards.

The AQMP includes land use and transportation strategies from the 2016–2040 RTP/SCS that are intended to reduce VMT and resulting regional mobile-source emissions. These strategies include supporting projects that encourage infill development and diverse housing opportunities for a variety of populations in locations that are close to job centers, commercial services such as restaurants and shopping centers, and entertainment options that are characteristic of higher density locations. Adoption of the MUOD would allow for future residential as well as commercial and light industrial uses within the various Project Sites, in addition to or replacement of the existing commercial uses in the various Project Sites. As such, adoption of the MUOD would allow for the infill development of diverse housing opportunities that would be close to job centers, commercial services, and entertainment options. Therefore, the Project would not conflict with AQMP land use and transportation strategies that are intended to reduce VMT and impacts would be less than significant.

### **Growth Projections**

While no specific development projects are proposed at this time, future development and redevelopment associated with the Project is expected to facilitate additional population growth and additional housing units through the proposed rezoning program. Adoption of the MUOD has

the potential to develop 1,360 additional dwelling units within the various Project Sites as well as commercial and light industrial uses. As discussed in Section XIV, *Population and Housing*, adoption of the MUOD would provide the City with housing opportunity locations that would substantially contribute to compliance with the RHNA assignment for the City of 1,910 new housing units and the proposed updated Housing Element (6th Cycle). Therefore, the growth anticipated by the operation of future development and redevelopment associated with the Project would not conflict with the long-term employment or population projections upon which the AQMPs are based and impacts would be less than significant.

## Mitigation Measures

**AIR-1: Construction Emissions.** If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable South Coast Air Quality Management District (SCAQMD) thresholds of significance, the City shall require applicants for future development and redevelopment associated with the Project to incorporate one or more of the following mitigation measures as necessary to reduce air pollutant emissions during construction activities to below the applicable SCAQMD thresholds of significance. Mitigation measures that may be identified during the environmental review include, but are not limited to:

1. Using construction equipment rated by the USEPA as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower, as commercially available.
2. Using construction equipment that are equipped with a California Air Resources Board (CARB) verified Level 3 diesel particulate matter filter, applicable for engines between 50 and 750 horsepower, as commercially available.
3. Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
4. Limiting nonessential idling of construction equipment to less than five consecutive minutes at a location.
5. Water all active construction areas at least three times daily or four times daily if needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Reclaimed water should be used whenever possible.
6. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Construction activities should be suspended during periods with wind speed gusts of 25 miles per hour or more.
7. Apply non-toxic chemical soil stabilizers, in lieu of watering, in sufficient quantities to control dust emissions and prevent visible dust from leaving the construction site.
8. Pave, apply water three times daily or as often as necessary to control dust, or apply non-toxic chemical soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.

9. Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).
10. Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.
11. Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the Project Sites, or as often as needed, to keep streets free of visible soil material.
12. Hydroseed or apply non-toxic soil stabilizers to inactive construction areas.
13. Enclose, cover, water three times daily, or apply non-toxic chemical soil binders to exposed stockpiles (dirt, sand, etc.).

**AIR-2: Architectural Coating VOC Emissions.** If, during subsequent project-level environmental review, it is determined that construction or operation of a project has the potential to exceed the applicable South Coast Air Quality Management District (SCAQMD) thresholds of significance for volatile organic compound (VOC) emissions from architectural coating activities, the City shall require the use of Super-Compliant VOC-content architectural coatings (10 grams per liter or less of VOCs) to be used during application of paints and other architectural coatings. If Super-Compliant VOC-content architectural coatings cannot be utilized, the developer shall reduce the quantity of paints and other architectural coatings applied in any one day as necessary to reduce VOC emissions from all project sources to below the SCAQMD thresholds of significance for VOCs (i.e., to below 75 pounds of VOC per day during construction activities and below 55 pounds of VOC per day during operational activities).

**AIR-3: Energy Conservation.** The City shall require energy conservation measures during future project-level environmental review, which may include the following:

- Install Energy Star rated heating, cooling, lighting, and appliances.
- Use of Heating, Ventilation and Air Conditioning (HVAC) equipment with a Seasonal Energy Efficiency Ratio (SEER) of 12 or higher.
- Installation of water heaters with an energy factor of 0.92 or higher.
- Install solar water heaters or tank-less water heaters.
- Use passive solar cooling/heating.
- Use cool roofs and surfaces for residential and non-residential buildings.
- Encourage strategic tree planting and shading to reduce building energy demand for cooling.
- Encourage the use of electric building energy systems in place of building natural gas systems.

**AIR-4: Transportation Efficiency.** The City shall require transportation efficiency measures during future project-level environmental review, which may include the following:

- Implement transportation demand management (TDM) strategies to reduce VMT from project operations.
- Provide residents and employees of projects with information regarding public transportation options.
- Provide residents and employees of projects with bicycle parking facilities that meet or exceed municipal code requirements.
- Provide residents and employees of projects with electric vehicle supply equipment that meet or exceed municipal code requirements.

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?**

**Less than Significant Impact with Mitigation Incorporated.** While no specific development projects are proposed at this time, implementation of the Project would result in the future development and redevelopment of residential uses, as well as commercial and light industrial uses, within the Project Sites. The development of sufficiently large future development and redevelopment associated with the Project may have the potential to result in construction and operational emissions that could cause a cumulatively considerable net increase of a criteria pollutant for which the region is non-attainment. The SCAB is designated under federal and state ambient air quality standards as nonattainment for ozone and PM<sub>2.5</sub> and state nonattainment for PM<sub>10</sub>. Based on the most recently adopted significance thresholds in the SCAQMD *CEQA Air Quality Handbook*, the Project may result in a significant impact of a federal or State non-attainment pollutant if emissions would exceed the values shown in **Table III-1, Criteria Pollutant Emissions Significance Thresholds – Los Angeles County**.

**TABLE III-1  
CRITERIA POLLUTANT EMISSIONS SIGNIFICANCE THRESHOLDS – LOS ANGELES COUNTY**

Phase	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>South Coast Air Basin (Los Angeles County); Pounds per Day</b>						
Construction	75	100	550	150	150	55
Operations	55	55	550	150	150	55

NOTES: VOC = volatile organic compounds; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = particulate matter, aerodynamic diameter of 10 micrometers or less; PM<sub>2.5</sub> = particulate matter, aerodynamic diameter of 2.5 micrometers or less.

SOURCE: SCAQMD 2019.

### **Construction Emissions**

Construction activities resulting from potential future development and redevelopment associated with the Project would result in the temporary emissions of pollutants. Emissions of ozone precursors, such as VOC and nitrogen oxides (NO<sub>x</sub>), result from the use of on-road and off-road

motorized vehicles and heavy-duty construction equipment associated with construction activities. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Localized concentrations of construction-generated TAC emissions, including emissions of diesel particulate matter from diesel-powered equipment, can increase health risk for nearby sensitive receptors. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions.

The size and intensity of future development and redevelopment associated with the Project would dictate whether the quantity of air pollutant emissions during construction are above or below the thresholds of significance. Future development and redevelopment associated with the Project may occur as large construction projects, but there is also the potential that the cumulative effect of multiple small-scale projects could result in a significant air quality impact.

All future development and redevelopment associated with the Project would be required to comply with SCAQMD rules and regulations. Significance determinations would be based on the individual project specifics. Furthermore, future construction activities associated with the Project would be required to comply with the CARB Air Toxics Control Measure, which limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle regulation, CARB Truck and Bus regulation, and CARB ACT regulation, which all require construction equipment and vehicle fleet operators to repower or replace higher-emitting equipment with less polluting models, including zero- and near-zero-emissions on-road truck technologies as they become developed and commercially available. Additionally, construction of future development and redevelopment associated with the Project would be required to comply with SCAQMD rules and regulations including Rule 403 for the control of fugitive dust and Rule 1113 for the control of VOC emissions from architectural coatings. Mandatory compliance with these CARB and SCAQMD rules and regulations would reduce emissions, particularly for NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, during construction activities for future development and redevelopment associated with the Project.

In order to provide a screening scenario of development size that would not exceed the SCAQMD mass daily thresholds, criteria air pollutant emissions associated with temporary construction activity from construction of a 10-percent build-out scenario were quantified using California Emissions Estimator Model (CalEEMod) Version 2020.4.0. This scenario assumes that approximately 10-percent of the total residential units and commercial and light industrial uses would be constructed at any given time. Because detailed project-level information is not available, construction emissions were calculated for this scenario generally using recommended default values in CalEEMod.

The total acreage for the Project is 74.83, with 60 percent of the area assumed for residential units at 30 dwelling units per acre, corresponding to the potential for 1,360 additional dwelling units. For the purposes of this analysis, the remaining 40 percent of total area was attributed to a split of recreational (high turnover restaurant) and general light industrial land uses for the purposes of a hypothetical future development scenario. The use of the high turnover restaurant land use type for commercial uses provides for a high-end conservative emissions estimate because the high

turnover restaurant land use type is associated with higher vehicle trip rates and building energy demand factors compared to other commercial land use types, such as office and retail. For construction, it was assumed that demolition and grading would require truck trips for the hauling of debris and material (soil) export.

There are six default CalEEMod construction phases commonly used to evaluate construction emissions: demolition, site preparation, grading, building construction, paving, and architectural coating. For example, due to the developed nature of some parcels within the Project Sites, some future development and redevelopment associated with the Project may only require a demolition (existing buildings and asphalt pavement) phase and minor site preparation phase prior to building construction, while other future development and redevelopment may require renovation, which would be less intensive than new construction. In addition, some future development and redevelopment may not require any demolition, but would require site preparation and/or grading to prepare the site for development. Nonetheless, for the purposes of this analysis, the CalEEMod default phase were applied to the modeling analysis.

Future development and redevelopment associated with the Project would be required to comply with SCAQMD Rule 403 to control dust emissions during any dust-generating activities. SCAQMD Rule 403 requires implementation of various best available fugitive dust control measures for all construction activity sources within its jurisdictional boundaries. Dust control measures include, but are not limited to, maintaining stability of soil through pre-watering of site prior to clearing, grubbing, cut and fill, and earth-moving activities; stabilizing soil during and immediately after clearing, grubbing, cut and fill, and other earth-moving activities; stabilizing backfill during handling and at completion of activity; and pre-watering material prior to truck loading and ensuring that freeboard exceeds six inches. Dust controls consistent with SCAQMD Rule 403 were accounted for within CalEEMod.

**Table III-2, *Unmitigated Construction Scenario – Criteria Pollutant Emissions***, presents the estimated maximum daily construction emissions generated during construction of the 10-percent build-out scenario. Details of the emission calculations are provided in **Appendix A**, of this Draft IS/MND.

**TABLE III-2  
UNMITIGATED CONSTRUCTION SCENARIO - CRITERIA POLLUTANT EMISSIONS**

Phase	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>South Coast Air Basin (Los Angeles County); Pounds per Day</b>						
Maximum Daily Emission	104.6	140.9	46.1	0.5	22.7	9.7
SCAQMD Threshold	75	100	550	150	150	55
Exceed?	Yes	Yes	No	No	No	no

NOTES: VOC = volatile organic compounds; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = particulate matter, aerodynamic diameter of 10 micrometers or less; PM<sub>2.5</sub> = particulate matter, aerodynamic diameter of 2.5 micrometers or less.

SOURCE: ESA 2022.

As shown in Table III-2, the construction scenario would potentially exceed the SCAQMD mass daily thresholds for VOC and NO<sub>x</sub>. Even with mandatory compliance with CARB and SCAQMD rules regulations, some future development and redevelopment associated with the Project could be large enough in scale and/or intensity such that many pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period emissions could exceed the significance thresholds. Therefore, construction activities associated with future development and redevelopment associated with the Project would result in impacts that would be potentially significant and mitigation measures would be required. For future development and redevelopment associated with the Project that exceeds the applicable SCAQMD thresholds of significance for construction, implementation of Mitigation Measures **AIR-1** through **AIR-4** would reduce impacts to less than significant.

### ***Operational Emissions***

As previously discussed, implementation of the Project could affect operational criteria pollutant emissions resulting from future development and redevelopment from vehicle trips traveling within the City, energy sources such as natural gas combustion, and area sources such as landscaping equipment and consumer products usage. The Project proposed changes to zoning designations that may yield greater densities than currently allowed in the City and thus potentially generate increased operational emissions relative to existing conditions within the various MUOD areas.

While no specific development projects are proposed at this time, operational emissions were estimated for buildout of the potential for 1,360 additional dwelling units and commercial (represented as high turnover restaurant) and general light industrial land uses. There are several categories of emissions in CalEEMod for operations commonly used to evaluate operational emissions: area sources, energy sources, mobile sources, and other sources. Area sources typically include consumer product use (e.g., cleaners, solvents, and other household or institutional cleaning products), architectural coatings, and landscape maintenance equipment. Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Architectural coatings are paints for coating buildings, structures, and roadway striping. Consumer products and architectural coatings generate VOC emissions. Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers. Landscape equipment may be gasoline fueled and may result in fuel combustion emissions (e.g., VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> with trace amounts of SO<sub>x</sub>). As represented in CalEEMod, energy sources generate air pollutant emissions from the combustion of natural gas for building heating and cooking (e.g., VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> with trace amounts of SO<sub>x</sub>). Mobile sources consist of motor vehicles (automobiles and light-duty trucks) traveling to and from future development and redevelopment associated with the Project. Motor vehicles may be fueled with gasoline, diesel, or alternative fuels. Emissions from motor vehicles consist of tailpipe fuel combustion emissions (e.g., VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> with trace amounts of SO<sub>x</sub>) and road dust emissions (e.g., PM<sub>10</sub> and PM<sub>2.5</sub> from brake wear, tire wear and re-entrained road



dust). Vehicles operating under alternative fuel or electric battery power would generate reduced or no tailpipe air pollutant emissions compared to gasoline- or diesel-fueled vehicles but would still generate road dust emissions. Mobile source emissions in CalEEMod were calculated using information from available traffic studies, where available, or using default CalEEMod assumptions.<sup>6</sup> For the purposes of this analysis, emissions sources not accounted for in CalEEMod defaults, such as stationary sources requiring an SCAQMD permit to operate, were not included as no information exists regarding whether such sources would be included in future development and redevelopment associated with the Project.

**Table III-3, Operation Scenario – Criteria Pollutant Emissions**, presents the maximum daily area, energy, and mobile source emissions associated with a conservatively-assumed operational year of 2024 for the full build-out scenario. It is anticipated that future development and redevelopment associated with the Project would occur over a number of years. Furthermore, it is not expected that development of the potential 1,360 additional dwelling units and commercial and general light industrial land uses in the 74.83-acre area would occur as a single project, but rather as multiple different projects. Details of the emission calculations are provided in **Appendix A**, of this Draft IS/MND.

**TABLE III-3  
OPERATION SCENARIO - CRITERIA POLLUTANT EMISSIONS**

Phase	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
<b>South Coast Air Basin (Los Angeles County); Pounds per Day – Full Buildout Scenario</b>						
Area	64.42	20.47	120.7	0.13	2.17	2.17
Energy	6.30	56.96	45.99	0.34	4.35	4.35
Mobile	263.4	218.4	1977	3.9	402.0	109.1
<b>Total Maximum Daily Emission</b>	334.1	295.8	2143	4.4	408.6	115.6
SCAQMD Threshold	55	55	550	150	150	55
Exceed?	Yes	Yes	Yes	No	Yes	Yes
<b>South Coast Air Basin (Los Angeles County); Pounds per Day – Optimized Project Buildout Scenarios</b>						
Maximum Allowable Percent Buildout of Total (%)	15%	15%	25%	100%	35%	45%
<b>Total Maximum Daily Emission</b>	50.1	44.4	535.8	4.4	143.0	52.0
SCAQMD Threshold	55	55	550	150	150	55
Exceed?	No	No	No	No	No	No

NOTES: VOC = volatile organic compounds; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM10 = particulate matter, aerodynamic diameter of 10 micrometers or less; PM2.5 = particulate matter, aerodynamic diameter of 2.5 micrometers or less.

SOURCE: ESA 2022.

As shown in Table III-3, the full buildout operational scenario would exceed the SCAQMD mass daily thresholds. However, as described above, the MUOD applies on an as-requested, project-by-project basis. As such, the types of sizes of future development and redevelopment associated

<sup>6</sup> Linscott Law & Greenspan, Transportation Assessment Report, Covina Mixed-Use Overlay District, March 2022 (**Appendix D**, of this Draft IS/MND).

with the Project cannot be determined until specific projects have been proposed and submitted to the City. Based on the results in Table III-3, it is expected that if approximately 15 percent of the full buildout scenario is developed as a single future project, its operational emissions would be expected to be below the SCAQMD thresholds of significance.

Significance determinations would be based on individual project specifics. Individual projects with emissions that exceed the thresholds normally would result in a significant impact and require mitigation. Future development and redevelopment associated with the Project could result in additional operational emission sources that are not listed above or for which specifics are not known. Thus, even with mandatory compliance with CARB and SCAQMD rules and regulations, it is possible that future development and redevelopment associated with the Project could result in significant impacts related to a cumulatively considerable net increase of a criteria pollutant for which the region is non-attainment for a sufficiently large project. Therefore, operational activities associated with future development and redevelopment associated with the Project could result in air quality impacts that are potentially significant and mitigation measures would be required. For future development and redevelopment associated with the Project that exceeds the applicable SCAQMD thresholds of significance for operation, implementation of Mitigation Measures **AIR-1** through **AIR-4** would reduce impacts to less than significant.

### **Mitigation Measures**

Refer to Mitigation Measures **AIR-1** through **AIR-4** above.

#### **c) Expose sensitive receptors to substantial pollutant concentrations?**

**Less than Significant Impact with Mitigation Incorporated.** Future development and redevelopment associated with the Project could expose sensitive receptors to pollutant concentrations from localized emissions near the Project Sites. In addition to these localized impacts, vehicle travel associated with future development and redevelopment of the Project could result in exposure of sensitive receptors to CO emissions from intersection congestion. Based on the nature and extent of new projects, nearby sensitive receptors could be exposed to levels of toxic air contaminants that could result in a potential increase in cancer, acute, and/or chronic risk.

Based on the thresholds in the SCAQMD *Final Localized Significance Threshold Methodology* (SCAQMD, 2008), the Project would cause a significant impact if maximum daily localized emissions of NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub> during construction or operation of an individual project were greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations at air quality-sensitive receptors greater than the most stringent ambient air quality standards for NO<sub>2</sub> and/or CO. **Table III-4, South Coast AQMD Air Quality Significance Thresholds**, provides the SCAQMD ambient concentration-based significance thresholds for emissions that may expose sensitive receptors to substantial pollutant concentrations. SCAQMD screening mass emissions levels that could cause an exceedance of the ambient concentration thresholds vary depending on the location (e.g., source-receptor area) of a project site, the size of a project site, and the distance from a project site to an air quality-sensitive

receptor and are provided in Appendix C of the SCAQMD *Final Localized Significance Threshold Methodology*.<sup>7</sup>

**TABLE III-4  
SOUTH COAST AQMD AIR QUALITY SIGNIFICANCE THRESHOLDS**

<b>Ambient Air Quality Standards for Criteria Pollutants <sup>a</sup></b>	
<b>NO<sub>2</sub></b> 1-hour average annual arithmetic mean	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)
<b>PM<sub>10</sub></b> 24-hour average annual average	10.4 µg/m <sup>3</sup> (construction) <sup>b</sup> & 2.5 µg/m <sup>3</sup> (operation) 1.0 µg/m <sup>3</sup>
<b>PM<sub>2.5</sub></b> 24-hour average	10.4 µg/m <sup>3</sup> (construction) <sup>b</sup> & 2.5 µg/m <sup>3</sup> (operation)
<b>CO</b> 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)

NOTES:

<sup>a</sup> Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated

<sup>b</sup> Ambient air quality threshold based on South Coast AQMD Rule 403.

CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = particulate matter, aerodynamic diameter of 10 micrometers or less; PM<sub>2.5</sub> = particulate matter, aerodynamic diameter of 2.5 micrometers or less; NO<sub>2</sub> = nitrogen dioxide; ppm = parts per million; µg/m<sup>3</sup> = one-millionth of a gram per cubic meter air.

SOURCE: SCAQMD 2019.

The Project would result in a significant impact for CO hotspots if the concentrations of CO at a roadway intersection within 0.25-mile of an air quality-sensitive receptor would exceed the CO 1-hour and/or 8-hour concentration limits in Table III-4. Based on the thresholds in the SCAQMD CEQA Air Quality Handbook, the Project would cause a significant impact by exposing air quality-sensitive receptors to toxic air contaminants if it would emit toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) or an acute or chronic Hazard Index of 1.0.

### **Construction Emissions**

Construction of future development and redevelopment associated with the Project could have the potential to create localized air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from the Project Sites in the SCAB. In addition, fugitive dust emissions would result from construction activities. 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. The SCAQMD recommends that a Localized Significance Threshold (LST) analysis

<sup>7</sup> SCAQMD, Final Localized Significance Threshold Methodology, 2008.

be conducted on a project-level using on-site mass emission look-up screening tables or project-specific air dispersion modeling (SCAQMD, 2008). As the Project is programmatic, a quantitative analysis is not provided at this time as sufficient project-level details are not known.

Concentrations of toxic air contaminants (TACs) are used as indicators of ambient air quality conditions. Sensitive receptors may be located within close proximity to future development and redevelopment associated with the Project. The SCAQMD recommends that construction health risk impacts be evaluated for substantial sources of diesel particulate matter (DPM) emissions (e.g., projects with substantial diesel-fueled trucks or equipment) in proximity to sensitive receptors and has provided guidance for analyzing mobile source diesel emissions. Localized DPM emissions strongly correlate with localized PM<sub>2.5</sub> emissions. However, localized analysis does not directly measure health risk impacts. Therefore, future development and redevelopment associated with the Project may require project-specific dispersion modeling to evaluate potential health risk impacts associated with construction.

No specific projects are current proposed under the Project. No information currently is available regarding specific projects that could be facilitated by the MUOD. Other details necessary to provide a meaningful estimate of emissions also is lacking, such as specific sites, buildings and facilities to be constructed or modified, construction schedules, and quantities of earthmoving. Since this information is unknown, localized emissions modeling is not feasible and would be speculative. Significance determinations would be based on the individual project's specifics. Through each project's individual environmental review process, localized emissions may be quantified and compared against project-specific thresholds. Individual projects that exceed the thresholds would normally be considered to have significant impacts and require mitigation. Because future development and redevelopment associated with the Project could occur close to existing sensitive receptors, construction of measures facilitated by the Project could expose sensitive receptors to substantial pollutant concentrations. Construction equipment exhaust combined with fugitive particulate matter emissions could expose sensitive receptors to substantial concentrations of criteria air pollutant emissions, DPM or TACs, resulting in a potentially significant impact and mitigation measures would be required. Implementation of Mitigation Measures **AIR-1** through **AIR-6** would reduce impacts related to localized emissions and TAC emission to less than significant.

### ***Operational Emissions***

The SCAQMD recommends the evaluation of localized air quality impacts on sensitive receptors in the immediate vicinity of a project. However, the impacts are based on specific equipment and operations. Because the exact nature, location, and operation of future development and redevelopment associated with the Project are unknown, quantification of localized operational impacts and health risks would not be feasible and would be too speculative. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD for industrial land uses. Future development and redevelopment associated with the Project may include the use of restaurant charbroilers or other equipment that could generate PM<sub>10</sub>, PM<sub>2.5</sub> and/or DPM emissions from equipment use and truck idling. As operation of some future development and redevelopment associated with the Project may occur within proximity to sensitive receptors, there is the potential for localized emissions to expose sensitive receptors to

substantial pollutant concentrations that could result in a potentially significant impact and mitigation measures would be required. Implementation of Mitigation Measures **AIR-1** through **AIR-6** would reduce impacts related to localized emissions and TAC emission to less than significant.

### ***Carbon Monoxide Hotspots***

The potential for future development and redevelopment associated with the Project to cause or contribute to carbon monoxide (CO) hotspots is evaluated by comparing project intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, and that CO concentrations at project intersections would remain well below the ambient air quality standards.

CO levels in the unincorporated County are below the NAAQS and CAAQS as the County portion of the SCAB are designated as attainment. Maximum CO levels in recent three years are 1.2 to 4.5 ppm (1-hour average) and 0.8 to 4.7 ppm (8-hour average). CO levels decreased dramatically in California with the introduction of the catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the SCAB since 2003 and both the SCAB are designated as CO attainment areas for both the CAAQS and NAAQS (SCAQMD, 2016). Thus, it is not expected that CO levels at roadway intersections would rise to the level of an exceedance of these standards.

Furthermore, CO emissions from vehicles have substantially reduced compared to 2003-era vehicles based on improved vehicle emissions standards and are presumed not to exceed the applicable thresholds. Thus, this comparison demonstrates that the Project would not contribute considerably to the formation of CO hotspots and no further CO analysis is required. The Project would result in a less than significant impact with respect to CO hotspots.

### ***Toxic Air Contaminants***

Construction and operation of future development and redevelopment associated with the Project would result in emissions of TAC, predominantly from DPM emissions from on- and off-road vehicles during construction and from the operation of diesel fueled equipment or generators during operational activities. Exposure to TACs can produce lifetime cancer risk or short-term chronic or acute not-cancer risk.

Because the exact nature, location, and operation of future development and redevelopment associated with the Project are unknown, and because health risk impacts from TACs are cumulative over the life of the nearby receptors, quantification of potential health risks would be speculative. However, as construction and operation of future development and redevelopment associated with the Project may occur within close proximity to sensitive receptors, there is the potential for risk to exceed air district thresholds of significance, which could cause the adverse health effects discussed above. Therefore, future development and redevelopment associated with the Project could expose sensitive receptors to substantial TAC concentrations. This may result in

potentially significant air quality impacts and mitigation measures are required. Implementation of Mitigation Measures **AIR-1** through **AIR-6** would reduce impacts related to localized emissions and TAC emission to less than significant.

### Mitigation Measures

Refer to Mitigation Measures **AIR-1** through **AIR-4** above.

**AIR-5: Stationary Sources.** Applicants for new or modified stationary sources associated with the Project that: 1) have the potential to generate 40 or more diesel trucks per day and 2) are located within 1,000 feet of a sensitive land use (e.g. residential, schools, hospitals, nursing homes), as measured from the property line of the Project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the County Department of Regional Planning prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the applicable air quality management district. If the HRA shows that the incremental cancer risk exceeds ten in one million ( $10E-06$ ), particulate matter concentrations would exceed  $2.5 \mu\text{g}/\text{m}^3$ , or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs) are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Project.

**AIR 6: Health Risk Assessment.** Applicants shall submit a HRA to the County prior to future discretionary project approval for sensitive land uses associated with the Project within the following distances as measured from the property line of the Project to the property line of the source/edge of the nearest travel lane, from these facilities:

- Industrial facilities within 1,000 feet.
- Distribution centers (40 or more trucks per day) within 1,000 feet.
- Major transportation projects (50,000 or more vehicles per day) within 1,000 feet.
- Gasoline dispensing facilities within 300 feet.
- The HRA shall be prepared in accordance with policies and procedures of the applicable Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds ten in one million ( $10E-06$ ) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:

- Air intakes located away from high volume roadways and/or truck loading zones, unless it can be demonstrated to the County Department of Regional Planning that there are operational limitations.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.

Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the County and shall be verified by the County Department of Regional Planning.

d) **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 depends on numerous factors, including the nature, frequency, and intensity of the source, the wind speeds and direction. Also a factor is the sensitivity of receiving location. Although offensive odors rarely cause physical harm, they can be a nuisance and cause distress among the public and result in citizen complaints.

While the Project is not anticipated to directly produce environmental impacts, the rezoning program as part of the Project would allow for greater densities than are currently allowed within the City. As such, future development and redevelopment associated with the Project would generate odors from vehicles and/or equipment exhaust emissions. Odors produced would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. However, such odors would disperse rapidly and would generally occur at magnitudes that would not affect substantial numbers of people. Additionally, approval of the Project would not provide any goals, policies, or programs that would significantly increase odors. Therefore, impacts associated with odors are expected to be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. As described in Threshold AE-1, while the Project consists of a policy document update that is not anticipated to produce environmental impacts, the rezoning program as part of the Project would allow for greater densities than are currently allowed within the County. However, the rezoning program involves a net increase in residential land uses and a net decrease in non-residential land uses and would not generate operational odors. Additionally, approval of the Project itself, as a policy document update, would not provide any goals, policies, or programs that would significantly increase odors. Therefore, the odor impacts would be less than significant. No mitigation is required.

## References

LLG, 2022. Linscott Law & Greenspan, Transportation Assessment Report, Covina Mixed-Use Overlay District, March 2022 (Appendix D, of this Draft IS/MND).

SCAQMD, 2008. South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, 2008.

SCAQMD, 2016. South Coast Air Quality Management District, 2016 Air Quality Management Plan (AQMP), 2017.

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## Biological Resources

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES</b> —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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

## Discussion

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?**

**Less than Significant Impact with Mitigation Incorporated.** The City is highly urbanized and is predominantly comprised of developed and disturbed areas lacking natural vegetation, except for landscaped areas typical of roadsides or medians with ornamental trees, shrubs, and herbaceous plant species. The Project Sites (which occupy approximately 74.83 acres in the aggregate and are distributed in several locations throughout the City) are likewise completely within and surrounded by urban development although some limited ornamental vegetation and street trees are present in limited areas. A review of available sources indicates that as many as 43 special-status species, including 15 plant species and 28 animals, have been reported as having occurred within a radius of up to 5 miles from the Project Sites (CDFW, 2021; USFWS, 2021a). However, many of these records are not of recent origin (older than 20 to 25 years) and most

reports are from areas that are not within the City or are attributed to unspecified locations. Therefore, such records are either obsolete or not definitively applicable to the Project Sites. Also, the Project Sites do not occur within or near any U.S. Fish and Wildlife Service (USFWS)-designated Critical Habitat for any special-status plant or wildlife species (USFWS, 2021a). The nearest Critical Habitat area to the City, designated for the federally listed “Threatened” coastal California gnatcatcher (*Polioptila californica californica*), lies to the south and east of the City in remnant natural areas on the opposite side of Interstate 10 and State Route 57 (SR-57), at least one mile or further from the City limits and Project Sites. Furthermore, no potentially suitable habitat for coastal California gnatcatcher occurs in or adjacent to the City or the Project Sites.

The landscaped and urban developed areas within the Project Sites provide virtually no suitable habitat for any special-status wildlife species, including bats and avian species. Furthermore, no suitable habitat is present for any special status species that require any natural habitats such as grasslands, scrub, riparian or wetland habitats. Therefore, no special status animal species are expected to occur in the Project Sites or directly adjacent areas. Finally, as no potentially suitable habitat occurs, no special-status plant species are currently known or expected to occur within the Project Sites. Therefore, implementation of the Project and the associated future development and redevelopment would not result in any loss of habitat for any special status species, within these urbanized areas.

Trees, buildings, and other structures, such as bridges or culverts in or near the Project Sites may be used by common, urban-adapted bird species. Bat species, however, have only a very low potential to occur in the Project Sites, due to limited areas of potentially suitable habitat, distance to and from natural areas and water sources for foraging, and due to the high level of noise, nighttime lighting, and overall human activity associated with urban development, which makes the possibility of these species occurring in the Project Sites remote at best.

Based on the above evaluation, implementation of the Project and the associated future development and redevelopment would not result in adverse effects on any special-status wildlife species that occur in the region. However, although they may not be special status species, almost all native bird species, except game birds, are protected by State and federal statutes when they are actively nesting. Some avian species may nest, forage, and roost within ornamental shrubs and trees planted as part of existing landscaping and some species will nest on or in buildings and other man-made structures. Therefore, Project implementation may result in demolition, new construction, or substantial renovations of structures, such activities may affect nesting birds within the Project Sites. Therefore, measures to avoid adverse effects on nesting birds are recommended to be implemented prior to or during construction and demolition activities associated with Project and future development and redevelopment. Implementation of Mitigation Measure **BIO-1** will reduce any potentially significant impacts to nesting birds to less than significant.

### **Mitigation Measure**

**BIO-1: Nesting Birds.** Vegetation removal shall be conducted between September 1 and January 31, outside the typical nesting season for birds in the region. If vegetation removal must occur during the typical nesting season (February 1 – August 31), a

qualified biologist shall conduct a pre-construction survey for active nests within areas that will be subject to vegetation removal, construction noise, and/or ground disturbances, including a 100 to 300-foot buffer around existing trees and landscaped areas, to identify any potential active nests. Buffer distances should be adjusted at the discretion of the biologist based on the location of the nest, species, and surrounding land uses. If no sign of nesting activity is observed, construction may proceed without potential impacts to nesting birds.

If an active nest is observed during the pre-construction clearance survey, an adequate buffer determined by the qualified biologist shall be established around the active nest depending on sensitivity of the species and proximity to construction activity and impact areas. Onsite construction monitoring may also be required to ensure that no direct or indirect impacts occur to the active nest or nesting activities. Construction activities shall be avoided within the buffer, unless otherwise approved by the monitoring biologist (e.g., vehicles could pass through buffer areas while jackhammering would be restricted). Buffers shall be clearly marked and defined to restrict certain activities where they could result in nest failure, and shall remain in place until nests are no longer active, as determined by the monitoring biologist.

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?**

**No Impact.** The City, including the Project Sites, are primarily comprised of developed and disturbed areas that generally lack natural vegetation. There are likely limited natural communities in the Project Sites either composed of native or non-native vegetation that would likely be categorized as “disturbed”. While Charter Oak Creek is present near the South Barranca Avenue and East Rowland Street intersection, it is channelized and concrete-lined and lacks riparian vegetation or other sensitive natural communities. Moreover, none of the Project Sites occur adjacent to Charter Oak Creek. Therefore, no impacts to riparian or sensitive natural communities will occur as the result of implementation of the Project and the associated future development and redevelopment.

The County has identified a number of Sensitive Ecological Areas (SEAs) in the region, including the East San Gabriel Valley SEA. The west end of that particular SEA, lies near and adjacent to a fragment of the southeastern border of the City. Inspection of maps and overlays reveals that none of the Project Sites are located in or near the East San Gabriel Valley SEA. The nearest Project Sites lie just over one mile to the northwest of the extreme western end of the SEA. Therefore, no impacts to this designated SEA will occur as the result of implementation of the Project and the associated future development and redevelopment.

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?**

**Less than Significant Impact.** No wetland features are identified by the National Wetlands Inventory (NWI) as occurring within the Project Sites (USFWS, 2021b). Surface flows from stormwater runoff are conveyed through portions of the City within storm drain channels or in

road gutters. These channels are maintained and contain virtually no vegetation. However, some of these channels may be considered jurisdictional “waters” and such resources are subject to federal and State regulation if they convey surface flows to Charter Oak Creek, Walnut Creek, or Big Dalton Wash, which are tributaries to the San Gabriel River, a water of the U.S. If implementation of the Project and the associated future development and redevelopment leads to alterations or discharges of fill material to waters of the U.S or State due to construction, permits from the U.S. Army Corps of Engineers (USACE) under Section 404 and water quality certification from the Los Angeles Regional Water Quality Control Board (LARWQCB) under Section 401 of the Clean Water Act (CWA), and/or a Water Quality Certification or Waste Discharge Requirement (WDR) under the Porter Cologne Water Quality Act may be required.

Additionally, California Department of Fish and Wildlife (CDFW) regulates all diversions, obstructions, or changes to the natural flow or bed, channel or bank of any river, stream, or lake which supports fish or wildlife. A notification of a Lake or Streambed Alteration Agreement (LSAA) must be submitted to CDFW for “any activity that may substantially change the bed, channel, or bank of any river, stream, or lake.” If implementation of the Project avoids any alteration or discharge to existing surface channels, then no such permits would be required. Confirmation of the jurisdictional status of features would be required and permit applications submitted and permits issued prior to construction. Required permits, including permits under Sections 401 and 404 of the CWA and Streambed Alteration Agreement in accordance with Section 1600 of the California Fish and Game Code, would be required to be obtained prior to the start of construction activities, as applicable.

It is not apparent that any of the Project Sites are situated near or directly adjacent to any potential jurisdictional waters. Thus, it is very unlikely that implementation of the Project would lead to any potential effects on surface waters or channels. In the event that a potential discharge or alteration into waters could occur, however, the regulations and permit processes described above are required by law. Therefore, due to required compliance with existing federal, state, and local requirements, implementation of the Project and the associated future development and redevelopment would result in a less than significant impact. No mitigation is required.

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?**

**No Impact.** The Project Sites are highly urbanized and predominantly developed with residential, commercial, and industrial uses. Additionally, the Project Sites are entirely surrounded by developed lands and no conservation lands or wildlife corridors are identified as occurring nearby. Therefore, no impact would occur to wildlife movement as a result implementation of the Project and the associated future development and redevelopment.

No known or expected native wildlife nursery sites occur in or near the Project Sites and no such resources would be affected by implementation of the Project and the associated future development and redevelopment. Therefore, no impact that would impede the use of native wildlife nursery sites would occur. In addition, implementation of MM BIO-1, during

development activities associated with the Project will maintain compliance with the Migratory Bird Treaty Act and the California Fish and Game Code as these statutes provide for the protection of active avian nests and nestlings.

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

**Less than Significant Impact.** The City’s General Plan includes a Natural Resources and Open Space Element that serves to identify, protect, and conserve local natural resources and to establish a framework for preserving, managing, and enhancing the community’s open space areas (Covina, 2000). Natural resources include water, soils, water bodies, vegetation, wildlife, and air; open space lands pertain to parks and related recreational facilities and trails. As noted above, the Project Sites do not coincide with any existing natural areas, and also do not overlap or occur adjacent to areas zoned as open space. It may be reiterated here that the proposed MUOD is an overlay zone. It may be added to, but not replace the underlying zoning classification. Furthermore, as proposed, the MUOD overlay areas would not impact natural resources or open space. Therefore, as future development or redevelopment associated with the Project will not adversely affect natural resources or open space and must be consistent with existing City’s General Plan provisions to protect such resources, implementation of the Project will not conflict with the Natural Resources and Open Space Element of the City’s General Plan.

The City’s Municipal Code, Title 17 – Zoning, includes a Tree Preservation Ordinance (Ch. 17.83). The purpose of this ordinance is “to assure that new development addresses the preservation of significant healthy and mature trees to the greatest extent which is reasonable and that activities on properties with existing development are conducted in a manner that minimizes harm and destruction of such trees” (Covina, 2022). The ordinance does not apply to street trees or to repair and maintenance of existing parkways, highways and streets and/or other public facilities. Tree protection is limited to requiring a permit for any damage to designated “Heritage Trees.” Heritage Trees include all Quercus (oak) species 10 inches in diameter at breast height (DBH) or greater and trees or groups of trees designated as heritage tree(s) by the City Council. Damage includes: “any action to destroy, remove, relocate, or otherwise inflict harm or injury to a tree. Damage shall include any act causing injury to the root system or other parts of a tree including burning, applications of toxic substances, operation of equipment or machinery within the dripline, paving within the dripline, change of the natural grade within the dripline, trenching or excavation within the dripline, excessive watering or any act of a similar nature.”

It is not apparent that any Heritage Trees occur within or directly adjacent to the Project Sites. If, however, any tree or trees occur in potentially affected areas that are subject to this ordinance (i.e., Heritage Trees), future development and redevelopment would be required to comply with this ordinance per the ordinance. Since compliance with the City’s tree ordinance is required, a less than significant impact would occur. No mitigation is required.

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?**

**No Impact.** The Project Sites are highly urbanized and not located within or adjacent to any habitat conservation plans or natural community conservation plan areas. The County has identified a number of SEAs in the region, including the East San Gabriel Valley SEA. The west end of that particular SEA, lies near and adjacent to a fragment of the southeastern border of the City. Inspection of maps and overlays reveals that none of the Project Sites are located in or near the East San Gabriel Valley SEA. The nearest Project Site lies just over one mile to the northwest of the extreme western end of that SEA. Therefore, no impacts to this designated SEA or any other adopted natural community conservation plan or other approved local, regional, or state habitat conservation plan will occur as the result of implementation of the Project and the associated future development and redevelopment.

## References

- CDFW, 2021. California Department of Fish and Wildlife, California Natural Diversity Database (CNDDB) RareFind 5. CDFW's Electronic database, Sacramento, California. Accessed on November 16, 2021, at <https://www.dfg.ca.gov/biogeodata/cnddb>.
- Covina, 2000. General Plan, Natural Resources and Open Space Element, adopted April 18, 2000.
- Covina, 2022. City of Covina Municipal Code, passed January 18, 2022, <https://www.codepublishing.com/CA/Covina/>, accessed April 2022.
- USFWS, 2021a. U.S. Fish and Wildlife Service, IPAC Information for Planning and Consultation. Accessed on November 17, 2021, at <https://ecos.fws.gov/ipac/>.
- USFWS, 2021b. U.S. Fish and Wildlife Services, National Wetland Inventory (NWI) Data Mapper. Accessed on November 17, 2021, at <https://www.fws.gov/wetlands/Data/Mapper.html>.
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## Cultural Resources

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>V. CULTURAL RESOURCES</b> —Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

Would the Project:

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

**Less than Significant Impact with Mitigation Incorporated.** A cultural resources records search was conducted on January 10, 2022, through the California Historical Resources Information System – South Central Coastal Information Center (SCCIC) (**Appendix B**, of this Draft IS/MND). The records search included a review of all recorded archaeological resources and previous studies within the Project Sites and a 0.25-mile radius, and historic architectural resources within or adjacent to (within 150 feet of) the Project Sites. The California Native American Heritage Commission (NAHC), which maintains a confidential Sacred Lands File (SLF) containing sites of traditional, cultural, or religious value to the Native American community, was contacted on October 21, 2021, to request a search of the SLF. In addition, the Archaeological Determinations of Eligibility and the Built Environment Resource Directory (BERD) was reviewed. Lastly, land use history research was conducted for some of the Project Sites within Project Areas J, K, and M, since the SCCIC records search results identified a previously recorded segment of a historical resource crossing those portions of the Project Sites.

The SCCIC records search results indicate that approximately less than 5 percent of the 0.25-mile records search radius has been included in previous cultural resources assessments. A segment of one archaeological resource, P-19-187085/California Historical Landmark (CHL) 963/Mojave Road, has been previously recorded within the Project Sites. No other archaeological resources have been previously recorded within the Project Sites or a 0.25-mile radius.

Resource P-19-187085/California Historical Landmark (CHL) 963/Mojave Road is mapped as crossing some portions of the Project Sites (northwest parcels in Project Area J, northwestern-most parcel in Project Area K, and southern-most parcel in Project Area M). Resource P-19-187085/CHL 963/Mojave Road is a trail/road that ran from the Drum Barracks at Wilmington, followed north to Downtown Los Angeles, east toward San Bernardino, north over the Cajon Pass to the Mojave River, and across the Mojave Desert to the Nevada State Line. The resource has

been described as unique for its significance as an Indian trail, a federal government supply, a freight and emigrant wagon route, and a recreational trail. A portion of the resource that traverses the Mojave National Preserve in San Bernardino County has been listed in the National Register of Historic Places (National Register). Additionally, CHLs numbered 770 and above are automatically listed in the California Register of Historical Resources (California Register), and therefore, resource P-19-187085/CHL 963/Mojave Road is a historical resource pursuant to CEQA.

A review of the BERD indicated that two historic architectural resources (Community Christian Center located at 165 W. Dexter St., and Covina Bowl located at 1060 W. San Bernardino Rd.) are located adjacent to (within 100 feet of) the Project Sites and one is located within the Project Sites. The Community Christian Center is located approximately 100 feet west of the Project Sites within Project Area E. It was previously determined ineligible for listing in the National Register, but has not been evaluated for listing in the California Register or Covina's local register (CHR Status Code 6Y). The Covina Bowl is located approximately 100 feet southeast of the Project Sites within Project Area K. It was determined eligible for listing in the National Register and is listed in the California Register (CHR Status Code 2S). It does not appear to have been evaluated for listing in Covina's local register. One historic architectural resource (listed twice as Property No. 034702 and 065265) is located within the Project Sites within Project Area K (at 1211 W. San Bernardino Rd.). This resource consists of a 1920s residence. It was previously determined ineligible for listing in the National Register, but has not been evaluated for listing in the California Register or Covina's local register (6Y).

The following provides a summary of the historic topographic map and aerial photograph review, which were examined to determine if there is evidence of resource P-19-187085/CHL 963/Mojave Road in the Project Sites within Project Areas J, K, and M (**Appendix B**, of this Draft IS/MND).

### **Project Area J**

Available topographic maps for Project Area J include the following: Hall's (1880) Los Angeles & San Bernardino topography map; 1894, 1897, and 1904 Pomona 15-minute topographic quadrangles (TopoView, 2022); and 1927 Covina 7.5-minute topographic quadrangle (TopoView, 2022). Aerial photographs were available for the years 1928 (UCSB, 2022), 1948, 1954, 1964, 1977, 1980, 1999, 2009, 2018 (historicaerials.com, 2022), and 2022 (Bing Maps, 2022). The 1880, 1894, 1897, 1904, and 1927 topographic maps show the parcels within Project Area J as undeveloped, and no roads or trails are depicted as crossing this portion of the Project Sites. The 1928 and 1948 aerials show the parcels in use as orchards. The 1954 aerial shows the parcels cleared and as no longer in use as orchards. Between 1964 and up to present time, buildings have existed in the parcels. The parcels are currently developed with buildings and a surface parking lot. No evidence of resource P-19-187085/CHL 963/Mojave Road was observed on historic topographic maps and aerials in Project Area J. In addition, development of the parcels with agricultural uses and later with residential and commercial buildings is likely to have destroyed any remnants of the road, should any have once been present.



### **Project Area K**

Available topographic maps for Project Area K include the following: Hall's (1880) Los Angeles & San Bernardino topography map; 1894, 1897, and 1904 Pomona 15-minute topographic quadrangles (TopoView, 2022); and 1927 Puente 7.5-minute topographic quadrangle (TopoView, 2022). Aerial photographs were available for the years 1928 (UCSB, 2022), 1948, 1954, 1964, 1972, 1980, 1999, 2009, 2018 (historicaerials.com, 2022), and 2022 (Bing Maps, 2022). The 1880, 1894, 1897, 1904, and 1927 topographic maps show the northwestern-most parcel within Project Area K as undeveloped, and no trails or roads are depicted as crossing Project Area K. The 1928 aerial shows the parcel and surrounding vicinity in use for agricultural purposes. Subsequent aeriels show that that the parcel was developed with several residential and commercial structures. The parcel is currently developed with a car wash. No evidence of resource P-19-187085/CHL 963/Mojave Road was observed on historic topographic maps and aeriels on this parcel in Project Area K. In addition, development of the parcel with agricultural uses and later with residential and commercial buildings is likely to have destroyed any remnants of the road, should any have once been present.

### **Project Area M**

Available topographic maps for Project Area M include the following: Hall's (1880) Los Angeles & San Bernardino topography map; 1894, 1897, and 1904 Pomona 15-minute topographic quadrangles (TopoView, 2022); and 1927 Puente 7.5-minute topographic quadrangle (TopoView, 2022). Aerial photographs were available for the years 1928, 1934, 1938, 1943, 1960 (UCSB, 2022), 1972, 1980, 1994, 2004, 2014, 2018 (historicaerials.com, 2022), and 2022 (Bing Maps, 2022). The 1880, 1894, and 1904 topographic maps indicate that the southernmost parcel within Project Area M was undeveloped during this timeframe. Review of the 1927 topographic map continues showing the parcel as mostly undeveloped, with the exception of one structure in the northernmost portion of the parcel. The 1928, 1934, 1938 aerial photographs show the parcel and surrounding vicinity as in use for agricultural purposes. The 1943 aerial photograph shows that the parcel was still in use for agricultural purposes, but also shows a couple residential structures. The 1960 aerial photograph indicates that the parcel had been cleared of any structures and agricultural uses by that time. Subsequent aerial photographs indicate that the parcel has remained undeveloped ever since. No evidence of resource P-19-187085/CHL 963/Mojave Road was observed on historic topographic maps and aeriels on this parcel in Project Area M. In addition, development of the parcel with previous agricultural and residential uses is likely to have destroyed any remnants of the road, should any have once been present.

The purpose of the City's MUOD is to guide and regulate future mixed-use development and redevelopment under the policies and objectives of the Mixed-Use general plan designation as established in the City's General Plan. The Project itself would not result in direct impacts to historical resources. However, future development and redevelopment associated with the Project could involve demolition of buildings and ground disturbing activities that could, depending on their location, result in direct or indirect adverse changes to the significance of historical resources, including archaeological resources that qualify as historical resources.

As discussed above, one archaeological resource qualifying as a historical resource, P-19-187085/CHL 963/Mojave Road, was identified in the portions of Areas J, K, and M as a result of the SCCIC records search. However, a review of historic topographic maps and aerial photographs indicate that there is no evidence of this resource in these areas, and modern-era development is likely to have destroyed any remnants of this resource should it once have been present. Therefore, no impacts to resource P-19-187085/CHL 963/Mojave Road would occur. No other archaeological resources were identified as a result of the SCCIC records search within or in a 0.25-mile radius of the Project Sites. However, there could be as-yet-unidentified subsurface archaeological resources present. Impacts to unknown archaeological resources qualifying as historical resources could result in a significant impact to historical resources. However, implementation of Mitigation Measure **CUL-1**, which would require the retention of a qualified archaeologist to oversee the preparation of an archaeological resources assessment, would reduce impacts to less than significant.

One historic architectural resource, consisting of a 1920s residence, is located within the Project Sites (Project Area K). This resource has not been previously evaluated for listing in the California Register or Covina's local historic register, and it may qualify as a historical resource. In addition, there are two adjacent historic architectural resources, one of which is listed in the California Register (Covina Bowl) and qualifies as a historical resource and one of which has not been previously evaluated for listing in the California Register or Covina's local historic register and may qualify as a historical resource. There may also be other historic architectural resources in or adjacent to the Project Sites that could also qualify as historical resources. Impacts to historic architectural resources qualifying as historical resources could result in a significant impact to historical resources. However, implementation of Mitigation Measure **CUL-2**, which would require the retention of a qualified architectural historian to conduct a historic resources assessment, would reduce impacts to less than significant.

### **Mitigation Measures**

**CUL-1:** Prior to the issuance of ground disturbing activities of future development and redevelopment associated with the Project, the City shall retain a qualified archaeologist, defined as meeting the Secretary of the Interior's Professional Qualification Standards for archaeology, to conduct an archaeological resources assessment including: a records search at the South Central Coastal Information Center; a Sacred Lands File search at the Native American Heritage Commission; a pedestrian field survey, where deemed appropriate by the qualified archaeologist; recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms; a subsurface archaeological sensitivity assessment; and preparation of a technical report documenting the methods and results of the study. If an archaeological resource is identified as a result of the survey, the qualified archaeologist will prepare and conduct a testing program to delineate the resource's boundaries and identify presence/absence of subsurface deposits. The results of the testing will be included in the technical report. If an archaeological resource cannot be avoided, it shall be evaluated for significance. The qualified archaeologist shall also provide recommendations regarding archaeological and Native American monitoring, protection of avoided resources and/or recommendations for additional work or treatment of significant resources that will be affected by the Project. When assessing significance and developing treatment for resources that are Native American in origin, the City shall consult with local Native American Tribes.

**CUL-2:** Prior to the issuance of ground disturbing activities of future development and redevelopment associated with the Project on parcels that contain or are adjacent to buildings or structures more than 45 years old, the City shall retain a qualified architectural historian, defined as meeting the Secretary of the Interior's Professional Qualification Standards for architectural history, to conduct a historic resources assessment including: a records search at the South Central Coastal Information Center; a review of pertinent archives and sources; a pedestrian field survey; recordation of all identified historic architectural resources on California Department of Parks and Recreation 523 forms; evaluation of resources for listing in the California Register and for local listing; and preparation of a technical report documenting the methods and results of the assessment. All identified historical resources will be assessed for the Project's potential to result in direct and/or indirect effects to those resources. The qualified architectural historian shall provide recommendations regarding additional work or treatment for historical resources that will be affected by the Project prior to their demolition or alteration. This could include but is not limited to compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, Historic American Buildings Survey (HABS) recordation, incorporation of interpretive elements into new construction, or commemoration.

In addition, the qualified architectural historian shall review project plans for future development and redevelopment associated with the Project adjacent to historical resources to ensure there will be no indirect effects.

b) **Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

**Less than Significant Impact with Mitigation Incorporated.** As mentioned above, one archaeological resource (P-19-187085/CHL 963/Mojave Road) was identified in portions of Project Areas J, K, and M as a result of the SCCIC records search. However, a review of historic topographic maps and aerial photographs indicate that there is no evidence of this resource in these areas, and modern-era development is likely to have destroyed any remnants of this resource should it once have been present. Therefore, no impacts to resource P-19-187085/CHL 963/Mojave Road would occur. No other archaeological resources were identified as a result of the SCCIC records search within or in a 0.25-mile radius of the Project Sites. However, there could be as-yet-unidentified subsurface archaeological resources present. Future development and redevelopment associated with the Project would involve ground disturbing activities that, depending on their location, could result in direct or indirect adverse changes to the significance of unique archaeological resources. However, implementation of Mitigation Measure **CUL-1** (see above) would reduce impacts to less than significant.

**Mitigation Measure**

Refer to Mitigation Measure **CUL-1** above.

c) **Disturb any human remains, including those interred outside of dedicated cemeteries?**

**Less than Significant Impact with Mitigation Incorporated.** The records search results through the SCCIC yielded negative results for archaeological resources within the Project Sites and 0.25-mile radius, and no cemeteries are known to have existed within the Project Sites. However, an SLF search requested through the NAHC on December 3, 2021 (Green, 2021), yielded positive results within the Project Sites. The results letter did not provide details on the resource(s) identified within the Project Sites, but recommended that the Gabrieleno Band of Mission Indians – Kizh Nation be contacted for additional information. No additional information is available regarding the nature or location of the sacred land on file at the NAHC. Future development and redevelopment associated with the Project would involve ground disturbing activities that, depending on their location, could result in disturbance of human remains. Such development could result in significant impacts to human remains under CEQA. However, implementation of Mitigation Measure **CUL-3** would reduce impacts to less than significant.

**Mitigation Measure**

**CUL-3:** If human remains are encountered, then the City or its contractor shall immediately halt work in the vicinity (within 50 feet) of the discovery and contact the Los Angeles County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5, which requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to the remains' origin and disposition pursuant. If the County Coroner determines the remains are Native American, then the Coroner will notify the NAHC within 24 hours in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code Section 5097.98. The NAHC shall then identify the person(s) thought to be the MLD. The MLD may, with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the landowner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. The City and the landowner shall discuss and confer with the MLD on all reasonable options regarding the MLD's preferences for treatment.

Until the City and the landowner have conferred with the MLD, the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity and is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.

If the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the

mediation provided for in Section 5097.94(k), if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall enter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

## References

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- Green, 2021. Green, Andrew. Sacred Lands File search results provided by the Native American Heritage Commission, re: City of Covina's Mixed Use Overlay Project. Dated December 3, 2021. Results on file at ESA.
- Hall, Wm. H. Circa 1880. State Engineer, Sacramento. Los Angeles & San Bernardino topography
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- TopoView, 2022. 1894, 1897, and 1904 Pomona 15-minute topographic quadrangles depicting Areas J, K, and M of Project Site. 1927 Covina 7.5-minute topographic quadrangle depicting Area J of Project Site. 1927 Puente 7.5-minute topographic quadrangle depicting Areas K and M of Project Site. <https://ngmdb.usgs.gov/topoview/viewer/>, accessed February 2022.
- UCSB, 2022. Aerial photographs from 1928, depicting Areas J, K, and M of Project Site. Aerial photographs from 1934, 1938, 1943, and 1960, depicting Area M of Project Site. [https://mil.library.ucsb.edu/ap\\_indexes/FrameFinder/](https://mil.library.ucsb.edu/ap_indexes/FrameFinder/), accessed February 2022.
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## Energy

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>VI. Energy</b> —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"/>

## Discussion

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?**

**Less than Significant Impact.** This analysis evaluates the considerations identified in CEQA Guidelines Appendix G and identified by the County to determine whether future development and redevelopment associated with the Project would result in significant impacts on the environment relative to energy. While the Project consists of a policy document update, which is not anticipated to produce environmental impacts, the rezoning program as part of the Project would allow for greater densities than currently allowed within the City.

### Construction

Construction-related energy consumption associated with future development and redevelopment associated with the Project would be subject to approval of permits prior to construction of new residential, commercial, and industrial uses. Energy use during future Project construction would primarily occur in association with fuel use by vehicles and other equipment to conduct construction activities.

The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The electricity used for construction activities would be temporary and minimal; it would be within the supply and infrastructure service capabilities of Southern California Edison (SCE) and it would not require additional local or regional capacity. The electricity demand during construction is anticipated to be minimal as the future development and redevelopment associated with the Project would be built over time during the 8-year planning horizon for modeling purposes (since the construction schedule has not yet been determined until specific projects have been proposed and submitted to the City). The electricity used for any potential future construction activities would be temporary and minimal.

## Natural Gas

Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below. Peak energy demand specifically applies to electricity; because natural gas (and petroleum) are liquid, these energy resources do not have the same constraints as electricity supply. Nonetheless, any use of natural gas is anticipated to be sufficiently served by existing supply from the Southern California Gas Company (SoCalGas) and would not require additional local or regional capacity. Any minor amounts of natural gas that may be consumed as a result of construction would be temporary and negligible and would not have an adverse effect.<sup>8</sup>

## Petroleum

Heavy-duty equipment associated with construction of future development and redevelopment associated with the Project would rely on diesel fuel, as would vendor trucks involved in delivery of materials to the individual parcels within the rezoning program and haul trucks exporting demolition material or other materials off site. Construction workers would travel to and from each of the parcels within the rezoning program throughout the duration of construction. It is assumed in this analysis that construction workers would travel in gasoline-powered light-duty vehicles.

**Appendix A**, of this Draft IS/MND, lists the assumed equipment usage and vehicle trips.

Fuel consumption from construction equipment was estimated by converting the total CO<sub>2</sub> emissions from each construction phase to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. Construction is estimated to occur intermittently over the planning horizon of the Project, which for modeling purposes is 8 years. The estimated energy demand from the 10-unit scenario was multiplied by the estimated number of 10-unit developments per year (i.e., 6,345 10-unit developments) in order to estimate the annual petroleum consumption from construction. The conversion factor for gasoline is 8.78 kilograms per MT CO<sub>2</sub> per gallon, and the conversion factor for diesel is 10.21 kilograms per MT CO<sub>2</sub> per gallon (The Climate Registry, 2020).

The estimated diesel fuel usage from construction equipment, haul trucks, and vendor trucks, as well as estimated gasoline fuel usage from worker vehicles, is shown in **Table VI-1, Total Project Construction Petroleum Demand**.

**TABLE VI-1**  
**TOTAL PROJECT CONSTRUCTION PETROLEUM DEMAND**

Project	Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
<b>Gallons</b>				
10% Buildout	40,890	28,532	45	158
Total Project Buildout	408,890	285,315	450	1,584
SOURCES: ESA 2022.				

<sup>8</sup> For disclosure only, by comparison, California as a whole consumes approximately 29 billion gallons of petroleum per year. Countywide total petroleum use by on-road vehicles only (i.e., not including construction off-road equipment) is expected to be 1.4 billion gallons per year in 2030 (CARB 2021).

In summary, construction associated with the future development and redevelopment associated with the Project over 12.25 years is conservatively anticipated to consume 1,584 gallons of gasoline and 694,655 gallons of diesel. Looking at a 10 percent buildout scenario, it is anticipated that implementation of the Project would consume on average 40,890 gallons of gasoline and 69,466 gallons of diesel. Notably, the Project would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements. Overall, the Project would not be unusual as compared to overall local and regional demand for energy resources and would not involve characteristics that require equipment that would be less energy-efficient than at comparable construction sites in the region or state.

Further, all future development and redevelopment associated with the Project would be required to adhere to all federal, state, and local requirements for energy efficiency, including the latest Title 24 standards. Considering these requirements, the housing element update would not result in the inefficient, wasteful, or unnecessary consumption of building energy. Therefore, impacts would be less than significant and no mitigation is required.

### ***Operation***

Future development and redevelopment associated with the Project would be subject to approval of permits prior to construction and operation of residential, commercial, and industrial uses. Operational-related energy consumption associated with the future development and redevelopment would include building electricity, natural gas usage, and fuel usage from vehicles, all of which are further described and analyzed below.

### **Electricity**

The Project would require electricity for building operation (e.g., appliances, lighting). However, the 2019 Title 24 standards, or the most recent standards at the time of building issuance, would decrease the amount of electricity required for building operation. The net increase in electricity demand for the future potential buildout of the additional 63,443 dwelling units allowed for by the Project, including the net increase in residential units and the net decrease in non-residential square footage is presented in **Table VI-2, Project Annual Operational Electricity Demand Summary**.



**TABLE VI-2**  
**PROJECT ANNUAL OPERATIONAL ELECTRICITY DEMAND SUMMARY**

Project	mWh/yr
Net Increase in Residential Units	676.23
Net Decrease in Non-Residential Unit Square Footage	TBD
<b>Total Net Project Electricity Demand</b>	<b>TBD</b>

NOTE: mWh/yr = megawatt-hours.  
SOURCE: ESA 2022.

As shown in Table VI-2, the net increase in residential units is estimated to have a total electrical demand of 676.23 megawatt-hours per year. The net decrease in non-residential square footage is currently unknown and dependent on future project-level details. Thus, the net increase is unknown currently. Additionally, the applicable Title 24 standards would further ensure that the energy demands would not be inefficient, wasteful, or otherwise unnecessary. Further, future project design features and/or mitigation measures will be implemented to ensure that impacts would be less than significant.

### Natural Gas

Natural gas consumption during operation would be required for various purposes, including but not limited to, building heating and cooling. Default natural gas generation rates in CalEEMod for the proposed land use and climate zone were used. **Table VI-3, Project Annual Operational Natural Gas Demand Summary**, presents the net increase in natural gas demand for the buildout of the additional potential 1,360 additional dwelling units, including the net increase in residential units and the net decrease in non-residential square footage.

**TABLE VI-3**  
**PROJECT ANNUAL OPERATIONAL NATURAL GAS DEMAND SUMMARY**

Project	mBTUyr
Net Increase in Residential Units	21,314
Net Decrease in Non-Residential Unit Square Footage	TBD
<b>Total Net Project Natural Gas Demand</b>	<b>TBD</b>

NOTE: mBTUyr = One million British Thermal Units.  
SOURCE: ESA 2022.

As shown in Table VI-3, the net increase in residential units is estimated to have a total natural gas demand of 21,314 million British Thermal Units per year. The net decrease in non-residential square footage is currently unknown and dependent on future project-level details. Thus, the net increase is unknown currently. Future development and redevelopment associated with the Project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Prior to development at individual parcel sites, applicants would ensure that the proposed development would meet Title 24 requirements applicable at that

time, as required by state regulations through their plan review process. Further, future project design features and/or mitigation measures will be implemented to ensure that the natural gas consumption related to future development and redevelopment associated with the Project would not be considered inefficient or wasteful, and impacts would be less than significant.

## Petroleum

During operations, the majority of fuel consumption resulting from the future development and redevelopment associated with the Project would involve the use of motor vehicles, as well as fuels used for alternative modes of transportation that may be used by residents of the future residential development. Petroleum fuel consumption associated with motor vehicles traveling to and from the future development and redevelopment is a function of the VMT as a result of operation of the development of the potential 1,360 additional dwelling units allowed for by the Project. The annual VMT attributable to the net increase in residential units is unknown currently and dependent on future project-level details. Fuel estimates for the buildout of the additional 1,360 dwelling units allowed for by the Project, including the net increase in residential units and the net decrease in non-residential square footage, are provided in **Table VI-4, Total Transportation Annual Fuel Demand**.

**TABLE VI-4  
TOTAL TRANSPORTATION ANNUAL FUEL DEMAND**

<b>Project</b>	<b>Annual Vehicle Miles Traveled</b>	<b>Estimated Annual Gasoline Fuel Consumption (gallons)</b>	<b>Estimated Annual Diesel Fuel Consumption (gallons)</b>	<b>Estimated Annual Fuel Consumption (gallons)</b>
Net Increase in Residential Units	16,120,299	15,133,411	660,093	15,793,504
Net Decrease in Non-Residential Unit Square Footage	TBD	TBD	TBD	TBD
<b>Net Total</b>	TBD	TBD	TBD	TBD

SOURCE: ESA 2022.

As summarized in Table VI-4, the buildout of the future development and redevelopment (additional 63,443 dwelling units as a result of the rezoning program) associated with the Project would likely result in a decrease in VMT and gallons of petroleum per year; however, those details are currently unknown and speculative. Fuel would be provided by current and future commercial vendors. The Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT or associated excess and wasteful vehicle energy consumption.

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Additionally, the general location of the parcels within the rezoning program proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. Furthermore, approval of the Project itself, as a policy document update, would not change these regulations and would not provide any goals, policies, or programs that would result in transportation energy consumption. Therefore, transportation energy consumption would not

be considered inefficient, wasteful, or otherwise unnecessary and impacts would be less than significant. No mitigation is required.

**b) 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 and all applicable rules and regulations discussed above would reduce energy demand and increase energy efficiency related to future development and redevelopment associated with the Project. Part 6 of Title 24 of the California Code of Regulations 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.

The City of Covina's 2019 Energy Action Plan Update and 2012 Energy Action Plan were prepared by the San Gabriel Valley Council of Governments for the City. The plans' goals are to reduce energy consumption and decrease GHG emissions in accordance with AB 32 and Senate Bill (SB) 32 emission reduction targets. (Covina, 2012, 2019). The 2019 Energy Action Plan Update sets the following updated targets: decrease overall municipal building electricity usage to 5 percent below 2018 levels by 2023, decrease overall municipal building gas usage to 5 percent below 2018 levels by 2023, and implement 3 or more energy efficiency projects by 2023. The City is supported by the San Gabriel Valley Energy Wise Partnership and SCE's Energy Leader Partnership in achieving these energy goals (Covina, 2019). Additionally, as discussed related to GHGs, existing various local plans would reduce energy use, including the County's Community Climate Action Plan, SCAG's 2020–2045 RTP/SCS, and CARB's Scoping Plan.

Further, approval of the Project itself, as a policy document update, would not change these regulations and would not provide any goals, policies, or programs that would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant. No mitigation is required.

## References

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[https://covina.ca.gov/sites/default/files/fileattachments/public\\_works/page/584/covina-eap-december-2012\\_final.pdf](https://covina.ca.gov/sites/default/files/fileattachments/public_works/page/584/covina-eap-december-2012_final.pdf), accessed November 2020.
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## Geology and Soils

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS</b> —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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 wastewater?	<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"/>

## Discussion

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?**

**Less than Significant Impact.** Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive. In addition, there are buried thrust faults,

which are low angle reverse faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS has established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones, which extend from 200 to 500 feet on each side of a known active fault, identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures.

No active faults have been identified within the City. However, there are two potentially active earthquake faults that pass through the City. The Indian Hill Fault runs through the northeastern portion of the City and the Walnut Creek Fault traverses the southeastern portion of the City along Walnut Creek. The nearest active faults to the City are the Sierra Madre Fault, the Duarte Fault, and the Lower Duarte Fault, which are between 2 miles and 4 miles north of the City. A segment of the San Andreas Fault, the portion which runs between the City of San Bernardino and Parkfield (southeast Monterey County), is located approximately 20 miles northeast of the City. The other active faults nearest to the City include the Whittier-Elsinore Fault located approximately 10 miles to the southwest, the Raymond Fault located approximately 15 miles to the northwest, and the Norwalk Fault located approximately 20 miles to the southwest, and (City of Covina, 2000).

The Project Sites are located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. However, no currently known active surface faults traverse the Project Sites, and the Project Sites are not located within a designated Alquist-Priolo Earthquake Fault Zone. Further, all future development and redevelopment associated with the Project would be required to submit a Geotechnical Report for review and approval by the City. As such, implementation of the Project and the associated future development and redevelopment would result in a less than significant impact related to the rupture of a known earthquake fault. No mitigation is required.

ii) **Strong seismic ground shaking?**

**Less than Significant Impact.** Seismicity is the geographic and historical distribution of earthquakes, including their frequency, intensity, and distribution. The level of ground shaking at a given location depends on many factors, including the size and type of earthquake, distance from the earthquake, and subsurface geologic conditions. The type of construction also affects how particular structures and improvements perform during ground shaking.

Strong seismic ground shaking is anticipated to be the strongest in the middle and upper portions of the City, which are nearest the active faults which include Sierra Madre Fault, Duarte Fault, and Lower Duarte Fault. Due to the proximity of the Project Sites to these active faults, and due to the prevalent, motion-susceptible alluvium that underlies the City, the Project Sites could experience strong seismic ground shaking (Covina, 2000). The City requires that all new construction meet or exceed Title 14, Buildings and Construction, of the City's Municipal Code,

and the latest standards of the 2019 California Building Code (CBC) for construction which requires structural design that can accommodate maximum ground accelerations expected from known faults. The Project would comply with the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provides guidance for evaluation and mitigation of earthquake-related hazards. Further, all future development and redevelopment associated with the Project would be required to submit a Geotechnical Report for review and approval by the City. Therefore, implementation of the Project and the associated future development and redevelopment would result in a less than significant impact related to strong seismic ground shaking. No mitigation is required.

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

**Less than Significant Impact.** Liquefaction is a phenomenon in which loosely deposited, granular soils and fine-grained soils located below the water table undergo rapid loss of shear strength when subjected to strong earthquake-induced ground shaking. Ground shaking of sufficient duration can result in a loss of grain-to-grain contact due to a rapid rise in pore water pressure causing the soil to behave as a fluid for a short period. Liquefaction is known generally to occur in saturated or near-saturated cohesionless soils at depths shallower than 50 feet below the ground surface. Factors known to influence liquefaction potential include composition and thickness of soil layers, grain size, relative density, degree of saturation, groundwater level, and both duration and intensity of ground shaking.

According to the City's General Plan, liquefaction typically occurs in areas where the groundwater is less than 30 feet from the ground surface and where the soils are composed of predominantly poorly consolidated fine sand. In the City, liquefaction has not been a hazard in the past and appears to have very limited future hazard potential because the water table is generally more than 50 feet deep and there are no areas of loose, cohesionless soils (Covina, 2000). However, if liquefaction zones were discovered within the Project Sites, complying with the 2019 CBC and the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, would reduce impacts from liquefaction within the Project Sites to maximum extent possible under currently accepted engineering practices. These engineering practices could include densification of soils, soil reinforcement, and drainage/dewatering to reduce pore water pressure within the soil. Further, all future development and redevelopment associated with the Project would be required to submit a Geotechnical Report for review and approval by the City. Therefore, implementation of the Project and the associated future development would result in a less than significant impact related to liquefaction. No mitigation is required.

iv) **Landslides?**

**Less than Significant Impact.** Earthquake-induced landslides often occur in areas where previous landslides have moved and in areas where the topographic, geologic, geotechnical and subsurface groundwater conditions are conducive to permanent ground displacements. In the City, which is predominantly flat, no documented cases of major landslides have occurred. However, there is potential for landslides in certain sections of the Covina Hills area, which is

comprised of hilly terrain and has many fill slopes (Covina, 2000). The Project and associated future development and redevelopment are located in relatively flat and highly urbanized areas of the City. As such, a less than significant impact would occur in this regard. No mitigation is required.

b) **Result in substantial soil erosion or the loss of topsoil?**

**Less than Significant Impact.** Soil erosion refers to the process by which soil or earth material is loosened or dissolved and removed from its original location. Erosion can occur by varying processes and may occur in a project area where bare soil is exposed to wind or moving water (both rainfall and surface runoff). The processes of erosion are generally a function of material type, terrain steepness, rainfall or irrigation levels, surface drainage conditions, and general land uses. Topsoil is used to cover surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms.

Construction of the associated future development and redevelopment associated with the Project would result in ground surface disruption during excavation, grading, and trenching that would create the potential for erosion to occur. Wind erosion would be minimized through soil stabilization measures required by the SCAQMD Rule 403 (Fugitive Dust), such as daily watering. Potential for water erosion would be reduced by implementation of standard erosion control measures imposed during site preparation and grading activities. As discussed in more detail in Section X, *Hydrology and Water Quality*, the Project would be subject to all existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the 2019 CBC and the requirements of the National Pollutant Discharge Elimination Systems (NPDES) General Construction Permit issued by the LARWQCB, as applicable. Consistent with these requirements, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates Best Management Practices (BMPs) to control water erosion during the construction periods of all future development and redevelopment associated with the Project. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant. No mitigation is required.

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?**

**Less than Significant Impact.** As previously discussed under Responses VII.a.iii and VII.a.iv above, liquefaction and landslide hazards were concluded to be less than significant. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to the combination of gravity and earthquake shaking. Such movement can occur on slope gradients of as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and structures. Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e., retaining wall, slope, or channel) and to a lesser extent on ground surfaces with a very gentle slope. As stated under

Response VII.a.iii, liquefaction has not been a hazard in the past and appears to have very limited future hazard potential because the water table is generally more than 50 feet deep and there are no areas of loose, cohesionless soils. Further, due to the absence of any channel, slope, or river within the Project Sites, the potential for lateral spreading occurring on or off the Project Site is considered to be low. Subsidence occurs when a void is located or created underneath a surface, causing the surface to collapse. Common causes of subsidence include withdrawal of groundwater or oil resources or wells beneath a surface. As no oil wells are located within the Project Sites, subsidence associated with extraction activities is not anticipated.

Conformance to the 2019 CBC and the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California would reduce impacts from stability hazards within the Project Site to the maximum extent possible under currently accepted engineering practices. These engineering practices could include densification of soils, soil reinforcement, and drainage/dewatering to reduce pore water pressure within the soil. Further, all future development and redevelopment associated with the Project would be required to submit a Geotechnical Report for review and approval by the City. As such, implementation of the Project would result in less than significant impacts related to stability hazards. No mitigation is required.

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?**

**Less than Significant.** Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Although not anticipated, expansive soils, if encountered within the Project Sites, would be removed and/or replaced as part of standard construction practices pursuant to the City and the 2019 CBC building requirements. Further, all future development and redevelopment associated with the Project would be required to submit a Geotechnical Report for review and approval by the City. Therefore, implementation of the Project would result in less than significant impacts associated with expansive soils and substantial risks to life or property would not occur. No mitigation is required.

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?**

**No Impact.** The Project Sites are located in urbanized areas where municipal wastewater infrastructure currently exists. The future development and redevelopment associated with the Project would connect to existing infrastructure and would not use septic tanks or alternative waste water disposal systems. Therefore, no impact would occur in this regard.

f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less than Significant Impact with Mitigation Incorporated.** Archival research was conducted for the Project and consisted of conducting geologic map review and requesting a paleontological



resources database search through the Natural History Museum of Los Angeles County (LACM) (**Appendix B**, of this Draft IS/MND).

Review of the El Monte and Baldwin Park (1:24,000) geologic map by Dibblee and Ehrenspeck (1999) indicates that the majority of the Project Sites are underlain by Quaternary alluvium (Qa) sediments, while only a portion of the Project Sites (Project Area L) is underlain by gravel, sand, and alluvial fan detritus (Qg) from the San Gabriel Mountains (**Appendix B**, of this Draft IS/MND).

The LACM indicates that no fossil localities lie directly within the Project Sites, but that fossil localities (LACM VP 6171; LACM VP 6166-6167, 6172-6173, and 7471; LACM VP 1728; LACM VP 7268 and 7271; LACM VP 7508; LACM VP 3363) exist nearby (approximately between 3.25 and 14 miles away from the Project Sites) and are from the same sedimentary deposits that occur in the Project Sites either at the surface or at depth. These localities were found within Pleistocene age alluvial deposits and within Puente Formation sediments that yielded fossil specimens of herring/anchovy family (Ganolytes), mako shark (Isurus planus), Sturgeonfish (Prionurus), extinct bony fish (Etringus), Mola (Molidae), horse (Equus), camel (Camelops), ground sloth (Nothrotheriops); elephant family (Proboscidea); some at known depths and others between surface and 15-20 feet below ground surface (Bell, 2021).

The Project Sites are located near the center of the San Gabriel Valley and it is likely that fossiliferous sediments attributed to older, Pleistocene alluvium or the marine Puente Formation lie at considerable depth below the surface within the Project Sites. The exact boundary of the fossiliferous sediments is not known but based on the location and limited collections from the LACM, an estimate of 10 feet or more below the surface is realistic. Therefore, excavations below 10 feet within the Project Sites may encounter older, Pleistocene alluvium or the Puente Formation, which is exposed in the San Jose anticline to the southeast.

The purpose of the City's MUOD is to guide and regulate future mixed-use development and redevelopment under the policies and objectives of the Mixed-Use general plan designation as established in the City's General Plan. The Project itself would not result in direct impacts to unique paleontological resources or sites or unique geologic features. However, future development and redevelopment associated with the Project could involve ground disturbing activities that could, depending on their location, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Such projects could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature under CEQA. However, implementation of Mitigation Measure **GEO-1** would reduce impacts to less than significant.

### **Mitigation Measure**

**GEO-1:** Prior to construction of future development and redevelopment associated with the Project that involve ground disturbance below 10 feet in Pleistocene alluvium or marine Puente Formation sediments, the City shall retain a qualified paleontologist who meets the (SVP) Standards (SVP, 2010) to develop and oversee construction worker paleontological resources sensitivity training program and paleontological monitoring.

All initial ground disturbance below 10 feet deep shall be monitored full-time by a qualified paleontological monitor (SVP 2010) working under the direct supervision of the qualified paleontologist. Monitoring may be reduced to periodic spot checks or ceased entirely at the discretion of the qualified paleontologist, based on subsurface observations and the likelihood of encountering fossiliferous sediments. The qualified paleontologist shall also consider whether screen washing sediments is necessary to recover smaller specimens. All recovered fossils shall be prepared for identification to the lowest taxonomic level possible, cataloged, and curated at an accredited facility with retrievable storage. The qualified paleontologist shall prepare a final report to be submitted to the City and filed with the curation facility and Natural History Museum of Los Angeles County.

## References

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- Covina. 2000. City of Covina's General Plan, Safety Element, adopted April 18, 2000.
- Dibblee, T.W. and Minch, J.A. 2007. Geologic map of the Venice and Inglewood quadrangles, Los Angeles County, California, Dibblee Geological Foundation, Dibblee Foundation Map DF-322, 1: 24,000.
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## Greenhouse Gas Emissions

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS</b> —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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

Would the Project:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**
- b) **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Less than Significant with Mitigation Incorporated.** Gases that trap heat in the atmosphere and contribute to global climate change are referred to as greenhouse gases (GHGs). Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The State defines GHGs as carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and nitrogen trifluoride (NF<sub>3</sub>). Because different GHGs have different global warming potentials (GWPs) and CO<sub>2</sub> is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO<sub>2</sub> equivalents (CO<sub>2</sub>e). For example, CH<sub>4</sub> has a GWP of 25 (over a 100-year period) and N<sub>2</sub>O has a GWP of 298 (over a 100-year period); therefore, one metric ton (MT) of CH<sub>4</sub> and N<sub>2</sub>O are equivalent to 25 MT and 298 MT, respectively, of CO<sub>2</sub> equivalents (MTCO<sub>2</sub>e). The GWP ratios are available from the United Nations Intergovernmental Panel on Climate Change (IPCC) and are published in the *Fourth Assessment Report* (AR4). By applying the GWP ratios, project-related CO<sub>2</sub>e emissions can be tabulated in metric tons (MT) per year. Large emission sources are reported in million metric tons (MMT) of CO<sub>2</sub>e.<sup>9</sup>

Some of the potential effects in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more forest fires, and more

<sup>9</sup> A metric ton is 1,000 kilograms; it is equal to approximately 1.1 U.S. tons and approximately 2,204.6 pounds.

drought years (CARB, 2008). Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns. The projected effects of global warming on weather and climate are likely to vary regionally, but are expected to include the following direct effects (IPCC, 2001):

- Higher maximum temperatures and more hot days over nearly all land areas;
- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas;
- Reduced diurnal temperature range over most land areas;
- Increase of heat index over land areas; and
- More intense precipitation events.

Also, there are many secondary effects that are projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

California emitted approximately 418 MMTCO<sub>2</sub>e in 2019. Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2019, accounting for approximately 40 percent of total GHG emissions in the state. This sector was followed by the industrial sector (21 percent) and the electric power sector (including both in-state and out-of-state sources) (14 percent) (CARB, 2021).

Impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and toxic air contaminants. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, it is clear that the quantity is enormous, and no single project would measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro climates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

The City has not adopted a threshold of significance for GHG emissions that would be applicable to the Project. In December 2008, the SCAQMD adopted a 10,000 MTCO<sub>2</sub>e per year significance threshold for industrial facilities for stationary source projects in which the SCAQMD is the lead agency. The SCAQMD has not formally adopted a significance threshold for GHG emissions generated by a project for which SCAQMD is not the lead agency, or a uniform methodology for analyzing impacts related to GHG emissions on global climate change for land use development projects, such as the Project.

CEQA Guidelines Section 15064.4 gives lead agencies the discretion to determine whether to assess the significance of GHG emissions quantitatively or qualitatively. Section 15064.4 recommends considering certain factors, among others, when determining the significance of a project's GHG emissions, including the extent to which the proposed project may increase or reduce GHG emissions as compared to the existing environment; whether a proposed project

exceeds an applicable significance threshold that the lead agency determines applies to a proposed project; and extent to which a proposed project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

The California Natural Resources Agency (CNRA) *Final Statement of Reasons for Regulatory Action* from December 2009 similarly provides that project-level quantification of emissions should be conducted where it would assist in determining the significance of emissions, even where no numeric threshold applies. In such cases, CNRA's guidance provides that qualitative thresholds can be utilized to determine the ultimate significance of project-level impacts based on a project's consistency with plans, which can include applicable regional transportation plans. Even when using a qualitative threshold, quantification can inform "the qualitative factors" and indicate "whether emissions reductions are possible, and, if so, from which sources."<sup>10</sup>

Neither CARB nor the City has adopted quantitative significance thresholds for assessing impacts related to GHG emissions. CEQA Guidelines section 15183.5 states that a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted mitigation program or plan for the reduction of GHG emissions. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if a project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of a project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency (CCR, Title 14, Section 15064(h)(3)). Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions" (CCR, Title 14, Section 15064(h)(3)).

Even in the absence of clearly defined thresholds for GHG emissions, the law requires that an agency makes a good faith effort to disclose the GHG emissions from a project and mitigate to the extent feasible whenever the lead agency determines that a project contributes to a significant, cumulative climate change impact. Regardless of which threshold(s) are used, the agency must support its analysis and significance determination with substantial evidence. (CEQA Guidelines, Section 15064.7). The CEQA Guidelines recommends considering certain factors, among others, when determining the significance of a project's GHG emissions, including the extent to which a project may increase or reduce GHG emissions as compared to the existing environment; whether a project exceeds an applicable significance threshold; and extent to which a project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

According to the California Air Pollution Control Officers Association (CAPCOA), "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts

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<sup>10</sup> CNRA, *Final Statement of Reasons for Regulatory Action*, December 2009, pp. 20–26.

from a climate change perspective.”<sup>11</sup> Due to the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that a single project’s increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Section 15064.4(b) of the CEQA Guidelines states that “in determining the significance of a project’s greenhouse gas emissions, the lead agency should focus its analysis on the reasonable, foreseeable incremental contribution of a project’s emissions to the effects of climate change. A project’s incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions.”

The Project is a planning document, the approval of which would not directly result in the development of land uses and would not directly result in GHG emissions. Future GHG emissions may result from future development and redevelopment associated with the Project. This assessment quantifies estimated GHG emissions from such future development and redevelopment under buildout conditions. Although GHG emissions have been quantified, CARB, SCAQMD, and the City have not adopted quantitative significance thresholds. In the absence of any adopted quantitative threshold, the determination of whether or not new development that could occur from adoption of the MUOD would result in a cumulatively considerable contribution to the cumulative impacts of global climate change is based on the following:

- If the Project, as a result of the future development and redevelopment from adoption of the MUOD, would conflict with (and thereby be inconsistent with) the applicable GHG emissions reduction plans, policies, and regulations, which include the emissions reduction measures included within CARB’s Climate Change Scoping Plan; SCAG’s 2020–2045 RTP/SCS; and the City’s Energy Action Plan.

As a program-level IS/MND, this document does not speculate on the individual environmental impacts of specific projects that could be facilitated by the Project. Consistent with the requirements of CEQA Guidelines Section 15168, this study provides a program-level discussion of the impacts of implementing these measures that could result, rather than project-level or site-specific physical impacts of future development and redevelopment associated with the Project. While no specific development projects are proposed at this time, the Project is expected to facilitate additional population growth and additional housing units through the proposed rezoning program. The rezoning program has the potential to develop an additional 1,360 dwelling units.

### ***Construction GHG Emissions***

Construction of the future development and redevelopment associated with the Project would result in GHG emissions, which are primarily associated with use of off-road construction equipment and on-road vehicles (haul trucks, vendor trucks, and worker vehicles). The SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (2008) recommends that, “construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational

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<sup>11</sup> California Air Pollution Control Officers Association (CAPCOA), 2008. CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act.

GHG reduction strategies.” Thus, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the significance threshold. Therefore, the determination of significance is addressed in the operational emissions discussion following the estimated construction emissions.

The California Emissions Estimator Model (CalEEMod) Version 2020.4.0 was used to calculate the annual GHG emissions based on the construction scenario described in Section III, *Air Quality*. **Table VIII-1, Unmitigated Construction Scenario – Greenhouse Gas Emissions**, presents construction emissions under the 10 percent buildout scenario. Total construction GHG emissions are estimated by multiplying the 10 percent buildout scenario by a factor of ten. The total construction GHG emissions are also amortized over a 30-year period.

**TABLE VIII-1  
UNMITIGATED CONSTRUCTION SCENARIO – GREENHOUSE GAS EMISSIONS**

Phase	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Total 10% Buildout Scenario Emissions (MT)	979.2	0.12	0.07	1,002
Total Project Buildout Scenario Emissions (MT)	9,792	1.19	0.68	10,024
Amortized Over 30 Years (MT/yr)	3,997	0.48	0.28	4,092

NOTES: The total project duration for this hypothetical full buildout construction scenario is 12.25 years, used for 30-year amortization calculations.

CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>e = carbon dioxide equivalents.

SOURCE: ESA 2022.

As shown in Table VIII-1, the estimated total GHG emissions during construction would be approximately 10,024 MTCO<sub>2</sub>e over an assumed 12.25-year construction period. Construction emissions from the potential future development and redevelopment associated with the Project amortized over 30 years are estimated to be approximately 4,092 MTCO<sub>2</sub>e per year. Construction-related GHG emissions are analyzed together with operational GHG emissions, which are discussed below.

### ***Operational GHG Emissions***

Operation of the future development and redevelopment associated with the Project would generate GHG emissions through motor vehicle trips; landscape maintenance equipment operation (area source); energy use (natural gas and electricity); solid waste disposal; and water supply, treatment, and distribution and wastewater treatment. CalEEMod was used to calculate the annual GHG emissions based on the operational assumptions described in Section III, *Air Quality*. Additionally, water and solid waste GHG emissions were estimated in CalEEMod based on model default factors for the residential, commercial (for the purposes of this analysis, modeled as high turnover restaurant as discussed in Section III, *Air Quality*), and general light industrial uses. The estimated operational GHG emissions from the Project and from area sources, energy usage, motor vehicles, solid waste generation, and water usage and wastewater generation are shown in **Table VIII-2, Unmitigated Operational Scenario – Greenhouse Gas Emissions**. Table VIII-2 presents GHG emissions under the 10 percent buildout scenario. Total

buildout scenario GHG emissions are estimated by multiplying the 10 percent buildout scenario by a factor of ten. No potential reduction credits to GHG emissions from the demolition of any existing land uses have been applied to the estimated GHG emissions.

**TABLE VIII-2  
UNMITIGATED OPERATIONAL SCENARIO – GREENHOUSE GAS EMISSIONS**

Phase	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Area	30.06	0.00	0.00	30.28
Energy	2,047	0.10	0.03	2,059
Mobile	5,480	0.45	0.29	5,576
Waste	220.70	13.04	0.00	546.76
Water	131.71	1.47	0.04	179.06
Total 10% Buildout Scenario Emissions (MT/yr)	7,910	15.06	0.35	8,391
Total Project Buildout Emissions (MT/yr)	79,095	150.6	3.53	83,911
Total net operational + amortized construction GHGs (MT/yr)	83,092	151.1	3.81	88,003

NOTE: CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>e = carbon dioxide equivalents.

SOURCE: ESA 2022.

As previously discussed, the Project consists of a program-level document and adoption of the Project would not itself result in the generation of GHG emission. The rezoning program as part of the Project would allow for greater densities than are currently allowed under existing conditions and would allow for the future development of residential, commercial, and light industrial uses. As shown in Table VIII-2, estimated increase in future development and redevelopment by the full buildout of the Project would be approximately 84,000 MTCO<sub>2</sub>e per year from only operations. After accounting for amortized construction emissions, total net GHGs generated by the would be approximately 88,000 MTCO<sub>2</sub>e per year.

It is anticipated that future development and redevelopment associated with the Project would occur over a number of years, as future projects are proposed. Furthermore, it is not expected that development of the potential for 1,360 additional dwelling units and commercial and general light industrial land uses in the 74.83-acre area would occur as a single project, but rather as multiple different projects. Additionally, adoption of the MUOD would allow for the infill development of diverse housing opportunities that would be close to job centers, commercial services, and entertainment options within the Project Sites. Therefore, the Project would support land use and transportation strategies that are intended to reduce VMT.

### ***Greenhouse Gas Reduction Plans, Policies, and Regulations***

#### **CARB 2017 Scoping Plan, SB 32 and EO S-3-05**

The Project would not conflict with State plans and regulatory requirements referenced in the 2017 Climate Change Scoping Plan, the purpose of which is to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030. The 2017 Climate Change Scoping Plan outlines a



framework that relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program and builds off of a wide array of regulatory requirements that have been promulgated to reduce statewide GHG emissions, particularly from energy demand and mobile sources. According to the 2017 Climate Change Scoping Plan, reductions needed to achieve the 2030 target are expected to be achieved by increasing the State's Renewables Portfolio Standard (RPS) to 50 percent of the State's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high speed rail and other alternative transportation options, and increasing the use of high efficiency appliances, water heaters, and HVAC systems.

**Table VIII-3, *Consistency with Applicable Climate Change Scoping Plan Greenhouse Gas Reduction Strategies***, contains a list of the GHG-reducing strategies from the 2017 Climate Change Scoping Plan. The analysis describes the Project's compliance and consistency with these strategies outlined in the State's Climate Change Scoping Plan to reduce GHG emissions. As discussed below, the Project would not conflict with applicable 2017 Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

**TABLE VIII-3  
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN  
GREENHOUSE GAS REDUCTION STRATEGIES**

Actions and Strategies	Responsible Party	Compliance/Consistency Analysis
<b>Energy</b>		
<p><b>Senate Bill 350 (SB 350).</b> The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California Renewable Portfolio Standard (RPS) program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.<sup>1</sup></p> <p>Required measures include:</p> <ul style="list-style-type: none"> <li>• Increase RPS to 50 percent of retail sales by 2030.</li> <li>• Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.</li> <li>• Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.</li> </ul>	<p>CPUC, CEC, CARB, SCE</p>	<p><b>Not Applicable/No Conflict.</b> SB 350 applies to electric utility providers in California and does not apply directly to land use planning projects, such as the Project. While this provision of SB 350 applies to the generators and suppliers of energy sources, the Project would support SB 350's goals since future development that could occur under the Project would use electricity from the local utility provider, which is required to meet the energy performance standard of 50 percent renewable energy by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. In 2020, SCE provided 43 percent from renewable sources, exceeding the required target 33 percent by 2020 established under previous legislation.</p> <p>As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR, Title 24, Part 6 and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. Future development under the Project would meet or exceed the applicable requirements of Title 24, Part 6, as well as the California Green Building Standards Code in Title 24, Part 11 as adopted and amended in the City's Municipal Code. As such, the Project would not conflict with SB 350.</p>

Actions and Strategies	Responsible Party	Compliance/Consistency Analysis
<b>Senate Bill 100 (SB 100).</b> The California Renewables Portfolio Standard Program (2018) requires a Statewide renewables energy portfolio that requires retail sellers to procure renewable energy that is at least 50 percent by December 31, 2026, and 60 percent by December 31, 2030. It would also require that local publicly owned electric utilities procure a minimum quantity of electricity from renewable energy resources achieve 44 percent of retail sales by December 31, 2024, and 60 percent by December 31, 2030.	CPUC, SCE	<b>Not Applicable/No Conflict.</b> SB 100 applies to electric utility providers in California and does not apply directly to land use development planning projects, such as the Project. While this provision of SB 100 applies to the generators and suppliers of energy sources, the Project would support SB 100's goals since future development under the Project would utilize the renewable energy provided by the regulated entity, which is required to generate electricity that would increase renewable energy resources to 33 percent by 2020 and 60 percent by 2030 in accordance with SB 100. As such, the Project would not conflict with SB 100.
<b>Mobile</b>		
<b>Implement Mobile Source Strategy (Cleaner Technology and Fuels):</b> <ul style="list-style-type: none"> <li>At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.</li> <li>At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.</li> <li>Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations.</li> <li>Implementation of federal phase 2 standards for medium- and heavy-duty vehicles.</li> <li>Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO<sub>x</sub> standard.</li> <li>Last Mile Delivery: New regulation that would result in the use of low NO<sub>x</sub> or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.</li> <li>Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."</li> </ul>	CARB, CalSTA, SGC, Caltrans, CEC, OPR, Local Agencies	<b>Not Applicable/No Conflict.</b> The 2017 Climate Change Scoping Plan Mobile Source Strategy applies to vehicle manufacturers, bus and transit operators, truck fleet and delivery operators, and local planning agencies. While this strategy does not apply directly to land use development planning projects, such as the Project, future development under the Project would not conflict with the goals of the Mobile Source Strategy as outlined below.  CARB approved the Advanced Clean Cars Program that includes Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. While this action does not directly apply to land used development planning projects, the standards would apply to all vehicles purchased or used by occupants, vendors, and visitors of the City. Future development under the Project would be required to comply with the City's Municipal Code and CALGreen requirements regarding the number of electric vehicle-ready and electric vehicle-capable parking spaces to support ZEVs and PHEVs. As such, the Project would not conflict with implementation of this strategy.  The Advanced Clean Truck Regulation has two components, a manufacturer sales requirement, and a reporting requirement. The manufacturer component of the regulation requires manufacturers that certify Class 2b-8 chassis or complete vehicles with combustion engines to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales. The reporting component of the regulation requires large employers, including retailers, manufacturers, brokers and others, to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. <sup>2</sup> Because deliveries to and within the City would be made by trucks subject to this regulation, the Project would benefit from these measures.  CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks

Actions and Strategies	Responsible Party	Compliance/Consistency Analysis
		<p>under the Advanced Clean Local Trucks (Last Mile Delivery) Program.<sup>3</sup> If and when such transit measures are adopted by CARB as regulatory standards, GHG emissions generated by transit trips to, from and within the City, including residents, employees, and other visitors, would be reduced in accordance with the future regulations.</p> <p>GHG emissions generated by passenger, truck, and bus vehicular travel as a result of future development under the Project would benefit from the above regulations and programs, and mobile source emissions would be reduced with implementation of standards under the Advanced Clean Cars Program, Advanced Clean Truck Regulation, and Innovative Clean Transit measure consistent with reduction of GHG emissions under SB 32. Mobile source GHG emissions provided in Table VIII-2 conservatively do not specifically include the numeric reduction in mobile source GHG emissions from the above regulations as the CalEEMod model, which was utilized in the analysis, does not yet fully account for these regulation or programs.</p> <p>SB 375 requires SCAG to direct the development of the RTP/SCS for the region. The Project would not conflict with the RTP/SCS goal to adapt to a changing climate and to support an integrated regional development pattern. The location, design, and land uses of the growth anticipated by the Project would implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the City by increasing commercial and residential density within the MUOD areas. The Project focuses on infill development and revitalization to help the City provide an integrated mix of housing along with commercial and general light industrial uses. Therefore, the Project would not conflict with the VMT reduction standards of the RTP/SCS and the Project would not conflict with applicable RTP/SCS actions and strategies to reduce GHG emissions.</p>
<b>Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets).</b>	CARB	<p><b>No Conflict.</b> Under SB 375, CARB sets regional targets for GHG emission reductions from passenger vehicle use. In 2010, CARB established targets for 2020 and 2035 for each region. As required under SB 375, CARB is required to update regional GHG emissions targets every 8 years, which have been most recently updated in 2018. As part of the 2018 updates, CARB adopted a passenger vehicle related GHG reduction of 19 percent per capita for 2035 for the SCAG region, relative to the baseline year 2005.</p> <p>As discussed above, the location, design, and land uses of the growth anticipated by the Project would implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the City by increasing residential density as well as commercial and general light industrial uses at infill locations. Higher densities, especially in mixed-use designations, increase capacity for residential development near community-serving commercial, retail, and office that will make it easier for residents to walk or use bicycles to travel to destinations. Therefore, the Project would not conflict with the VMT reduction standards of the RTP/SCS and the Project would not conflict with applicable RTP/SCS actions and strategies to reduce GHG emissions.</p>

Actions and Strategies	Responsible Party	Compliance/Consistency Analysis
<p><b>By 2019, adjust performance measures used to select and design transportation facilities.</b></p> <ul style="list-style-type: none"> <li>Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).</li> </ul>	<p>CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans</p>	<p><b>Not Applicable/No Conflict.</b> The Project is a planning document, the approval of which would not directly result in the development of transportation facilities. However, the Project would encourage emission reduction strategies by establishing a land use design that would accommodate future growth in the City in higher density residential as well as commercial and general light industrial areas, which would allow for increased mixed-use density at infill locations and provide for residents to walk and use bicycles. Therefore, the Project would not interfere, impede, or conflict with this strategy.</p>
<p><b>By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).</b></p>	<p>CalSTA, Caltrans, CTC, OPR/SGC, CARB</p>	<p><b>No Conflict.</b> The Project would support this policy through the implementation of electric vehicle-ready and electric vehicle-capable parking spaces for future development within the MUOD areas, as well as parking spaces for carpools and alternative fueled vehicles. As such, the Project would not conflict with this strategy.</p>
<p><b>Implement California Sustainable Freight Action Plan:</b></p> <ul style="list-style-type: none"> <li>Improve freight system efficiency.</li> <li>Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.</li> </ul>	<p>CalSTA, CalEPA, CNRA, CARB, CalTrans, CEC, GoBiz</p>	<p><b>Not Applicable/No Conflict.</b> The Project is a planning document, the approval of which would not directly result in the development of freight transportation or warehousing uses. Nonetheless, the Project would support these actions through the implementation of electric vehicle-ready and electric vehicle-capable infrastructure and parking spaces for future development within the MUOD areas. As such, the Project would not conflict with this strategy.</p>
<p><b>Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18 percent.</b></p>	<p>CARB</p>	<p><b>Not Applicable/No Conflict.</b> This regulatory program applies to fuel suppliers, not directly to land use development planning projects, such as the Project. GHG emissions related to vehicular travel associated with future development under the Project would benefit from this regulation because fuel used by vehicles in the City would be required to comply with LCFS. Therefore, would not interfere, impede, or conflict with this strategy.</p> <p>On September 27, 2018, CARB approved an amendment to the LCFS regulation to require a 20 percent reduction in carbon intensity from a 2010 baseline by 2030. Reductions in carbon intensity are phased in starting in 2019 with a reduction of 6.25 percent and increases by 1.25 percent each year. Thus, in 2021, LCFS emissions reductions are 8.75 percent reduced carbon intensity relative to the 2010 baseline. Project-related mobile source GHG emissions would be reduced accordingly, and would increase as LCFS compliance increases to 20 percent to reduce carbon intensity by 2030 relative to the 2010 baseline year. Mobile source GHG emissions provided in Table VIII-2 were calculated using CalEEMod, and does not yet fully account for this regulation or program. Thus, Table VIII-2 provides conservatively estimated GHG emissions.</p>
<b>Other Sources</b>		
<p><b>Implement the Short-Lived Climate Pollutant Strategy by 2030:</b></p> <ul style="list-style-type: none"> <li>40-percent reduction in methane and hydrofluorocarbon emissions below 2013 levels.</li> <li>50-percent reduction in black carbon emissions below 2013 levels.</li> </ul>	<p>CARB, CalRecycle, CDFA, SWRCB, Local air districts</p>	<p><b>Not Applicable/No Conflict.</b> Senate Bill 605 (SB 605), adopted in 2014, directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.<sup>4</sup></p> <p>SB 1383 requires various agencies, including CARB, California Department of Food and Agriculture (CDFA), and the State Water Resources Board (SWRCB), to be responsible for</p>

Actions and Strategies	Responsible Party	Compliance/Consistency Analysis
<b>By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.</b>	CARB, CalRecycle, CDFA, SWRCB, Local air districts	<p>adopting regulations to reduce GHG emissions. These regulations would not be applicable to future development that could occur under the Project, as such development would not be anticipated to generate SLCP emissions. Therefore, the Project would not conflict with this strategy.</p> <p><b>No Conflict.</b> Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025. Future development that could occur under the MUOD would be consistent with AB 341, which requires not less than 75 percent of solid waste generated to be source reduced through recycling, composting, or diversion. This reduction in solid waste generated by the Project would reduce overall GHG emissions. Compliance with AB 341 would also help achieve the goals of SB 1383. Therefore, the Project would not conflict with this strategy.</p>
<b>Implement the post-2020 Cap-and-Trade Program with declining annual caps.</b>	CARB	<p><b>No Conflict.</b> Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions. Under the Cap-and-Trade program, entities, such as power generation companies and natural gas processing plants, would be required to limit or reduce GHG emissions. While the Project is a land use development planning project and not a regulated entity under the Cap-and-Trade Program, the Program would result in a reduction of GHG emissions associated with the energy usage, since energy supplied to future development that could occur under the Project would be from a regulated entity. The Project would not interfere, impede, or conflict with implementation of the Program.</p>
<p><b>By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink:</b></p> <ul style="list-style-type: none"> <li>• Protect land from conversion through conservation easements and other incentives.</li> <li>• Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.</li> <li>• Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.</li> <li>• Establish scenario projections to serve as the foundation for the Implementation Plan.</li> </ul>	CNRA and departments within, CDFA, CalEPA, CARB	<p><b>Not Applicable/No Conflict.</b> This regulatory program applies to Natural and Working Lands. There are no Natural and Working Lands in the MUOD areas. Thus, this strategy is not directly related to future development that could occur under the Project. However, the Project would not interfere, impede, or conflict with implementation of the Integrated Natural and Working Lands Implementation Plan.</p>
<b>Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.</b>	CARB	<p><b>Not Applicable/No Conflict.</b> This regulatory program applies to Natural and Working Lands. There are no Natural and Working Lands in the MUOD areas. Thus, this strategy is not directly related to future development that could occur under the Project. However, the Project would not interfere, impede, or conflict with implementation of the Integrated Natural and Working Lands Implementation Plan.</p>

Actions and Strategies	Responsible Party	Compliance/Consistency Analysis
<b>Implement Forest Carbon Plan.</b>	CNRA, CAL FIRE, CalEPA and departments within	<b>Not Applicable/No Conflict.</b> This regulatory program applies to state and federal forest land, not directly related to future development that could occur under the Project. However, the Project would not interfere, impede, or conflict with implementation of the Forest Carbon Plan.
<b>Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.</b>	State Agencies & Local Agencies	<b>Not Applicable/No Conflict.</b> Funding and financing mechanisms are the responsibility of the state and local agencies. The Project would not conflict with funding and financing mechanisms to support GHG reductions.

<sup>1</sup> Senate Bill 350 (2015–2016 Regular Session) Stats 2015, Ch. 547.

<sup>2</sup> CARB, Advance Clean Cars, 2017 Midterm Review, <https://ww2.arb.ca.gov/resources/documents/2017-midterm-review-report>. Accessed May 18, 2021.

<sup>3</sup> CARB, Advanced Clean Local Trucks, <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>. Accessed May 18, 2021.

<sup>4</sup> CARB, SLCP: Organic Waste Methane Emissions Reductions, <https://www.calrecycle.ca.gov/climate/slcp/>. Accessed May 18, 2021.

SOURCE: ESA, 2022.

Even though the State has not developed a clear regulatory and technological roadmap to achieve the statewide 2050 GHG emissions reduction goal of 80 percent below 1990 levels, it has demonstrated the potential pace at which emission reductions can be achieved through new regulations as well as technology and market developments. As part of the 2017 Climate Change Scoping Plan, CARB, CEC, CPUC, and the California Independent System Operator (CAISO) commissioned a study that evaluates the feasibility and cost of meeting the 2030 target along the way to reaching the State’s 2050 GHG emissions reduction goal. The California State Agencies’ PATHWAYS Project explores scenarios for meeting the State’s long-term GHG emissions target, which affects all sectors of the California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.<sup>12</sup> The PATHWAYS study acknowledges the inherent uncertainty associated with its modeling assumptions and emphasizes the need for continued action and policy development by the State to support the development of low-carbon technologies and markets for energy efficiency, building electrification, renewable electricity, zero-emission vehicles, and renewable fuels.

The PATHWAYS study was updated in 2018 and concludes that market transformation is needed to reduce the capital cost and to increase the range of options available in order to achieve high levels of consumer adoption of zero carbon technologies, particularly of electric vehicles and energy efficiency and electric heat in buildings. The PATHWAYS study suggests that market transformation can be facilitated by: (1) higher carbon prices (which can be created by the Cap and Trade and LCFS programs); (2) adoption of codes and standards, regulations, and direct incentives to reduce the upfront cost to the customer; and (3) business and policy innovations to make zero-carbon technology options the more affordable and preferred solutions compared to fossil fueled alternatives.<sup>13</sup> It is reasonable to expect the GHG emissions from future development and redevelopment associated with the Project would decline over time, as the regulatory initiatives identified by CARB in the 2017 Climate Change Scoping Plan and future updates to the Scoping Plan are developed and implemented, along with other technological innovations and

<sup>12</sup> Energy + Environmental Economics (E3), 2015. Summary of the California State Agencies’ PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios, [https://www.arb.ca.gov/html/fact\\_sheets/e3\\_2030scenarios.pdf](https://www.arb.ca.gov/html/fact_sheets/e3_2030scenarios.pdf). Accessed November 12, 2021.

<sup>13</sup> E3, 2018. Deep Decarbonization in a High Renewables Future. Updated Results from the California PATHWAYS Model, Final Project Report, Deep Decarbonization in a High Renewables Future. Accessed November 12, 2021.

market developments that occur. Given the reasonably anticipated decline in emissions, the Project would not conflict with or interfere with the ability of the State to achieve the 2050 horizon-year goal of EO S-3-05.

### **SCAG 2020–2045 RTP/SCS**

The 2020–2045 RTP/SCS includes targets that comply with emission reduction targets established by CARB and meet the requirements of SB 375. The Project incorporates several key strategies, including increasing density near high-quality transit areas (HQTAs) in the County, to align with the goals of SCAG’s 2020–2045 RTP/SCS. In addition to demonstrating the region’s ability to attain the GHG emission-reduction targets set forth by CARB, the 2020–2045 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 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

The following strategies are intended to be supportive of implementing the 2020–2045 RTP/SCS and reducing GHGs: focus growth near destinations and mobility options; promote diverse housing choices; leverage technology innovations; support implementation of sustainability policies; and promote a green region. Compliance with the remaining applicable strategies is presented below.

**Focus Growth Near Destinations and Mobility Options.** The Project would facilitate the potential development of up to 1,360 additional dwelling units within dense multi-use urban areas. The proposed multi-family units would be developed with a higher density with increased access to transit and within dense multi-use urban areas. As such, the facilitation of the Project would provide residences within proximity to transit services and would reduce VMT and associated GHG emissions by being in proximity to complimentary land uses and employment centers, which could encourage use of alternative transportation methods such as transit, walking, or biking, or would result in shorter vehicle trips. The Project would be consistent with the City’s General Plan Policies to promote sustainability in land use design by encouraging development within dense multi-use urban areas to increase walking, bicycling, and transit ridership to reduce VMT, and improve pedestrian infrastructure through sidewalk continuity and street connectivity.

**Promote Diverse Housing Choices.** The Project would comply with this strategy of the 2020–2045 RTP/SCS since it would result in the development of diverse housing types as well as new market-rate and affordable residential units to increase a mix of housing supply options. The Project includes goals and policies that would provide a range of housing types in sufficient supply to meet the needs of current and future residents, provide a supply that ranges broadly in housing costs, and maintain a healthy and diverse housing supply.

**Leverage Technology Innovations.** The Project would comply with this strategy of the 2020–2045 RTP/SCS since it would be consistent with the City’s General Plan Policies and would be required to comply with the 2019 Title 24 Standards and 2019 CALGreen at a minimum, through

energy-efficient design and support low emission technologies for transportation, such as the installation of electric vehicle supply equipment to reduce per capita GHG emissions.

**Promote a Green Region.** Another applicable strategy within the 2020–2045 RTP/SCS to the Project involves promoting a green region through efforts such as supporting local policies for renewable energy production and promoting more resource efficient development (e.g., reducing energy consumption) to reduce GHG emissions. The development of multi-family residences allowed for by the Project would be required to comply with 2019 Title 24 building code (at a minimum), which would require installation solar photovoltaic systems for single-family and low-rise residential buildings.

### **City of Covina Energy Action Plan**

The City’s Energy Action Plan identifies goals and policies for reducing electricity use within the community. Goals and policies relevant to the Project are listed below:

**Goal 3:** Maximize the Efficiency of All New Buildings.

**Policy 3.1:** Maximize the Energy-Efficient Design and Orientation of New, Remodeled, and Renovated Buildings Through Voluntary Sustainable Building Standards.

**Policy 3.2:** Encourage the Use of Energy-Efficient Appliances and Equipment in New Buildings.

**Goal 5:** Maximize Use of Shading and Cooling to Sustain a Comfortable and Energy-Efficient Urban Environment.

**Policy 5.1:** Maximize the Cooling of Buildings Through Strategic Tree Planting and Shading to Reduce Building Electricity Demands.

**Policy 5.2:** Reduce Electricity Demand by Promoting Cool Roofs and Surfaces for Residential and Nonresidential Buildings.

**Goal 6:** Encourage Water Conservation to Support Community Energy Efficiency and Conservation Goals.

**Policy 6.2:** Support Water-Efficient Landscaping Practices to Reduce Electricity Demand for Water Transport and Treatment.

The Project consists of a program-level document that is not anticipated to produce environmental impacts; however, the rezoning program as part of the Project would allow for greater densities than are currently allowed. Based on the general areas of the rezoning program and the goals of the MUOD, the Project would likely result in higher density housing developments with complimentary land uses and employment centers, which would encourage use of alternative transportation methods such as transit, walking, or biking, and would result in reduced VMT.

The Project would not conflict with the GHG reduction targets established by Executive Order S-3-05, and SB 32, or the reduction measures identified in CARB’s 2017 Scoping Plan or SCAG’s 2020–2045 RTP/SCS. With the implementation of mitigation measures **AIR-3** and **GHG-1**, future development and redevelopment associated with the Project would not conflict with



relevant goals and policies in the City's Energy Action Plan. Therefore, the Project's impact would be less than significant with mitigation

### Mitigation Measures

Implement **Mitigation Measure AIR-3: Energy Conservation.**

**GHG-1: Water Conservation.** The City shall require water conservation measures during future project-level environmental review, which may include the following:

- Utilize the model energy efficiency code to encourage drought-tolerant landscaping and the use of water-efficient irrigation systems.
- Use drought-tolerant, low water, and/or native vegetation for landscaping.
- Use water efficient irrigation systems.

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## Hazards and Hazardous Materials

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS</b> —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 checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

## Discussion

Would the Project:

- a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.**
- b) **Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.**

**Less than Significant Impact (a–b).**

## Construction

During the construction phase of future development and redevelopment associated with the Project, construction equipment and materials would include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction. Routine uses of any of these

substances could pose a hazard to people or the environment and would be considered potentially significant.

Construction activities would be required to comply with numerous hazardous materials regulations designed to ensure that hazardous materials are transported, used, stored, and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment, including stormwater and downstream receiving water bodies. Contractors would be required to prepare and implement Hazardous Materials Business Plans (HMBPs) that would require that hazardous materials used for construction would be used properly and stored in appropriate containers with secondary containment to contain a potential release. In Los Angeles County, HMBPs are submitted to the local Certified Unified Program Agency (CUPA), which in this case would be the Los Angeles County Fire Department Health Hazardous Materials Division (LACFD HHMD), for their review for compliance with hazardous materials regulations. The California Fire Code (CFC) would also require measures for the safe storage and handling of hazardous materials, which are included in the CUPA review of HMBPs.

Construction contractors would be required to prepare a SWPPP for construction activities according to the NPDES Construction General Permit requirements. The SWPPP would list the hazardous materials (including petroleum products) proposed for use during construction; describe spill prevention measures, equipment inspections, equipment and fuel storage; protocols for responding immediately to spills; and describe BMPs for controlling site runoff. The SWPPP would be submitted to the LARWQCB, which would review both the SWPPP and the required inspection reports for compliance with the Construction General Permit.

In addition, the transportation of hazardous materials would be regulated by the U.S. Department of Transportation (USDOT), Caltrans, and the California Highway Patrol (CHP). Together, federal and state agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. In the event of a spill that releases hazardous materials at the Project Sites, a coordinated response would occur at the federal, state, and local levels. The LACFD HHMD is the local hazardous materials response team. In the event of a hazardous materials spill, the LACFD and Covina Police Department (CPD) would be simultaneously notified and sent to the scene to respond and assess the situation.

Finally, implementation of some projects may include the demolition and removal of existing buildings and structures. Some buildings and structures may include hazardous building materials, such as asbestos-containing material (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCBs), mercury, and Freon (i.e., refrigerants). If improperly managed, the demolition activities could result in exposures to construction workers, the public, and the environment.

Numerous existing regulations require that demolition and renovation activities that may disturb or require the removal of materials that consist of, contain, or are coated with ACM, LBP, PCBs, mercury, Freon, and other hazardous materials must be inspected and/or tested for the presence of hazardous materials. If present, the hazardous materials must be managed and disposed of in

accordance with applicable laws and regulations. Compliance with existing regulations is a condition of demolition and construction permits.

In the case of ACM and LBP, all work must be conducted by a State-certified professional, which would ensure compliance with all applicable regulations. If ACM and/or LBP are determined to exist onsite, a site-specific hazard control plan must be prepared detailing removal methods and specific instructions for providing protective clothing and equipment for abatement personnel. A State-certified LBP and/or an ACM removal contractor would be retained to conduct the appropriate abatement measures as required by the plan. Wastes from abatement and demolition activities would be disposed of at a landfill permitted to accept such waste. Once all abatement measures have been implemented, the contractor would conduct a clearance examination and provide written documentation to the appropriate regulatory agency documenting that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

Equipment and materials with PCBs, mercury, and Freon, are managed thru the Universal Waste Rule. In the case of PCBs, electrical transformers and older fluorescent light ballasts not previously tested and verified to not contain PCBs must be tested. If PCBs are detected above action levels, the materials must be disposed of at a licensed facility permitted to accept the materials. In the case of mercury in fluorescent light tubes and switches, the identification, removal, and disposal of the materials must be removed without breakage and disposed of at a licensed facility permitted to accept the materials. In the case of Freon or other refrigerants, the refrigerants must be directed to licensed recycling and reuse facilities permitted to handle the refrigerants.

Compliance with the numerous laws and regulations discussed above that govern the transportation, use, handling, and disposal of hazardous building materials would limit the potential for impacts due to the transportation, use, handling, disposal, or accidental release of hazardous building materials, and this impact would be less than significant. No mitigation is required.

### ***Operation***

Once constructed, future development and redevelopment associated with the Project operating within the City may use chemicals associated with their particular business, some of which may be hazardous materials. The routine use or an accidental spill of hazardous materials could result in inadvertent releases, which could adversely affect construction workers, the public, and the environment.

Businesses that use hazardous materials would be required to prepare and implement a HMBP that would require that hazardous materials used in operations be used properly, stored in appropriate containers with secondary containment to contain a potential release, and disposed of at facilities permitted to accept the waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, state and federal regulations. The CFC would also require measures for the safe storage and handling of hazardous materials. In addition, businesses would be required to comply with the local MS4 permit development standards, which

would reduce pollutants and runoff flows from new developments using BMPs and low-impact development (LID)/post-construction standards.

Compliance with the numerous laws and regulations discussed above that govern the transportation, use, handling, and disposal of hazardous materials would limit the potential for impacts due to the transportation, use, handling, disposal, or accidental release of hazardous materials, and this impact would be less than significant. No mitigation is required.

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

**Less than Significant Impact.** There are 5 schools within the City limits that are within 0.25 mile of one of the Project Sites. The name of the school, the address, and the distance from the Project Sites are listed below.

- Covina Elementary School – 160 Barranca Avenue, immediately adjacent to the south of Area I;
- Barranca Elementary School – 727 S. Barranca Avenue, approximately 0.10 miles south of Area G;
- Northview High School – 1016 Cypress Street, approximately 0.18 miles northwest of Area K;
- Cypress Elementary School – 351 Cypress Street, approximately 0.20 miles west of Area D; and
- Fairvalley High School – 758 W. Grondahl Street, approximately 0.25 miles southeast of Area C.

Construction activities associated with future development and redevelopment associated with the Project would include the handling of hazardous materials, as discussed above. The routes to the specific construction sites would depend on the location of new development and redevelopment associated with the Project but could pass near schools. The accidental release or spill of hazardous materials transported through the vicinity near a school could expose school children, school staff, and workers to hazardous materials. Further, the prolonged use of construction equipment could produce hazardous emissions, if in proximity to a school.

Although there are Project Sites within 0.25 miles of a school, as discussed above, there are numerous regulations covering the transportation, use, storage, and disposal of hazardous materials during construction activities. The required compliance with these regulations would ensure that nearby schools would not be exposed to hazardous materials, and the impacts would be less than significant. No mitigation is required.

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

**Less than Significant with Mitigation Incorporated.** A review of the SWRCB GeoTracker online database and the Department of Toxic Substances Control (DTSC) EnviroStor online database revealed that there a variety of hazardous materials sites within the City (SWRCB, 2022; DTSC, 2022); the types of sites include Cleanup Program Sites, Leaking Underground Storage Tank (LUST) Cleanup Sites, Land Disposal Sites, DTSC Cleanup Sites. Of those, there are 17 closed (remediation has been completed) LUST Cleanup Sites in proximity to, or immediately adjacent to, one or more Project Sites. While all of these sites have been remediated (cleaned up) to the satisfaction of the overseeing regulatory agencies (SWRCB or DTSC) and have been closed, in some cases there may be residual contamination at these locations. Further, additional hazardous materials sites may be discovered in the future, particularly for properties with past industrial or commercial uses.

### **Construction**

The construction of future development and redevelopment within the Project Sites could include the excavation of soil or removal of groundwater (dewatering), some of which may have chemical concentrations above regulatory action levels. If the future development and redevelopment associated with the Project involve the excavation of soils or extraction of groundwater from a site with existing contamination, and the contaminated materials are improperly handled, it could expose construction workers, the public, and the environment to hazardous materials. This would be a potentially significant impact.

As discussed above, there are numerous regulations covering the transportation, use, storage, and disposal of hazardous materials during construction activities. The required compliance with these regulations would reduce the exposure to hazardous materials. However, in order to ensure that future projects plan for the potential to encounter existing contamination and inadvertently expose construction personnel, the public, or the environment, the Project Applicants shall implement Mitigation Measures **HAZ-1** through **HAZ-3**, as described below. To evaluate whether Project development on industrial and commercial properties have potential issues with contaminated materials, Project Applicants would be required to implement Mitigation Measures **HAZ-1** through **HAZ-3**, as described below. Implementing the general protection measure and Mitigation Measures **HAZ-1** through **HAZ-3** would reduce this potentially significant impact to a less than significant level.

### **Mitigation Measures:**

**HAZ-1: Phase I Environmental Site Assessment:** Prior to the initiation of any construction requiring ground-disturbing activities on industrial and commercial properties, as well as listed active hazardous materials cleanup sites, Project Applicants shall complete a Phase I environmental site assessment for that property in accordance with American Society for Testing and Materials Standard E1527 for those active hazardous materials sites to ascertain their current status. Any recommended follow up sampling (i.e., Phase II activities) set forth in the Phase I assessment shall be

implemented prior to construction. The results of Phase II studies, if necessary, shall be submitted to the local overseeing agency and any required remediation or further delineation of identified contamination shall be completed prior to commencement of construction.

**HAZ-2: Health and Safety Plan:** For those properties for which the Phase I assessment identifies hazardous materials issues, before the start of ground-disturbing activities, including grading, trenching, or excavation, or structure demolition, the Project Applicants for the specific work proposed shall require that the construction contractor(s) retain a qualified professional to prepare a site-specific health and safety plan (HASP) in accordance with federal Occupational Safety and Health Administration regulations (29 CFR 1910.120) and California Occupational Safety and Health Administration regulations (8 CCR Section 5192).

The HASP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing and structure demolition activities. The HASP shall include designation of a site health and safety officer, a summary of the anticipated risks, a description of personal protective equipment and decontamination procedures, and procedures to follow if evidence of potential soil or groundwater contamination is encountered.

**HAZ-3: Soil and Groundwater Management Plan:** In support of the HASP described in Mitigation Measure **HAZ-2**, the Project Applicants shall require that its contractor(s) develop and implement a Soil and Groundwater Management Plan (SGMP) for the management of soil and groundwater before any ground-disturbing activity. The SGMP shall describe the hazardous materials that may be encountered, the roles and responsibilities of on-site workers and supervisors, training for site workers focused on the recognition of and response to encountering hazardous materials, and protocols for the materials (soil and/or dewatering effluent) testing, handling, removing, transporting, and disposing of all excavated materials and dewatering effluent in a safe, appropriate, and lawful manner.

### ***Operation***

Once constructed, contaminated materials associated with implementation of PMAs would have been removed and/or treated, people and the environment would not be exposed to hazardous materials, and this impact would be less than significant. No mitigation is required during operations.

- 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.** There are no airports within two miles of any of the Project Sites. As such, the Project Sites are not within any delineated safety or noise hazard zones. The Project would not result in a safety hazard or excessive noise, and there would be no impact.

- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less than Significant Impact.**

### ***Construction***

The Hazard Mitigation Plan for the City does not specifically delineate evacuation routes to be utilized during an emergency (Covina, 2019).

The Project Sites are located in an established urban area that is well served by the surrounding roadway network. While it is expected that the majority of construction activities associated with future development and redevelopment associated with the Project would be mostly confined on-site, construction activities may involve temporary lane closures along roadways adjacent to the Project Sites, while curbside improvements are being made (e.g., sidewalks, driveways, underground facilities and infrastructure). However, through-access for drivers, including emergency personnel, along all roadways will still be provided. In these instances, the construction contractors of future development and redevelopment associated with the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) consistent with required City encroachment permit(s) to maintain flow and access. Furthermore, in accordance with the City's Public Works Department, construction contractors would develop a Construction Management Plan, subject to City review and approval, that includes designation of a haul routes to ensure that adequate emergency access is maintained during construction. Therefore, construction of the Project is not expected to impair or interfere with an established emergency response or evacuation plan, and the construction impacts would be less than significant. No mitigation is required.

### ***Operation***

With respect to operation of the Project, the LACFD, which provides fire and paramedic services for the City, and other relevant City departments would review the final design and on-site circulation of future development and redevelopment associated with the Project, to ensure that there is no interference with an emergency response or evacuation plan. Therefore, operation of the Project is not expected to interfere or impair an emergency response or evacuation plan, and the operational impact would be less than significant. No mitigation is required.

- g) **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 California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resource Assessment Program (FRAP) published Fire Hazard Severity Zone (FHSZ) maps. According to the map of Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Area (LRA) for the City, the Project Sites are not within a VHFHSZ, although there are VHFHSZs in the lower southwestern corner of the City limits (CAL FIRE, 2011).



New developments within the Project Sites would require construction during development, which, if unregulated, could lead to fire ignition. Nevertheless, all construction activities would be required to comply with all applicable fire protection and prevention regulations specified in the CFC, Hazardous Materials Transportation regulations, and Cal/OSHA regulations. These requirements include various measures such as accessibility of firefighting equipment, proper storage of combustible liquids, no smoking in service and refueling areas, and worker training for firefighter extinguisher use. Compliance with all applicable laws and regulations would further minimize the potential for construction activities to cause a wildland fire.

In addition, facilities that use or store hazardous and flammable materials would be required to comply with all applicable fire codes and fire protection requirements established by the CFC, Hazardous Materials Transportation regulations, and Cal/OSHA requirements. As such, the operation of future development and redevelopment associated with the Project would not substantially increase the risk of wildland fires within the Project Sites.

For these reasons, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and thus this impact is considered less than significant. No mitigation is required.

## References

- CAL FIRE, 2011. California Department of Forestry and Fire Protection, 2011. City of Covina.
- Covina, 2019. City of Covina, Hazard Mitigation Plan.
- DTSC, 2022. Department of Toxic Substances Control, 2022. EnviroStor database. Hazardous materials sites within the City of Covina.
- SWRCB, 2022. State Water Resources Control Board, 2022. GeoTracker database, Hazardous materials sites within the City of Covina.
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## Hydrology and Water Quality

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY</b> —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 offsite;	<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 checked="" type="checkbox"/>	<input 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"/>

## Discussion

The Project Sites are located in the San Gabriel River Watershed in the eastern portion of Los Angeles County (LARWQCB Water Quality Control Plan [Basin Plan] 2014). The Project Sites are highly developed, consisting of commercial and industrial facilities. There are no natural water features within the Project Sites however a channelized and concrete lined portion of Charter Oak Creek is present near the South Barranca Avenue and East Rowland Street intersection.

The CWA authorizes the USEPA to regulate point sources that discharge pollutants into the waters of the United States under the NPDES permitting program. The EPA delegates the responsibility for the protection of surface water and groundwater quality to the SWRCB and RWQCBs. Future development and redevelopment associated with the Project are located within the jurisdiction of the LARWQCB which administer and enforces the Basin Plan policies and other water quality programs within the coastal watersheds of Los Angeles County. The City is currently covered by the following NPDES permits (Covina, 2022):

- Order No. R4-2012-0175 NPDES Permit No. CAS004001 Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) discharges within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4.

- Order No. 97-03-DWQ: NPDES General Permit No. CAS000001, WDRS for Discharges of Storm Water Associated with Industrial Activities, Excluding Construction Activities.
- Order No. 2009-0009-DWQ (As amended by 2010-0014-DWQ and 2012-006-DWQ): NPDES General Permit No. CAS000002 for Storm Water Discharges Associated with Construction and Land Disturbance Activities.

Would the Project:

- a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

**Less than Significant Impact.** Upon completion of the Project, it is anticipated that development and redevelopment activities would commence concurrently, resulting in construction of various structures, both residential, commercial, and industrial. The Project Sites are located in urbanized environments consisting mainly of impervious surfaces such as roof tops, asphalt parking lots and roadways. Stormwater runoff is collected through existing inlets, catchment basins and underground storm drains that are maintained either privately or by the City (LARWQCB, 2014). Construction of future development and redevelopment associated with the Project could increase stormwater pollutants that could impair surface and groundwater through typical construction activities such as demolition, site preparation, grading and excavation, paving and landscaping. In addition, it is anticipated that additional impervious surfaces would be created during development and redevelopment of the Project Sites that could result in an increase of stormwater pollutants. An increase in pollutants such as trash, fertilizers, cleaning agents, sediments, and spilled or leaked petroleum products on surface parking lots could violate water quality standards and waste discharge requirements set by the LARWQCB.

The City would design and construct new facilities to capture and convey stormwater runoff and pollution in accordance with the existing LA County NPDES permits and the new MUOD Special Development Regulations Chapter. Consistent with these requirements, a SWPPP would be prepared that incorporates BMPs to control water erosion during the construction and operation of new facilities that would be developed upon completion of the Project.

Therefore, adherence to applicable local, state and federal water quality control plans and permits during future development and redevelopment associated with the Project would reduce impacts to surface and groundwater quality. As such, impacts would be less than significant in this regard. No mitigation is required.

- b) **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.** The Project does not involve the use of groundwater supplies and would not interfere with groundwater recharge. As described above, stormwater runoff would be collected and managed during construction and operation of the future development and redevelopment associated with the Project in accordance with local, state and federal requirements.

Upon completion of the Project, future development and redevelopment projects would increase demand for potable water. Covina Irrigating Company (CIC) is the primary water provider for the City. CIC's water supply is obtained from the Main San Gabriel Groundwater Basin and from the San Gabriel River. The CIC extracts groundwater and treats surface water from the Main San Gabriel Basin and delivers treated potable water to the City (Covina 2017). Adoption of the MUOD has the potential to develop 1,360 additional dwelling units within the various Project Sites as well as commercial and light industrial uses. As discussed in Section XIV, *Population and Housing*, adoption of the MUOD would provide the City with housing opportunity locations that would substantially contribute to compliance with the RHNA assignment for the City of 1,910 new housing units and the proposed updated Housing Element (6th Cycle). Therefore, the population growth would not substantially decrease groundwater supplies or impede groundwater recharge. As such, impacts would be less than significant. No mitigation is required.

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?**

**Less than Significant Impact.** Future development and redevelopment of the Project would be constructed within existing degraded parcels that do not contain streams or rivers. Erosion and siltation could occur off-site from stormwater runoff due to excavation and stockpiling of soils on-site during construction. As described above, construction of facilities would be subject to provisions and conditions of applicable NPDES and SWPPP permits as well as BMPs. In addition, the increase in stormwater runoff anticipated with the increase of impervious surfaces from the future development and redevelopment projects would be managed through incorporation of new infrastructure to existing facilities.

Therefore, substantial erosion or siltation would not occur as a result of altering drainage patterns including streams and rivers or with the addition of impervious surfaces. As such, impacts would be less than significant. No mitigation is required.

ii) **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?**

**Less than Significant Impact.** The Project involves amending the City's Official Zoning Map to allow for mixed-use development and redevelopment to 13 Project Areas. Upon completion of the Project, it is anticipated that design and construction would commence on the various facilities and dwellings, resulting in the addition of impervious surfaces that could increase the rate at which surface water flows on and offsite. However, as described above, the City would comply with the NPDES and SWPPP permitting requirements to collect and convey surface runoff offsite to designated facilities for reuse or recharge. The rate at which surface water runoff would be managed through the addition or upgrade of existing facilities. The impacts would be less than significant and would not result in substantial flooding on or offsite. 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?**

**Less than Significant Impact.** Refer to Sections a), c(i), and c(ii) above.

- iv) **impede or redirect flood flows?**

**Less than Significant Impact.** Refer to Section c) above.

- d) **In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?**

**Less than Significant Impact.** The City, except for the area around Walnut Creek in Covina Hills, has not experienced major flooding problems in recent years due to the development of adequate flood control infrastructure. The City does not contain any Special Flood Hazard Areas, and is not located in a tsunami zone due to its distance from the Pacific Ocean. However, due to presence of the upstream Puddingstone Reservoir and Dam complex, and because the City lies in a seismically active region, the City could be susceptible to seiches, which could cause major flooding due to inadequate stormwater catchment and conveyance facilities (Covina, 2000).

As described throughout this section, the City would incorporate design features in the development and redevelopment projects to adequately capture and convey the increase in stormwater runoff. As such, impacts would be less than significant. No mitigation is required.

- e) **Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Less than Significant Impact.** Refer to Sections a) and b) above.

## References

- LARWQCB, 2014. Los Angeles County Regional Water Quality Control Board (LARWQCB) Water Quality Control Plan (Basin Plan) 2014.  
[https://www.waterboards.ca.gov/losangeles/water\\_issues/programs/basin\\_plan/2020/Chapter\\_1/Chapter\\_1.pdf](https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/2020/Chapter_1/Chapter_1.pdf). Accessed April 2022.
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- Covina, 2022. Stormwater Pollution Prevention. 2022.  
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## Land Use and Planning

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING</b> —Would the Project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>

## Discussion

Would the Project:

a) **Physically divide an established community?**

**Less than Significant Impact.** The Project consists of adding a new chapter of mixed-use overlay regulations to the City’s Zoning Ordinance and amending the City’s Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas. The total acreage of parcels where the MUOD would be applied is approximately 74.83 acres with parcels less than 1 acre (0.99) in would allow a density range of 14 to 22 units per acre and parcels of more than 1 acre in size would allow a density range of 22 to 40 units per acre. City staff assumed that 60 percent of the total development for mixed-use development and redevelopment is for residential uses and the remaining 40 percent is for either commercial or industrial uses. The assumption is that 60 percent of the total approximate 74.83 acres will be for residential uses at an average density of 30 dwelling units per acre, resulting in the potential for 1,360 additional dwelling units. The Project Sites are located within highly urbanized areas of the City predominately developed with residential, commercial, and industrial uses. The Project Sites are developed lots generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. Future development and redevelopment associated with the Project would be considered infill projects and would likely replace an existing use of similar type and intensity, thereby not substantially altering the current land use intensity or land use patterns within the City. Infill development and redevelopment within existing residential, commercial, and industrial uses would not create physical divisions in a community. As such, impacts would be less than significant in this regard. No mitigation is required.

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?**

**Less than Significant Impact.** The purpose of the City’s MUOD is to guide and regulate future mixed-use development and redevelopment under the policies and objectives of the Mixed-Use general plan designation as established in the City’s General Plan. The MUOD allows horizontal mixed-use and vertical mixed-use development and redevelopment and creates specific development regulations and design criteria and standards to achieve a high-quality mixed-use

residential project. The MUOD applies on an as-requested, project-by-project basis, to General Commercial (GC), Town Center Commercial (TC-C), and General Industrial (GI) general plan designations. The MUOD is an overlay zone, that may be added to, but not replace, the underlying zoning classification of the existing parcel. In addition to establishing a new chapter of the MUOD zoning regulations, the City desires to initiate a Zone Change and to amend the City's Official Zoning Map to add the MUOD to various sites.

The total acreage of parcels where the MUOD would be applied is approximately 74.83 with parcels less than 1 acre (0.99) in size would allow a density range of 14 to 22 units per acre and parcels of more than 1 acre in size would allow a density range of 22 to 40 units per acre. City staff assumed that 60 percent of the total development for mixed-use development and redevelopment is for residential uses and the remaining 40 percent is for either commercial or industrial uses. The assumption is that 60 percent of the total approximate 74.83 acres will be for residential uses at an average density of 30 dwelling units per acre, resulting in the potential for 1,360 additional dwelling units to various sites located in 141 parcels within 13 Project Areas. As discussed in Section XIV, *Population and Housing*, the potential for 1,360 additional dwelling units associated with the Project could potentially result in approximately 4,216 additional residents in the City, assuming that all residents of the Project would relocate to the City. Employment increases have the potential to generate indirect population growth, as they may draw additional persons and their households to the City. The MUOD applies on an as-requested, project-by-project basis. As such, the estimated indirect residential population generated from future commercial and industrial development and redevelopment associated with the Project has not been determined as specific commercial and industrial projects have not been proposed and submitted to the City.

The RHNA assignment for the City is 1,910 new housing units. With the proposed updates to the Housing Element (6th Cycle), the City must demonstrate to the state Housing and Community Development (HCD) that the City will address several required components. One component is an inventory of sites available for future housing developments. Another component is that the City has reduced the CEQA and land use obstacles by rezoning potential sites within the MUOD. The City's second objective is to comply with the proposed updated Housing Element (6th Cycle). The City's proposed updated Housing Element (6th Cycle) is on a different time track, while the proposed MUOD will follow after the Housing Element.

Overall, addition of a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas would not reduce or eliminate any environmentally protective regulations in the City's Zoning Ordinance. The Project does not include any features that would circumvent any mitigation policies in the City's General Plan. The MUOD will guide and regulate future development and redevelopment consistent with the policies and objectives of the City's General Plan. As such, the Project would not conflict with land use plans, policies, or regulations that have been adopted for the purpose of avoiding or mitigating the environmental effect. Further, the existing environmental protections in the City's land use plans and policies would remain in place. As such, a less than significant impact would occur in this regard. No mitigation is required.

## References

City of Covina, 2021–2029 Housing Element, Draft, November 2021.

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## Mineral Resources

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>XII. MINERAL RESOURCES</b> —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"/>

## Discussion

Would the Project:

- a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- b) **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

**No Impact (a–b).** According to the City’s General Plan Natural Resources and Open Space Element, there are currently no extractable mineral resources due to long-term urbanization (Covina, 2000). Further, the City’s Zoning Code prohibits the extraction or production of aggregate mineral resources. In addition, the State Division of Oil and Gas has indicated that there are no significant energy-producing minerals or oil, gas, or geothermal fields within the City (DOC, 2010). Further, the Project Sites are located in a highly urbanized area of the City consist of developed lots generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. Therefore, the potential for the loss of a known mineral or locally important mineral resource is low. As such, no impact would occur in this regard.

## References

- DOC, 2010. California Department of Conservation, San Gabriel Valley P-C Region Showing MRZ-2 (Mineral Resource Zone) Areas and Active Mine Operations. 2010.
- Covina. 2000. City of Covina’s General Plan, Natural Resources and Open Space Element, page D-9. Adopted April 18, 2000.

## Noise

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>XIII. NOISE</b> —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"/>

## Discussion

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz). Because of the logarithmic scale of the decibel unit, sound levels cannot be added or subtracted arithmetically. If a sound's physical intensity is doubled, the sound level increases by 3 dBA, regardless of the initial sound level; i.e., 60 dBA plus 60 dBA equals 63 dBA. However, where noise levels of different levels are combined, the change in noise level would be less than 3 dB; i.e., 70 dBA plus 60 dBA equals 70.4 dBA.

Noise that is experienced at any receptor can be attenuated by distance or the presence of noise barriers or intervening terrain. Sound from a single source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. For acoustically absorptive, or soft, sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dBA per doubling of distance is normally assumed. A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receiver, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receiver specifically to reduce noise. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dBA of noise reduction.

The City's General Plan Noise Element contains noise goals and policies that address unnecessary, excessive, and annoying noise levels and sources, such as transportation sources,

commercial and industrial sources, miscellaneous stationary sources (e.g., heating and cooling systems, mechanical rooms, etc.), and construction sources (Covina, 2000). Potentially sensitive land uses in the City include residences (including residences for the elderly), schools, churches, and libraries. Commercial uses are not defined as noise sensitive receptors. Chapter 9.40, Noise, of the City's Municipal Code, includes the following noise standards and regulations:

Section 9.40.050, Time Duration Correction Factors, prohibits any person from operating machinery or mechanical devices in a manner which creates a noise increase of more than 5 dBA for a cumulative period of more than 15 minutes in any hour; 10 dBA for a cumulative period of more than 5 minutes in any hour; 15 dBA for a cumulative period of more than 1 minute in any hour; or 20 dBA for any period above the ambient noise level at any property outside the hours permitted by the City's noise ordinance for construction activity.

Section 9.40.110, Construction, prohibits construction activity between the hours of 8:00 PM and 7:00 AM any day, and at any time on Sundays and public holidays.

Section 10.44.010, Designation, establishes truck routes for vehicles exceeding a maximum gross weight of three tons.

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?**

**Less than Significant with Mitigation Incorporated.**

### ***Construction***

Implementation of the Project and the associated future development and redevelopment would result in construction activity that could adversely affect existing land uses adjacent to the Project Sites. As discussed above, the City's Municipal Code, Chapter 9.40, Section 9.40.110 Construction, contains noise regulations and standards that limit unnecessary, excessive, and annoying noise in the City including noise generated by construction, machinery, motor vehicles, and animals (Covina, 2022).

*It is unlawful for any person within any residential land use category or within a radius of 500 feet therefrom to operate equipment or perform any outside construction or repair work on any building, structure, or project; or to operate any pile driver, steam shovel, pneumatic hammer, electric saw, grinder, steam or electric hoist, or other construction-type equipment or device between the hours of 8:00 p.m. of any one day and 7:00 a.m. of the next day, at any time on any Sunday or at any time on any public holiday in such a manner that a reasonable person of normal sensitivity residing in the area is caused discomfort or annoyance, unless beforehand a permit therefor has been duly obtained in accordance with the provisions of subsection (B) of this section. No permit shall be required to perform emergency work.*

The noise regulations and standards are designed to allow construction activities and the use of construction equipment during daytime hours when people are normally awake and less sensitive to potentially offending noise sources and prohibit such activities and equipment during late evening and nighttime hours or during Sundays or holidays when people are normally asleep or resting and more sensitive to potentially offending noise sources. Compliance with the City's Municipal Code noise regulations and standards is required and enforceable through the City building official and would be protective of potentially offending noise from construction activities associated with buildout of the future development and redevelopment associated with the Project.

The MUOD applies on an as-requested, project-by-project basis, to General Commercial (GC) and General Industrial (GI) general plan designations. As such, the construction schedule and activities associated with the future development and redevelopment of the Project has not been determined until specific projects have been proposed and submitted to the City. With implementation of Mitigation Measures **NOI-1** and **NOI-2**, the Project would comply with construction hours per the City's Municipal Code and would incorporate construction BMPs. Implementation of the Project and the associated future development and redevelopment would not result in the 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. As such, impacts would be less than significant in this regard.

### ***Operation***

This section describes the activities relating to operation of the future development and redevelopment associated with the Project; including project-related vehicular traffic and any onsite noise-generating equipment and activity.

### **Traffic Noise Impacts on Off-Site Land Uses**

To characterize the Project Area's future day/night noise environment, the noise levels attributed to future traffic volumes on local roadways were evaluated (**Appendix C**, of this Draft IS/MND).

The City adopted Resolution CC 2020-56 (Covina, 2020) regarding the VMT thresholds of significance for the purposes of analyzing transportation impacts under CEQA. These thresholds are consistent with the recommended screening criteria contained in the Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (ORP, 2018). Consistent with the OPR Technical Advisory, the City recommends that a project generating 110 average daily trips (ADT) or less be screened out of a VMT analysis due to the presumption of a less than significant impact.

According to the Project's *Transportation Assessment Report* (**Appendix D**, of this Draft IS/MND), over a 24-hour period, the buildout of the potential for 1,360 additional dwelling units would generate 6,174 daily trip ends during a typical weekday (3,087 inbound trips and 3,087 outbound trips). The above trip generation forecast is considered very conservative, in that no specific vehicle trip generation credits have been applied to the forecast to account for existing

and occupied land uses that may be demolished as part of any future development and redevelopment associated with the Project.<sup>14</sup> These estimated daily trips would occur as a result of buildout of the potential residential dwelling units throughout the various Project Areas. Thus, the trips that would result from future development and redevelopment associated with the Project would not occur on any one roadway segment in the City, but would be distributed throughout various roadway segments in the City. As a result, implementation of the Project would not result in substantially more vehicle trips to the existing conditions on any one roadway segment and would result in minimal changes in the traffic noise levels compared to the corresponding baseline traffic noise level along roadway segments in the Project Areas. A doubling of traffic volumes along a roadway segment is required to increase traffic noise by 3 dBA and such an increase is not anticipated to occur with implementation of the Project given the anticipated number of vehicle trips and the distribution of those trips throughout various roadway segments in the City. Therefore, no significant traffic noise impact under the existing plus project scenario would occur from the implementation of the Project.

### **Noise Impacts on Land Uses Proposed within the Mixed-Use Overlay District**

Chapter IV of the City's General Plan Noise Element states that "the goal is: An environment in which potential adverse impacts of noise on the City's residents and workers are identified and prevented and mitigated" (Covina, 2000). Among the Policy Areas, Policy Area 1 (Transportation Noise Sources) has the following relevant policies:

The City shall:

- 1. Examine the noise environment of proposed residential or other noise-sensitive uses located within all 60 Ldn noise contours to ensure compatibility and, pertaining to residential activities, adherence to applicable State noise insulation standards.*
- 2. Attempt to mitigate or eliminate the possible noise problems of proposed residential or other noise-sensitive uses located within all 65 Ldn noise contours to ensure compatibility and, pertaining to residential activities, adherence to applicable State noise insulation standards.*
- 3. Consider "noise-sensitive uses" to include, but not be limited to, all residential housing types, public and private primary and secondary schools, libraries, parks/recreation areas, hospitals/medical facilities, nursing homes, and churches.*
- 4. Consider establishing acceptable limits of noise levels for various land uses throughout the community, in accordance with State guidelines, as a means of determining noise-compatible land uses.*
- 5. Ensure the inclusion of noise-mitigation measures and features in the design, orientation, and routing of new and improved streets and circulation and transportation facilities, where necessary and consistent with funding capability.*

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<sup>14</sup> Linscott Law & Greenspan, Transportation Assessment Report, Covina Mixed-Use Overlay District, March 2022 (**Appendix D**, of this Draft IS/MND).

*6. Require noise-reduction techniques and features in site planning, architectural design, project landscaping, building materials, and/or construction, where necessary or required by law.*

*14. Require that new or expanded developments minimize the noise impacts of trips that they generate on residential neighborhoods by controlling the location of driveways and parking.*

California Code of Regulations (CCR) Title 24 establishes the CBC. The most recent building standard adopted by the legislature and used throughout the state is the 2016 version, which took effect on January 1, 2017 (CCR, 2017). The State of California's noise insulation standards are codified in the CBC (Title 24, Part 2, Chapter 12) (CBC, 2017). These noise standards are for new construction in California for the purposes of interior compatibility with exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residences, schools, or hospitals, are near major transportation noises, and where such noise sources create an exterior noise level of 60 dBA Community Noise Level Equivalent (CNEL), or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

Based on the U.S. EPA Levels Document, standard buildings in warm climate areas would provide a 24 dBA exterior-to-interior noise attenuation with windows and doors closed, and 12 dBA noise attenuation with windows open. In order to meet the 45 dBA CNEL interior noise standard for residential uses, residences proposed within the impact zone of 57 dBA CNEL should be equipped with mechanical ventilation (e.g., air conditioning) to ensure that windows can remain closed for prolonged periods of time. For residences proposed within the impacts zone of 69 dBA CNEL, building façade upgrades (e.g., windows upgrades with sound transmission class ratings higher than the STC-28 standard building design would provide) would be required.

New residential units within the Project Sites would be potentially exposed to traffic noise levels in the Conditionally Acceptable or Normally Unacceptable zones, with traffic noise levels ranging from 60 to 75 dBA CNEL. All proposed new multifamily residential uses in the Project Sites will be required to prepare a detailed noise impact analysis as a part of their environmental review process. With the implementation of the Mitigation Measures **NOI-3** and **NOI-4**, the Project would comply with the requirements of the City's General Plan Noise Element and City's Municipal Code noise ordinance. Implementation of the future development and redevelopment of the Project would not result in the 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. As such, impacts would be less than significant.

### **Mitigation Measures**

**NOI-1: Construction Hours.** Construction activities occurring as part of the future development and redevelopment associated with the Project shall be subject to the limitations which states that construction activities may occur between 7:00 a.m. and

8:00 p.m. Mondays through Saturdays. No construction activities shall be permitted outside of these hours or on Sundays and federal holidays unless a temporary waiver is granted by the City.

**NOI-2: Construction Best Management Practices.** Prior to issuance of grading permits for future development and redevelopment associated with the Project, the Project Applicants shall incorporate the following measures as a note on the grading plan cover sheet to ensure that the greatest distance between noise sources and sensitive receptors during construction activities have been achieved.

- Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards.
- Construction staging areas shall be located away from off-site sensitive uses during project construction.
- The Project Contractors shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the Project Sites, whenever feasible.

**NOI-3: Building Design Noise Control Measures.** Design standards for proposed new multifamily residential uses within the Project Sites may include but are not limited to:

- Dwelling units that would be exposed to traffic noise levels exceeding 57 dBA CNEL: A form of fresh air supply, such as air conditioning systems, will be required.
- Dwelling units that would be exposed to traffic noise levels exceeding 65 dBA CNEL: Outdoor living areas such as balcony or deck on the side of the buildings exposed to high traffic noise should not be allowed unless noise mitigation measures, such as barrier walls with a minimum height of 5 feet with adequate materials (CMU, wood, Plexiglas) with no holes or gaps, along the perimeter of the outdoor living areas are included.
- Dwelling units that would be exposed to traffic noise levels exceeding 69 dBA CNEL: Windows associated with bedrooms and living/family rooms on the side of the buildings exposed to high traffic noise will be required to have building façade upgrades, such as using windows with Sound Transmission Class (STC) ratings higher than standard building practice (up to STC-28).

**NOI-4: Stationary Sources Noise Control Measures.** Due to the nature of mixed use overlay, some residences may be exposed to noise sources from the operations of the commercial uses nearby or down below. Such noise sources include loading/unloading activity and outdoor mechanical equipment and the following design standards are recommended.

- Loading areas associated with commercial uses within the Project Sites should be placed away from outdoor living areas associated with residential uses. Noise barriers with sufficient height to block the line-of-sight between the loading areas and outdoor living areas in proximity of the loading areas will be required.

- Stationary outdoor mechanical equipment should be placed away from residential outdoor living areas or be enclosed with a structure to minimize the potential noise impacts.
- All noise sources shall follow the City's Municipal Code noise control ordinance requirements.

b) **Generation of excessive groundborne vibration or groundborne noise levels?**

**Less than Significant with Mitigation Incorporated.**

**Construction**

As shown in **Table XIII-1**, *Construction Vibration Damage Criteria*, Federal Transportation Administration (FTA) guidelines show that a vibration level of up to 0.5 inch/sec peak particle velocity (PPV) (FTA, 2018) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 0.2 inch/sec PPV. The PPV values for human annoyance thresholds shown in **Table XIII-2**, *Caltrans Vibration Annoyance Potential Criteria*, which is taken from the *Transportation and Construction Vibration Guidance Manual* (Caltrans, 2020). **Table XII-3**, *Guidelines Vibration Damage Potential Threshold Criteria*, taken from the *Transportation and Construction Vibration Guidance Manual* (Caltrans, 2020), shows additional vibration damage thresholds for various buildings.

**TABLE XIII-1  
CONSTRUCTION VIBRATION DAMAGE CRITERIA**

<b>Building Category</b>	<b>PPV (inch/sec)</b>	<b>Approximate L<sub>v</sub><sup>a</sup></b>
Reinforced-concrete, steel or timber (no plaster)	0.50	102
Engineered concrete and masonry (no plaster)	0.30	98
Non-engineered timber and masonry buildings	0.20	94
Buildings extremely susceptible to vibration damage	0.12	90

NOTES:

PPV = peak particle velocity; L<sub>v</sub> = velocity in decibels; inch/sec = inches per second

<sup>a</sup> Root-mean-square velocity in decibels (VdB) re 1 microinch per second.

SOURCE: Federal Transit Administration. Table 12-3, *Transit Noise and Vibration Impact Assessment* (2008).



**TABLE XIII-2  
CALTRANS VIBRATION ANNOYANCE POTENTIAL CRITERIA**

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/ Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.1
Severe	2.0	0.4

NOTE: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

SOURCE: Caltrans, Transportation and Construction Vibration Guidance Manual. September 2020.

**TABLE XIII-3  
GUIDELINE VIBRATION DAMAGE POTENTIAL THRESHOLD CRITERIA**

Structure and Condition	Maximum PPV (inch/sec)	
	Transient Sources <sup>a</sup>	Continuous/Frequent Intermittent Sources <sup>b</sup>
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.20	0.10
Historic and some old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

NOTES:

PPV = peak particle velocity; inch/sec = inches per second

<sup>a</sup> Transient sources create a single, isolated vibration event, such as blasting or drop balls.

<sup>b</sup> Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

SOURCE: California Department of Transportation, *Transportation and Construction Vibration Guidance Manual* (Caltrans, 2020), Table 19.

Construction of the future development and redevelopment associated with the Project would be required to avoid causing structural damage to any buildings adjacent to the construction sites. Due to the proximity of potential sites within the Project Areas, there is the potential for structural damage impacts during construction activity. With implementation of Mitigation NOI-5, the Project would incorporate the construction vibration measures below as a note on the grading plan to ensure the greatest distance between vibration sources and sensitive receptors/buildings during construction have been achieved. As such, impacts would be less than significant in this regard.

**NOI-5: Construction Vibration Management Plan.** Prior to issuance of grading permits for future development and redevelopment associated with the Project, the Project Applicants shall incorporate the following measures as a note on the grading plan

cover sheet to ensure that the greatest distance between vibration sources and sensitive receptors/buildings during construction activities have been achieved.

- Construction on any individual Project Site that would result in vibration levels exceeding 0.5 in/sec PPV at adjacent buildings shall submit a Construction Vibration Management Plan to the City for approval and ensure that no building damages would occur as a result of construction of the Project.
- Construction on any individual Project Site that would result in vibration levels exceeding 0.04 in/sec PPV or 80 VdB shall submit a Construction Vibration Management Plan to the City for approval and ensure that human annoyance by Project construction vibration is reduced to the level considered less than distinctly perceptible by adjacent building occupants.

### **Operation**

Operation of future development and redevelopment associated with the Project would include typical residential and commercial- or light industrial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which could produce vibration. In addition, the primary sources of transient vibration would include vehicle circulation within designated parking areas. Groundborne vibration generated by each of the above-mentioned activities would generate approximately up to 0.005 in/sec PPV in the vicinity of these vibration sources,<sup>15</sup> which would not be substantial to cause building damage or human annoyance. As such, implementation of the Project would not generate substantial ground vibration and impacts would be less than significant. No mitigation is required during operations.

- 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.** Future development and redevelopment associated with the Project would not result in impacts relevant to airport land use plans, airports, or private airstrips as the Project is not located within the vicinity of a private airstrip, airport land use plan, or public or public use airport. The nearest airport to the Project Sites is Brackett Field Airport which is not located within two miles of the Project Sites. No impacts would occur in this regard.

### **References**

CBC, 2017. *California Building Code*, Title 24, Part 2, Chapter 12, January 1, 2017.

CCR, 2017. *California Code of Regulations*, Title 14, Section 15168(c), January 1, 2017.

Caltrans, 2013. California Department of Transportation, *Technical Noise Supplement (TeNS)*, September 2013.

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<sup>15</sup> This vibration estimate is based on data presented in the USDOT FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.

- Caltrans, 2020. California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, 2020.
- OPR, 2018. California Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, April 2018.
- Covina, 2000. City of Covina's General Plan, Noise Element, adopted April 18, 2000.
- Covina, 2022. City of Covina Municipal Code, passed January 18, 2022, <https://www.codepublishing.com/CA/Covina/>, accessed April 2022.
- Covina, 2020. City of Covina, Resolution CC 2020-56, to adopt Vehicle Miles Traveled Thresholds of Significance for the Purposes of Analyzing Transportation Impacts under the California Environmental Quality Act, June 2020.
- FHA, 2006. Federal Highway Administration, *Roadway Construction Noise Model User's Guide*, 2006.
- FTA, 2018. *Transit Noise and Vibration Impact Assessment Manual*, September 2018.
- USEPA, 1974. *EPA Identifies Noise Levels Affecting Health and Welfare*, April 1974.
- USEPA, 1978. Protective Noise Levels, Condensed Version of EPA Levels Document (EPA 550/9-79-100, November 1978).
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## Population and Housing

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING</b> —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 checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

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)?**

**Less than Significant Impact.** No development projects are currently proposed as part of the MUOD amendment; therefore, no direct impacts to population growth would be caused by the amendment. However, the proposed MUOD amendment would be expected to induce population growth in the City by allowing multi-family housing or mixed-use development within an area where new housing is not currently allowed. The proposed MUOD amendment is required by State law in order to create additional opportunities for housing development consistent with the RHNA and the RTP/SCS. If the City fails to adopt the MUOD, or other similar amendment to facilitate additional housing development commensurate with the RHNA, the City would be subject to sanctions and enforcement actions by HCD and the Attorney General including potential fines, litigation, and court-imposed zoning changes and development project approvals, as well as litigation from other interested parties. As such, impacts would be less than significant in this regard.

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

**Less Than Significant Impact.** The Project and the associated future development and redevelopment are located in 141 parcels within 13 Project Areas located throughout the City. The existing site conditions of the 13 Project Areas consist of developed lots generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. While residential uses are not permitted within the areas where the MUOD would be applied and there are no known dwelling units currently located on the Project Sites, a comprehensive survey of every parcel within the proposed MUOD area has not been conducted to confirm existing uses. Therefore, it is possible that one or more non-conforming residential uses may be present. California Government Code Sec. 66300 requires that any housing units

demolished as part of a housing development project must be replaced. The proposed MUOD regulations include a provision requiring conformance with this State requirement, which would avoid or substantially mitigate potential displacement of people or housing. Required compliance with existing State law would substantially reduce this impact to a level that is less than significant.

## References

- SCAG, 2020. Southern California Association of Governments. 2020–2045 RTP/SCS, Demographics & Growth Forecast. May 7, 2020.
- SCAG, 2021. 6<sup>th</sup> cycle Final RHNA Allocation Plan. March 4, 2021. <https://scag.ca.gov/rhna>, accessed May 2022.
- U.S. Census, 2021. United States Census Bureau, QuickFacts, Covina City, California. Population Estimates, July 1, 2021. <https://www.census.gov/quickfacts/covinacitycalifornia>, accessed April 2022.
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## Public Services

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>XV. PUBLIC SERVICES</b> —Would the Project:				
a) 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 following public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

Would the Project:

- a) **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 following public services:**
- i) **Fire Protection?**

**Less than Significant Impact.** Fire protection and emergency medical services for the City, including the Project Sites, are provided by the Los Angeles County Fire Department (LACFD), who is contracted with the City. The LACFD provides 24-hour, all-risk emergency services to a population of approximately 4.1 million residents living and working in 60 cities and all of the County's unincorporated communities in a service area of approximately 2,311 square miles. The LACFD is comprised of the Emergency Operations Bureau, the Business Operations Bureau, and the Leadership and Professional Standards Bureau. The emergency operations field divisions are comprised of the North Region, the Central Region, and the East Region within the LACFD service area, which are divided into nine divisions and 22 battalions (LACFD, 2021). The LACFD provides emergency services in response to a wide range of incidents including structure fires, wildfires, commercial fires, hazardous materials incidents, urban search and rescue, and swift water rescue. In 2020, the LACFD responded to a total of 379,517 incidents which included 307,025 emergency medical responses, 9,813 fire incidents (i.e., structures, vehicles, rubbish, brush/grass, outside storage, and miscellaneous property), and 62,679 other incidents (i.e., false alarms, mutual aid provided, hazardous materials, and miscellaneous incidents). In 2020, the LACFD lifeguard division responded to 26,103 incidents which included medical calls, ocean

rescues, missing persons, boat rescues/distress, oxygen therapy, and drownings. The LACFD consists of approximately 4,775 personnel including chief officers, captains, firefighter specialists, firefighter paramedics, firefighters, call firefighters, fire suppression aides, pilots, administrative support, lifeguards, dispatchers, foresters, and hazardous materials specialists. The LACFD is comprised of 177 fire stations with 228 engine companies (i.e., type I, type III, and type VI), 34 truck companies (i.e., quints and light forces), 112 paramedic units (i.e., squads, assessment engines, air squads, and assessment quint/light force), and reserve equipment. The lifeguard division includes 24 lifeguard stations, 159 lifeguard towers, 58 beach patrol vehicles, 8 rescue boats, 2 paramedic rescue boats, and 2 baywatch paramedic squads. The air and wildland division includes 10 helicopters, 9 fire suppression camps, 18 fire suppression crews, and 19 pieces of heavy equipment (i.e., excavators, heavy dump trucks, track loaders, and rubber tire loaders) (LACFD, 2020).

The City, including the Project Sites, are located within Division II of the East Region's emergency operations field division. Division II includes Battalions No. 2 and 16 and serves the cities of Azusa, Baldwin Park, Bradbury, Claremont, Covina, Duarte, Glendora, Irwindale, and San Dimas. Three LACFD fire stations provide fire protection and emergency medical services for the City, including the Project Sites: Fire Station No. 152, located at 807 Cypress Street, Covina; Fire Station No. 153, located at 1577 East Cypress Street, Covina; and Fire Station No. 154, located at 401 North Second Avenue, Covina (LACFD, 2020). The LACFD operates under a regional concept in its approach to providing fire protection and emergency medical services, wherein emergency response units are dispatched as needed to an incident anywhere in the LACFD's service territory based on distance and availability, without regard to jurisdictional or municipal boundaries.

## **Construction**

Construction activities for future development and redevelopment associated with the Project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of the Occupational Safety and Health Administration (OSHA), all construction managers and personnel would be trained in fire prevention and emergency response. Further, fire suppression equipment specific to construction would be maintained on the Project Sites. As applicable, construction activities of future development and redevelopment associated with the Project would be required to comply with the 2019 CBC and the 2019 CFC, of which the City has adopted as the City's Fire Code.

Construction activities for future development and redevelopment may involve temporary lane closures for curbside improvements (e.g., sidewalks, driveways, underground facilities and infrastructure). Construction-related traffic could result in increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Sites during construction. As such, construction activities could increase response times for emergency vehicles to local business and/or residences within the Project Areas, due to travel time delays to

through traffic. However, the impacts of such construction activity would be temporary and on an intermittent basis. Further, a Construction Management Plan for future development and redevelopment associated with the Project would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Sites and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. As a component of the Construction Management Plan, the times of day and locations of all temporary lane closures would be coordinated so that they do not occur during peak periods of traffic congestion, to the extent feasible. Truck routes for material and equipment deliveries, as well as for soil export and disposal, would require approval by the City's Public Works Department prior to construction activities. The Construction Management Plan would be prepared for review and approval prior to commencement of any construction activity. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic (i.e., lights and sirens), are expected to limit the potential for significant delays in emergency response times during construction of future development and redevelopment. Therefore, impacts regarding emergency response times and emergency access during construction of future development and redevelopment associated with the Project would be less than significant. No mitigation is required.

### ***Operation***

The Project consists of adding a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas. Future development and redevelopment associated with the Project would result in the potential for 1,360 additional dwelling units and commercial and general light industrial land uses. As discussed in Section XIV, *Population and Housing*, implementation of the Project would increase the residential population, temporary and permanent employment, and visitors in the City, which would increase the demand for fire protection and emergency medical services. As discussed above, three LACFD fire stations provide fire protection and emergency medical services for the City, including the Project Sites (LACFD, 2020). The LACFD operates under a regional concept in its approach to providing fire protection and emergency medical services, wherein emergency response units are dispatched as needed to an incident anywhere in the LACFD's service territory based on distance and availability, without regard to jurisdictional or municipal boundaries. Due to the close proximity of multiple fire stations to the Project Sites, service calls are anticipated to be responded to within LACFD's desired response times.

Future development and redevelopment associated with the Project would be subject to compliance with fire protection design standards, as necessary, per the 2019 CBC, 2019 CFC, and LACFD, to ensure adequate fire protection and emergency medical services. The LACFD's standard conditions of approval generally require that plans for building construction, fire flow requirements, fire protection devices (i.e., fire sprinklers and alarms), fire hydrants and spacing, fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the City and LACFD. It is anticipated that future development and redevelopment associated with the Project would be considered infill and/or redevelopment and would likely replace an existing building of similar type and intensity, thereby not substantially



altering the current land use intensity or land use patterns within the City. Further, improvement plans of future development and redevelopment would be subject to review and approval by the City and LACFD at the time such development is proposed. As such, impacts regarding fire protection and medical services would be less than significant. No mitigation is required.

ii) **Police Protection?**

**Less than Significant Impact.** Police protection services for the City, including the Project Sites, are provided by the Covina Police Department (CPD). The CPD is comprised of the Operations Division and the Police Support Services Division. The Operations Division is comprised of those divisions which provide the basic police function and is made up of patrol, service area policing, traffic unit, school resource officers, Covina Jail, helicopter support, special response team, and parking enforcement. The Administration Services Division supports the CPD and is comprised of investigations, police records, police communications, police administration, crime prevention, and animal control (CPD, 2022). The CPD police station is located at 444 North Citrus Avenue.

**Construction**

During construction activities for future development and redevelopment associated with the Project, equipment and building materials could be temporarily stored on-site, which could result in theft, graffiti, and vandalism. However, the Project Sites are located in areas with high vehicular activity from adjacent roadways. In addition, future construction sites would be fenced along the perimeter, with the height and fence materials subject to review and approval by the City's Public Works Department. As discussed above, temporary lane closures may be required for curbside improvements (e.g., sidewalks, driveways, underground facilities and infrastructure). However, these closures would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the Project Sites would be maintained. Further, as discussed above, a Construction Management Plan for future development and redevelopment associated with the Project would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Sites and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. Emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Given the visibility of the Project Sites from adjacent roadways and surrounding properties, existing CPD presence in the City, maintained emergency access, and construction fencing, the Project is not expected to increase demand on existing police services to a meaningful extent. As such, future development and redevelopment associated with the Project would have a less than significant temporary impact on police protection during the construction phases. No mitigation is required.

**Operation**

The Project consists of adding a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas. Future development and redevelopment associated with the Project would result in the potential for 1,360 additional

dwelling units and commercial and general light industrial land uses. As discussed in Section XIV, *Population and Housing*, implementation of the Project would increase the residential population, temporary and permanent employment, and visitors in the City, which would increase the demand for police protection. With future development and redevelopment on the Project Sites, patrol routes in the Project Areas would be slightly modified to include the Project Sites, as necessary. It is expected that future development and redevelopment would incorporate typical defensible design techniques, such as lighting of entry-ways and public areas, landscaping, and open fencing designed to minimize dead spaces hidden from public view. Defensible design techniques would help prevent loitering and crime, thereby lessening the demand for police protection services associated with future development and redevelopment. To ensure that police protection considerations are incorporated into the Project design, prior to issuance of building permits for future development and redevelopment, the CPD would be provided the opportunity to review and comment upon improvement plans in order to facilitate opportunities for improved emergency access and response; ensure the consideration of design strategies that facilitate public safety and police surveillance; and other specific design recommendations to enhance public safety and reduce potential demands upon police protection services. It is anticipated that future development and redevelopment associated with the Project would be considered infill and/or redevelopment and would likely replace an existing building of similar type and intensity, thereby not substantially altering the current land use intensity or land use patterns within the City. Further, improvement plans of future development and redevelopment would be subject to review and approval by the City and CPD at the time such development is proposed. As such, impacts regarding police protection services would be less than significant. No mitigation is required.

iii) **Schools?**

**Less than Significant Impact.** The City and Project Sites are served by the Covina Valley Unified School District (CVUSD). There are 5 schools within the City limits that are within close proximity (i.e., 0.25 mile) of one of the Project Sites. The name of the school, the address, and the distance from the Project Sites are listed below.

- Covina Elementary School – 160 Barranca Avenue, immediately adjacent to the south of Area I;
- Barranca Elementary School – 727 S. Barranca Avenue, approximately 0.10 miles south of Area G;
- Northview High School – 1016 Cypress Street, approximately 0.18 miles northwest of Area K;
- Cypress Elementary School – 351 Cypress Street, approximately 0.20 miles west of Area D; and
- Fairvalley High School – 758 W. Grondahl Street, approximately 0.25 miles southeast of Area C.

The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause new schools to be constructed. As discussed in Section XIV, *Population and Housing*, the potential for 1,360 additional dwelling units associated with the Project could potentially result in approximately 4,216 additional residents in

the City, assuming that all residents of the Project would relocate to the City. Employment increases have the potential to generate indirect population growth, as they may draw additional persons and their households to the City. The MUOD applies on an as-requested, project-by-project basis. As such, the estimated indirect residential population generated from future commercial and industrial development and redevelopment has not been determined as specific commercial and industrial projects have not been proposed and submitted to the City. Using the State of California Student Yield Factor for Unified School Districts, which is 0.7 students per dwelling unit, future development and redevelopment associated with the Project would generate approximately 952<sup>16</sup> new students within the CVUSD (California, 2008). The Project and associated future development and redevelopment are located in 141 parcels within 13 Project Areas located throughout the City. As such, the Project Sites would be served by different school facilities, which would lessen the number of students that each school would support. Pursuant to Education Code Section 17620 and California Government Code Section 65995, development impact fees may be levied for residential, commercial, and industrial construction. Further, as stated in California Government Code Section 65996, payment of school impact fees in accordance with California Government Code Section 65995 and/or Education Code Section 17620 is deemed to constitute full and complete mitigation for potential impacts to schools caused by development. As such, impacts regarding schools would be less than significant. No mitigation is required.

#### iv) **Parks?**

**Less than Significant Impact.** The residents, temporary and permanent employees, and visitors generated from future development and redevelopment of the Project could use nearby park facilities. The City's park system consists of nine parks and two ball fields. The City owns seven of nine parks, two parks are leased from the CVUSD, and recreational activities in the ball fields are conducted under leases with the Charter Oak Unified School District (COUSD). The parks in the City vary in size and facilities from the Three Oak Park, a 0.2-acre passive area oriented for employees of an adjacent office park in the southeastern portion of the City, to Wingate Park, a 16-acre park which contains ball fields, basketball courts, tennis courts, a roller rink, trails and picnic areas in the eastern portion of the City. Covina Park, a 10-acre multi-amenity facility located west of the City's downtown, is the City's oldest and most heavily used park. Additionally, the 11-acre Walnut Creek Regional Park, which is owned and operated by the County, lies within the City limits. At the time of adoption of the City's General Plan, 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 (Covina, 2000). While the City is currently deficient in parkland acreage, implementation of the Project would not substantially exacerbate this issue. The Project and associated future development and redevelopment are located in 141 parcels within 13 Project Areas located throughout the City. As such, the Project Sites would be served by different parks, which would lessen the number of residents, temporary and permanent employees, and visitors that each park facility would support. Further, Project Applicants of future development and redevelopment associated with the Project would be required to pay development fees that would

<sup>16</sup> 1,360 dwelling units x 0.7 students per dwelling unit = 952 new students.

help support park facilities. Payment of fees would help address any incremental increase in demand for parks facilities that may be caused by future development and redevelopment. As such, impacts regarding parks would be less than significant. No mitigation is required.

v) **Other public facilities?**

**Less than Significant Impact.** Library services within the City are provided by the Covina Public Library (CPL), located at 234 North Second Avenue. The residents, temporary and permanent employees, and visitors generated from the future development and redevelopment of the Project could use the City's library facilities and services, but the increase in use would not be significant relevant to the Citywide demand. Further, Project Applicants of future development and redevelopment associated with the Project would be required to pay development fees that would help support library facilities and services. As such, impacts regarding libraries would be less than significant.

The residents, temporary and permanent employees, and visitors generated from the future development and redevelopment associated with the Project would utilize and, to some extent, impact the maintenance of public facilities, including roads. However, it is not anticipated that development of the Project would significantly increase the use of government services beyond current levels. Construction activities would result in temporary increased use of the surrounding roads. However, the use of such facilities would not require maintenance beyond normal requirements. The Project Applicants of future development and redevelopment associated with the Project would be required to pay all applicable impact fees of the City. Overall, less than significant impacts to governmental services, including roads, would occur. No mitigation is required.

## References

- Covina, 2000. City of Covina's General Plan, Natural Resources and Open Space Element, adopted April 18, 2000.
- CPD, 2022. City of Covina Police Department Website. Police Operations Division Website, <https://covinapd.org/> and <https://covinapd.org/services/>, accessed April 2022.
- LACFD, 2021. Los Angeles County Fire Department Overview Booklet, August 2021, [https://fire.lacounty.gov/wp-content/uploads/2021/09/Department-Overview-Booklet\\_single-pages\\_9.09.21-A.pdf](https://fire.lacounty.gov/wp-content/uploads/2021/09/Department-Overview-Booklet_single-pages_9.09.21-A.pdf), accessed April 2022.
- LACFD, 2020. Los Angeles County Fire Department 2020 Statistical Summary, <https://fire.lacounty.gov/wp-content/uploads/2021/06/2020-Statistical-Summary-FINAL-DRAFT.pdf>, accessed April 2022.
- State of California Enrollment Certification/Projection School Facility Program, revised June 2008, <https://www.dgsapps.dgs.ca.gov/OPSC/ab1014/sab50-01instructions.pdf>, accessed April 2018.
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## Recreation

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

## Discussion

Would the Project:

- a) **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 residents, temporary and permanent employees, and visitors generated from future development and redevelopment of the Project could use nearby park and recreational facilities. The City's park system consists of nine parks and two ball fields. Additionally, the 11-acre Walnut Creek Regional Park, which is owned and operated by the County, lies within the City limits. The City has a limited trail-related network that supplements the park system, include a few streets that are designated as bicycle ways and two equestrian/hiking trails that run through the City. As discussed under Section XV, *Public Services*, at the time of adoption of the City's General Plan, 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. As such, the City is currently deficient in parkland acreage (Covina, 2000). The Project and associated future development and redevelopment are located in 141 parcels within 13 Project Areas located throughout the City. As such, the Project Sites would be served by different parks and recreational facilities, which would lessen the number of residents, temporary and permanent employees, and visitors that each park and recreational facility would support. Further, Project Applicants of future development and redevelopment associated with the Project would be required to pay development fees that would help support parks and recreational facilities. Payment of fees would help address any incremental increase in demand for parks and recreational facilities that may be caused by future development and redevelopment. As such, impacts regarding recreational facilities 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?**

**No Impact.** The Project consists of adding a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas. Future development and redevelopment associated with the Project would result in the potential for 1,360 additional dwelling units and commercial and general light industrial land uses. The future development and redevelopment does not include recreational facilities and does not require the construction or expansion of recreational facilities. As such, no impacts would occur in this regard.

## References

Covina, 2000. City of Covina's General Plan, Natural Resources and Open Space Element, adopted April 18, 2000.

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## Transportation

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>XVII. TRANSPORTATION</b> —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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

The following analysis is based on the *Transportation Assessment Report: Covina Mixed-Use Overlay District* (Transportation Assessment) (LLG, 2022), located in **Appendix D**, of this Draft IS/MND. The Transportation Assessment was conducted following the City's *Transportation Study Guidelines* (Guidelines) (Covina, 2020), which are focused on transportation metrics that promote: the reduction of greenhouse gas emissions, the development of multimodal networks and access to diverse land uses, as well as safety, sustainability and smart growth. In compliance with CEQA, the Guidelines identify VMT as the primary metric for evaluating a project's transportation impacts.

Would the Project:

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

**Less than Significant Impact.** The Project Sites are located in the City within the San Gabriel Valley of the County of Los Angeles. Regional access to the Project Sites is provided via I-210 Freeway to the north, I-10 Freeway to the south, and South Azusa Avenue/California State SR-39 to the east of Project Areas L, K, and M and to the west for the remainder of the Project Areas. Local access to/from the Project Areas is provided via various local, collector, and secondary and primary arterial roadways throughout the City.

If implemented, the Project would apply on an as-requested, project-by-project basis, to General Commercial (GC) and General Industrial (GI) General Plan designations. As such, the construction schedule and activities associated with the future development and redevelopment of the Project Sites is indeterminate at this time, until specific projects are proposed and the Project Applicants have submitted entitlement applications to the City for review. The City's Municipal Code currently limits construction hours to no earlier than 7:00 A.M. and no later than 5:00 P.M., on Monday through Friday, except on Sundays and federal holidays. Construction on Saturdays would require pre-approval by the City Engineer (Covina, 2022).

During the construction period, construction vehicles would use the roadways that surround the Project Sites to deliver materials and haul waste. Workers' vehicles and construction vehicles could access the Project Sites from any of the regional facilities described above, as well as various local, collector, and secondary and primary arterial roadways throughout the City. Roadway users could experience temporary delays from material deliveries, but these delays would be both brief and infrequent. Therefore, they would not affect overall traffic circulation in the vicinity of the Project Sites. Construction staging would generally occur on-site and would not affect traffic operations on adjacent roadways. Construction activities would not impede non-motorized travel or public transportation in the vicinity of the Project Sites. The Project could, however, require temporary sidewalk and/or lane closures along roadways adjacent to the Project Sites while curbside improvements are being made (e.g., sidewalks, driveways, underground facilities and infrastructure). However, through-access for vehicles, bicycles, and pedestrians along all roadways will still be provided. In these instances, the construction contractors of future development and redevelopment associated with the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) consistent with required City encroachment permit(s) to maintain flow and access. Any delays would be temporary and would be considered to be less than significant.

The Project would not conflict with any applicable plans, ordinances, or policies establishing measures for effectiveness of the performance of the circulation system, such as the Covina General Plan Mobility Element (Covina, 2000) or the City of Covina Bicycle Master Plan (Covina, 2011). Consistent with the City's requirements, trip generation for the Project was calculated using the Institute of Transportation Engineers' (ITE) Trip Generation Manual (ITE, 2021). As detailed in the Transportation Assessment (**Appendix D**, of this Draft IS/MND), future development and redevelopment associated with the Project is expected to generate 504 vehicle trips during the weekday AM peak hour and 529 vehicle trips during the weekday PM peak hour. The above trip generation forecast is considered to be very conservative, in that no specific vehicle trip generation credits were applied to the forecast to account for existing and occupied land uses that may be demolished as part of any future entitlement application. Considering that these vehicle trips would be spread across a vast geographic area representing all 13 Project Areas, future development and redevelopment associated with the Project is not expected to substantially degrade traffic operations or roadways in the Project vicinity, nor would it impede non-motorized travel or public transportation. As such, impacts would be less than significant.

Based on the above discussion, the Project would not conflict with adopted policies, plans, or programs addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. As mentioned above, the Project would not impede travel in the vicinity of the Project Sites, and would not decrease the performance or safety of such facilities. As a result, impacts would be less than significant. No mitigation is required.

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

**Less than Significant Impact.** Based on the City's adoption of Resolution CC 2020-56 and the City's new guidelines regarding the VMT thresholds of significance for the purposes of analyzing



transportation impacts under CEQA, the Project's VMT is evaluated herein against these thresholds. These thresholds are also consistent with the recommended screening criteria contained in the State of California Governor's Office of Planning and Research (OPR)'s 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR, 2018).

The City's Guidelines have established screening criteria pertaining to project trip generation forecasts, project land use types (i.e., local serving retail, affordable housing, etc.), proximity to transit, and locality within a low VMT-generating area. The City's Guidelines provide the following three (3) types of potential screening criteria that may be applied to screen projects from project-level assessment: Transit Priority Areas Screening, Low VMT-generating Areas Screening, and Project Type Screening, all of which are described in detail in the Transportation Assessment (**Appendix D**, of this Draft IS/MND). Ten of the 13 Project Areas qualify for screening under one or more of the screening criteria described above, meaning that a less than significant impact to VMT can be assumed without further analysis. For the three Project Areas that do not qualify for screening (Area F, Area G, and Area J), further analysis was required, as described below.

As outlined in the City's Guidelines, a project would result in a significant project-generated VMT impact if either of the following conditions are satisfied:

1. The baseline project-generated VMT per service population exceeds the 15 percent below the San Gabriel Valley Council of Governments (SGVCOG) Southeast subarea baseline VMT per service population, or
2. The cumulative project-generated VMT per service population exceeds 15 percent below the SGVCOG Southeast subarea baseline VMT per service population

The VMT expected to be generated by each of the 13 Project Areas was forecast using the SGVCOG VMT Evaluation Tool. As noted above, 10 of the 13 Project Areas screen out from a full VMT assessment. After applying the Increase Density TDM Measure (described below), the remaining three Project Areas would result in VMT per capita that is below the City's threshold of 15 percent below the SGVCOG Southeast subarea baseline VMT per service population, as calculated by the SGVCOG VMT Evaluation Tool:

- Increase Residential Density (T-1): This measure accounts for the VMT reduction achieved by a project that is designed with a higher density of dwelling units (du) compared to the average residential density in the U.S. Increased densities affect the distance people travel and provide greater options for the mode of travel they choose. Increasing residential density results in shorter and fewer trips by single-occupancy vehicles and thus a reduction in GHG emissions.

Therefore, the Project is presumed to result in a less than significant transportation impact. The detailed SGVCOG VMT Evaluation Tool reports for each Project Area are contained in Appendix A of the Transportation Assessment (**Appendix D**, of this Draft IS/MND).

Long-term, or cumulative, effects of the Project on VMT were determined through a consistency check with the SCAG's RTP/SCS. The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction

targets. As such, projects that are consistent with this plan in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG reduction goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, as noted in the City's Guidelines, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita, VMT per employee, or VMT per service population) in the impact analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS. Therefore, no cumulative VMT impacts are anticipated. A less than significant impact would occur in this regard. No mitigation is required.

c) **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.** While it is expected that the majority of construction activities for future development and redevelopment associated with the Project would be mostly confined on-site, construction activities could encroach into the public right-of-way along roadways adjacent to the Project Sites while curbside improvements are being made (e.g., sidewalks, driveways, underground facilities and infrastructure). In addition, slow-moving and large construction vehicles may be present in and around the Project Sites, which could reduce visibility and increase roadway congestion for other roadway users. However, in accordance with the City's Public Works Department, construction contractors would develop a Construction Management Plan, subject to City review and approval, that would ensure that safe travel conditions are maintained for vehicles, bicycles, pedestrians, and transit vehicles. Therefore, construction of the Project would not introduce any geometric design features or incompatible uses, and this impact would be less than significant.

Future development and redevelopment associated with the Project would not make any modifications to the public roadway network, as all development would occur within existing parcels. Conceptual on-site circulation for the 141 parcels within 13 Project Areas that could be developed with implementation of the Project have not yet been developed. As detailed on-site circulation designs are developed, any new or reconfigured driveways and internal circulation would need to comply with the City's Engineering Standards, which include design specifications to ensure safe and efficient travel of vehicles, bicycles, pedestrians, and transit vehicles. Therefore, the Project would not introduce any geometric design features or incompatible uses, and this impact would be less than significant. No mitigation is required.

d) **Result in inadequate emergency access?**

**Less than Significant Impact.** The Project Sites are located in an established urban area that is well served by the surrounding roadway network. While it is expected that the majority of construction activities associated with future development and redevelopment associated with the Project would be mostly confined on-site, construction activities may involve temporary lane

closures along roadways adjacent to the Project Sites while curbside improvements are being made (e.g., sidewalks, driveways, underground facilities and infrastructure). However, through-access for drivers, including emergency personnel, along all roadways will still be provided. In these instances, the construction contractors of future development and redevelopment associated with the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) consistent with required City encroachment permit(s) to maintain flow and access. Furthermore, in accordance with the City's Public Works Department, construction contractors would develop a Construction Management Plan, subject to City review and approval, that includes designation of a haul routes to ensure that adequate emergency access is maintained during construction. Therefore, construction of the Project is not expected to result in inadequate emergency access, and a less than significant construction impact would occur.

With respect to operation of the Project, the LACFD, which provides fire and paramedic services for the City, and other relevant City departments would review the final design and on-site circulation of future development and redevelopment associated with the Project, to ensure that there is adequate emergency access. Therefore, operation of the Project is not expected to result in inadequate emergency access, and a less than significant construction impact would occur. No mitigation is required.

## References

- Covina, 2000. City of Covina, Covina General Plan Circulation Element, April 2000.
- Covina, 2011. City of Covina, City of Covina Bicycle Master Plan, September 2011.
- Covina, 2020. City of Covina, Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service (LOS) Assessment, October 2020.
- Covina, 2022. City of Covina Municipal Code, passed January 18, 2022, <https://www.codepublishing.com/CA/Covina/>, accessed April 2022.
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- ITE, 2021. Institute of Transportation Engineer's Trip Generation Manual, 2021.
- OPR, 2018. California Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, April 2018.
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## Tribal Cultural Resources

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

## Discussion

Would the Project:

- a) **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or**
- 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**No Impact (ai–aii).** The California NAHC, which maintains a confidential SLF containing sites of traditional, cultural, or religious value to the Native American community, was contacted on October 21, 2021, to request a search of the SLF. The NAHC indicated that the results of the SLF search were positive, but did not provide details on the resource(s) identified within the Project Sites. The NAHC recommended that the Gabrieleno Band of Mission Indians – Kizh Nation be

contacted for additional information. No additional information is available regarding the nature or location of the sacred land on file at the NAHC. The City conducted consultation with California Native American tribes pursuant to AB 52 to identify tribal cultural resources in or near the Project Sites (see **Appendix E**, of this Draft IS/MND).

On March 29, 2022, the City sent notification letters via email to the designated representative of one California Native American tribe (Gabrieleno Band of Mission Indians – Kizh Nation). The letter provided brief descriptions of the Project and its locations, with maps, the lead agency's contact information, and a notification that the tribe has 30 days to request consultation pursuant to Public Resources Code section 21080.3.1.

In an email dated March 31, 2022, the Gabrieleño Band of Mission Indians-Kizh Nation asked the City if ground disturbance was planned as part future development and redevelopment associated with the Project. On April 4, 2022, the City indicated that no ground disturbance was proposed, and as a result, the Gabrieleño Band of Mission Indians-Kizh Nation stated that there was no need for consultation. However, the tribe asked to be notified in the future if ground disturbance is proposed. As no tribal cultural resources were identified, the Project would have no impact on tribal cultural resources. Nevertheless, future development and redevelopment associated with the Project would be required to comply with applicable federal, state, and local regulations and, as appropriate, to undergo the City's discretionary review process, including completion of subsequent project-level planning and environmental review under CEQA. These projects would similarly require compliance with AB 52 to ensure that tribal cultural resources are properly identified.

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## Utilities and Service Systems

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS</b> —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 checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

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?**

**Less than Significant Impact.** The Project consists of adding a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas. As discussed in Section XIV, *Population and Housing*, the potential for 1,360 additional dwelling units associated with the Project could potentially result in approximately 4,216 additional residents in the City, assuming that all residents of the Project would relocate to the City. Employment increases have the potential to generate indirect population growth, as they may draw additional persons and their households to the City. The MUOD applies on an as-requested, project-by-project basis. As such, the estimated indirect residential population generated from future commercial and industrial development and redevelopment associated with the Project has not been determined as specific commercial and industrial projects have not been proposed and submitted to the City. As such, implementation of the Project would result in increased water demand, wastewater generation, storm water drainage, electricity usage, natural gas usage, and demand for telecommunication services. However, due to the presence of existing infrastructure within the vicinity of the Project Sites, construction or relocation of facilities and services is not anticipated as further detailed below.

## **Water**

Water service is provided to the Project Site through the CIC, which obtains water from the Main San Gabriel Groundwater Basin and from the San Gabriel River (Covina, 2022). The City's water supply sources include purchased treated local groundwater and treated surface water from the CIC and imported surface water supplies from the Three Valleys Municipal Water District, which is water that is imported by the Metropolitan Water District (MWD) of Southern California (Covina, 2022).

During construction of future development and redevelopment, there would be a temporary, intermittent demand for water for such activities as soil watering for site preparation, fugitive dust control, concrete preparation, cleanup, and other short-term activities. Construction-related water usage is not expected to have an adverse impact on available water supplies or the existing water distribution system.

Future development and redevelopment associated with the Project would involve the connection of new on-site water lines with surrounding existing infrastructure. However, due to the presence of existing infrastructure within the vicinity of the Project Sites, relocation or construction of water facilities and services is not anticipated. Implementation of future development and redevelopment associated with the Project could increase the intensity of uses on the Project Sites, resulting in increased water demand when compared to existing conditions of the Project Sites. According to the City's 2015 Urban Water Management Plan (UWMP), the reliable quantities of projected water supply for Year 2025 is 5,762 acre-feet (AF) per year; Year 2030 is 5,821 AF; Year 2035 is 5,800 AF; and Year 2040 is 5,940 AF (Covina, 2017). Because the exact nature, location, and operation of future development and redevelopment associated with the Project are unknown, quantification of water consumption would not be feasible and would be too speculative. However, it is anticipated that the estimated water consumption of future development and redevelopment associated with the Project would be within the CIC's future projected water supply and would not, therefore, significantly impact existing and future water service. Further, the Project would comply with CALGreen, which requires water-efficient appliances and fixtures, thereby ensuring efficient use of water at the Project Sites. Lastly, the Project Applicants would be required to pay water connection fees. The CIC would use these fees, at least in part, to fund projects and programs necessary to meet the regulatory obligation with respect to treatment requirements, treatment capacity, and supply reliability. As such, the Project not require or result in the construction or expansion of water facilities. Impact would be less than significant in this regard. No mitigation is required.

## **Wastewater**

Wastewater service is provided to the Project Site by the Sanitation Districts of Los Angeles County (LACSD) (Covina, 2017). During construction of the Project, a negligible amount of wastewater would be generated by construction workers. It is anticipated that portable toilets would be provided by a private company and the waste disposed off-site. Wastewater generation from construction activities is not anticipated to cause a measureable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Future development and redevelopment associated with the Project would tie into existing sewer lines surrounding the Project Sites. However, due to the presence of existing infrastructure within the vicinity of the Project Sites, relocation or construction of wastewater facilities and services is not anticipated. Implementation of future development and redevelopment associated with the Project could increase the intensity of uses on the Project Sites, resulting in increased demand for wastewater treatment services when compared to existing conditions of the Project Sites. The Project would deliver sewage into the City's sewer collection system, which is operated and maintained by the City's Public Works Department and treated by LACSD. The water reclamation plants serving the City include the San Jose Creek Water Reclamation Plant (SJCWRP) and the Joint Water Pollution Control Plant. The SJCWRP has the capacity to provide tertiary treatment for approximately 100 million gallons per day (MGD) and serves an estimated population of one million persons (LACSD, 2022a). The Joint Water Pollution Control Plant currently has the capacity to provide primary and secondary treatment for approximately 400 MGD of wastewater and serves an estimated population of 4.8 million persons (LACSD, 2022b). Because the exact nature, location, and operation of future development and redevelopment associated with the Project are unknown, quantification of wastewater generation would not be feasible and would be too speculative. However, based on the capacities of the SJCWRP and the Joint Water Pollution Control Plant, it is anticipated the wastewater generated by the future development and redevelopment associated with the Project would be minimal. As such, the Project would not exceed current capacities of the wastewater treatment system and would not significantly impact existing wastewater treatment systems such that new facilities would be required. Further, the Project Applicants would be required to pay sewer connection fees. The providers would use these fees, at least in part, to fund projects and programs necessary to meet their regulatory obligation with respect to treatment requirements and treatment capacity. As such, the Project not require or result in the construction or expansion of wastewater facilities. Impact would be less than significant in this regard. No mitigation is required.

### ***Stormwater***

Stormwater runoff is collected through existing inlets, catchment basins and underground storm drains that are maintained either privately or by the City (LARWQCB, 2014). Construction of future development and redevelopment associated with the Project would result in ground surface disruption during typical construction activities such as demolition, site preparation, and grading and excavation. However, compliance with project-specific erosion and sediment control plans that are required per the City's Stormwater Quality and Urban Runoff Control Ordinance would ensure that stormwater runoff is minimized during construction, the extent feasible. Further, consistent with the requirements of the LA County NPDES, a SWPPP would be prepared that incorporates BMPs set forth in the project specific erosion and sediment control plans that would ensure a less than significant impact would occur to stormwater drainage infrastructure during construction.

As discussed in Section X, *Hydrology and Water Quality*, it is anticipated that the drainage patterns of the Project Sites would not substantially change relative to existing conditions. The City would design and construct new facilities to capture and convey stormwater runoff and pollution in accordance with the existing LA County NPDES permits and the new MUOD Special Development Regulations Chapter. Permits to connect to existing storm drainage systems



would be required to obtain prior to construction. All drainage plans are subject to City review and approval. In accordance with the LA County NPDES and the City's Stormwater Quality and Urban Runoff Control Ordinance, the Project Applicants would be required to prepare and comply with a Low Impact Development (LID) Plan. Compliance with the City's Stormwater Quality and Urban Runoff Control Ordinance would reduce the peak volume of stormwater runoff discharged into the City's storm drain system and would ensure that stormwater is retained on-site, to the extent feasible. As such, future development and redevelopment of the Project would not require the construction or expansion of off-site stormwater drainage facilities. As such, impacts would be less than significant in this regard. No mitigation is required.

### ***Electric Power***

As discussed in Section VI, *Energy*, future development and redevelopment associated with the Project would be serviced by SCE. The electricity used for construction activities would be temporary and minimal; it would be within the supply and infrastructure service capabilities of SCE and it would not require additional local or regional capacity. The Project Sites would connect to the existing power grid. New electrical connections to the Project Sites would be install via undergrounded lines. Although future development and redevelopment would require new electrical line tie-ins for service, Project implementation would not result in the need for new electrical substations or electrical generating facilities. SCE conditions of approval would apply to the Project. As such, a less than significant impact would occur in this regard. No mitigation is required.

### ***Natural Gas***

As discussed in Section VI, *Energy*, SoCalGas would provide natural gas services to the Project Sites. The majority of the gas supply is transported via transmission pipelines owned by private companies. The Project Sites would utilize the existing SoCalGas distribution grid to service future development and redevelopment. All new connections and service installation would be reviewed and approved by SoCalGas and City's Public Works Department. Any use of natural gas is anticipated to be sufficiently served by existing supply from SoCalGas and would not require additional local or regional capacity. Although future development and redevelopment would require new natural gas service connections, Project implementation would not result in the need for new natural gas supplies or infrastructure. As such, a less than significant impact would occur in this regard. No mitigation is required.

### ***Telecommunication Facilities***

The Project Sites are supported by telecommunication services from a variety of providers. Spectrum provides residential and business services throughout the City. Fiber optic cables and high-speed connection services from wireless providers such as Spectrum are available to service the Project Sites. The Project Sites would be required to comply with all Federal, State and local regulations for installation and wiring of telecommunications to future development and redevelopment associated with the Project. With adherence to existing City and State electrical, building and safety code requirements, Project implementation would have a less than significant impact. No mitigation is required.

b) **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 discussed in Section XIX(a), water service is provided to the Project Site through the CIC, which obtains water from the Main San Gabriel Groundwater Basin and from the San Gabriel River (Covina, 2022). The City's water supply sources include purchased treated local groundwater and treated surface water from the CIC and imported surface water supplies from the Three Valleys Municipal Water District, which is water that is imported by the MWD of Southern California (Covina, 2022). According to the City's 2015 Urban Water Management Plan (UWMP), the reliable quantities of projected normal year water supply for Year 2025 is 5,762 AF per year; Year 2030 is 5,821 AF; Year 2035 is 5,800 AF; and Year 2040 is 5,940 AF. The projected single dry year water supply for Year 2025 is 5,506 AF per year; Year 2030 is 5,562 AF per year; Year 2035 is 5,618 AF per year; and Year 2040 is 5,676 AF per year. The projected multiple dry year water supply for Year 2025 is 5,506 AF per year for the first year, 5,734 AF per year for the second year, and 5,751 AF per year for the third year; Year 2030 is 5,562 AF per year for the first year, 5,792 AF per year for the second year, and 5,809 AF per year for the third year; Year 2035 is 5,618 AF per year for the first year, 5,851 AF per year for the second year, and 5,868 AF per year for the third year; and Year 2040 is 5,676 AF per year for the first year, 5,911 AF per year for the second year, and 5,928 AF per year for the third year (Covina, 2017). Because the exact nature, location, and operation of future development and redevelopment associated with the Project are unknown, quantification of water consumption would not be feasible and would be too speculative. However, it is anticipated that the estimated water consumption of future development and redevelopment associated with the Project would be within the CIC's future projected water supply for normal, dry, and multiple dry years. Further, the Project would comply with CALGreen, which requires water-efficient appliances and fixtures, thereby ensuring efficient use of water at the Project Sites. Lastly, the Project Applicants would be required to pay water connection fees. The CIC would use these fees, at least in part, to fund projects and programs necessary to meet the regulatory obligation with respect to treatment requirements, treatment capacity, and supply reliability. As such, a less than significant impact would occur in this regard. No mitigation is required.

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?**

**Less than Significant Impact.** As discussed in Section XIX(b), the Project would deliver sewage into the City's sewer collection system, which is operated and maintained by the City's Public Works Department and treated by LACSD. The water reclamation plants serving the City include SJCWRP and the Joint Water Pollution Control Plant. The SJCWRP has the capacity to provide tertiary treatment for approximately 100 MGD (LACSD, 2022a). The Joint Water Pollution Control Plant currently has the capacity to provide primary and secondary treatment for approximately 400 MGD of wastewater (LACSD, 2022b). Because the exact nature, location, and operation of future development and redevelopment associated with the Project are unknown, quantification of wastewater generation would not be feasible and would be too speculative. However, based on the capacities of the SJCWRP and the Joint Water Pollution Control Plant, it

is anticipated the wastewater generated by the future development and redevelopment associated with the Project would be minimal and would not exceed current capacities of these wastewater plants. As such, impacts would be less than significant in this regard. No mitigation is required.

- 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?**

**Less than Significant Impact.** Construction activities associated with future development and redevelopment of the Project would generate minor amounts of solid waste. The City's Construction and Demolition Debris Management Program requires 75 percent of all construction waste materials be recycled. The City maintains an exclusive franchise agreement with Athens Services to carry out the City's Construction and Demolition Diversion Program for construction contractor (Covina, 2022b). The City's requirement of 75 percent construction waste diversion rate would reduce solid waste from construction associated with the future development and redevelopment associated with the Project. The remaining 25 percent of construction materials that are not required to be recycled would either be disposed of or voluntarily recycled at a solid waste facility with available capacity. 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.

Future development and redevelopment would produce solid waste on a regular basis, in association with operation and maintenance activities. As discussed above, solid waste generated by the Project would be collected by Athens Services and transported to a local or regional landfill. Athens Services uses regional landfills in both Los Angeles County and San Bernardino County to dispose of waste from its collection, transfer, and disposal services. The Los Angeles County landfills have an estimated remaining permitted capacity of 142.67 million tons (County of Los Angeles, 2020). The remaining life of Los Angeles County landfills ranges from approximately 8 years for the Pebbly Beach Landfill to 35 years for the Savage Canyon Landfills (County of Los Angeles, 2020). San Bernardino County landfills have an estimated remaining capacity of 164,209,140 tons (County of San Bernardino, 2018). The remaining life of the San Bernardino County landfills is over 15 years (County of San Bernardino, 2018). Because the exact nature, location, and operation of future development and redevelopment associated with the Project are unknown, quantification of solid waste generation would not be feasible and would be too speculative. It is anticipated that solid waste generated by future development and redevelopment associated with the Project each year would be negligible relative to the remaining permitted capacity of both County landfills. As such, a less than significant impact would occur in this regard. No mitigation is required.

- e) **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Less than Significant Impact.** All local governments, including the City, are required under Assembly Bill 939 (AB 939), the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to

landfills. The Project Applicants of future development and redevelopment associated with the Project are required to comply with all local, state, and federal requirements for integrated waste management (i.e., recycling, green waste) and solid waste disposal. Specifically, all future development and redevelopment would require to comply with the City's Recycling and Waste Handling Requirement for construction and demolition debris, which requires at least 75 percent of all building and demolition materials to be recycled (Covina, 2022a). As discussed above, Athens Services currently transports all of the City's residential and commercial recycling to a material recovery facility (MRF), where recyclable materials are sorted, and recyclables are separated and processed (Covina, 2022b). As a result, future development and redevelopment, which would be served by Athens Services, would be in compliance with applicable laws for recycling and disposal of solid waste. As such, a less than significant impact would occur in this regard. No mitigation is required.

## References

- County of Los Angeles, 2020. Los Angeles County Public Works, County of Los Angeles Countywide Integrated Waste Management Plan, 2020 Annual Report, dated October 2021.
- County of San Bernardino, 2018. County of San Bernardino Solid Waste Management Division, County of San Bernardino Countywide Siting Element, Countywide Integrated Waste Management Plan, amended 2018.
- Covina, 2017. City of Covina, 2015 Urban Water Management Plan, February 2017, [https://covinaca.gov/sites/default/files/fileattachments/public\\_works/page/451/final\\_2015\\_uwmp\\_-\\_city\\_of\\_covina.pdf](https://covinaca.gov/sites/default/files/fileattachments/public_works/page/451/final_2015_uwmp_-_city_of_covina.pdf), accessed April 2022.
- Covina, 2022a. City of Covina Website, Construction & Demolition Debris Management, <https://covinaca.gov/publicworks/page/construction-demolition-debris-management>, accessed April 2022.
- Covina, 2022b. City of Covina Website, Construction & Demolition Debris Management Program, Background and Reference, [https://covinaca.gov/sites/default/files/fileattachments/public\\_works/page/579/background\\_and\\_reference.pdf](https://covinaca.gov/sites/default/files/fileattachments/public_works/page/579/background_and_reference.pdf), accessed April 2022.
- LACSD, 2022a. San Jose Creek Water Reclamation Plant website, <https://www.lacsd.org/services/wastewater-sewage/facilities/san-jose-creek-water-reclamation-plant#:~:text=The%20facility%20currently%20has%20a,some%20of%20the%20attached%20documents.,> accessed April 2022.
- LACSD, 2022b. Joint Water Pollution Control Plan (JWPCP) website, <https://www.lacsd.org/services/wastewater-sewage/facilities/joint-water-pollution-control-plant>, accessed April 2022.
- LARWQCB, 2014. Los Angeles County Regional Water Quality Control Board (LARWQCB) Water Quality Control Plan (Basin Plan) 2014.
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## Wildfire

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>XX. WILDFIRE</b> —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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

Would the Project:

- a) **Substantially impair an adopted emergency response plan or emergency evacuation plan?**
- b) **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**
- c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**
- d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**No Impact (a–d).** The CAL FIRE maps FHSZs, based on factors such as fuel, slope, and fire weather to identify the degree of fire hazard throughout California (i.e., moderate, high, or very high). While FHSZs do not predict when or where a wildfire will occur, they do identify areas where wildfire hazards could be more severe and therefore are of greater concern. The Project Sites are not designated as a State Responsibility Area nor are the Project Sites near a State Responsibility Area (CAL FIRE, 2020). According to the CAL FIRE, Covina Fire Hazards Severity Zone Map for the Local Responsible Areas, the Project Sites are designated as a non-Very High FHSZ (CAL FIRE, 2020). The Project Sites are outside of areas identified by CAL

FIRE as having substantial or very high risk (CAL FIRE, 2020). Further, the Project Sites are located in a highly urbanized areas of the City and consist of developed lots generally comprising of commercial uses, asphalt surface parking lots, and ornamental landscaping and trees. No increase of wildfire hazard is expected as a result of the Project and the associated future development and redevelopment. Therefore, no impacts would occur in this regard.

## References

CAL FIRE, 2020. California Department of Forestry and Fire Protection, California Fire Hazard Severity Zone Viewer. [online]: <https://egis.fire.ca.gov/FHSZ/>, accessed April 2022.

Covina, 2000. City of Covina's General Plan, Safety Element, adopted April 18, 2000.

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## Mandatory Findings of Significance

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>XXI. Mandatory Findings of Significance—</b>				
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input 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"/>

## Discussion

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

**Less than Significant Impact with Mitigation Incorporated.** As discussed under Section IV, *Biological Resources*, almost all native bird species, except game birds, are protected by State and federal statutes when they are actively nesting. Some avian species may nest, forage, and roost within ornamental shrubs and trees planted as part of existing landscaping and some species will nest on or in buildings and other man-made structures. Therefore, Project implementation may result in demolition, new construction, or substantial renovations of structures, such activities may affect nesting birds within the Project Sites. Therefore, measures to avoid adverse effects on nesting birds are recommended to be implemented prior to or during construction and demolition activities associated with Project and future development and redevelopment. Implementation of Mitigation Measure **BIO-1** will reduce any potentially significant impacts to nesting birds to less than significant. No impacts to riparian or sensitive natural communities will occur as the result of implementation of the Project.

As discussed under Section V, *Cultural Resources*, there could be as-yet-unidentified subsurface archaeological resources present. Impacts to unknown archaeological resources qualifying as historical resources could result in a significant impact to historical resources. However,

implementation of Mitigation Measure **CUL-1**, which would require the retention of a qualified archaeologist to oversee the preparation of an archaeological resources assessment, would reduce impacts to less than significant.

One historic architectural resource, consisting of a 1920s residence, is located within the Project Sites (Project Area K). This resource has not been previously evaluated for listing in the California Register or Covina's local historic register, and it may qualify as a historical resource. In addition, there are two adjacent historic architectural resources, one of which is listed in the California Register (Covina Bowl) and qualifies as a historical resource and one of which has not been previously evaluated for listing in the California Register or Covina's local historic register and may qualify as a historical resource. There may also be other historic architectural resources in or adjacent to the Project Sites that could also qualify as historical resources. Impacts to historic architectural resources qualifying as historical resources could result in a significant impact to historical resources. However, implementation of Mitigation Measure **CUL-2**, which would require the retention of a qualified architectural historian to conduct a historic resources assessment, would reduce impacts to less than significant.

Future development and redevelopment associated with the Project would involve ground disturbing activities that, depending on their location, could result in disturbance of human remains or a unique paleontological resource or site or unique geologic feature. Such development could result in significant impacts to human remains under CEQA. However, implementation of Mitigation Measure **CUL-3** and **GEO-1** would reduce impacts to less than significant.

### **Mitigation Measure**

Refer to Mitigation Measure **BIO-1**, **CUL-1** through **CUL-3**, and **GEO-1**.

- 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 Impact with Mitigation Incorporated.** A cumulative impact could occur if the Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of the past, present, and reasonably foreseeable future projects for each resource area. The Project consists of adding a new chapter of mixed-use overlay regulations to the City's Zoning Ordinance and amending the City's Official Zoning Map through the addition of a MUOD to various sites located in 141 parcels within 13 Project Areas. The MUOD applies on an as-requested, project-by-project basis, to General Commercial (GC), Town Center Commercial (TC-C), and General Industrial (GI) general plan designations. The types and sizes of future development and redevelopment associated with the Project cannot be determined until specific projects have been proposed and submitted to the City. Because the exact nature, location, and operation of future development and redevelopment associated with the Project are unknown, defining a cumulative study area would be too speculative at this time. However, with implementation of Mitigation Measures **AIR-1** through **AIR-6**, **BIO-1**, **CUL-1** through **CUL-3**,



**GEO-1, GHG-1, HAZ-1 through HAZ-3, and NOI-1 through NOI-4**, future development and redevelopment of the Project would not have impacts that are individually limited, but cumulatively considerable and a less than significant impact would occur.

### **Mitigation Measures**

Refer to Mitigation Measure **AIR-1 through AIR-6, BIO-1, CUL-1 through CUL-3, GEO-1, GHG-1, HAZ-1 through HAZ-3, and NOI-1 through NOI-4**.

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

**Less than Significant Impact with Mitigation Incorporated.** Based on the analysis of the Project's impacts in Sections I through XX, there is no indication that future development and redevelopment associated with the Project could result in substantial adverse effects on human beings. While there would be a variety of effects related to air quality, biological resources, cultural resources, paleontological resources, greenhouse gas emissions, hazards and hazardous materials, and noise, these impacts would be less than significant with mitigation incorporated, as necessary. The analysis herein concludes that direct and indirect environmental effects will, at most, require mitigation to reduce potentially significant impacts to less than significant levels. Generally, environmental effects will result in less than significant impacts. Based on the analysis in this Draft IS/MND, the City finds that direct and indirect impacts to human beings will be less than significant with mitigation incorporated, as necessary.

### **Mitigation Measures**

Refer to Mitigation Measure **AIR-1 through AIR-6, BIO-1, CUL-1 through CUL-3, GEO-1, GHG-1, HAZ-1 through HAZ-3, and NOI-1 through NOI-4**.

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## SECTION 4

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# Mitigation Monitoring Reporting Program

### 4.1 CEQA Requirements

**Table 4-1** is a Mitigation Monitoring and Reporting Program (MMRP) for the City's Mixed-Use Overlay District Project, which has been prepared pursuant to CEQA Guidelines Section 15097 and Public Resources Code Section 21081.6. This MMRP lists all applicable mitigation measures from the IS/MND. The appropriate timing of implementation and responsible party are identified to ensure proper enforcement of the mitigation measures from the IS/MND to reduce Project impacts to less than significant levels. Mitigation measures are presented in the same order as they occur in the IS/MND.

The columns in the MMRP table provide the following information:

- **Mitigation Measure(s):** The action(s) that will be taken to reduce the impact to a less than significant level.
- **Implementation Action:** The action(s) listed out, according to the identified mitigation measure that would be implemented by the responsible agency.
- **Responsible Implementation Agency:** The agency or private entity responsible for ensuring implementation of the mitigation measure. For the Project, the City of Covina, as the CEQA Lead Agency, remains responsible for ensuring that implementation of the mitigation measures occur in accordance with the MMRP (CEQA Guidelines Section 15097(a)).
- **Timing of Verification:** The general timing for implementing each mitigation measure.
- **Verification Date:** The date in which the mitigation measure has been completed.

The MMRP will be kept on file at the following address:

City of Covina, Community Development Department  
125 E. College Avenue  
Covina CA 91723

**TABLE 4-1**  
**MITIGATION MONITORING AND REPORTING PROGRAM FOR THE CITY OF COVINA'S MIXED-USE OVERLAY DISTRICT PROJECT**

Mitigation Measure	Implementation Action	Responsible Implementation Agency/Party	Timing of Verification	Verification Date
<b>Air Quality</b>				
<p><b>Mitigation Measure AIR-1: Construction Emissions.</b> If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable South Coast Air Quality Management District (SCAQMD) thresholds of significance, the City shall require applicants for future development and redevelopment associated with the Project to incorporate one or more of the following mitigation measures as necessary to reduce air pollutant emissions during construction activities to below the applicable SCAQMD thresholds of significance. Mitigation measures that may be identified during the environmental review include, but are not limited to:</p> <ol style="list-style-type: none"> <li>1. Using construction equipment rated by the USEPA as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower, as commercially available.</li> <li>2. Using construction equipment that are equipped with a California Air Resources Board (CARB) verified Level 3 diesel particulate matter filter, applicable for engines between 50 and 750 horsepower, as commercially available.</li> <li>3. Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.</li> <li>4. Limiting nonessential idling of construction equipment to less than five consecutive minutes at a location.</li> <li>5. Water all active construction areas at least three times daily or four times daily if needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Reclaimed water should be used whenever possible.</li> <li>6. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Construction activities should be suspended during periods with wind speed gusts of 25 miles per hour or more.</li> <li>7. Apply non-toxic chemical soil stabilizers, in lieu of watering, in sufficient quantities to control dust emissions and prevent visible dust from leaving the construction site.</li> <li>8. Pave, apply water three times daily or as often as necessary to control dust, or apply non-toxic chemical soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.</li> </ol>	<p>The City shall require applicants for future development and redevelopment associated with the Project to incorporate one or more of the following mitigation measures as necessary to reduce air pollutant emissions during construction activities to below the applicable SCAQMD thresholds of significance.</p>	<p>City of Covina</p>	<p>During project-level environmental review.</p>	

Mitigation Measure	Implementation Action	Responsible Implementation Agency/Party	Timing of Verification	Verification Date
<p>9. Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).</p> <p>10. Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.</p> <p>11. Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the Project Sites, or as often as needed, to keep streets free of visible soil material.</p> <p>12. Hydroseed or apply non-toxic soil stabilizers to inactive construction areas.</p> <p>13. Enclose, cover, water three times daily, or apply non-toxic chemical soil binders to exposed stockpiles (dirt, sand, etc.).</p>				
<p><b>AIR-2: Architectural Coating VOC Emissions.</b> If, during subsequent project-level environmental review, it is determined that construction or operation of a project has the potential to exceed the applicable South Coast Air Quality Management District (SCAQMD) thresholds of significance for volatile organic compound (VOC) emissions from architectural coating activities, the City shall require the use of Super-Compliant VOC-content architectural coatings (10 grams per liter or less of VOCs) to be used during application of paints and other architectural coatings. If Super-Compliant VOC-content architectural coatings cannot be utilized, the developer shall reduce the quantity of paints and other architectural coatings applied in any one day as necessary to reduce VOC emissions from all project sources to below the SCAQMD thresholds of significance for VOCs (i.e., to below 75 pounds of VOC per day during construction activities and below 55 pounds of VOC per day during operational activities).</p>	<p>The City shall require the use of Super-Compliant VOC-content architectural coatings (10 grams per liter or less of VOCs) to be used during application of paints and other architectural coatings.</p>	City of Covina	During project-level environmental review.	
<p><b>AIR-3: Energy Conservation.</b> The City shall require energy conservation measures during future project-level environmental review, which may include the following:</p> <ul style="list-style-type: none"> <li>• Install Energy Star rated heating, cooling, lighting, and appliances.</li> <li>• Use of Heating, Ventilation and Air Conditioning (HVAC) equipment with a Seasonal Energy Efficiency Ratio (SEER) of 12 or higher.</li> <li>• Installation of water heaters with an energy factor of 0.92 or higher.</li> <li>• Install solar water heaters or tank-less water heaters.</li> <li>• Use passive solar cooling/heating.</li> <li>• Use cool roofs and surfaces for residential and non-residential buildings.</li> </ul>	<p>The City shall require energy conservation measures during future project-level environmental review.</p>	City of Covina	During project-level environmental review.	

Mitigation Measure	Implementation Action	Responsible Implementation Agency/Party	Timing of Verification	Verification Date
<ul style="list-style-type: none"> <li>Encourage strategic tree planting and shading to reduce building energy demand for cooling.</li> <li>Encourage the use of electric building energy systems in place of building natural gas systems.</li> </ul>				
<p><b>AIR-4: Transportation Efficiency.</b> The City shall require transportation efficiency measures during future project-level environmental review, which may include the following:</p> <ul style="list-style-type: none"> <li>Implement transportation demand management (TDM) strategies to reduce VMT from project operations.</li> <li>Provide residents and employees of projects with information regarding public transportation options.</li> <li>Provide residents and employees of projects with bicycle parking facilities that meet or exceed municipal code requirements.</li> <li>Provide residents and employees of projects with electric vehicle supply equipment that meet or exceed municipal code requirements.</li> </ul>	The City shall require transportation efficiency measures during future project-level environmental review.	City of Covina	During project-level environmental review.	
<p><b>AIR-5: Stationary Sources.</b> Applicants for new or modified stationary sources associated with the Project that: 1) have the potential to generate 40 or more diesel trucks per day and 2) are located within 1,000 feet of a sensitive land use (e.g. residential, schools, hospitals, nursing homes), as measured from the property line of the Project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the County Department of Regional Planning prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHHA) and the applicable air quality management district. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), particulate matter concentrations would exceed 2.5 µg/m3, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T BACTs) are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Project.</p>	Submit a health risk assessment (HRA) to the County Department of Regional Planning prior to future discretionary project approval.	City of Covina County Department of Regional Planning	During project-level environmental review.  Prior to future discretionary project approval.	

Mitigation Measure	Implementation Action	Responsible Implementation Agency/Party	Timing of Verification	Verification Date
<p><b>AIR 6: Health Risk Assessment.</b> Applicants shall submit a HRA to the County prior to future discretionary project approval for sensitive land uses associated with the Project within the following distances as measured from the property line of the Project to the property line of the source/edge of the nearest travel lane, from these facilities:</p> <ul style="list-style-type: none"> <li>Industrial facilities within 1,000 feet.</li> <li>Distribution centers (40 or more trucks per day) within 1,000 feet.</li> <li>Major transportation projects (50,000 or more vehicles per day) within 1,000 feet.</li> <li>Gasoline dispensing facilities within 300 feet.</li> <li>The HRA shall be prepared in accordance with policies and procedures of the applicable Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:</li> <li>Air intakes located away from high volume roadways and/or truck loading zones, unless it can be demonstrated to the County Department of Regional Planning that there are operational limitations.</li> <li>Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.</li> </ul>	<p>Applicants shall submit a HRA to the County prior to future discretionary project approval for sensitive land uses associated with the Project.</p>	<p>City of Covina</p>	<p>During project-level environmental review.</p> <p>Prior to future discretionary project approval.</p>	
<b>Biological Resources</b>				
<p><b>Mitigation Measure BIO-1: Nesting Birds.</b> Vegetation removal shall be conducted between September 1 and January 31, outside the typical nesting season for birds in the region. If vegetation removal must occur during the typical nesting season (February 1 – August 31), a qualified biologist shall conduct a pre-construction survey for active nests within areas that will be subject to vegetation removal, construction noise, and/or ground disturbances, including a 100 to 300-foot buffer around existing trees and landscaped areas, to identify any potential active nests. Buffer distances should be adjusted at the discretion of the biologist based on the location of the nest, species, and surrounding land uses. If no sign of nesting activity is observed, construction may proceed without potential impacts to nesting birds.</p>	<p>Conduct all vegetation removal between September 1 and January 31, outside the typical nesting season for birds in the region.</p> <p>If vegetation removal must occur during the typical nesting season (February 1 – August 31), a qualified biologist shall conduct a pre-construction survey for active nests within areas that will be</p>	<p>City of Covina</p> <p>Qualified Project Biologist</p> <p>Project Contractor</p>	<p>Prior to and during grading and/or construction.</p>	

Mitigation Measure	Implementation Action	Responsible Implementation Agency/Party	Timing of Verification	Verification Date
If an active nest is observed during the pre-construction clearance survey, an adequate buffer determined by the qualified biologist shall be established around the active nest depending on sensitivity of the species and proximity to construction activity and impact areas. Onsite construction monitoring may also be required to ensure that no direct or indirect impacts occur to the active nest or nesting activities. Construction activities shall be avoided within the buffer, unless otherwise approved by the monitoring biologist (e.g., vehicles could pass through buffer areas while jackhammering would be restricted). Buffers shall be clearly marked and defined to restrict certain activities where they could result in nest failure, and shall remain in place until nests are no longer active, as determined by the monitoring biologist.	subject to vegetation removal, construction noise, and/or ground disturbances, including a 100 to 300-foot buffer around existing trees and landscaped areas, to identify any potential active nests.  If an active nest is observed during the pre-construction clearance survey, an adequate buffer determined by the qualified biologist shall be established around the active nest depending on sensitivity of the species and proximity to construction activity and impact areas.			
<b>Cultural Resources</b>				
<b>Mitigation Measure CUL-1:</b> Prior to the issuance of ground disturbing activities of future development and redevelopment associated with the Project, the City shall retain a qualified archaeologist, defined as meeting the Secretary of the Interior's Professional Qualification Standards for archaeology, to conduct an archaeological resources assessment including: a records search at the South Central Coastal Information Center; a Sacred Lands File search at the Native American Heritage Commission; a pedestrian field survey, where deemed appropriate by the qualified archaeologist; recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms; a subsurface archaeological sensitivity assessment; and preparation of a technical report documenting the methods and results of the study. If an archaeological resource is identified as a result of the survey, the qualified archaeologist will prepare and conduct a testing program to delineate the resource's boundaries and identify presence/absence of subsurface deposits. The results of the testing will be included in the technical report. If an archaeological resource cannot be avoided, it shall be evaluated for significance. The qualified archaeologist shall also provide recommendations regarding archaeological and Native American monitoring, protection of avoided resources and/or recommendations for additional work or treatment of significant resources that will be affected by the Project. When assessing significance and developing treatment for resources that are Native American in origin, the City shall consult with local Native American Tribes.	Prior to the issuance of ground disturbing activities of future development and redevelopment associated with the Project, the City shall retain a qualified archaeologist.  If an archaeological resource is identified as a result of the survey, the qualified archaeologist will prepare and conduct a testing program to delineate the resource's boundaries and identify presence/absence of subsurface deposits.	City of Covina  Qualified Archaeologist  Project Contractor	Prior to the issuance of ground disturbing activities.  Prior to commencement of excavation activities.	



Mitigation Measure	Implementation Action	Responsible Implementation Agency/Party	Timing of Verification	Verification Date
<p><b>Mitigation Measure CUL-2:</b> Prior to the issuance of ground disturbing activities of future development and redevelopment associated with the Project on parcels that contain or are adjacent to buildings or structures more than 45 years old, the City shall retain a qualified architectural historian, defined as meeting the Secretary of the Interior's Professional Qualification Standards for architectural history, to conduct a historic resources assessment including: a records search at the South Central Coastal Information Center; a review of pertinent archives and sources; a pedestrian field survey; recordation of all identified historic architectural resources on California Department of Parks and Recreation 523 forms; evaluation of resources for listing in the California Register and for local listing; and preparation of a technical report documenting the methods and results of the assessment. All identified historical resources will be assessed for the Project's potential to result in direct and/or indirect effects to those resources. The qualified architectural historian shall provide recommendations regarding additional work or treatment for historical resources that will be affected by the Project prior to their demolition or alteration. This could include but is not limited to compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, Historic American Buildings Survey (HABS) recordation, incorporation of interpretive elements into new construction, or commemoration.</p> <p>In addition, the qualified architectural historian shall review project plans for future development and redevelopment associated with the Project adjacent to historical resources to ensure there will be no indirect effects.</p>	<p>Prior to the issuance of ground disturbing activities of future development and redevelopment associated with the Project on parcels that contain or are adjacent to buildings or structures more than 45 years old, the City shall retain a qualified architectural historian.</p> <p>The qualified architectural historian shall provide recommendations regarding additional work or treatment for historical resources that will be affected by the Project prior to their demolition or alteration.</p>	<p>City of Covina</p> <p>Qualified Architectural Historian</p> <p>Project Contractor</p>	<p>Prior to and during grading and/or construction.</p>	
<p><b>Mitigation Measure CUL-3:</b> If human remains are encountered, then the City or its contractor shall immediately halt work in the vicinity (within 50 feet) of the discovery and contact the Los Angeles County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5, which requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to the remains' origin and disposition pursuant. If the County Coroner determines the remains are Native American, then the Coroner will notify the NAHC within 24 hours in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code Section 5097.98. The NAHC shall then identify the person(s) thought to be the MLD. The MLD may, with the permission of the land owner, or their authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the landowner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items</p>	<p>If human remains are encountered, the contractor should halt work in the vicinity (within 100 feet) of the find and contact the Los Angeles County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the California Native American Heritage Commission (NAHC) will be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section</p>	<p>City of Covina</p> <p>Qualified Archaeologist</p> <p>Project Contractor</p>	<p>Prior to and during grading and/or construction.</p>	

Mitigation Measure	Implementation Action	Responsible Implementation Agency/Party	Timing of Verification	Verification Date
<p>associated with Native American burials. The City and the landowner shall discuss and confer with the MLD on all reasonable options regarding the MLD's preferences for treatment.</p> <p>Until the City and the landowner have conferred with the MLD, the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity and is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.</p> <p>If the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Section 5097.94(k), if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.</p>	5097.98 (as amended by Assembly Bill 2641). The NAHC will designate a Most Likely Descendent (MLD) for the remains per PRC Section 5097.98.			
<b>Geology and Soils</b>				
<p><b>Mitigation Measure GEO-1:</b> Prior to construction of future development and redevelopment associated with the Project that involve ground disturbance below 10 feet in Pleistocene alluvium or marine Puente Formation sediments, the City shall retain a qualified paleontologist who meets the (SVP) Standards (SVP, 2010) to develop and oversee construction worker paleontological resources sensitivity training program and paleontological monitoring. All initial ground disturbance below 10 feet deep shall be monitored full-time by a qualified paleontological monitor (SVP 2010) working under the direct supervision of the qualified paleontologist. Monitoring may be reduced to periodic spot checks or ceased entirely at the discretion of the qualified paleontologist, based on subsurface observations and the likelihood of encountering fossiliferous sediments. The qualified paleontologist shall also consider whether screen washing sediments is necessary to recover smaller specimens. All recovered fossils shall be prepared for identification to the lowest taxonomic level possible, cataloged, and curated at an accredited facility with retrievable storage. The qualified paleontologist shall prepare a final report to be submitted to the City and filed with the curation facility and Natural History Museum of Los Angeles County.</p>	<p>Prior to construction of future development and redevelopment associated with the Project that involve ground disturbance below 10 feet in Pleistocene alluvium or marine Puente Formation sediments, the City shall retain a qualified paleontologist.</p> <p>All initial ground disturbance below 10 feet deep shall be monitored full-time by a qualified paleontological monitor (SVP 2010) working under the direct supervision of the qualified paleontologist.</p> <p>All recovered fossils shall be prepared for identification to the lowest taxonomic level possible, cataloged, and curated at an accredited</p>	<p>City of Covina Qualified Paleontologist Project Contractor</p>	<p>Prior to and during grading and/or construction.</p>	

Mitigation Measure	Implementation Action	Responsible Implementation Agency/Party	Timing of Verification	Verification Date
	<p>facility with retrievable storage.</p> <p>The qualified paleontologist shall prepare a final report to be submitted to the City and filed with the curation facility and Natural History Museum of Los Angeles County.</p>			
<b>Greenhouse Gas Emissions</b>				
<p><b>Mitigation Measure GHG-1: Water Conservation.</b> The City shall require water conservation measures during future project-level environmental review, which may include the following:</p> <ul style="list-style-type: none"> <li>Utilize the model energy efficiency code to encourage drought-tolerant landscaping and the use of water-efficient irrigation systems.</li> <li>Use drought-tolerant, low water, and/or native vegetation for landscaping.</li> <li>Use water efficient irrigation systems.</li> </ul>	<p>The City shall require water conservation measures during future project-level environmental review.</p>	City of Covina	Project-level environmental review.	
<b>Hazards and Hazardous Materials</b>				
<p><b>Mitigation Measure HAZ-1: Phase I Environmental Site Assessment:</b> Prior to the initiation of any construction requiring ground-disturbing activities on industrial and commercial properties, as well as listed active hazardous materials cleanup sites, Project Applicants shall complete a Phase I environmental site assessment for that property in accordance with American Society for Testing and Materials Standard E1527 for those active hazardous materials sites to ascertain their current status. Any recommended follow up sampling (i.e., Phase II activities) set forth in the Phase I assessment shall be implemented prior to construction. The results of Phase II studies, if necessary, shall be submitted to the local overseeing agency and any required remediation or further delineation of identified contamination shall be completed prior to commencement of construction.</p>	<p>Project Applicants shall complete a Phase I environmental site assessment for that property in accordance with American Society for Testing and Materials Standard E1527 for those active hazardous materials sites to ascertain their current status.</p>	City of Covina	<p>Prior to the initiation of any construction requiring ground-disturbing activities, as well as listed active hazardous materials cleanup sites.</p>	
<p><b>Mitigation Measure HAZ-2: Health and Safety Plan:</b> For those properties for which the Phase I assessment identifies hazardous materials issues, before the start of ground-disturbing activities, including grading, trenching, or excavation, or structure demolition, the Project Applicants for the specific work proposed shall require that the construction contractor(s) retain a qualified professional to prepare a site-specific health and safety plan (HASP) in accordance with federal Occupational Safety and Health Administration regulations (29 CFR 1910.120) and California Occupational Safety and Health Administration regulations (8 CCR Section 5192).</p>	<p>Project Applicants for the specific work proposed shall require that the construction contractor(s) retain a qualified professional to prepare a site-specific health and safety plan (HASP).</p>	<p>City of Covina</p> <p>Project Contractor</p> <p>Qualified Professional to prepare HASP</p>	<p>Before the start of ground-disturbing activities, including grading, trenching, or excavation, or structure demolition.</p>	

Mitigation Measure	Implementation Action	Responsible Implementation Agency/Party	Timing of Verification	Verification Date
The HASP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing and structure demolition activities. The HASP shall include designation of a site health and safety officer, a summary of the anticipated risks, a description of personal protective equipment and decontamination procedures, and procedures to follow if evidence of potential soil or groundwater contamination is encountered.				
<b>Mitigation Measure HAZ-3: Soil and Groundwater Management Plan:</b> In support of the HASP described in Mitigation Measure HAZ-2, the Project Applicants shall require that its contractor(s) develop and implement a Soil and Groundwater Management Plan (SGMP) for the management of soil and groundwater before any ground-disturbing activity. The SGMP shall describe the hazardous materials that may be encountered, the roles and responsibilities of on-site workers and supervisors, training for site workers focused on the recognition of and response to encountering hazardous materials, and protocols for the materials (soil and/or dewatering effluent) testing, handling, removing, transporting, and disposing of all excavated materials and dewatering effluent in a safe, appropriate, and lawful manner.	The Project Applicants shall require that its contractor(s) develop and implement a Soil and Groundwater Management Plan (SGMP).	City of Covina Project Contractor	Before the start of ground-disturbing activities, including grading, trenching, or excavation, or structure demolition.	
<b>Noise</b>				
<b>Mitigation Measure NOI-1: Construction Hours.</b> Construction activities occurring as part of the future development and redevelopment associated with the Project shall be subject to the limitations which states that construction activities may occur between 7:00 a.m. and 8:00 p.m. Mondays through Saturdays. No construction activities shall be permitted outside of these hours or on Sundays and federal holidays unless a temporary waiver is granted by the City.	Construction activities shall be subject to the limitations which states that construction activities may occur between 7:00 a.m. and 8:00 p.m. Mondays through Saturdays.	City of Covina Project Contractor	During construction.	
<b>Mitigation Measure NOI-2: Construction Best Management Practices.</b> Prior to issuance of grading permits for future development and redevelopment associated with the Project, the Project Applicants shall incorporate the following measures as a note on the grading plan cover sheet to ensure that the greatest distance between noise sources and sensitive receptors during construction activities have been achieved. <ul style="list-style-type: none"> <li>Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards.</li> <li>Construction staging areas shall be located away from off-site sensitive uses during construction of the Project.</li> <li>The Project Contractors shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the Project Sites, whenever feasible.</li> </ul>	The Project Applicants shall incorporate measures as a note on the grading plan cover sheet to ensure that the greatest distance between noise sources and sensitive receptors during construction activities have been achieved.	City of Covina Project Applicants	Prior to issuance of grading permits.	

Mitigation Measure	Implementation Action	Responsible Implementation Agency/Party	Timing of Verification	Verification Date
<p><b>Mitigation Measure NOI-3: Building Design Noise Control Measures.</b> Design standards for proposed new multifamily residential uses within the Project Sites may include but are not limited to:</p> <ul style="list-style-type: none"> <li>Dwelling units that would be exposed to traffic noise levels exceeding 57 dBA CNEL: A form of fresh air supply, such as air conditioning systems, will be required.</li> <li>Dwelling units that would be exposed to traffic noise levels exceeding 65 dBA CNEL: Outdoor living areas such as balcony or deck on the side of the buildings exposed to high traffic noise should not be allowed unless noise mitigation measures, such as barrier walls with a minimum height of 5 feet with adequate materials (CMU, wood, Plexiglas) with no holes or gaps, along the perimeter of the outdoor living areas are included.</li> <li>Dwelling units that would be exposed to traffic noise levels exceeding 69 dBA CNEL: Windows associated with bedrooms and living/family rooms on the side of the buildings exposed to high traffic noise will be required to have building façade upgrades, such as using windows with Sound Transmission Class (STC) ratings higher than standard building practice (up to STC-28).</li> </ul>	Building design noise control measures.	City of Covina Project Contractor	During project-level environmental review. Prior to construction.	
<p><b>Mitigation Measure NOI-4: Stationary Sources Noise Control Measures.</b> Due to the nature of mixed use overlay, some residences may be exposed to noise sources from the operations of the commercial uses nearby or down below. Such noise sources include loading/unloading activity and outdoor mechanical equipment and the following design standards are recommended.</p> <ul style="list-style-type: none"> <li>Loading areas associated with commercial uses within the Project Sites should be placed away from outdoor living areas associated with residential uses. Noise barriers with sufficient height to block the line-of-sight between the loading areas and outdoor living areas in proximity of the loading areas will be required.</li> <li>Stationary outdoor mechanical equipment should be placed away from residential outdoor living areas or be enclosed with a structure to minimize the potential noise impacts.</li> <li>All noise sources shall follow the City's Municipal Code noise control ordinance requirements.</li> </ul>	Stationary sources noise control measures	City of Covina Project Contractor	During project-level environmental review. Prior to construction.	

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## **SECTION 5**

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### **List of Preparers and Acronyms**

#### **5.1 List of Preparers**

##### **5.1.1 Lead Agency**

City of Covina, Community Development Department  
125 E. College Avenue, Covina, CA 91723

- Nancy Fong, AICP, Principal Planner

##### **5.1.2 Initial Study/Mitigated Negative Declaration Preparation**

ESA  
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Pasadena, CA 91101

- Ruta K. Thomas, Senior Vice President/Southern CA Regional Director (Project Director)
- Brian Allee, Managing Associate (Project Manager)
- Alan Sako, Director (Air Quality, Greenhouse Gas Emissions, Energy, Noise)
- Tony Chung, Principal Associate (Noise)
- Michael Stewart, Air Quality and Acoustical Analyst (Air Quality, Greenhouse Gas Emissions, Energy, Noise)
- Scott Holbrook, Principal Ecologist (Biological Resources)
- Amanda French, Biologist (Biological Resources)
- Fatima Clark, Cultural Resources Specialist (Cultural Resources)
- Brandon Carroll, Environmental Scientist (Hazards and Hazardous Materials)
- Stephanie Breeden, Senior Managing Associate (Hydrology and Water Quality)
- Shadde Rosenblum, Senior Technical Associate (Transportation)
- Stephan Geissler, Managing Associate (GIS/Graphics)
- Denise Kaneshiro, Senior Graphic Designer (Graphics)

### 5.1.3 Technical Subconsultant

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- Clare Look-Jaeger, P.E., Principal
- Francesca Bravo, Senior Transportation Engineer

## 5.2 Acronyms

Acronym/Abbreviation	Definition
AB	Assembly Bill
ACM	Asbestos-Containing Material
ADT	Average Daily Traffic
AF	Acre-Feet
AQMP	Air Quality Management Plan
BACT	Best Available Control Technology
BERD	Built Environment Resource Directory
BMPs	Best Management Practices
CAAQS	California Ambient Air Quality Standards
CAISO	California Independent System Operator
CBC	California Building Code
CalEEMod	California Emissions Estimator Model
Cal Fire	California Department of Forestry and Fire Protection
CalRecycle	California Department of Resources Recycling and Recovery
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFC	California Fire Code
CGS	California Geological Survey
CH <sub>4</sub>	Methane
CHL	California Historical Landmark
CIC	Covina Irrigating Company
City	City of Covina
CNDDb	California Natural Diversity Database
CNEL	Community Noise Level Equivalent
CNPS	California Native Plant Society



Acronym/Abbreviation	Definition
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
CO <sub>2</sub>	Carbon Dioxide
CO <sub>2</sub> e	Carbon Dioxide Equivalents
COUSD	Charter Oak Unified School District
County	County of Los Angeles
CPD	Covina Police Department
CPL	Covina Public Library
CUPA	Certified Unified Program Agency
CVRP	Clean Vehicle Rebate Pilot
CVUSD	Covina Valley Unified School District
CWA	Clean Water Act
DB	Decibels
dBA	A-weighted Sound Pressure Level
DBH	Diameter at Breast Height
DPM	Diesel Particulate Matter
DTSC	California Department of Toxic Substances Control
DU	Dwelling Unit
EFMP	Enhanced Fleet Modernization Program
EIR	Environmental Impact Report
FHSZ	Fire Hazard Severity Zone
FRAP	Fire and Resource Assessment Program
FTA	Federal Transportation Administration
GC	General Commercial
GHG	Greenhouse Gas Emissions
GI	General Industrial
GVW	Gross Vehicle Weight
GWP	Global Warming Potential
HABS	Historic American Buildings Survey
HASP	Health and Safety Plan
HCD	Housing and Community Development
HFCs	Hydrofluorocarbons
HMBPs	Hazardous Materials Business Plans
HQTA	High-Quality Transit Areas
HRA	Health Risk Assessment
HVAC	Heating, Ventilation, and Air Conditions
I-	Interstate
IN/SEC	Inches per Second
IPCC	Intergovernmental Panel on Climate Change
IS/MND	Initial Study/Mitigated Negative Declaration

Acronym/Abbreviation	Definition
ITE	Institute of Transportation Engineers
LACFD	Los Angeles County Fire Department
LACM	Natural History Museum of Los Angeles County
LACSD	Sanitation Districts of Los Angeles County
LARWQCB	Los Angeles Regional Water Quality Control Board
LBP	Lead-Based Paint
Ldn	Average Equivalent Sound Level Over a 24 Hour Period
LEV	Low-Emission Vehicle
LID	Low Impact Development
LOS	Level of Service
LRA	Local Responsibility Area
LSAA	Lake or Streambed Alteration Agreement
LST	Localized Significant Threshold
LUST	Leaking Underground Storage Tank
mBTUyr	One million British thermal units
MERV	Maximum Efficiency Rating Value
MGD	Million Gallons Per Day
MMT	Million Metric Ton
MND	Mitigated Negative Declaration
MPO	Metropolitan Planning Organization
MRF	Material Recovery Facility
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MT	Metric Ton
MTCO <sub>2</sub> e	Metric Ton CO <sub>2</sub> Equivalents
MUOD	Mixed-Use Overlay District
MWD	Metropolitan Water District of Southern California
mWH/yr	Megawatt-hours
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
ND	Negative Declaration
NF <sub>3</sub>	Nitrogen Trifluoride
NO <sub>x</sub>	Oxides of Nitrogen
NO <sub>2</sub>	Nitrogen Dioxide
N <sub>2</sub> O	Nitrous Oxide
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
O <sub>3</sub>	Ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research

Acronym/Abbreviation	Definition
OSHA	Occupational Safety and Health Administration
PCBs	Polychlorinated Biphenyls
PCD	Planned Community Development
PFCs	Perfluorocarbons
PHEV	Plug-In Hybrid Vehicle
PM	Particulate Matter
PM <sub>2.5</sub>	Particulate matter, aerodynamic diameter of 2.5 micrometers or less
PM <sub>10</sub>	Particulate matter, aerodynamic diameter of 10 micrometers or less
PPM	Parts per million
PPV	Peak Particle Velocity
Q <sub>a</sub>	Quaternary Alluvium
RHNA	Regional Housing Needs Assessment
RPS	Renewables Portfolio Standards
RWQCB	Regional Water Quality Control Board
RTP	Regional Transportation Plan
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coast Information Center
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SEAs	Sensitive Ecological Areas
SEER	Seasonal Energy Efficiency Ratio
SF <sub>6</sub>	Sulfur Hexafluoride
SGMP	Soil and Groundwater Management Plan
SGVCOG	San Gabriel Valley Council of Governments
SJCWRP	San Jose Creek Water Reclamation Plant
SLCP	Short-Lived Climate Pollutant
SLF	Sacred Lands File
SoCalGas	Southern California Gas
SO <sub>x</sub>	Sulfur Oxides
SOON	Surplus Off-Road for NO <sub>x</sub>
SORE	Small Off-Road Equipment
SR-	State Route
STC	Sound Transmission Class
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
T-BACTs	That Best Available Control Technologies for Toxics
TACs	Toxic Air Contaminants

Acronym/Abbreviation	Definition
TC-C	Town Center Commercial
TCSP	Town Center Specific Plan
TDM	Transportation Demand Management
TeNS	Technical Noise Supplement
TPD	Tons per day
USACE	U.S. Army Corps of Engineers
USDOT	U.S. Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VdB	Vibratory Decibel
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WDR	Waste Discharge Requirement
ZEV	Zero-Emission Vehicle